

AIR and WATER

Pollution Patrol

BROAD AXE, PA.

Nuclear Regulatory Commission Atomic Sefety and Licensing Board Washington, D.C. 20555

In the Matter of

PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station, Units 1 & 2)

OFFICE DA SECULAR DOCKET ING & SERVIT BRANCH
DOCKET NOS. 50-35

RECEIVED

50-353

During the Jan. 6-7-8/82 prehearing conference Judge Lawrence Brenner, for the sake of assuring co-operation in serving the public interest, asked if the Applicant's counsel would consider getting together with the co-ordinated intervenors/and/or intervenors counsel, to iron out points regarding certain aspects of contentions including the PRA.

The Applicant's Counsel refused on the basis that Philadlephia Electric might be caused to reveal a fact or information which the intervenors might then use against P.E. Judge Brenner was correct in generally stating the basis for the hearings is to secure the safety of the public. The Applicant, therefore, should not fear that discussion with intervenors might smoke out information detrimental to the Applicant.

Such information belongs to the public...and inparticular, the Licensing Board, in order to insure the completion of the record as it affects public mafety.

Because P.E. refused to co-operate (with apparent selfish intent), I object to the Licensing Board extending P.E.'s request re the Jan. 29/82 NRC Memorandum and Order re "Applicant's request for Extension of Time".

I object on the basis that I did not receive the above subject matter notice until Fec. 6/82 a day after the extension date.

Further, as it relates to Applicant's letter of 2/3/82 to Mr. A. Schwencer (NRC) re Plant Security Personnel Training and Qualification Plan, the Applicant requests that the "enclosed response be witheld from public disclosure because of safeguards information, and information relating to details of the security plans of a licensed facility."

As an intervenor, I ask the NRC to require of the Applicant a written guarrantee the Applicant will conduct no surveillance that directly or indirectly infringes on the civil rights, privacy, and freedom of movement of the public outside the property limits of the Applicant's proposed Facility.

I certify I have, by first class mail, this day serviced the attached list.

Frank R. Romano 61 Forest Ave. Ambler, Pa. 19002

FRR/jch

D503/0



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Administrative Judge Lawrence Brenner Administrative Judge Richard F. Cole Administrative Judge Peter A. Morris Stephen H. Lewis, Esq. Mr. Charles B. Taylor Mr. Robert L. Anthony Mr. Marvin I. Lewis Samuel and Clarissa B. Cooper Judith A. Dorsey, Esq. Charles W. Elliott, Esq Mr. William Lochstet Mr. Alan J. Nogee Mr. Steven Levin Edward G. Bauer, Jr., Esq. Robert W. Adler, Esq. Mr. Thomas Gerusky Director, Pennsylvania Emergency Management Agency John Shniper, Esq. Steven P. Hershey James M. Neill, Esq. Donald S. Bronstein, Esq. Mr. Joseph H. White, III Dr. Judith H. Johnsrud Walter W. Cohen, Esq. Robert J. Sugarman, Esq. Mr. W. Wilson Goode Atomic Safety and Licensing Appeal Panel Atomic Safety and Licensing Board Panel Docket and Service Section Troy B. Conner, Jr., Esq.