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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 NOV -5 110:58

Before the Atomic Safety and Licensing Board

In the Matter of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Units 1 and 2)

)
)
) Docket Nos. 50-352
) 50-353

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APPLICANT'S TRANSMITTAL OF TESTIMONY RELATING TO
LEA AND FOE OFFSITE EMERGENCY PLAN CONTENTIONS
AND CITY OF PHILADELPHIA CONTENTIONS
CITY-18 AND CITY-19

In accordance with the Atomic Safety and Licensing Board's "Order Establishing Schedule for Offsite Emergency Planning Issues" (August 15, 1984) and "Order (Granting Extension of Time)" (October 9, 1984), Applicant hereby transmits its testimony relating to offsite emergency plan contentions. The testimony consists of:

1. Testimony of Robert Bradshaw, John Cunningham and Robin Hoffman Wenger, Relating to LEA Offsite Emergency Plan Contentions;
2. Professional qualifications of Robert Bradshaw, John Cunningham and Robin Hoffman;
3. Testimony of Robert Klimm, Relating to LEA-24/FOE-1;
4. Professional qualifications of Robert Klimm;

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5. Testimony of V.S. Boyer, N.I. Goldman, G.D. Kaiser and R. Waller, Relating to City of Philadelphia Contentions City-18 and City-19;

6. Professional qualifications of N.I. Goldman, G.D. Kaiser and R. Waller;^{1/}

7. Applicant's Exhibits Relating to Offsite Emergency Plan Contentions as referenced in its written Testimony, attached as Appendix A.^{2/}

Background documents included in the reference list attached to Applicant's written Testimony relating to Contention City-18 and City-19 are being sent to the Licensing Board, City of Philadelphia, the NRC Staff, PEMA and

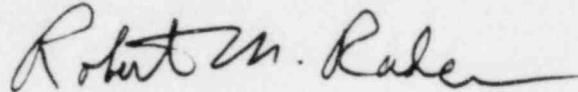
1/ The professional qualifications of Mr. Boyer were previously submitted and received into evidence at ff. Tr. 9772.

2/ Pursuant to the previous Orders of the Licensing Board, Applicant has been providing the parties with copies of the emergency plans and related materials as they have been generated. Previously, the Board received some of this material, but later indicated that it did not wish to receive further updates and revisions. At the time of the hearing, Applicant will offer the current versions of the emergency plans in evidence. Accordingly, Applicant does not intend to furnish the Licensing Board with copies of these versions at an earlier time unless requested to do so. Similarly, the Evacuation Time Estimates study for Limerick, prepared by HMM Associates, Inc., was furnished to the Board and parties at the time it was made available to Applicant. The only other exhibit to be offered by Applicant will be a model day care plan, which was provided to the Board and parties in Applicant's Answer to LEA's Respecification of Offsite Emergency Planning Contentions (September 13, 1984).

FEMA. There is no intention on the part of Applicant to make these references exhibits.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

A handwritten signature in cursive script, appearing to read "Robert M. Rader".

Troy B. Conner, Jr.
Mark J. Wetterhahn
Robert M. Rader

Counsel for the Applicant

November 1, 1984

APPENDIX A

1. Evacuation Time Estimates for the Limerick Generating Station Plume Exposure Emergency Planning Zone (May 1984), prepared by HMM Associates, Inc.

2. Model Radiological Emergency Response Plan for Day Care Facilities for Incidents at the Limerick Generating Station.

3. Offsite Training Programs: Agricultural Community (January 20, 1984); School Teachers and Staff (November 1983); School Officials (December 28, 1983); Bus Drivers (January 25, 1984); Introduction to Nuclear Energy and Radiation (December 29, 1983), all prepared by Energy Consultants for Philadelphia Electric Company.

4. The current version of each of the 42 municipal, 13 school district and three risk county Radiological Emergency Response Plans, as previously provided to the parties.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 NOV -5 A11:01

In the Matter of)
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(Limerick Generating Station,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Transmittal of Testimony Relating to LEA and FOE Offsite Emergency Plan Contentions and City of Philadelphia Contentions City-18 and City-19" and "Joint Report of the Parties With Respect to the Hearing on Offsite Emergency Planning Contentions dated November 1, 1984 in the captioned matter have been served upon the following by deposit in the United States mail this 1st day of November, 1984:

* Helen F. Hoyt, Esq. Chairperson Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Atomic Safety and Licensing Appeal Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555 Docketing and Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555
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* Hand Delivery on November 2, 1984

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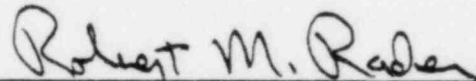
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