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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY :
(Limerick Generating Station, : DOCKET NOS. 50-352
Units 1 and 2) : 50-353

MOTION FOR ORDER REQUIRING FULL DISCLOSURE
BY PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
OF THE EVACUATION PLAN FOR STATE CORRECTIONAL
INSTITUTE AT GRATERFORD

AND NOW, comes the inmates of the State Correctional Institute at Graterford, through their attorney, Angus R. Love, who respectfully request the Licensing Board to permit full disclosure of the evacuation plan for the State Correctional Institute at Graterford under appropriate circumstances for the following reasons:

1. On September 18, 1981, the National Lawyers Guild, through their attorney, Don Bronstein, filed a Petition to Intervene in the above-captioned matter on behalf of inmates at the State Correctional Institute at Graterford.
2. In response to a Board Order of October 14, 1981, the National Lawyers Guild filed a supplemental Memorandum.
3. On November 16, 1981, the Nuclear Regulatory Commission staff issued a response to said Motions indicating that the Nuclear Regulatory Commission staff believes the inmates do

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have standing to intervene.

4. On July 22, 1983, Angus R. Love, Esquire, agreed to assume representation of the inmates and Don Bronstein formally withdrew from this matter.

5. On April 20, 1984, in a Special Prehearing Order, the Board granted the inmates twenty (20) days to submit their contentions upon receipt of the evacuation plan for S.C.I.G.

6. On December 14, 1984, counsel for the inmates received an unclassified copy of the Pennsylvania Bureau of Corrections Radiological Emergency Response Plan (copy attached as Exhibit "A").

7. Upon review of said document, it became obvious that major portions of said plan have been removed. The remaining portions made little or no sense, giving counsel an inadequate basis from which to form contentions pursuant to the Board's Order of April 20, 1984.

8. Censorship of the plan was so broad that even information in the public domain has been withheld (see page E-1-7; capacity of infirmary at S.C.I.G.).

9. Information in said plan is irreconcilable with information given in Applicant's initial evacuation plan filed March 17, 1981 App. H §4.1 (attached as Exhibit "B").

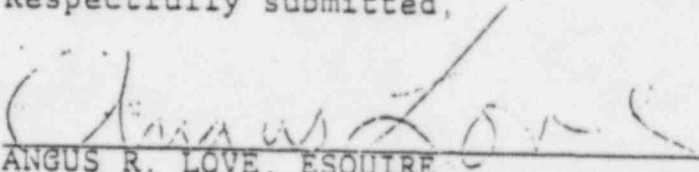
10. Pennsylvania Emergency Management Agency and the Governor's Energy Council have joined in a request to withhold

confidential portions of said plan from the public citing 10 C.F.R. 2.790(d) as authority.

11. Inmates at S.C.I.G. object to the withholding of confidential information, and request the Board to issue a protective Order allowing counsel and any recognized experts to review the entire plan under appropriate circumstances.

12. Inmates also request that the twenty day time period allowed for the filing of their contentions not begin until full disclosure of the plan is permitted under the appropriate circumstances.

Respectfully submitted,


ANGUS R. LOVE, ESQUIRE
Montgomery County Legal Aid