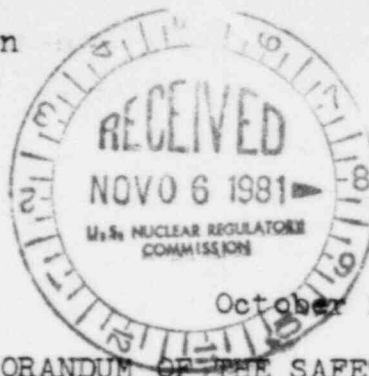


U.S. Nuclear Regulatory Commission  
Atomic Safety and Licensing Board

Re: Philadelphia Electric Company  
Limerick Generating Station



Docket # 50- 352  
50- 353

DOCKETED  
USNRC

OCT 29 P5:07

PD  
OFFICE OF SECRETARY  
REGULATING & SERVICE  
BRANCH

RESPONSE TO ORDER AND MEMORANDUM OF THE SAFETY  
AND LICENSING BOARD, JUDGE LAWRENCE BRENNER, CHAIR-  
MAN, DATED 10/14/81, FROM ROBERT L. ANTHONY FOR HIMSELF  
AND FRIENDS OF THE EARTH IN THE DELAWARE VALLEY.

In connection with the seventeen sworn affidavit, included  
with the petition to intervene filed by Robert L. Anthony on Sept.  
18, 1981, two of these individuals are members of Friends of the  
Earth (FOE), Elizabeth P.S. Anthony and Anne S. McIndoo (Mrs. McIndoo  
applied for membership after filing the affidavit).

The other fifteen affiants are residents of the area affected  
by the Limerick plant who are known to Robert and Elizabeth Anthony.  
They expressed confidence in the former's ability to represent their  
interests and stated their endorsement of FOE principles and their  
identification with FOE representations in the Limerick operating  
license proceedings. Without this representation these individu-  
als would have no way to present the threat caused by the Limerick  
plant to their health, well being, and economic security. AND they  
would be deprived of the involvement in decisions affecting their  
vital interests provided for under NEPA, 40CFR Sect. 1500 and following.

Furthermore, Ms. Kathleen O'Leary, chairperson of FOE, in her af-  
fidavit of Sept. 16, 1981, stated that she was directed by the 500 FOE  
members and the Board to intervene in the Limerick proceeding through  
the petition of Robert L. Anthony. Some of those members who live  
in closest proximity to Limerick and who have the greatest threat are:

M.&M. E. Stewart, Jr.	838 Lewis Rd., Limerick, Pa.	(Approx. miles)	1
Everett Rodebaugh R.D. 2	309 Pottstown	19464	3
M.&M. Samuel W. Morris R.D. 1	Bx. 360 " "	" "	3
M.&M. Henry H. Hayman R.D. 1	Bx. 284 Spring City	19475	4
Mrs Dorothy N. Lloyd	Bx. 153 Route 1	" " "	4
William F. Brinton P.O.	Bx. 215 Phoenixville	19460	7
David L. Toth	502 Carlisle Ave.	" " "	7
Ms. Nancy N. Iannuzzelli	109 Develin Dr. R.D. 2	Phoenixville	8
Ms. Elaine Milito	R.D. 2 Phoenixville	19460	8
Douglas E. Baker	Kimberton Rd. R.D. 2 Bx. 337	" "	8
Henry F. Bisbeff	3350 Stump Hall Rd. Colledgeville	19426	9

B111060572 B111025  
PDR ADDCK 05000352  
PDR

C.C. via 1st class mail 10/26/81  
Judge Lawrence Brenner NRC. Wash.  
" Richard F. Cole " "  
" Peter A. Morris " "  
Counsel for NRC Staff " "  
Troy B. Connor, Jr. Washington 20006  
Phila Elec Co. Edw. G. Bauer, Jr. Phila  
Bobt. W. Adler, Asst. Counsel Harrisburg  
Thomas Gerusky, Dir. D.E.B. " " (OVER)

Respectfully submitted,  
*Robert L. Anthony*

Sworn to and subscribed before me  
this 26th day of Oct. 1981

*Sarah W. Lukens*  
Notary Public, Nether Providence Twp., Del. Co.  
My Commission Expires August 27, 1983.

9503  
9110

OCT 28 1981