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November 21, 1984

Mr. Harold Denton  
Director  
Division of Nuclear Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Application of Philadelphia Electric Co.  
No. 52-352, 52-353 OL

Dear Mr. Denton:

On various occasions, most recently September 13, 1984, you considered and rejected the requests of Del-AWARE, Unlimited, Inc. that the Commission consider and direct PECO to provide information regarding alternative sources of supplemental cooling water for operation of Limerick. Your refusal was based, among other things, upon the fact that, as you believed, the Company had given no indication of any intent to consider or utilize alternative sources of supplemental cooling water.

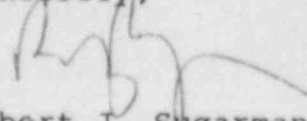
I enclose a copy of a letter from J.F. Paquette to Mr. Jerry Rich, Secretary of Pennsylvania PUC, dated October 30, 1984, stating that the Limerick Unit I will go into operation during the third quarter of 1985, at the earliest, "if an interim source of supplemental cooling water is available by May, 1985".

With this disclosure by PECO of its intent to utilize an interim source of supplemental cooling water, I believe the Commission staff should now require that PECO provide to the Commission a full disclosure of its intended sources, and the environmental consequences thereof, prior to issuing the full commercial license.

Please consider this a renewed and amended and updated petition under Section 2.206.

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PDR ADOCK 05000352  
P PDR

Sincerely,

  
Robert J. Sugarman

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Enclosure

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S. J. & H.

PHILADELPHIA ELECTRIC COMPANY

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Dave  
General  
OCA

JOSEPH F. PAQUETTE, JR., VICE PRESIDENT  
FINANCE AND ACCOUNTING DEPARTMENT

October 30, 1984

Mr. Jerry Rich, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17120

Re: Philadelphia Electric Company Limerick  
Nuclear Generating Station Investigation  
Docket No. I-80100341

Dear Mr. Rich:

In accordance with the Commission Order of February 22, 1984 at Docket No. I-80100341, notification is hereby given of a deviation from cost projections for Limerick #1 and Common Plant.

On October 26, 1984, a Low Power (5%) Operating License for Limerick Unit #1 was issued by the Nuclear Regulatory Commission. The Company is proceeding with fuel loading and expects to start-up the reactor in December.

Low Power Licensing of Unit #1 occasioned a new review of the remaining steps to achieve commercial operation. As a result we now estimate that the earliest date for commercial operation of Limerick Unit #1 will be during the Third Quarter of 1985, if an interim supply of supplemental cooling water is available by May 1985. This represents a revision of two to five months from the previous estimate of the earliest commercial operation date and will result in an increase in the total cost of Limerick Unit #1 of approximately \$30 million per month.

The Company will provide a revised schedule of milestones and revised estimated costs, together with explanations thereof, as a part of the next Bimonthly Report to be submitted to the Commission by November 30, 1984.

A copy of this letter has been provided to the Office of Consumer Advocate.

Sincerely,

*J. F. Paquette*