

AIR and WATER Pollution Patrol

BROAD AXE, PA. Feb. 10, 1984 FEB 21 12:22

U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board
Washington, D.C. 20555

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

In the Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Units 1 and 2)

Docket No. 50-352
and 50-353

Judge Lawrence Brenner, Chairman, Dr. Richard F. Cole, Dr. Peter A. Morris

Gentlemen:

AWPP asks the Board to compel Applicant to answer interrogatories primarily answered with evasion:

Re AWPP 8th set of Interrogatories:

Re interrogatory #1--AWPP asked where the welds are so as to verify that number of welds radiographed are still available. Interrogatory #1 did not ask reinspection of such welds.

Re interrogatory #3,4,6,10 and 11 relate to statistics of sampling. Applicant evaded answer.

Re AWPP 10th Set of Interrogatories:

Interrogatory 2A:

Why were Bechtel records in error? Why the change from 350 to 709?

Interrogatory 2B:

Why state "some additional deficiencies may be present"? Why are the records not complete?

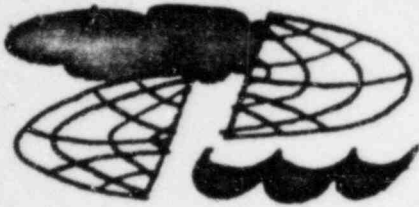
Interrogatory 2C:

Applicant states "associated affidavits were sent with Oct. 4, 1983 report...only one usual affidavit, Mr. Boyer's, was sent.

Re AWPP 12th Set of Interrogatories:

Interrogatory #2:

Reference to reports does not answer who, specifically, signed off deficiencies.



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AWPP request to Compel continued:

Interrogatory #7a:

Applicant avoids the question requiring number values.

Interrogatory #7b

Applicant avoids the question.

Interrogatory #7c:

Applicant avoids the question.

Interrogatory #7d:

Applicant avoids the question.

Interrogatory #7e:

Applicant avoids the question.

Interrogatory #7g:

Applicant avoids the question.

Interrogatory #7h:


Applicant avoids the question.

Interrogatory #7i:

Would not supply affidavit.

Interrogatory #7k:

What about discharge of inspector I am required to
keep confidential?

Very truly yours,
AIR & WATER POLLUTION PATROL

Frank R. Romano, Chairman
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