

08/04/82

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)

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Docket Nos. 50-352
50-353

NRC STAFF RESPONSE TO INTERROGATORIES OF DEL-AWARE UNLIMITED,
INC. ADDRESSED TO THE NUCLEAR REGULATORY COMMISSION STAFF AND
REQUEST OF DEL-AWARE UNLIMITED, INC. FOR PRODUCTION OF DOCUMENTS

On July 21, 1982, Del-Aware Unlimited, Inc. filed Interrogatories on the Staff, by which Del-Aware sought information concerning the Staff's evaluation of the Point Pleasant diversion during the AEC/NRC proceeding on the application of Philadelphia Electric Company for a construction permit for the Limerick Generating Station.

On that same day, Del-Aware filed a request for the production of documents by which Del-Aware requested Staff to produce all documents relating to the Staff's evaluation of the Point Pleasant diversion during the AEC/NRC proceeding on PECO's application for a construction permit for the Limerick Station.

In accordance with the telephone conference call between the Board and counsel for PECO, Del-Aware and Staff on August 2, 1982, Staff counsel has discussed with Del-Aware its objections to Del-Aware's Interrogatories and Request for Production of Documents. On the basis of this discussion, it was agreed that the documents identified on Attachment 1 hereto are responsive to and satisfy Del-Aware's Interroga-

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tories and document request. By voluntarily producing the documents identified, the Staff does not waive its objections as to their relevance vis-a-vis the contentions admitted in this proceeding or to the future need to comply with the Commission's regulations respecting discovery of the Staff.

Accordingly, the Staff is producing copies of the documents on the attached list to Del-Aware. Copies of the NRC Staff response, together with Attachment 1, are being sent to all persons on the service list.

Respectfully submitted,

Ann P. Hodgdon

Ann P. Hodgdon
Counsel for NRC Staff

Elaine I. Chan

Elaine I. Chan
Counsel for NRC Staff

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Dated at Bethesda, Maryland
this 4th day of August 1982

NRC STAFF LIST OF DOCUMENTS SUPPLIED IN
RESPONSE TO DEL-AWARE INTERROGATORIES

1. NRC Staff's rebuttal testimony concerning consideration of the Point Pleasant Diversion, February 28, 1974.
2. Local Public Document Room Accession List, February 27, 1970 through January 6, 1976.
3. Limerick Constructin Permit Hearing Trascript 3569-3667 (Cross-examination and recross-examination of Alvin R. Lyle, Robert L. Mann and Robert Leslie Goodell).
4. AEC Regulatory Staff's Proposed Findings of Fact and Conclusions of Law (CP Stage Hearing), pages 17-36b.
5. Final Environmental Statement, Limerick Generating Station, Units 1 and 2, November 1973. USAEC, pages ii, iii, v, vi, 1-3 - 1-6, 5-1 - 5-18, 13-1 - 13-8, 13-11, 13-20 - 13-21, 14-1 - 14-4, 14-8, Appendix B, Appendix C, Appendix F: 14-23, Appendix H: 1-4, 7-46, 73-78, 99-140, Appendix I: 1-18, 21-27, 32-46, 56, 63-68.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO INTERROGATORIES OF DEL-AWARE UNLIMITED, INC. ADDRESSED TO THE NUCLEAR REGULATORY COMMISSION STAFF AND REQUEST OF DEL-AWARE UNLIMITED, INC. FOR PRODUCTION OF DOCUMENTS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 4th day of August 1982:

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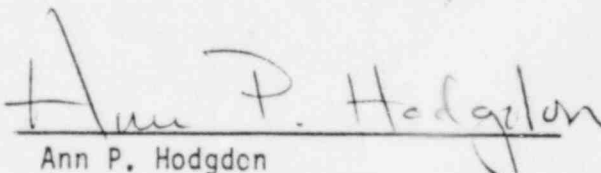
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Atomic Safety & Licensing Appeal
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