

7/28

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'83 SEP 30 A11:46

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
Philadelphia Electric Company )  
(Limerick Generating Station, )  
Units 1 and 2) )

Dockets nos. 50-352  
50-353

MOTION TO REWORD CONTENTION I-62 IN RESPONSE TO THE BOARD'S  
M & O OF SEPTEMBER 13, 1983.

Due to material disclosed during discovery , Intervenor Lewis  
motions the Board to accept rewording of Contention I-62 as  
follows:

REWORDED CONTENTION I-62.

Staff's dependence upon a comparison of Limerick to PWRs in which PTS  
has been studied in order to develop its low probability for PTS  
failure at Limerick, is not justified. An operating license should not  
be issued without a full engineering analysis of PTS at Limerick, since  
PTS can cause a major breach of containment , which is an accident  
beyond the design basis.

Please accept this filing as the formal report specified in the  
M & O of September 13, 1983. Formal reports on items specifically agreed  
to in two separate telephone conference calls with this Intervenor  
relating to litigation schedule are being submitted by the Staff.

Respectfully submitted,

*Marvin I. Lewis*  
Marvin I. Lewis

CERTIFICATE OF SERVICE

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I certify that the foregoing Motion to Reword Contention  
I-62 in Response to the Board's M & O of September 13, 1983  
was served upon the following by mail, first-class postage  
prepaid:

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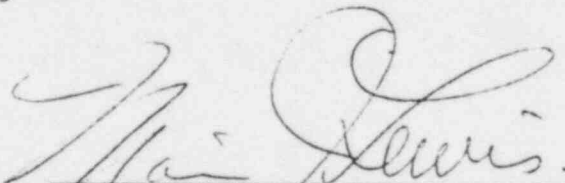
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September 28, 1983