

7/28
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'83 SEP 30 A11:46

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
Philadelphia Electric Company)
(Limerick Generating Station,)
Units 1 and 2))

Dockets nos. 50-352
50-353

MOTION TO REWORD CONTENTION I-62 IN RESPONSE TO THE BOARD'S
M & O OF SEPTEMBER 13, 1983.

Due to material disclosed during discovery , Intervenor Lewis
motions the Board to accept rewording of Contention I-62 as
follows:

REWORDED CONTENTION I-62.

Staff's dependence upon a comparison of Limerick to PWRs in which PTS
has been studied in order to develop its low probability for PTS
failure at Limerick, is not justified. An operating license should not
be issued without a full engineering analysis of PTS at Limerick, since
PTS can cause a major breach of containment , which is an accident
beyond the design basis.

Please accept this filing as the formal report specified in the
M & O of September 13, 1983. Formal reports on items specifically agreed
to in two separate telephone conference calls with this Intervenor
relating to litigation schedule are being submitted by the Staff.

Respectfully submitted,

Marvin I. Lewis
Marvin I. Lewis

CERTIFICATE OF SERVICE

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I certify that the foregoing Motion to Reword Contention
I-62 in Response to the Board's M & O of September 13, 1983
was served upon the following by mail, first-class postage
prepaid:

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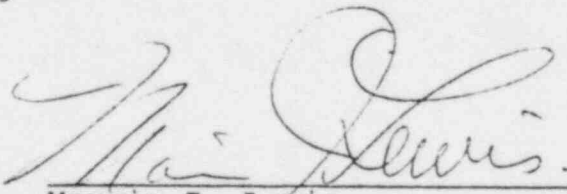
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September 28, 1983