

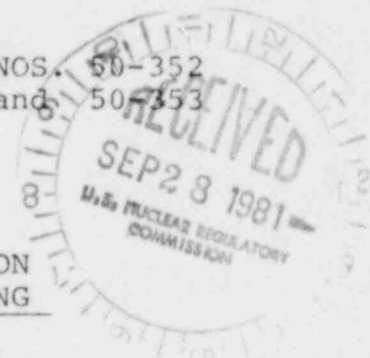
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



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
:



PETITION FOR INTERVENTION
AND REQUEST FOR A HEARING

Consumers Education and Protective Association (CEPA), on its own behalf and on behalf of its members, hereby petitions the Nuclear Regulatory Commission for leave to intervene in the above-captioned proceeding, pursuant to 10 CFR §2.714.

I.

INTEREST OF THE PETITIONER
IN THE PROCEEDING

CEPA is an incorporated organization founded in 1966. CEPA is to educate the public and its members about their rights as consumers and how to best advocate and protect those rights.

CEPA has, by its past activities and conduct, exhibited a special interest in the protection of its members rights in regard to the operations of Philadelphia Electric Company.

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CEPA's membership consists of over 900 individuals and families, the vast majority of whom live within 30 miles of the facility; members live as close as within a mile, and as far away as 50 miles.

Operation of the Limerick reactors will directly affect members of CEPA in that their health and safety and their children will be adversely impacted by routine releases of radionuclides into both air and water, and by accidental releases of such material, when and if such accidents occur.

Many members are property owners, and therefore will be financially affected by Limerick's proposed operation, both by decreases in property values during normal operations over the life of the plant, as well as by the impacts of potential accidents at the site. CEPA also has several members who work in institutions such as hospitals, schools and nursing homes, who will be responsible for emergency response duties in the event of an accident.

Finally, almost all of CEPA's membership are Philadelphia Electric Company ratepayers, and will therefore be affected by escalating costs of construction, operation and maintenance of the facility, as well as the devastating financial consequences of potential accidents on the utility and therefore on its customers.

II.

AFFECT ON PETITIONER'S INTEREST BY RESULTS OF THE PROCEEDING

CEPA has a long-standing concern with the impact of Limerick on the health and safety of its members and the public at large. At

the construction permit stage of these proceedings, specific health and safety issues, technical and otherwise, dealing with the operation of the plant, were not litigated pending issuance of critical documents such as the FSAR and SER. CEPA and its members will be adversely affected if they are denied the right to participate as a party in hearings designed to assure that no operating permit is issued unless and until there is reasonable certainty that operation "will not be inimical to the common defense and security or to the health and safety of the public".

III.

ASPECTS OF SUBJECT MATTER OF PROCEEDING AS TO WHICH PETITIONER WISHES TO INTERVENE

Pursuant to 10 CFR §2.714(b), in accordance with the schedule to be set by the Licensing Board, Petitioner intends to file a supplement to this petition listing contentions that it seeks to have litigated, under the following subject matter areas:

- 1) Emergency planning
- 2) Technical safety issues
- 3) Availability of water supply
- 4) NEPA cost/benefit (need for power)
- 5) Radiation protection
- 6) Security
- 7) Quality assurance/quality control
- 8) Operator training
- 9) Management/technical resources
- 10) Financial qualifications of applicant
- 11) Fuel cycle

The above list is in no way meant to limit the scope of the contentions that the Petitioner intends to file, but rather is meant to indicate the nature of Petitioner's interest. Petitioner reserves the right to file contentions that do not appear but were intended to fall under the indicated subject matter areas, and are litigable issues pursuant to the Commission's rules and regulations.

IV.

RELIEF

Based upon the foregoing, Petitioner respectfully requests a hearing in the above-captioned matter, and requests that it be granted leave to intervene in this proceeding.

Respectfully submitted,

CONSUMERS' EDUCATION and PROTECTIVE
ASSOCIATION

BY: Steven P. Hershey
STEVEN P. HERSHEY

COMMUNITY LEGAL SERVICES, INC.
Sylvania House
Juniper and Locust Streets
Philadelphia, PA 19107
(215) 893-5300

Attorney for Petitioner

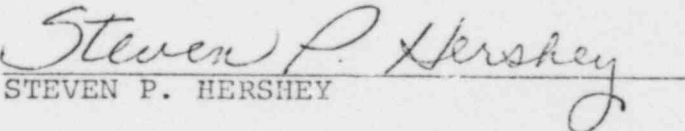
September 21, 1981

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Petition to Intervene and Request for a Hearing were served, by deposit in the United States mail, first class postage prepaid, upon the following on September 18, 1981:

Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Troy B. Conner, Jr., Esquire
Conner & Wetterhahn
1747 Pennsylvania Avenue, N.W.
Washington, DC 20006


STEVEN P. HERSHEY

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : DOCKET NOS. 50-352
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Units 1 and 2 :

A F F I D A V I T

I, Lee Frissell, being first duly sworn according to law,
depose and say that:

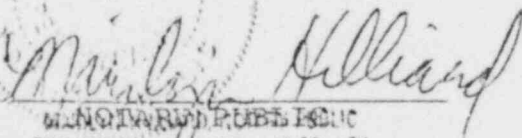
1. I am Executive Director of Consumers' Education and
Protective Association (CEPA);

2. I have read the foregoing Petition of CEPA to Intervene
and Request for a Hearing and it is true and correct to the best of
my knowledge and belief.



LEE FRISSELL

Sworn to and subscribed
before me this 21st day
of September, 1981.



NOTARY PUBLIC
PHILADELPHIA, PENNSYLVANIA COUNTY
MY COMMISSION EXPIRES DEC. 5, 1983
Member, Pennsylvania Association of Notaries