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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 JUN 20 A10:24

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 ANSWER TO AWPP'S JUNE 8, 1984
MOTION RELATING TO CONTENTION VI-1

On June 8, 1984, Air and Water Pollution Patrol filed a document entitled "Motion to Reopen Re-consideration on AWPP-VI-1." The motion relies principally on a May 21, 1984 letter to Philadelphia Electric Company from NRC Region I. The letter acknowledges receipt and attaches copies of letters dated February 17 and March 26, 1984 from Applicant in response to a letter dated January 10, 1984 transmitting an NRC Inspection Report.

The May 21, 1984 letter, including its attachments, fails to support the requested relief. Of primary importance is the fact that the quoted material on pages 1 and 2 of AWPP motion is directly related to a matter which AWPP has previously attempted to raise in support of Contention VI-1. The document, which AWPP previously designated "AWPP 260A," is the Notice of Violation which Applicant's letter dated February 17, 1984 is addressing and which it partially quotes. In its "Memorandum and Order Ruling on Applicant's

Motion to Strike Specific Instances Advanced by AWPP in Support of Contention VI-1" (April 2, 1984) (slip op. at 4), the Atomic Safety and Licensing Board ruled that the instances described in AWPP 260A have nothing to do with the quality of welding or welding related quality assurance. In any event, AWPP fails to demonstrate how anything in the May 21, 1984 letter supports the relief requested.

AWPP asserts that Applicant should have done destructive testing "on those welds done in the test welds made by prospective employee welders."^{*/} No technical justification is given for this assertion. AWPP fails to show how Applicant has in any way failed to comply with applicable regulations, codes and standards regarding welding or qualification of welders. The remainder of the statements in the pleading are mere generalizations and repetitious of arguments previously made by AWPP.

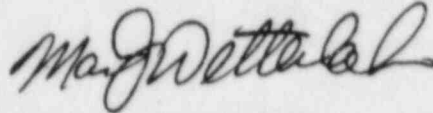
In sum, whether treated as a motion to reopen the record or to reconsider the Board's ruling on the merits, AWPP has not addressed the legal standards for either nor

^{*/} AWPP Motion at 2.

has it demonstrated that it is entitled to whatever relief it is seeking. For these reasons, AWPP's motion should be denied.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn". The signature is fluid and cursive, with the first name "Mark" and last name "Wetterhahn" clearly distinguishable.

Mark J. Wetterhahn
Counsel for the Applicant

June 18, 1984