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Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

In the Matter of
Philadelphia Electric Company
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 3530L

Dear Mr. Chilk:

The purpose of this letter is to advise the Commissioners that the Delaware River Basin Commission ("DRBC") is withholding action on additional supplemental water for the Limerick Generating Station, Unit 1 until such time as the Commission acts to authorize the issuance of a full-power operating license. Philadelphia Electric Company therefore requests that the Commission act upon its application for the full-power license as soon as possible. As the Nuclear Regulatory Commission is aware, the Atomic Safety and Licensing Board issued its Fourth Partial Initial Decision on July 22, 1985, completing adjudication of all contested issues and authorizing the issuance of a full-power operating license for Limerick.

As the Commission is also aware, Philadelphia Electric Company has filed certain applications with DRBC to assure the availability of sufficient cooling water to meet the needs for Limerick Unit 1 during the ascension to power program. The applications by the Company to DRBC (furnished to the Commission) have been necessitated by actions, wholly beyond its control, that have delayed completion of the Point Pleasant Pumping Station, which will be the permanent source of supplemental cooling water for Limerick. The Company has therefore sought DRBC's approval of other cooling water sources for 1985 in order to proceed with its ascension to power program upon license issuance.

At its regular meeting on July 24, 1985, following a legislative hearing held July 3, 1985, DRBC considered an

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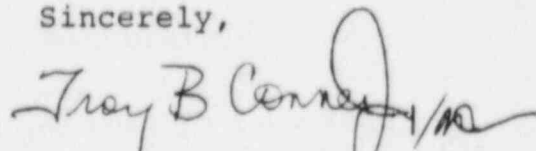
application by the Company for approval to use, for Limerick Unit 1 consumptive water needs during 1985, the water allocations of certain other generating units located on the Schuylkill River. Following the general discussion by the DRBC Commissioners and a discussion of the status of the NRC proceedings, one of the Commissioners suggested two alternatives: (1) that DRBC hold an emergency meeting to act upon the water application after the NRC acted on the full-power license; and (2) that DRBC act upon the recommendations of the DRBC Staff for a docket decision which would provide the water, conditioned upon the issuance of the full-power license by the NRC. After further discussion among the Commissioners, the former course was decided upon.

Accordingly, this action by DRBC constitutes the first time in the operating license proceeding that another agency has acted to withhold action relating to Limerick until the NRC has acted. Given the DRBC decision, obviously some time will elapse between the issuance of a full-power license and the DRBC Commissioners' convening the emergency session.

As the Company has previously stated to the Commission, delay in the full-power licensing of Limerick has unfortunately cost and continues to cost approximately \$1.5 million a day. As the Commission also knows, all low-power testing was completed for Unit 1 over four months ago in March 1985. Solely by reason of unforeseen delay regarding the Graterford issues, a matter wholly beyond the control of the Company, issuance of a full-power license for Unit 1 was not forthcoming after issuance of the Third Partial Initial Decision on May 7, 1985.

Accordingly, we request that the Commission expeditiously conclude its "immediately effective" review as soon as any comments are filed.

Sincerely,



Troy B. Conner, Jr.
Counsel for Philadelphia
Electric Company

TBC/dlf
cc: Service List