



# CITY OF PHILADELPHIA

LAW DEPARTMENT  
15th Floor, Municipal Services Building  
Philadelphia, Pa. 19102

BARBARA W. MATHER,  
City Solicitor

TERI R. SIMON,  
Assistant City Solicitor  
(215) 686-5246

DOCKETED  
USNRC

'84 SEP -5 P1:32

August 31, 1984

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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 0/

Dear Sirs:

Pursuant to the Board's Order dated August 15, 1984 which requires, inter alia, a submittal to the Board by September 6, 1984 relating to the narrowing and focusing of admitted issues and contentions and reports of any settlements, the City of Philadelphia respectfully submits the following:

On August 30, 1984 representatives of Applicant and the City, and representatives of other interested parties met. At the meeting, Applicant handed to the City representatives present a copy of letter purporting to contain Applicant's position and analysis with respect to City Issues 18 and 19. This letter is being reviewed by appropriate City officials and response will be made thereto in due course.

Accordingly, as of this time, the City's Issues of Concern remain the same, i.e.,

- (18). Emergency planning in the Ingestion Exposure Pathway is inadequate, and 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

8409060265 840831  
PDR ADOCK 05000352  
PDR  
e

DS03

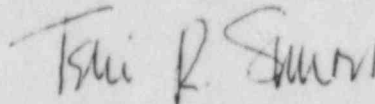
Administrative Law Judge Lawrence F. Brenner  
Administrative Law Judge Richard F. Cole  
Administrative Law Judge Peter A. Morris  
August 31, 1984  
Page 2

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.

- (19). Emergency planning in the Ingestion Exposure Pathway is inadequate, and 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.

We will keep the Board apprised if any settlements are reached.

Very truly yours,



TERI R. SIMON  
Assistant City Solicitor

TRS

cc: To all parties

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

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.

*Teri R Simon*

TERI R. SIMON  
Assistant City Solicitor

DATED: August 31, 1984