

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
Philadelphia Electric Company ) Docket Nos. 50-352  
 ) 50-353  
(Limerick Generating Station, )  
Units 1 and 2) )

MOTION FOR EXTENSION OF TIME TO SERVE SUBPOENAS

The Atomic Safety and Licensing Board's Order Confirming Schedules Established During Prehearing Conference (May 16, 1983) established August 1, 1983 as the last day to serve requests for discovery with regard to, inter alia, Contentions V-3a and V-3b. Despite having made a timely request for the identification of experts and potential expert witnesses on June 3, 1983 and after having made repeated efforts to obtain such information,<sup>\*/</sup> only on the afternoon of August 1, did Applicant receive a postcard from Mr. R.L. Anthony which for the first time identifies Intervenor Friends of the Earth's "potential experts." A copy of the postcard is attached.

Efforts were made to contact the designated individuals by telephone, but as of the time of service of this pleading

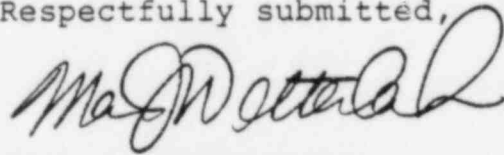
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<sup>\*/</sup> See, for example, Letter to R.L. Anthony from M.J. Wetterhahn dated July 18, 1983 previously sent to the Board and parties.

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were unsuccessful in every case. Applicant submits that these circumstances constitute good cause and moves for an extension of one week until August 8, 1983 for the limited purpose of obtaining and serving subpoenas to the designated potential experts. Inasmuch as Mr. Anthony is still in Maine, no attempt could be made to reach him to discuss this request.

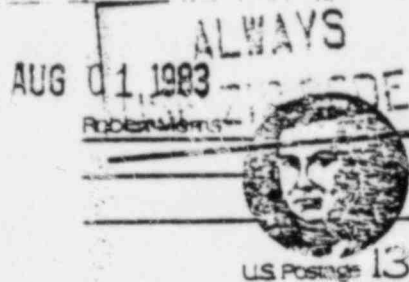
Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn  
Counsel for the Applicant

August 1, 1983

R.L. ANTHONY  
GEN. DELIVERY  
BELLSWORTH, ME. 04605



P.S. Dear Mr. Wetterhahn,  
I'm sorry to send you  
this longhand message.  
I know you want the  
information and I am  
not near a typewriter so  
am sending it anyway.  
I hope it will be useful  
to you in this form.  
R.L. Anthony

MR. MARK J. WETTERHAN  
1747 PENNA. AVE. N.W.  
WASHINGTON, D.C. 20006

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Mr. M.J. Wetterhahn  
1747 Penna Ave. Wash 20006  
R.L. Anthony + POE in the Delaware Valley  
Response to M.J. Wetterhahn's letters 7/15 and 7/20  
Our research is still in progress. Up to now our potential  
experts are: U.S. Dept. of Transp. Materials Transport Bureau  
Pipeline Safety Dept. Frank Fulton, supt. and  
Edward Cygan DMT63 system Information Division  
Washington 20590.  
David A. Torsi, Wilson Hill Associates Wash  
20005, contractor to U.S. Dept. Transp., Hazard  
Materials Information  
Penna. Public Utility Commission, Safety and  
Compliance, Pipeline Safety, Harrisburg, Pa. 17112  
We disagree with applicant that our interrogations  
42 through 47 are not within the scope of our content.  
They are related to the representation from possible pipe  
accidents. Sub to 1. Anthony