



# AIR and WATER Pollution Patrol

BROAD AXE, PA. February 14, 1985  
U.S. Nuclear Regulatory Commission 85 FEB 19 AM 1:10  
Washington, D.C. 20555

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

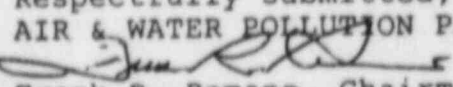
In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station  
Units 1 and 2)

Docket Nos. 50-352  
and 50-353

In its February 11, 1985 "Applicant's Response To Air And Water Pollution Patrol Motion With Regard To Admission Of Late-filed Contention Relating To Sheltering", Applicant states AWPP's (Romano) motion "does not contain a statement of contention which AWPP wishes to litigate", pointing to one word in AWPP's contention which was not spelled properly.

Thereupon the Applicant's discussion under "AWPP Has Failed To Set Forth A Litigable Contention", demonstrates confusion in its statement that "It is entirely unclear what aspect LEA(sic) wishes to litigate". Applicant continues in a manner which seems not to respond to AWPP's contention, for example it tells that the Pennsylvania Disaster Operation Plan, Annex E describes how sheltering will be taken into account as a protective action for this facility. The gist of AWPP's contention, however, is that Applicant did not make tests, nor inform the public, on the penetrating effect of Gamma rays and radioactive particulates on residents in the ordinary types of homes, thus creating the illusion that staying inside their own home would guard against high intensity radiation. It seems that Applicant was responding to LEA, as it stated under discussion.

AWPP asks that Applicant re-read my contention and respond to it, rather than confusing it with LEA's contention having to do with people leaving their homes because of the inadequacy of their homes as it relates to preventing lethal radiation as would come in a general emergency type accident.

Respectfully submitted,  
AIR & WATER POLLUTION PATROL  
  
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I certify the above was served by first class mail on the latest service list.