

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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)	)	

AFFIDAVIT OF NON-DISCLOSURE

I, Charles W. Elliott, being duly sworn, state:

1. As used in this Affidavit of Non-Disclosure,

(a) "Protected information" is (1) any form of the physical security plan for Special Nuclear Material for the Applicant's Limerick, Generating Station, Units 1 and 2: or (2) any information obtained by virtue of these proceedings which is not otherwise a matter of public record and which deals with or describes details of the security plan.

(b) "An authorized person" is (1) an employee of the Nuclear Regulatory Commission entitled to access to protected information; (2) a person who at the invitation of the Atomic Safety and Licensing Board ("Licensing Board"), has executed a copy of this affidavit; or (3) a person employed by Philadelphia Electric Company or its counsel and authorized by it in accordance with Commission regulations to have access to protected information.

2. I shall only examine the physical security plan for Special Nuclear Material at a location designated by and under the control of Applicant.

3. I shall not disclose protected information to anyone except an authorized person, unless that information has previously been disclosed in the public record of this proceeding, I will safeguard protected information in written form (including any portions of transcripts of in camera hearings, filed testimony or any other documents that contain such information), so that it remains at all times under the control of an authorized person and is not disclosed to anyone else.

4. I will not reproduce any protected information by any means without the Licensing Board's express approval or direction. So long as I possess protected information, I shall continue to take these precautions until further order of the Licensing Board.

5. I shall similarly safeguard and hold in confidence any data, notes or copies of protected information and all other papers which contain any protected information by means adequate to guarantee their security.

6. If I prepare papers containing protected information in order to participate in further proceedings in this case, I will assure that any secretary or other individual who must receive protected information in order to help me prepare those papers has executed an affidavit like this one and has agreed to abide by its terms. Copies of any such

affidavit will be filed with the Licensing Board before I reveal any protected information to any such person.

7. I shall use protected information only for the purpose of preparation for this proceeding or any further proceedings in this case dealing with security plan issues, and for no other purpose.

8. I shall keep a record of all protected information in my possession, including any copies of that information made by or for me. At the conclusion of this proceeding, I shall account to the Licensing Board or to a Commission employee designated by that Board for all the papers or other materials containing protected information in my possession and deliver them as provided herein. When I have finished using the protected information they contain, but in no event later than the conclusion of this proceeding, I shall deliver those papers and materials to the Licensing Board (or to a Commission employee designated by the Board), together with all notes and data which contain protected information for disposal or safekeeping during the lifetime of the plant as directed by the Board.

9. I make this agreement with the following understandings: (a) I do not waive any objections that any other person may have to execute an affidavit such as this one: (b) I will not corroborate to any individual who is not an authorized person the accuracy or inaccuracy of information obtained outside this proceeding by using protected information gained through the hearing process.

10. I make the foregoing statements under oath subject to the penalties and provisions of 18 U.S.C. §1001.

Charles W. Elliott

Subscribed and sworn to before me this 16th day of March 1984.

Notary Public

ROBIN L. NAROLL, Notary Public  
Eaton, Northampton Co., Pa.  
My Commission expires May 11, 1987