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ADMITTED IN PA.

September 20, 1982

ROBERT J. SUGARMAN
JOANNE R. DENWORTH

Secretary
Nuclear Regulatory Commission
ATTN: Chief Docketing & Service Branch
Washington, DC 20555

RE: Application Philadelphia
Electric Co. Docket #50-352

Dear Sir:

Enclosed for filing is Del-AWARE Unlimited's Pre-trial Brief, Exhibits, and the direct testimony of Del-AWARE's witnesses, with the exceptions noted here.

The proposed direct testimony Messrs. Richard McCoy and Joseph Miller are not available to Del-AWARE. Both witnesses are employees of the Federal Government, and although they have been authorized to testify before the Board, their testimony has not been approved by U.S. Fish & Wildlife Service. Accordingly, Del-AWARE has no capability to provide direct testimony for these witnesses at this time. Del-AWARE anticipates the direct testimony will be available shortly, and it will be furnished to the Commission immediately.

Also, the direct testimony of Samuel Landis has been lost in the mail, and while efforts are being made to locate another copy for duplicating and service, it may not be possible to do so until September 21 or 22. Therefore, we request the opportunity to file this testimony slightly late as indicated.

The testimony of John Phillipi is being separately delivered to the Commission today.

Sincerely,



Robert J. Sugarman

enclosures
RJS/vf
cc: Service List