SUGARMAN, DENWORTH & HELLEGERS

ATTORNEYS AT LAW

ROBERT J. SUGARMAN

JOANNE R. DENWORTH

JOHN F. HELLEGERS

ROBIN T. LOCKE

16TH FLOOR, CENTER PLAZA

101 NORTH BROAD STREET

PHILADELPHIA, PENNSYLVANIA 19107

(215) 751-9733

SUITE 835

1201 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20004

(202) 737-4460

ROBERT RAYMOND ELLIOTT, P. C.*
COUNSEL

*NOT ADMITTED IN PA.

'84 JUL 27 P3:05

July 13 1984

Honorable Nunzio Palladino
Chairman
Nuclear Regulatory Commission
Washington, DC   20555

Re: Application of Philadelphia Electric Co.
No. 50-352, 50-353 OL

Dear Mr. Palladino:

Enclosed is correspondence directed to the Licensing
Board and the Appeal Board, in an effort to get some recognition
by the NRC of its duties with respect to the Limerick Generating
Station, and supplemental water. This will supplement our letter
of May 23, 1984.

As stated in that letter, the staff has had a secret
contact with PECo regarding this matter, which, contrary to
practice and regulations, was not documented. In fact, the staff
explicitly promised to contact PECo before "a formal contact".

Action must be taken at some level to create a
responsible approach to this problem, and we earnestly request
that you do so.

In this connection, please be advised that on June 18,
1984, the Pennsylvania Environmental Hearing Board determined
that the water diversion is subject to the Clean Water Act in
regard to the discharge of diverted water into a creek on its way
to Limerick. In our understanding, this will require that PECo
design and build a sewage treatment plant in order to comply with
water quality standards, which our engineers project will take at
least two and possibly five years. This must be done before the
diversion can be operated.

DS03

Hon. Nunzio Palladino   2   July 13, 1984

    In these circumstances, we earnestly call upon the
Commission to direct that PECo pursue alternative sources of
water, unless it wishes the NRC to adjust the schedules for
Limerick accordingly.

                        Sincerely,

                        Robert J. Sugarman

rll.rjs/sp
enclosures
cc: the service list