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ROBERT J. SUGARMAN

JOANNE R. DENWORTH

November 11, 1982

Mr. Harold Denton
Division of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Application of Philadelphia Electric
Company No. 50-352, 50-353

Dear Mr. Denton:

Enclosed is Del-AWARE's Supplement to its Petition under Sections 2.202 and 2.206 of the Regulations in the above matter. The Supplement is simple and direct, and the documentation attached is all documentation that has been available to the Staff since Del-AWARE filed its Pre-Hearing documents in the OL Preliminary Proceeding.

Once again, as you know, the clock is running, and has been running since January 5, 1981 on the staff's action with regard to depletive effects, and also, since July 2, 1982 on our Petition. The staff's inaction on this matter and failure to issue an Order to Show Cause, providing opportunity for appropriate and timely adjudication, is indeed unfortunate and intolerable.

In addition to the documents enclosed, I would direct the staff's attention to the testimony at the hearing provided by Messrs. Phillipi, McCoy, Miller, Kaufman and Emery, relating to aquatic impacts, and to the results to the staff's site visits.

As indicated in their reviews, the Corps of Engineers made no review of the effects of construction to the land site of River Road, and completely failed to note the 80 foot high construction less than 100 feet from the National Historic Landmark (the pumphouse).


Mr. Harold Denton

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November 10, 1982

I would appreciate hearing from you, to avoid the necessity for further action.

Sincerely,



Robert J. Sugarman

RJS/vc

Enclosures