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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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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) )

APPLICANT'S SECOND SET OF INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS TO INTERVENOR  
AIR AND WATER POLLUTION PATROL ON CONTENTION VI-1

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R §2.740(b), and the Atomic Safety and Licensing Board's Order Adjusting Discovery Schedule for Contention VI-1 (December 2, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatory to Air and Water Pollution Patrol ("AWPP") to be answered fully in writing, under oath, in accordance with the definitions and instructions previously contained in Applicant's First Set of Interrogatories and Request for Production of Documents dated December 7, 1983.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that intervenors produce for inspection and copying (or provide copies of) those documents designated by intervenor in its answer below.

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Interrogatory

Please update all answers by intervenor to interrogatories previously propounded in Applicant's First Set of Interrogatories. Such answer shall include all responsive information available up to and including January 16, 1984. In providing your response, please use the same numeration as used for the original interrogatory and answer.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

*Mark J. Wetterhahn / RAR*

Mark J. Wetterhahn  
Counsel for Applicant

January 13, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
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Philadelphia Electric Company	)	Docket Nos. 50-352
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Second Set of Interrogatories and Request for Production of Documents to Intervenor Air and Water Pollution Patrol on Contention VI-1" dated January 13, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 13th day of January, 1984:

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