

# AIR and WATER Pollution Patrol

BROAD AXE, PA.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dec. 10, 1983

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BEFORE THE ATOMIC SAFETY & LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(LIMERICK GENERATING STATION  
Units 1 and 2)

Docket Nos. 50-352  
and 50-353

Judges Lawrence Brenner, Chairman; Richard F. Cole; Peter A. Morris  
Gentlemen:

## REQUEST FOR EQUIVALENT TIME

Contention VI-1 was the last accepted contention in the Limerick licensing hearings. It was accepted after contentions of LEA, I-41; I-42 and LEA Series VIII as per "Memorandum and Order" of November 21, 1983.

Contention VI-1 is far more involved and covers more years of activity requiring discovery at site, then time necessary for accepted contentions of LEA.

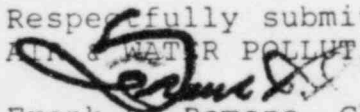
It is unfair that Contention VI-1 is denied equivalent time for interrogatories than LEA, and I move that the Board extend discovery time at least to that of LEA.

I so move because of Applicant's delayed answers to my interrogatories together with Applicant's interrogatories sent to me which I can't answer because they have delayed answers to interrogatories I submitted. As a result hearing time required for hearings on V-4 now prevent attention to VI-1 interrogatories.

I, therefore, plead and require as much or more time than LEA limit of Feb. 6, 1984.

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PDR ADOCK 05000352  
G PDR

FRR/jch

Respectfully submitted,  
  
AIR & WATER POLLUTION PATROL  
Frank R. Romano, Chairman  
61 Forest Ave.  
Ambler, Pa. 19002

I certify the above has been served on the Service List.

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