### BEFORE THE

# UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of : Docket Nos. 50-352

PHILADELPHIA ELECTRIC COMPANY : 50-353

AMENDMENT NO. 38

TO

LICENSE APPLICATION OF

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION UNITS NO. 1 and 2

Edward G. Bauer, Jr. Eugene J. Bradley

2301 Market Street Philadelphia, Pennsylvania 19101

Attorneys for Philadelphia Electric Company

### BEFORE THE

### UNITED STATES NUCLEAR REGULATORY COMMISSION

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AMENDMENT NO. 38

TO

# LICENSE APPLICATION OF PHILADELPHIA ELECTRIC COMPANY

Applicant, Philadelphia Electric Company, hereby amends its Application in the above-entitled proceeding by making the deletions, substitutions and additions to the Plant Security Personnel Training and Qualification Plan shown on the document entitled "Plant Security Personnel Training and Qualification Plan, Revision 2 Page Changes," dated August, 1982, which is filed herewith and incorporated herein by reference. Revisions to the document are indicated by a bar in the right margin of the Plan pages.

Pursuant to Section 2.790(d) of the Commission's regulations, it is hereby requested that the revisions to the Personnel Training and Qualification Plan be withheld

from public disclosure. In support of its request for withholding from public disclosure, Applicant states:

The revisions to the Personnel Training and Qualification
Plan which are sought to be withheld from public disclosure
contain Safeguards Information and details relating to the
physical security plans for Limerick Generating Station.

The information set forth in the revisions to the

Personnel Training and Qualification Plan has been treated

as confidential and proprietary information and has been

withheld from public disclosure by Applicant in accordance

with Applicant's practice of treating all information

dealing with Safeguards Information and the details of security

plans and procedures and information which could be used to

compromise the security and safety of its facilities as

confidential and proprietary information.

The information in the revisions to the Personnel

Training and Qualification Plan should be considered by the

Nuclear Regulatory Commission as confidential and proprietary
information and be withheld from public disclosure on the
grounds that it contains Safeguards Information, it contains
details relating to the physical security plans and procedures
of a licensed facility, it contains detailed information
which could be used to compromise the safety and security of

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the facility, such disclosure is not required in the public interest, and such disclosure would adversely affect the interests of Applicant.

> Respectfully submitted, PHILADELPHIA ELECTRIC COMPANY

By: Y. S. Boye
Senior Vice President

COMMONWEALTH OF PENNSYLVANIA

SS.

COUNTY OF PHILADELPHIA

V. S. BOYER, being first duly sworn, depos s and says:

That he is Senior Vice President of Philadelphia

Electric Company, the Applicant herein; that he has read the
foregoing Amendment No. 38, including the request by Applicant
to withhold the revisions to the Personnel Training and
Qualification Plan from public disclosure, and knows the
contents thereof; and that the statements and matters set
forth therein are true and correct to the best of his
knowledge, information and belief.

V. S. Boyer

Subscribed and sworn to before me this 3157 day of August , 1982.

Notary Public

My Commission Expires July 28, 1983

#### BEFORE THE

### UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of : Docket Nos. 50-352

PHILADELPHIA ELECTRIC COMPANY : 50-353

(Limerick Generating Station Units 1 and 2)

# CERTIFICATE OF SERVICE

I hereby certify that copies of Amendment No. 38 to the License Application of Philadelphia Electric Company in the above-captioned matter, but not including Revision 2 to the Plant Security Personnel Training and Qualification Plan were served on the following by deposit in the United States mail, first class postage prepaid on this 31st day of August, 1982.

Administrative Judge Lawrence Brenner Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge Richard F. Cole Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 Stephen H. Lewis, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Troy B. Conner, Jr., Esq. Conner & Wetterhahn 1747 Pennsylvania Ave. N.W. Washington, D.C. 20006 . Judith H. Johnsrud -Director ECNP - Orlando Avenue - uce College, PA 16801

Donic Safety and Licensing
Board Panel
G. Nuclear Regulatory Comm.
Shington, D.C. 20555

Frank R. Romano Forest Avenue Dler, PA 19002

mes M. Neill, Esquire x 511

South Merion Avenue
Mawr, PA 19010

arles W. Elliott, Esquire W. 5th St., Suite 101 Lencown, PA 18102

Alan J. Nogee
Go Chestnut Street
Lladelphia, PA 19104

Walnut Street
Lladelphia, PA 19102

Accurate W. Adler, Esquire

Listant Counsel

Conwealth of Penna., DER

Conceptive House, P.O. Box 2357

Coloury, PA 17120

Thomas Gerusky, Director

and of Radiation Protection

of Environmental Resources

Floor, Fulton Bank Building

and Locust Streets

Lisburg, PA 17120.

Docketing and Service Section U.S. Nuclear Regulatory Comm. Washington, D.C. 20000

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

Mr. W. Wilson Goode, Managina Director 1620 Municipal Svcs. Building Philadelphia, PA 19107 Mr. Marvin I. Lewis 6504 Bradford Terrace Philadelphia, PA 19149

Judith A. Dorsey, Esquire 1315 Walnut Street, Suite 1631 Philadelphia, PA 19107

Steven Hershey, Esquire Community Legal Services, Inc Law Center North Central Beury Building 3701 N. Broad Street Philadelphia, PA 19140

Mr. Robert L. Anchony 103 Vernon Lane, Box 186 Moylan, PA 19065

> Robert J. Sugarman, Esquire Sugarman & Denworth Suite 510 North American Building 121 S. Broad Street Philadelphia, PA 19107

Walter W. Cohen, Esquire Consumer Advocate Office of Attorney General 1425 Strawberry Square Harrisburg, PA 17120 Director
Pennsylvania Emergency Management
Agency
Basement, Transportation & Safety Bldg.
Harrisburg, PA 17120

Eugene J. Bradley

Attorney for

Philadelphia Electric Company

2301 Market Street Philadelphia, PA 19101