

Exelon Nuclear
Limerick Generating Station
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Sanatoga, PA 19464

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September 19, 2003

Ms. Jennifer Fields
Department of Environmental Protection
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

Re: Limerick Generating Station, Units 1 & 2
Draft Bradshaw Reservoir NPDES Permit PA0052221

Dear Ms. Fields:

This letter is to provide the following comments to the referenced draft permit.

Page 2 of the draft permit has an effective date range of 2/15 to 7/31 for the Dissolved Oxygen limit. The current permit has an effective date range of 5/1 to 9/30 for the same parameter. We suggest the effective date for the Dissolved Oxygen be changed to reflect the current permit range of 5/1 to 9/30.

Page 15 Part C Other Requirements, the frequency of the analyses for the listed parameters is not specified. The current permit has the analyses being completed annually, and we suggest this frequency be maintained.

Page 15 Part C Other Requirements, Exelon would like the specified test methods removed, and the requirement to be specified as "methods contained in 40 C.F.R. Part 136 or other approved methods".

Exelon would also request a provision be added to Part C Other Requirements which states when the water quality criteria for E. coli has been approved, the limits for Outfall 001 may be converted to E. coli water quality standard for TSF listed in Title 25 Chapter 93 with concurrence of the Department.

A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC) in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2, which stipulates that the USNRC shall receive a copy of any proposed changes to the NPDES permit at the same time that the permitting agency is notified.

If you have any questions or require additional information, please contact Mr. Tracy Siglin at 610-765-5904 or Mr. Todd Tierney at 610-718-2701

Sincerely;



Ronald J. DeGregorio
Vice President, Limerick Generating Station

Cc: U.S. Nuclear Regulatory Commission, Document Control Desk
H. J. Miller, Administrator, USNRC, Region 1
A. L. Burmitt, USNRC Senior Resident Inspector, LGS

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