



AIR and WATER Pollution Patrol

BROAD AXE, PA.

DOCKETED
JAN 1984

March 19, 1984 MAR 22 A10:51

Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

LETTER OF SUBMITTAL
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, Peter Morris and Richard Cole

AWPP MOVES BOARD REQUIRE FURTHER DEPOSITIONS RE VI-I

AWPP (Romano's) primary purpose to take time off from work and incur an expensive charge for a court reporter, was to get first-hand, face-to-face clarification on ambiguous nuclear industry parlance as it relates to details surrounding the 76-06-01 "Broomsitck" deficient welding affair.

I had indicated to the Board I would want key people, such as the NRC, the Bechtel, and the Applicant's QA-QC inspectors. It is inexcusable, therefore, that Mr. Corcoran, whom I specifically asked for, I feel, was kept away. Similarly it is ironic that the NRC had their Counsel present, but the NRC Quality Control inspector who led the inquiry into the Broomstick affair was absent.

While Mr. Boyer was there with Mr. Clohecyc, Mr. Clohecyc continued to avoid answering questions by repeatedly asking that the question be reasked. He avoided answering directly, and as a result I could not resolve the question of evasion of interrogatories. Altogether, therefore, the purpose and right to depose was, in effect, violated.



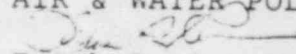
AIR and WATER
Pollution Patrol
BROAD AXE, PA.

(2)

AWPP Moves Board Require Further Deposition Re VI-I continued:

Further, Mr. Cloncy, on repeated questioning answered that what welds were chosen for inspection and how many were chosen is up to his judgement. In fact Mr. Boyer, included a statement that even a welder might use his judgement even if specified procedure exists.

On these bases, I move that the Board require another pre hearing on the VI-I Contention.

Respectfully submitted,
AIR & WATER POLLUTION PATROL

Frank R. Romano, Chairman
61 Forest Ave.
Ambler, Pa. 19002

I certify the service list has been served: Lawrence Brenner, Chairman; Dr. Richard Cole; Dr. Peter Morris; Troy B. Conner, Esq; Ann Hodgdon, Esq; Atomic Safety and Licensing Board; Docketing and Service Section; Atomic Safety & Licensing Appeal Panel; without enclosure to Edward G. Bauer; Robert L. anthony; Marvin I Lewis; Thomas Gerusky; Walter W. Cohen; Martha Busch; Steven P. Hershey, Esq; Phyllis Zitzer; Charles Elliott, Esq.; Nori G. Ferkin, Esq; Angus Love, Esq. Joseph White III; Robert J. Sugarman, Esq; Director PEMA; Spence W. Perry, Esq; Jay M. Gutierrez, Esq; and James Wiggins .