

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

82 JUL 23 AM

In the matter of

PHILADELPHIA ELECTRIC COMPANY

(Limerick Generating Station
Units 1 and 2)

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Docket Nos. 50-352
50-353
OFFICE OF SECRETARY
GENERAL SERVICE
50-353-101CH

REQUEST FOR PRODUCTION OF DOCUMENTS
OF DEL-AWARE UNLIMITED, INC.

Pursuant to the Order of the Atomic Safety and Licensing Board dated June 1, 1982, and the Letter Order dated July 14, 1982, and pursuant to the rules of the Nuclear Regulatory Commission published at 10 C.F.R. § 2.741, Del-AWARE Unlimited, Inc. ("Del-AWARE") hereby requests that the following documents be produced by Philadelphia Electric Company ("PECo"), Applicant in the above-captioned proceedings, for inspection and/or copying by Del-AWARE at a time and place and in a manner to be agreed upon by PECo and Del-AWARE

DEFINITIONS

As used in these Interrogatories the following words shall have the following meanings:

1. "Person" means any individual, corporation, partnership, association, council or similar organization.
2. "Technical Consultant" means a person or entity who has rendered advice or assistance to the Pennsylvania Department of

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Environmental Resources ("DER") on the basis of that person or entity's expertise.

3. "Document" includes any written, recorded or graphic material, however produced or reproduced, including, but not limited to: the original or any copy of books, records, reports, correspondence, memoranda, notes, written communications, telegrams and cables, notes of oral or telephonic communications, diaries, schedules, calendars, graphs, charts, contracts, agreements, releases, appraisals, valuations, estimates, projections, work papers, opinions, studies, analyses, summaries, booklets, circulars, bulletins, instructions, minutes or notes of meetings, resolutions, photographs, tabulations, questionnaires, tapes, surveys, messages, tables, drawings, sketches, financial statements, as well as any other tangible things on which information is recorded in writing or by sound or magnetically or in any other manner and including supporting, underlying or preparatory material.

4. "Identify" when used in reference to a natural person, means to state in the answer in each instance his/her full name, present or last known business address, occupation (including name of present employer) and position, if known.

5. "Identify" when used in reference to a non-natural person, means to set forth a description of the entity, identify its principal place of business, its officers, directors, limited partners, general partners, board or council members, if any.

6. "Identify" when used in reference to a writing or document, means to state in the answer in each instance, (i) the date, type of

document (e.g., letter, memorandum, etc.), author, address, all recipients, title and filing or identifying number, and (ii) the present or last known location and custodian of the document and all copies.

7. "You" or "yours" means PECO, its servants, agents, representatives, and employees or anyone acting on its behalf.

8. "Environmental Report" means The Environmental Report on the Neshaminy Water Supply System, prepared by the Neshaminy Water Resources Authority, Doylestown, Pennsylvania (February 1979) and/or the Environmental Report, Bradshaw Reservoir, Transmission Main, East Branch Perkiomen, and Perkiomen Creeks, prepared by Philadelphia Electric Company (July 1979).

9. "Delaware River Basin Commission Level B Study" means a study by that name prepared by the Delaware River Basin Commission.

INCORPORATION BY REFERENCE

This Request for Production of Documents incorporates by reference the Interrogatories of Del-AWARE Unlimited, Inc. Addressed to Applicant which were served this day on PECO and the other parties to this proceeding, and filed with the Secretary of the Nuclear Regulatory Commission and the Atomic Safety Licensing Board, pursuant to 10 C.F.R. §2.740(b). As used in the following Request for Production of Documents, the term "Interrogatory No. ____" shall mean the designated Interrogatory set forth in the above-described Interrogatories.

DOCUMENTS REQUESTED TO BE

PRODUCED

1. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 1 (a)-(i), or which PECO referred to or relied on in responding to such Interrogatory.
2. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 2 (a)-(d), or which PECO referred to or relied on in responding to such Interrogatory.
3. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 3, or which PECO referred to or relied on in responding to such Interrogatory.
4. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 4 (a)-(e), or which PECO referred to or relied on in responding to such Interrogatory.
5. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 5 (a)-(f), or which PECO referred to or relied on in responding to each Interrogatory.

6. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 6 (a)-(f), or which PECO referred to or relied on in responding to such Interrogatory.
7. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 7 (a)-(b), or which PECO referred to or relied on in responding to such Interrogatory.
8. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 8 (a)-(b), or which PECO referred to or relied on in responding to such Interrogatory.
9. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 9, or which PECO referred to or relied on in responding to such Interrogatory.
10. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 10, or which PECO referred to or relied on in responding to such Interrogatory.

11. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 11, or which PECO referred to or relied on in responding to such Interrogatory.
12. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 12, or which PECO referred to or relied on in responding to such Interrogatory.
13. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 13, or which PECO referred to or relied on in responding to such Interrogatory.
14. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 14 (a)-(b), or which PECO referred to or relied on in responding to such Interrogatory.
15. Any and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 15, or which PECO referred to or relied on in responding to such Interrogatory.

and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 16, or which PECO referred to or relied on in responding to such Interrogatory.

and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 17 (a)-(b), or which PECO referred to or relied on in responding to such Interrogatory.

and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 18, or which PECO referred to or relied on in responding to such Interrogatory.

and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 19, or which PECO referred to or relied on in responding to such Interrogatory.

and all documents which refer or relate to, discuss, describe, record or contain the information requested in Interrogatory No. 20, or which PECO referred to or relied on in responding to such Interrogatory.

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CERTIFICATE OF SERVICE

'82 JUL 23 AM 11:00

I hereby certify that I have served copies of the foregoing Request of Del-Aware Unlimited, Inc. for of Documents by hand delivering or mailing the same to the following persons:

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH *emp*

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Robert J. Sugarman