

CITY OF PHILADELPHIA

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BRJULY 5, 1984

Administrative Law Judge Lawrence F. Brenner Administrative Law Judge Richard F. Cole Administrative Law Judge Peter A. Morris United States Nuclear Regulatory Commission Washington, D.C. 20555

> RE: IN THE MATTER OF: PHILADELPHIA ELECTRIC COMPANY (Limerick Generating Station Units 1 and 2) DOCKET NOS. 50-352, 50-353

Dear Sirs:

Pursuant to the direction of the Board, I am submitting the following memo containing the City's issues in the area of emergency planning with transcript references.

CITY - 18

The State Plan is inadequate in the area of emergency planning because in the plan there is no adequate implementable plan for providing an alternate source of water for the City of Philadelphia which is appropriate to the locale of Philadelphia and which gives consideration to the PAG guidelines, namely, substitution of other drinking water sources, importation of water, rationing, substitution of other beverages and designation of critical users. "Implementable plan" includes consideration of ability to implement in which is included resources available.

CITY - 19

The State Plan is inadequate in the area of emergency planning because in the plan there is no adequate implementable plan or implementable alternatives and methods for decontamination of the City's water supply and water supply system. "Implementable plan" includes consideration of ability to implement in which is included resources available.

8407100237 840705 PDR ADOCK 05000352 PDR PDR LAW DEPARTMENT 15th Floor, Municipal Services Building Philacelphia, Pa. 19102

BARBARA W. MATHER City Solicitor

HERBERT SMOLEN Deputy City Solicitor (215) 686-5251

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Administrative Law Judge Lawrence F. Brenner Administrative Law Judge Richard F. Cole Administrative Law Judge Peter A. Morris Page 2 7-5-84

TRANSCRIPT REFERENCES JUNE 20, 1984

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Very truly yours,

HERBERT SMOLEN Deputy City Solicitor

HS:ddb

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION ATOMIC SAFETY AND LICENSING BOARD BEFORE THE ADMINISTRATIVE JUDGES

Lawrence Brenner, Chairman Dr. Richard F. Cole Dr. Peter A. Morris

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In the Matter of:

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352-OL 50-353-OL

(Limerick Generating Station, Units 1 & 2)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing letter has been served on the following persons named on the attached service list by hand delivery or by Federal Express Mail, or by causing the same to be deposited in envelopes addressed to said persons, first class, postage prepaid, and deposited with the United States Postal Service at Philadelphia, Pennsylvania.

Respectfully submitted,

1. Time

HERBERT SMOLEN Deputy City Solicitor

DATED: July 5, 1984