

256.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

*84 NOV 20 P3:05

ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of :
Philadelphia Electric Company : Docket No. 50-352-OL
(Limerick Generating Station, : 50-353-OL
Units I and II) :

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

MOTION FOR LEAVE TO FILE REPLY

Appellant, by its counsel, move that the Appeal Board permit it to file a reply to the staff brief in opposition to its request for stay, and aver as the basis thereof the following:

1. In its brief opposing the stay, the staff unjustifiably and inexplicably completely failed to address the applicant's reliance on the supplemental cooling water system for safety related purposes.

2. In fact, not only did the staff have the September 4 letter referred to in the Motion, but also had before it a letter dated October 19, 1984, addressed by Vincent Boyer to Harold Denton, requesting an exemption under the provisions of 10 CFR Section 50.12, based, in part, on an undisclosed "number of other sources". This letter Exemption Request is attached to the Reply.

3. It is necessary to permit reply in order to bring these matters to the attention of the Appeal Board.

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DENIED

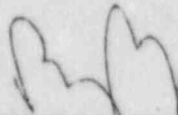
For the Appeal Board

C. Jean Shearman 11-20-84
Secretary to the Appeal Board

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WHEREFOR the intervenor-appellant requests that the Board permit it to file a reply brief as attached hereto.

Respectfully submitted,



ROBERT J. SUGARMAN
Counsel for Intervenor

Of Counsel

Sugarman, Denworth & Hellegers
16th Floor, Center Plaza
101 North Broad Street
Philadelphia, PA 19107
215-751-9733

Dated November 9, 1984