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December 13, 1984OFFICE OF SECRETARY
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CABLE ADDRESS: ATOMLAW

Miss Phyllis Zitzer
Limerick Ecology Action
762 Queen Street
P.O. Box 761
Pottstown, PA 19464

FEDERAL EXPRESS

In the Matter of
Philadelphia Electric Company
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 50-353 O

Dear Mrs. Zitzer:

This will confirm our telephone conversation late yesterday afternoon regarding the Licensing Board's request that the parties discuss stipulated testimony and that Limerick Ecology Action ("LEA") specify the sequence of its witnesses for the remainder of the hearing on offsite emergency planning contentions.

As regards stipulations, you advised me that LEA has not prepared any proposed stipulations regarding the testimony of its witnesses. You stated that you would discuss preparing stipulations with your counsel, Mrs. Ercole, but that you did not have any stipulations for us to review at this time. I advised you that Applicant could not stipulate to any of the LEA prefiled testimony, although in some cases it might not be necessary for Applicant to cross-examine those witnesses, achieving the same savings in time. This was in fact the case with Mr. John Lukacs (Tr. 14,776).

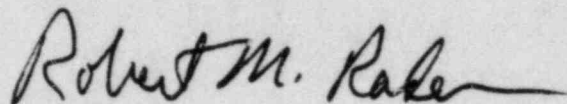
As to the sequence of witnesses, you advised me that the names and sequence of witnesses you intend to call starting Monday, November 17, 1984 is as follows: Dr. Royden Price, Barbara Greaser, Elaine Troisi, Jim Brown and Dr. William Welliver. You also stated that you intend to call Dr. Roy Claypool as your first witness Wednesday morning, but that you had not arranged for other witnesses to fill in if they are reached before Dr. Claypool on Tuesday. You then stated that, at the limited appearance hearing on Thursday, November 13, you will give Mr. Wetterhahn a complete list of witnesses and their order for the entire week beginning November 17.

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You noted that Mr. Brown is the head of the Methacton Task Force and that you would be relying upon the most recent minutes of that organization. You agreed to provide Mr. Wetterhahn with a copy of those minutes.

As Mr. Conner has repeatedly stated on the record and during informal meetings, Applicant remains willing to consider any proposed stipulations you wish to submit and to consider any other suggestions which will expedite the hearing.

Sincerely,

A handwritten signature in cursive script, reading "Robert M. Rader". The signature is written in dark ink and has a fluid, connected style.

Robert M. Rader
Counsel for Applicant

RMR/lad

cc: Service List
Hand Delivery to Licensing Board Members