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* NOT ADMITTED IN D.C.

October 14, 1983

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Christine N. Kohl, Chairman
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U.S. Nuclear Regulatory
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Washington, D.C. 20555

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Dr. Reginald L. Gotchy
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Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

Dear Members of the Appeal Board:

The letter of October 6, 1983, received October 11, 1983, from Mrs. Shoemaker, the Secretary of the Appeal Board, requests assurance that my former employment does not preclude my representation of Philadelphia Electric Company in the Limerick operating license proceeding and refers to 10 C.F.R. §§0.735-26 and 0.735-27.

As you know, Section 0.735-26 of the Commission's rules essentially provides that no former employee may represent anyone other than the United States in any particular matter in which he participated personally and substantially as an employee. This section implements Section 501(a) of the Ethics in Government Act. 18 U.S.C. §207. Section 0.735-27 specifies that the General Counsel is the only NRC official authorized to provide a former employee with an interpretation of how 18 U.S.C. Section 207 applies to individual cases.

Before accepting employment with Conner & Wetterhahn, P.C., I discussed with the General Counsel the applicability of 18 U.S.C. §207 and 10 C.F.R. §0.735-26 to my activities while an NRC employee. Based on these discussions and an

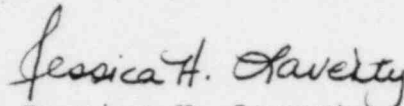
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Christine N. Kohl . Chairman
Gary J. Edles
Dr. Reginald L. Gotchy
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extensive review of the matters I worked on as an NRC employee, I concluded that I may represent the Philadelphia Electric Company in the Limerick license proceeding, as well as other clients of the firm in other cases.

Very truly yours,


Jessica H. Laverty

JHL/dlf

cc: Herzel H.E. Plaine, Esq.
Ann P. Hodgdon, Esq.
Robert J. Sugarman, Esq.
Atomic Safety and Licensing Board
Docketing and Service Branch