

October 26, 1981

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  
50-353



NOTICE OF APPEARANCE

Notice is hereby given that the undersigned representative herewith enters an appearance in the above-captioned matter. In accordance with 10 C.F.R. 2.713(a), the following information is provided:

Name: Alan J. Nogee  
Address: Keystone Alliance  
3700 Chestnut St.  
Philadelphia, PA 19104  
Telephone Number: (215) 387-5254  
Authorization: By accompanying affidavit of Keystone Alliance  
Name of Party: Keystone Alliance



Respectfully submitted,

Alan J. Nogee  
Keystone Alliance

Dated in Philadelphia, Pennsylvania  
this 26th day of October, 1981.

DS03  
50/11

AFFADAVIT

I, Betsy Wright, am a member of the Keystone Alliance Coordinating Committee. I have been duly authorized by the Coordinating Committee to submit this affidavit on its behalf authorizing the Keystone Alliance to intervene in the Limerick Operating License proceedings before the Nuclear Regulatory Commission. The Keystone Alliance Coordinating Committee further authorizes Alan J. Noguee to represent its interests in those proceedings.

Betsy Wright  
name  
4820 Windsor Ave  
address  
Phila PA 19143

Betsy Wright  
4820 Windsor Ave.  
Philadelphia, PA 19143

Sworn and subscribed before me  
this 22 day of Oct, 1981.

Priscilla Davis  
Notary Public  
Priscilla Davis  
5335 Market St  
PRISCILLA DAVIS  
Notary Public, Phila. Co.  
My Commission Expires Feb 25, 1985.



October 20, 1981

AFFIDAVIT

I, Carl Craft, am a member of the Keystone Alliance and own a home within eight miles of the Limerick Nuclear Power Plant. I am concerned that the operation of the Limerick reactors may result in radioactive releases risking my health, safety, home value, economic security, and might require an evacuation which could prove to be infeasible.

I am concerned as a citizen and a Philadelphia Electric ratepayer that I will be needlessly exposed to these risks because alternative energy sources and conservation are economically feasible.

I hereby authorize Keystone Alliance represented by Alan J. Nogee to represent my interests as intervenor in the Limerick operators' license proceedings before the Nuclear Regulatory Commission (NRC).

Carl Craft

Carl Craft  
470 Saw Mill Court  
Norristown, Pa. 19401



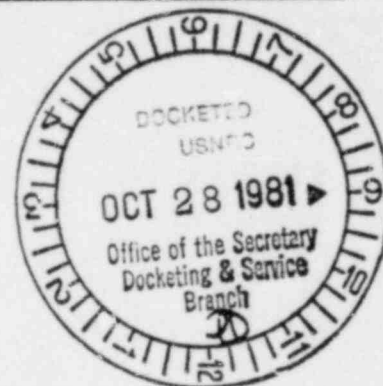
Sworn and Subscribed before me this 21st day of October, 1981.

Mary Lou Hunter

MARY LOU HUNTER, Notary Public  
Reynoldsford Boro., Montg. Co., Pa.

MY COMMISSION EXPIRES MAR. 5, 1984

# THE CREFELD SCHOOL



TO WHOM IT MAY CONCERN

I am a member of the Keystone Alliance living within eighteen miles of the Limerick Power Plants. I am concerned that the operation of the Limerick plants may result in radioactive releases which could affect adversely my health, safety and economic security.

As Headmaster of The Crefeld School in Chestnut Hill, Philadelphia, I am also concerned that current emergency plans would not adequately protect my students from radiological emergency.

I hereby authorize the Keystone Alliance, represented by Alan N. Kogee, to represent my interests as intervenor in the Limerick operating license proceedings before the N.R.C.

Sworn and Subscribed  
before me this

23 day of October 1981

*Hinda Anne Kogee*

LINDA ANNE KOGEE  
Notary Public, Philadelphia, Pa. Co.  
My Comm. Expires March 21, 1983

*Barry E. Trevor*

Barry E. Trevor  
Headmaster  
8836 Crefeld Street  
Philadelphia, Pa. 19118  
October 22, 1981

OCT. 20, 1981

I Dwain K. Jones am a member of KEYSTONE ALLIANCE living within 10 Miles of Limerick. I am concerned that the operation of the Limerick plant may result in radioactive releases which could adversely affect my health and safety and could require evacuation which might prove to be infeasible.

I hereby authorize the KEYSTONE ALLIANCE, represented by Alan J. Neece, to Represent my interests as intervener in the Limerick operating license proceeding before the Nuclear Regulatory Commission.

*Dwain K. Jones 10-21-81*

Dwain K. Jones  
Box 33 RD 1  
Douglasville PA 19518

*Danna M. Mabry, 10-21-81*

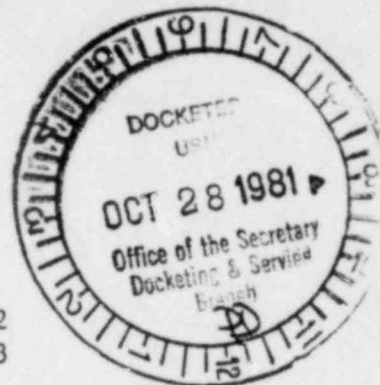
Danna M. Mabry, Notary Public  
Perkiomen Township, Montgomery County  
My Commission Expires Oct. 4, 1992  
Member, Pennsylvania Association of Notaries

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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PHILADELPHIA ELECTRIC COMPANY )  
 )  
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CERTIFICATE OF SERVICE

I hereby certify that copies of Affidavits of Keystone Alliance members and Betsy Wright of the Keystone Alliance Coordinating Committee, along with the Notice of Appearance of Alan J. Nogee, Keystone Alliance representative, in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 26th day of October, 1981:

Lawrence Brenner, Esq., Chairman  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. Frank R. Romano  
Air and Water Pollution Patrol  
61 Forest Ave.  
Ambler, PA 19002

Dr. Richard F. Cole  
Administrative Judge  
U.S. NRC  
Washington, DC 20555

Steven P. Hershey, Esq.  
CEPA  
Sylvania House  
Juniper and Locust Streets  
Philadelphia, PA 19107

Dr. Peter A. Morris  
Administrative Judge  
US NRC  
Washington, DC 20555

Samuel and Clarissa B. Cooper  
P.O. Box 16  
Colora, MD 21917

Atomic Safety and Licensing Board Panel  
US NRC  
Washington, DC 20555

Robert J. Sugarman  
Del-Aware Unlimited, Inc.  
Berle, Butzel, Kass & Case  
2115 Bainbridge St.  
Philadelphia, PA 19146

Atomic Safety and Licensing Appeal Panel  
US NRC  
Washington, DC 20555

Environmental Coalition on Nuclear Power  
Dr. Judith H. Johnsrud, Co-Director  
433 Orlando Ave.  
State College, PA 16801

Docketing and Service Section  
Office of the Secretary  
US NRC  
Washington, DC 20555

Robert L. Anthony  
Friends of the Earth of the Delaware Valley  
103 Vernon Lane, Box 186  
Moylan, PA 19065

Mr. Edward G. Bauer, Jr.  
Vice President & General Counsel  
PECO  
2301 Market St.  
Philadelphia, PA 19101

Steven Levin  
11 Beard Circle  
Phoenixville, PA 19460

Troy B. Conner, Jr., Esq.  
Mark J. Wetterhahn, Esq.  
Conner and Wetterhahn  
1747 Pennsylvania Avenue, NW  
Washington, DC 20006

Mr. Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149

William A. Lochstet  
119 E. Aaron Drive  
State College, PA 16801

Judith A. Dorsey, Esq.  
Limerick Ecology Action  
1315 Walnut St., Suite 1632  
Philadelphia, PA 19107

Donald S. Bronstein, Esq.  
National Lawyers Guild  
Third Floor  
1425 Walnut Street  
Philadelphia, PA 19102

John Shniper, Esq.  
Meeting House Law Bldg. & Gallery  
Mennonite Church Rd.  
Schuylkill Rd. (Rte 724)  
Spring City, PA 19475

Mr. Charles Bruce Taylor  
24 West Tenth Ave.  
Collegeville, PA 19426

Joseph H. White III  
11 South Merion Ave.  
Bryn Mawr, PA 19010

Clarence Wells  
376 S. Sugan Rd.  
New Hope, PA 18938

Charles W. Elliot, Esq.  
123 N. 5th St., Suite 101  
Allentown, PA 18102

Counsel for NRC Staff  
Office of the Executive Legal Director  
US NRC  
Washington, DC 20555

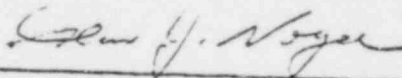
Thomas Gerusky, Director  
Bureau of Radiation Protection  
Department of Environmental Resources  
5th Floor, Fulton Bank Building  
Third and Locust Streets  
Harrisburg, PA 17120

Randall Brubaker, Esq.  
Asstant Counsel  
Commonwealth of Pennsylvania, DER  
Room 1200, 1315 Walnut St.  
Philadelphia, PA 19107

Director  
Pennsylvania Emergency Management Agency  
Basement, Transportation and Safety Bldg.  
Harrisburg, PA 17120

Walter W. Cohen, Esq.  
Consumer Advocate  
Office of Attorney General  
1425 Strawberry Square  
Harrisburg, PA 17120

Respectfully submitted,



Alan J. Noguee  
Keystone Alliance Representative