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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 JAN 10 A10:26

Before the Atomic Safety and Licensing Board

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

APPLICANT'S INITIAL INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS TO LIMERICK  
ECOLOGY ACTION ON CONTENTION 1-42

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740b, and the Atomic Safety and Licensing Board's Memorandum and Order Establishing Discovery Schedule (November 21, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Limerick Ecology Action ("LEA") to be answered fully in writing, under oath, and to be served on Applicant on or before February 3, 1984.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that LEA produce for inspection and copying (or provide copies of) the documents requested below.

These requests are preliminary in nature in order to ascertain the identity of those deponents who may be examined by Applicants. Further interrogatories and document requests will be made subsequently as to specific contentions.

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Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in Contention I-42. If so, identify each such expert witness and further state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; (d) the grounds for each opinion; (e) the expert's business and residential addresses. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. State whether you intend to present any fact witnesses on the subject matter at issue in Contention I-42. If so, identify each such fact witness and further state (a) his business and residential addresses; (b) the subject matter on which the witness is expected to testify; (c) the substance of the factual testimony which the witness is expected to offer.

3. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for Contention I-42 or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case on Contention I-42 and all documents to which you intend to refer in conducting cross-examination of other witnesses who may testify in connection with this contention.

Document Request

Please attach to your answer(s) to the interrogatories listed above a copy of all documents identified therein, or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

CONNER & WETTERHAHN, P.C.

*Mark J. Wetterhahn / RAK*

Mark J. Wetterhahn  
Counsel for the Applicant

January 9, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
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Philadelphia Electric Company	)	Docket Nos. 50-352
	)	50-353
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Initial Interrogatories and Request for Production of Documents to Intervenor Limerick Ecology Action on Contention I-42" dated January 9, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 9th day of January, 1984:

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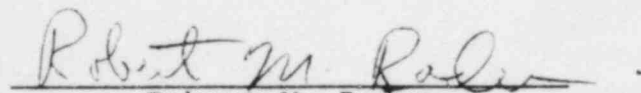
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