



AIR and WATER Pollution Patrol

BROAD AXE, PA.

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RELATE

CONDEMNATION

DOCKETED
USNRC

Feb. 21, 1984
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket Nos. 50-352
50-353

Judge Lawrence Brenner, Chairman; Dr. Peter Morris; Dr. Richard Cole
Gentlemen:

AWPP (Romano) 4th Request re Interrogatories concerning Contention VI-1 dated Dec. 5, 1983, in particular the first interrogatory, asked completion dates for approximately fifty log numbers.

The Applicant answered, "there is no completion date on certain inspection log entries because the inspection activities required for items included in the scope of that inspection record had not been completed at the time the log was made available. Inspection planning and the scoping of the inspection records started early in the project and is a continuing process. The work is performed in the sequence prescribed by construction schedules, and the final inspections are performed after the work is completed. The completion date is entered after the final inspections that are within the scope of the inspection record are completed".

AWPP asserts that most of these log numbers for which we asked completion dates go back to 1976 and 1977. If the completion date is entered after the final inspection (as Applicant stated), and none is shown as of the Applicant's Interrogatory response date of Dec. 28, 1983, it must be presumed the inspections have not yet been done.

Therefore, AWPP requests extension of Discovery period in order to get complete records on those logs and welds involved which occurred principally just previous to the time Inspector Ferretti was involved with the IE 76-06-01 "broomstick" affair.

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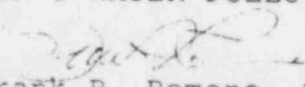
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Letter re 4th Interrogatory "completion dates" continued.

The request is made also because the procedure to inspect welds years after they were done means reports on improperly done welds are not now available as it affects Contention VI-1.

Further, AWPP requests whether any listed welds are now inaccessible, in order to continue the search.

Respectfully submitted
AIR & WATER POLLUTION PATROL


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FRR/jch