

RELATED CORRESPONDENCE
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PHILADELPHIA ELECTRIC COMPANY)
(Limerick Generating Station,)
Units 1 and 2))

Docket No. 50-352
50-353

COLLECTED
USNR

'84 NOV -6 A11:43

OFFICE OF REGULATORY AFFAIRS
REQUEST OF LIMERICK ECOLOGY ACTION FOR ISSUANCE OF A
SUBPOENA TO OBTAIN THE TESTIMONY OF MR. MORELAND BOLLINGER,
PRESIDENT OF THE OWEN J. ROBERTS TEACHERS ASSOCIATION ON
OFF-SITE EMERGENCY PLANNING CONTENTIONS

Pursuant to 10.CFR § 2.720, Limerick Ecology Action respectfully requests the Atomic Safety and Licensing Board to issue a subpoena to Mr. Moreland Bollinger, President of the Owen J. Roberts Teachers Association so that the attached letter may become his testimony in this proceeding on off-site emergency planning contentions. Mr. Bollinger's address is:

Moreland Bollinger
Owen J. Roberts Senior High School
Route 23, RD#1
Pottstown, Pa. 19464 (215-469-6162 work, 215-469-9589 home)

LEA attempted to obtain written testimony from Mr. Bollinger on behalf of the Teachers Association on school related contentions in this proceeding. His prepared statement is attached, but he prefers to be subpoenaed to present this statement as his testimony, if the Licensing Board grants LEA's request to issue a subpoena.

Therefore Limerick Ecology Action respectfully requests the approval of a subpoena so that Mr. Bollinger may appear as a witness on behalf of Limerick Ecology Action to inform the parties to this proceeding on matters relevant to contentions LEA-12 and LEA-14.

Respectfully submitted,

Phyllis Zitze

Phyllis Zitze
President of LEA

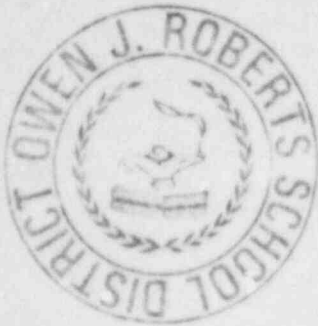
November 2, 1984

Mr. Bollinger is requested to appear at the United States Customs Court House, Second and Chestnut Streets (Room 300) in Philadelphia on November 26, 1984 starting at 9:00 A.M. and will be on 24 hour phone alert standby every day thereafter until called to testify on behalf of Limerick Ecology Action on school related off-site emergency planning contentions.

cc: Service List

Subpoena forms sent only to Board

8411060626 841102
PDR ADOCK 05000352
G PDR



Owen J. Roberts School District

Owen J. Roberts High School
R. D. 1, Pottstown, Pennsylvania 19464
Telephone (215) 469-6261

November 1, 1984

Chairman Helen Hayt
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Hayt:

My name is Moreland Bollinger. I am the President of the Owen J. Roberts Teachers Association. I have been a Social Studies teacher at Owen J. Roberts for nineteen years. My professional background includes the presidency of our local association for the past year, negotiation chairperson for six years prior to that, and a member of the negotiation team for fourteen years.

The concern of our association is that a plan for emergency action will be passed without specific knowledge of the number of supervisory personnel available to deal with the students. Since there has been no specific duty assignment, time period, or location, finalized, our staff has not been able to make a commitment. Our contract only delineates the normal school day, and the issue here is after school hours either on or off campus. Furthermore, there are no designated responsibilities. I feel no plan should be approved until problems such as the above, have been adequately resolved. At the current time this issue is not being addressed in our preparation for a new contract.

Sincerely,

A handwritten signature in cursive script that reads "Moreland Bollinger".

Moreland Bollinger
President N.E.A.