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\*NOT ADMITTED IN N.Y.

DOCKETED  
USNRC

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(212) 765-1800  
COUNSEL  
STEPHEN A. LEFKOWITZ

October 26, 1981

Nuclear Regulatory Commission  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 50-352, 353 - Limerick Nuclear Plant

Dear Sir:

As directed by your Order dated October 14, 1981, I am enclosing herewith an original and a copy of an affidavit executed by Val Sigstedt authorizing Del-AWARE Unlimited, Inc. to represent him in these proceedings, and describing in particular the nature of his interest, and the way in which it would be affected by the implementation of the project, including those aspects which are different from those originally proposed.

The affidavit of Colleen Wells is being separately mailed to you by or before today's date, and should reach

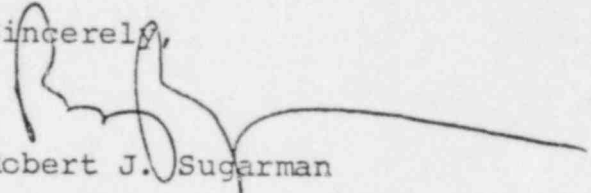
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you in due course.

By copy of this letter, I am serving copies of the enclosed affidavit and the affidavit of Colleen Wells upon other counsel. I enclose a Certificate of Service accordingly.

Sincerely,



Robert J. Sugarman

Enclosures

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :  
Philadelphia Electric Company : Docket ~~DOCKETED~~ 50-352  
: USNRC 50-353  
(Limerick Generating Station, :  
Units 1 and 2) :  
COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF BUCKS :

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AFFIDAVIT

Val Sigstedt, being duly sworn, deposes and says:

1. He is a member of Del-AWARE Unlimited, Inc., that he has authorized Del-AWARE Unlimited to intervene on his behalf in this proceeding.

2. He regularly and frequently utilizes the Delaware River, its environs, and its waters, for the purposes of fishing, boating, swimming, tubing, and other activities both for himself and his family.

3. He also utilizes the river and its environs as part and parcel of his business activities, namely, teaching stained glass making and making such stained glass, for the purpose of obtaining inspiration for himself, his pupils, and his clients, as to the elements of beauty involved in the landscape reproduced as part of stained glass manufacture.

4. He also depends on the character of Bucks County in its present environmentally attractive condition,

rural and attractive to urban areas as a respite, to attract clients, and to provide a location conducive to the promotion and sale of his artistic products.

5. The operation of the Limerick Project as proposed, and the construction as now proposed, having been modified since the construction license was approved, will adversely affect his activities in the following ways:

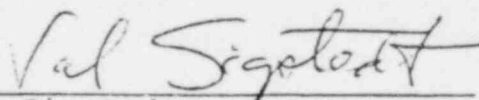
(a) His recreational activities which depend upon the flows of water in the river, the viability of the fishery in the river, and the natural character of the Point Pleasant area, will be substantially and adversely affected by the appearance of the intake, especially the rip-rap walls, the operation of the intake, especially the drawdown of the presently important spawning and nursery area for American shad, the disturbance of the character of the lower Black Eddy as a beauty spot, and a swimmable, fishable area, and the loss of its environs along the Delaware Canal.

(b) His business of teaching and manufacture and sale of artistic products would suffer if the intake is constructed, and renders feasible the plans of the Neshaminy Resources Authority, because the latter will induce conversion of Bucks County from a rural and environmentally attractive area to an urbanized area, thus causing potential clients and students to lose interest in the area, and thus in his artistic production.

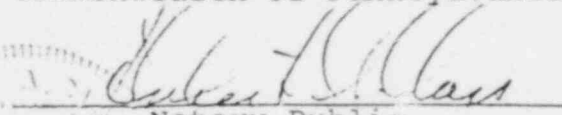
(c) As a person who values, enjoys, and devotes himself to the preservation of the natural environment, he will suffer severe and irreparable injury through the insult to the environment that the intake and its operation present.

6. The changes in the intake location and design since preparation of the original impact statement and issuance of the construction license will materially change and further adversely affect the above interests; in addition, the operation of the project, especially with respect to the drawing rate, will adversely affect him with respect to the above-mentioned values.

7. His home is located down gradient from the Bradshaw Reservoir, and his water supply may be adversely affected by leaching of toxic materials from Bradshaw Reservoir, an issue which was not dealt with in the original impact statement or construction license.

  
Val Sigstedt

Sworn and subscribed to  
before me this 22 day  
of October, 1981, in the  
Commonwealth of Pennsylvania.

  
Notary Public

Notary Public, Doylestown, Bucks Co.  
My Commission Expires May 24, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	:	
	:	
Philadelphia Electric Company	:	Docket Nos. 50-352
	:	50-353
(Limerick Generating Station,	:	DOCKETED
Units 1 and 2)	:	USHRC
	:	
COMMONWEALTH OF PENNSYLVANIA	:	
COUNTY OF BUCKS	:	

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AFFIDAVIT

Colleen Wells, being duly sworn, deposes and says:

1. She is a member of Del-AWARE Unlimited, Inc., and has authorized Del-AWARE Unlimited to represent her as an intervener in these proceedings.

2. She has read the affidavit of Val Sigstedt, and adopts each of the statements therein, as if fully set forth herein. Specifically, she is also an artist in stained glass, and also a user of the river, and its environs, as indicated, and will suffer similar harm from the implementation of the project.

3. In addition to the foregoing, she resides in Pipersville, which is within the vicinity of the proposed Perkiomen transmission main and Perkiomen Creek, and would be adversely affected in her use of the environment of the Perkiomen Creek and in the enjoyment of the natural environment in the Pipersville area by reason of the construction of the proposed transmission main to the Perkiomen, and the dumping

of polluted materials into the Perkiomen Creek. She presently utilizes that environment for purposes of fishing, hiking, and scenic enjoyment, as well as for its value in her business.

\_\_\_\_\_  
Colleen Wells

Sworn and subscribed to  
before me this      day  
of October, 1981, in the  
Commonwealth of Pennsylvania.

\_\_\_\_\_  
Notary Public

DOCKETED  
USNRC

CERTIFICATE OF SERVICE

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PD

I hereby certify that I have served copies of the foregoing affidavits of Val Sigstedt and Colleen Wells by mailing the same at their respective addresses, as follows:

Atomic Safety and Licensing Appeal Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Station  
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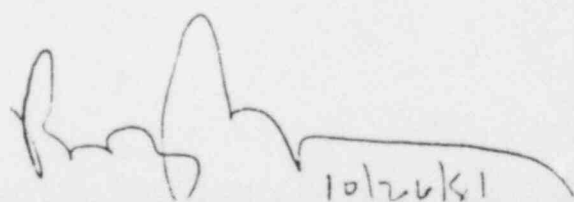
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10/26/81