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BRANCH  
ROBERT RAYMOND ELLIOTT, P.C.  
COUNSEL  
AND ADMITTED IN PA.

November 30, 1983

Christine N. Kohl, Esquire, Chairman  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Stephen F. Eilperin  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Reginald L. Gotchy  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Application of Philadelphia Electric Company  
Docket No. 50-252/ 50-253

Dear Judges:

I have a copy of several letters which came in too rapid  
a succession to permit time for intervenors to respond.

Despite the Board's finding, which was rendered, apparently,  
immediately upon receipt of the letter from General Counsel, inter-  
venors believe that further inquiry is required into the matter of  
Ms. Laverty's disqualification, and therefore that of Conner &  
Wetterhahn. Specifically, appellants do not believe that Ms. Laverty's  
statements and descriptions of the tour are sufficient to relieve  
her of the burden of substantial participation in the Limerick pro-  
ceedings, including those directly related to the supplemental cool-  
ing water issues.

Moreover, and specifically, appellants do not agree with  
the conclusion, in view of Ms. Laverty's purely conclusory statement,  
that she did not "participate" in disposing of Del-AWARE's 2.206  
petition. Appellants request a detailed description of who in  
Commissioner Robert's office did "participate" in a specialized  
sense.

Christine N. Kohl, Esquire, Chairman -2- November 30, 1983  
Stephen F. Eilperin  
Dr. Reginald L. Gotchy

In view of Ms. Laverty's foot-dragging in disposing of this matter, appellants believe that justice requires that the argument scheduled for December 5 be deferred until answers to these questions are provided and the Board can make an intelligent decision. Alternatively, appellants request that the Board forward to the General Counsel or other appropriate body within the NRC the information and questions, and defer continuation of the proceedings until such matters are resolved.

Sincerely,



Robert J. Sugarman

RJS/kc

cc: Conner & Wetterhahn  
General Counsel