



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 11, 2013

Mr. Michael P. Gallagher
Vice President License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: ISSUANCE OF ENVIRONMENTAL SCOPING SUMMARY REPORT
ASSOCIATED WITH THE STAFF'S REVIEW OF THE APPLICATION BY
EXELON GENERATION COMPANY, LLC FOR RENEWAL OF THE
OPERATING LICENSE FOR LIMERICK GENERATING STATION, UNITS 1
AND 2

Dear Mr. Gallagher:

The U.S. Nuclear Regulatory Commission (NRC or the staff) conducted an environmental scoping process and solicited public comments from August 26 to October 28, 2011. This process determined the scope of the staff's environmental review of the application for renewal of the operating license for Limerick Generating Station, Units 1 and 2 (LGS). The scoping process is the first step in the development of a plant-specific supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS), for LGS.

As part of the scoping process, the staff held two public meetings in Pottstown, PA on September 22, 2011, to solicit public input regarding the scope of the review. The staff also received written comments by letter, e-mail, and through www.Regulations.gov. At the conclusion of the scoping process, the staff prepared the enclosed environmental scoping summary report identifying comments received during the scoping period. In accordance with Section 51.29(b) of Title 10 of the *Code of Federal Regulations* (10 CFR) the staff will send a copy of the scoping summary report to all participants in the scoping process.

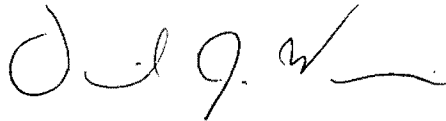
The transcripts of the public scoping meetings are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. The transcripts for the afternoon and evening meetings are listed under ADAMS accession numbers ML11287A207 and ML11287A211, respectively. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at pdr.resource@nrc.gov.

M. Gallagher

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The draft supplement to the GEIS is scheduled to be issued in March 2013. A notice of the availability of the draft document and the procedures for providing comments will be published in the *Federal Register*. If you have any questions concerning the staff's environmental review of this license renewal application, please contact the Project Manager, Ms. Leslie Perkins, at 301-415-2375 or by e-mail at Leslie.Perkins@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. J. Wrona', with a stylized flourish at the end.

David J. Wrona, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-352 and 50-353

Enclosure:
As stated

cc w/encl: Listserv

M. Gallagher

- 2 -

The draft supplement to the GEIS is scheduled to be issued in March 2013. A notice of the availability of the draft document and the procedures for providing comments will be published in the *Federal Register*. If you have any questions concerning the staff's environmental review of this license renewal application, please contact the Project Manager, Ms. Leslie Perkins, at 301-415-2375 or by e-mail at Leslie.Perkins@nrc.gov.

Sincerely,

/RA/

David J. Wrona, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-352 and 50-353

Enclosure:
As stated

cc w/encl: Listserv

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NMcNamara, RI

ADAMS Accession No.: ML12131A499

***Concurred via email**

OFFICE	LA:DLR*	PM:DLR/RPB1	OGC* (NLO)	BC:DLR/RERB	BC:DLR/RPB1
NAME	IKing	LPerkins	MSmith	MWong	DWrona
DATE	6/12/12	10/25/12	11/ 5/12	12/11/12	3/11/13

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**Environmental Impact Statement
Scoping Process**

Summary Report

**Limerick Generating Station
Pottstown, PA**

March 2013



**U.S. Nuclear Regulatory Commission
Rockville, Maryland**

ENCLOSURE

Introduction

The U.S. Nuclear Regulatory Commission (NRC) received an application from Exelon Generation Company, LLC (Exelon), dated June 22, 2011, for renewal of the operating license for Limerick Generating Station, Units 1 and 2 (LGS). LGS is located in Pottstown, PA, about 35 miles from Philadelphia, PA. The purpose of this report is to provide a concise summary of the determinations and conclusions reached, including the significant issues identified, as a result of the scoping process in the NRC staff's environmental review of this license renewal application.

As part of the application, Exelon submitted an environmental report (ER) (Exelon 2011) prepared in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, which contains the NRC requirements for implementing the National Environmental Policy Act of 1969 (NEPA). The requirements for preparation and submittal of ERs to the NRC are outlined in 10 CFR 51.53(c)(3).

The requirements in Section 51.53(c)(3) were based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS) (NRC 1996; NRC 1999). In the GEIS, the staff identified and evaluated the environmental impacts associated with license renewal. After issuing a draft version of the GEIS, the NRC staff received and considered input from Federal and State agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be generic to all nuclear power plants (or, in some cases, to plants having specific characteristics such as a particular type of cooling system). These generic issues were designated as "Category 1" impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts unless there is new and significant information that may cause the conclusions to differ from those of the GEIS. Other impacts that require a site-specific review were designated as "Category 2" impacts and are required to be evaluated in the applicant's ER. The Commission determined that the NRC does not have a role in energy-planning decision making for existing power plants. Therefore, an applicant for license renewal need not provide an analysis of the need for power or the economic costs and benefits of the proposed action. On August 26, 2011, the NRC initiated the scoping process by issuing a *Federal Register* Notice (76 FR 53498). This notified the public of the staff's intent to prepare a plant-specific supplement to the GEIS regarding the application for renewal of the LGS operating licenses. The plant-specific supplement to the GEIS is also referred to as the Supplemental Environmental Impact Statement or SEIS. The SEIS will be prepared in accordance with 10 CFR Part 51.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the SEIS and to highlight public concerns and issues. The notice of intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the SEIS and identify significant issues to be analyzed in depth
- Identify and eliminate peripheral issues

- Identify any environmental assessments (EAs) and other environmental impact statements being prepared that are related to the SEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the SEIS
- Identify any cooperating agencies
- Describe how the SEIS will be prepared

The NRC's proposed action is whether to renew the LGS operating licenses for an additional 20 years.

The scope of the SEIS includes an evaluation of the environmental impacts of license renewal and reasonable alternatives to license renewal. The "Scoping Comments and Responses" section of this report includes specific issues identified by the comments. The subsequent NRC responses explain if the issues will be addressed in the SEIS and, if so, where they will likely be addressed.

Throughout the scoping process, the NRC staff identified and eliminated peripheral issues. This report provides responses to comments that were determined to be out of the scope of this review. Those that were considered to be in scope will be evaluated in detail and documented in the appropriate sections of the SEIS for LGS, Units 1 and 2, license renewal.

The NRC staff is required to consult with the National Marine Fisheries Service and U.S. Fish and Wildlife Service under the Magnuson-Stevens Fisheries Conservation and Management Act and Section 7 of the Endangered Species Act in order to evaluate the potential impacts of continued operation on the affected endangered species. In order to fulfill its obligations under the National Historic Preservation Act, the NRC initiated consultation with the Advisory Council on Historic Preservation, and the Pennsylvania State Historic Preservation Office.

The SEIS will be prepared by NRC staff with contract support from Pacific Northwest National Laboratory.

The NRC invited the applicant; Federal, State and local government agencies; Indian tribal governments; local organizations; and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings or by submitting written comments before the end of the scoping comment period on October 28, 2011. The scoping process included two public meetings which were held on September 22, 2011, at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464-2946. The NRC issued press releases, purchased newspaper advertisements, emailed information to State and local government agencies and delegates, and distributed flyers locally to advertise these meetings. Approximately 100 people attended the meetings. Each session began with NRC staff members providing a brief overview of the license renewal process and the NEPA environmental review process. Following the NRC's prepared statements, the floor was opened for public comments. Twenty-four attendees provided oral comments that were recorded and transcribed by a certified court reporter. Transcripts of the entire meeting are available using the NRC's Agencywide Document Access and Management System (ADAMS). ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. Transcripts for the afternoon and evening meetings are available in ADAMS under Accession Nos. ML11287A207 and ML11287A211, respectively (NRC 2011a, NRC 2011b) The NRC issued a summary of the scoping meetings on September 22, 2011 (NRC 2011c).

All documents associated with this scoping process are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or in ADAMS. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR Reference staff by telephone at 1-800-397-4209 or 301-415- 4737 or by e-mail at hdr_resource@nrc.gov. The ADAMS accession number for each document is listed below in Table 1.

In addition to the comments received at the meetings, the NRC also received 20 letters and 21 e-mails with comments about the review. At the conclusion of the scoping period, the NRC staff reviewed the transcripts, meeting notes, and all written material received in order to identify individual comments. Figure 1 explains how the comments are labeled.

Figure 1. Key to Identifiers

"My name is John Doe ^(a) and this comment relates to alternative energy sources.	}	1 ^(b) -1 -AL
I would also like to discuss my comments that relate to Aquatic Resources ..."		
"My name is Jane Doe and my comment relates to Aquatic Resources .. "	}	1 -2 ^(c) -AQ
	}	2 -1 -AQ ^(d)

(a) commenter name identified in Table 1.

(b) commenter ID specified in Table 1.

(c) sequential comment number

(d) technical category, presented in Table 2 and Table 3.

Table 1 identifies the individuals providing comments and the assigned Commenter ID. For oral comments, the individuals are listed in the order in which they spoke at the public meeting.

Table 1 also includes the accession numbers of each source of comments in order to locate the original reference in the NRC's ADAMS.

Comments were consolidated and categorized according to the topic within the proposed SEIS or according to the general topic if outside the scope of the GEIS. Comments were placed into 1 of 17 technical issue categories, which are based on the topics that will be contained within the staff's SEIS for LGS, as outlined by the GEIS. These technical issue categories and their abbreviation codes are presented in Table 2.

Once comments were grouped according to subject area, the NRC staff determined the appropriate action for the comment. The action or resolution for each comment is described in the NRC staff's responses in this report. Table 3 represents the location where the response to each technical category begins. In those cases where no new environmental information was provided by the commenter, a brief response has been provided to the comment and no further evaluation will be performed.

Table 1. Individuals Providing Comments During The Scoping Comment Period
Each commenter is identified along with their affiliation and how their comment was submitted.

Commenter	Affiliation (if stated)	ID	Comment source	ADAMS Accession Number
Dr. Lewis Cuthbert	Alliance for a Clean Environment	1	Afternoon scoping meeting	ML11287A207
			Evening scoping meeting	ML11287A211
				ML11354A392
			Letters	ML11036A244
				ML11036A245
Bill Maguire	Limerick Site Vice President, Exelon	2	Afternoon scoping meeting	ML11287A207
			Evening scoping meeting	ML11287A211
Representative Tom Quigley	State Representative	3	Afternoon scoping meeting	ML11287A207
Lorraine Ruppe	Resident	4	Afternoon scoping meeting	ML11287A207
			Evening scoping meeting	ML11287A211
			Letter	ML11308B354

Commenter	Affiliation (if stated)	ID	Comment source	ADAMS Accession Number
Mike Gallagher	Vice President for License Renewal, Exelon	5	Afternoon scoping meeting	ML11287A207
			Evening scoping meeting	ML11287A211
Dr. Fred Winter	Resident	6	Afternoon scoping meeting	ML11287A207
			Evening scoping meeting	ML11287A211
			Letter	ML11305A016
Thomas Neafcy	Resident	7	Afternoon scoping meeting	ML11287A207
Dr. Anita Baly	Resident	8	Afternoon scoping meeting	ML11287A207
			Letter	ML11035A010
Tim Fenchel	Schuylkill River Heritage Area	9	Afternoon scoping meeting	ML11287A207
Bill Vogel	Resident	10	Afternoon scoping meeting	ML11287A207
Eileen Dautrich	Tri-County Area Chamber of Commerce	11	Afternoon scoping meeting	ML11287A207
Billy Albany	Resident	12	Afternoon scoping meeting	ML11287A207
John McGowen	Jaeco/Gas Breaker/UMAC, Inc.	13	Afternoon scoping meeting	ML11287A207
Ted Del Gaizo	Resident	14	Afternoon scoping meeting	ML11287A207
Tim Phelps	Resident	15	Afternoon scoping meeting	ML11287A207
Thomas Saporito	Saporito-Associates	16	Evening scoping meeting	ML11287A207
Jeff Chomnuk	Resident	17	Evening scoping meeting	ML11287A207

Commenter	Affiliation (if stated)	ID	Comment source	ADAMS Accession Number
Daniel Ludwig	Resident	18	Evening scoping meeting	ML11287A207
Catherine Allison		19	Evening scoping meeting	ML11287A207
Jeffrey Norton	Pennsylvania Energy Alliance	20	Evening scoping meeting	ML11287A207
Dan Ely	Resident	21	Evening scoping meeting	ML11287A207
Jay Beckermen	Resident	22	Evening scoping meeting	ML11287A207
Jim Der	Pottstown Energy Advisory Committee	23	Evening scoping meeting	ML11287A207
Traci Confer	Energy Justice Network	24	Evening scoping meeting	ML11287A207
Camilla Lange		25	Email	ML11279A107
Eric Hamell		26	Email	ML11279A108
Steven Furber		27	Email	ML11279A109
Charlene Padworny		28	Letter	ML11279A110
Sylvia Polluck		29	Letter	ML11279A111
Joe Roberto		30	Email	ML11290A106
			Email	ML11279A112
Brice Obermeyer	Delaware Tribe Historic Preservation Office	31	Letter	ML11279A113
Sherry White	Stockbridge-Munsee Tribal Historic Preservation Office	32	Letter	ML11279A114
Unknown		33	Letter	ML11286A298
Richard Kolsch	Resident	34	Email	ML11286A299
Charles and Elizabeth Sharik	Resident	35	Letter	ML11286A300
Nancy Leaming	Resident	36	Email	ML11290A102

Commenter	Affiliation (if stated)	ID	Comment source	ADAMS Accession Number
Cynthia Gale	Resident	37	Email	ML11290A103
Jude Schwegel		38	Email	ML11290A104
Michael Gale	Resident	39	Email	ML11290A105
Melissa Antrim	Resident	40	Email	ML11291A155
Michael Antrim	Resident	41	Email	ML11291A156
Joan McGone		42	Email	ML11292A011
Mary Lou and Harold Smith	Resident	43	Letter	ML11294A208
Lisa Smoyer		44	Email	ML11300A011
Unknown		45	Letter	ML11300A012
Lori Molinari	Resident	46	Letter	ML11305A072
Doris Meyers	Resident	47	Email	ML11305A014
Ken Sekellick	Resident	48	Email	ML11305A015
Anthony Gonyea	Onondaga Nation	49	Letter	ML11305A006
Debby Penrod	Resident	50	Email	ML11305A007
Charlie Koeing	Resident	51	Email	ML11305A008
Joyce Webber	Resident	52	Email	ML11305A009
Charlotte Derr	Resident	53	Letter	ML11307A388
Michael Stokes	Montgomery County Planning Commission	54	Letter	ML11307A387
Thomas Sullivan	Montgomery County Department of Public Safety	55	Letter	ML11307A386
Natural Resources Defense Council		56	Letter	ML11307A456
Sharon Yohn		57	Email	ML11307A455
Michael Smokowicz		58	Email	ML11307A454
Barbara Miller	Resident	59	Letter	ML11311A063
Debra Schneider	Resident	60	Letter	ML11313A013

Table 2. Technical Issue Categories. Comments were divided into one of the 16 categories below, each of which has a unique abbreviation code.

Code	Technical Issue	Code	Technical Issue
AL	Alternative Energy Sources	OR	Opposition to License Renewal
AM	Air & Meteorology	OS	Outside of Scope ^(a)
DC	Decommissioning	PA	Postulated Accidents & Severe Accident Mitigation Analyses (SAMA)
GE	Geology	RW	Radioactive & Non-Radioactive Waste
GW	Groundwater	SE	Socioeconomics
HA	Historic & Archaeological	SR	Support of License Renewal
HH	Human Health	SW	Surface Water
LU	Land Use		
LR	License Renewal and its Process		

^(a) Outside of Scope are those comments that pertain to issues that are not evaluated during the environmental review of license renewal and include, but are not limited to, issues such as need for power, emergency preparedness, safety, security, and terrorism.

Table 3. Comment Response Location in Order of Resource Area

Comment Category	Page	Comment Category	Page
Alternative Energy Sources	11	Opposition to License Renewal	14
Air & Meteorology	11	Outside of Scope	14
Decommissioning	12	Postulated Accidents & SAMA	31
Geology	12	Radioactive & Non-Radioactive Waste	31
Groundwater	12	Socioeconomics	31
Historic and Archaeological	12		
Human Health	13	Support of License Renewal	32
Land Use	13	Surface Water	32
License Renewal and its Process	13		

The comments and suggestions received as part of the scoping process are documented in this section, and the disposition of each comment is discussed. The meeting transcripts and written comments are included in their original form at the end of this report. In those cases where no new environmental information was provided by the commenter, a brief response has been provided to the comment, and no further evaluation will be performed.

The preparation of the SEIS will take into account all the relevant issues raised during the scoping process. The SEIS will address both Category 1 and 2 issues, along with any new information identified as a result of the scoping process. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues and will include analysis of Category 2 issues and any new and significant information. The NRC will issue a draft SEIS for public comment. The comment period will offer the next opportunity for the applicant, interested Federal, State, and local government agencies, Indian tribal governments, local organizations, and other members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's safety evaluation report (SER), will provide much of the basis for the NRC's decision on the Exelon application to renew or not renew the licenses for LGS.

Limerick Generating Station Scoping Comments and Responses

1. Alternative Energy Sources (AL)

Comment: The following comments have been categorized under the resource area of Alternative Energy Sources. The comments express opposition to nuclear power, cite renewable energy solutions such as wind, solar, geothermal, and/or the alternative of not renewing the operating license, also known as the “no-action” alternative.

Identifiers: 1-44-AL, 4-8-AL, 5-3-AL, 16-7-AL, 25-5-AL, 27-1-AL, 28-2-AL, 29-1-AL, 35-6-AL, 37-15-AL, 39-16-AL, 44-5-AL, 44-10-AL, 44-12-AL, 53-2-AL, 60-3-AL, 60-19-AL

Response: *The staff will evaluate all reasonable alternatives, including the no-action alternative in Chapter 8 of the SEIS. In this chapter, the NRC staff examines the potential environmental impacts of alternatives to license renewal for LGS, as well as alternatives that may reduce or avoid adverse environmental impacts from license renewal, when and where these alternatives are applicable.*

In evaluating alternatives to license renewal, the NRC staff first selects energy technologies or options currently in commercial operation, as well as some technologies not currently in commercial operation but likely to be commercially available by the time the current LGS's operating licenses expire in 2024 and 2029.

Second, the NRC staff screens the alternatives to remove those that cannot meet future system needs. Then, the remaining options are screened to remove those whose costs or benefits do not justify inclusion in the range of reasonable alternatives. Any alternatives remaining, then, constitute alternatives to the proposed action that the NRC staff evaluates in-depth throughout Chapter 8. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.

2. Air & Meteorology (AM)

Comment: The following comments have been categorized under the resource area of Air and Meteorology. These comments express opposition to LGS on the basis of increased air pollution and severe weather.

Identifiers: 1-16-AM, 1-22-AM, 1-32-AM, 35-3-AM, 37-2-AM, 39-3-AM, 60-8-AM

Response: *The staff will address air quality and cumulative impacts associated with greenhouse gases and other emissions in Chapters 2 and 4 of the draft SEIS. Greenhouse gas emissions of the nuclear fuel cycle will be discussed in Chapter 6. Finally, the environmental impacts of the alternatives evaluated in depth will be discussed in Chapter 8, including air emissions. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

3. Decommissioning (DC)

Comment: The following comment has been categorized under the area decommissioning. The comment addresses a concern regarding approving a closure plan for LGS prior to granting an extended license for LGS.

Identifiers: 34-2-DC

Response: *The staff will address the impacts of decommissioning LGS in Chapter 7 of the SEIS. Additionally, the environmental impacts of the no-action alternative will be discussed in Chapter 8 of the draft SEIS. This comment is in scope and will be represented and responded to in Appendix A of the draft SEIS.*

4. Geology (GE)

Comment: The following comments have been categorized under the resource area of geology. These comments address concerns regarding LGS being located near a fault line.

Identifiers: 1-12-GE, 4-2-GE, 4-14-GE, 30-2-GE, 51-4-GE, 52-5-GE, 60-2-GE

Response: *The staff will address the current geologic environment for LGS in Chapter 2 of the draft SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

5. Groundwater (GW)

Comment: The following comments have been categorized under the resource area of groundwater. The comments express concern over groundwater contamination.

Identifiers: 1-34-GW, 37-4-GW, 37-5-GW, 39-5-GW, 39-6-GW, 45-10-GW

Response: *The staff will address the groundwater impacts of renewing the LGS's operating licenses in Chapters 2 and 4 of the draft SEIS. In addition, the groundwater impacts of not renewing the operating licenses will be discussed in Chapter 8 of the draft SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

6. Historical and Archaeological (HA)

Comment: These comments have been categorized under the resource area of historical and archaeological. These comments identify whether or not historical and archeological sites are located near LGS.

Identifiers: 31-1-HA, 49-1-HA

Response: *The staff will address the historical and archaeological impacts of renewing the LGS's operating licenses in Chapters 2 and 4 of the draft SEIS. Finally, the environmental impacts of alternatives evaluated in depth will be discussed in Chapter 8 of the SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

7. Human Health (HH)

Comment: The following comments have been categorized under the resource area of Human Health. The comments describe health risks, such as cancer or mortality rates, related to operations at nuclear plants and/or LGS.

Identifiers: 1-15-HH, 1-18-HH, 1-25-HH, 1-26-HH, 1-36-HH, 4-6-HH, 4-7-HH, 6-1-HH, 6-2-HH, 6-6-HH, 6-8-HH, 19-6-HH, 21-1-HH, 25-2-HH, 36-1-HH, 36-3-HH, 37-1-HH, 37-7-HH, 37-14-HH, 39-2-HH, 39-15-HH, 40-4-HH, 40-5-HH, 41-3-HH, 42-2-HH, 43-6-HH, 44-8-HH, 44-9-HH, 45-6-HH, 45-6-HH, 45-7-HH, 45-8-HH, 47-2-HH, 48-2-HH, 51-3-HH, 52-6HH, 57-3-HH, 58-1-HH, 60-10-HH, 60-14-HH

Response: *The staff will address the human health impacts of renewing the LGS operating licenses in Chapters 2 and 4 of the draft SEIS. In addition, the environmental impacts of alternatives evaluated in depth will be discussed in Chapter 8 of the SEIS, including human health impacts. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

8. Land Use (LU)

Comment: The following comments have been categorized under the resource area of land use.

Identifiers: 54-5-LU

Response: *The staff will address the land use impacts of renewing the LGS's operating licenses in Chapters 2 and 4 of the draft SEIS. In addition, the land use impacts of not renewing the operating licenses will be discussed in Chapter 8. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

9. License Renewal and its Process (LR)

Comment: The following comments have been categorized under License Renewal and its Process. The comments express opposition to the process. These comments also refer to the advertisement, quantity, and location of the public meetings.

Identifiers: 1-4-LR, 1-19-LR, 4-9-LR, 3-1-LR, 4-13-LR, 8-1-LR, 8-5-LR, 16-2-LR, 16-3-LR, 16-4-LR, 19-4-LR, 22-1-LR, 22-3-LR, 25-1-LR, 30-1-LR, 30-13-LR, 34-1-LR, 41-1-LR, 48-3-LR, 54-7-LR, 56-2-LR, 60-5-LR, 60-13-LR, 60-20-LR

Response: *These comments refer to the license renewal process. A summary of the license renewal process is provided in Chapter 1 of the draft SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

10. Opposition to License Renewal (OR)

Comment: The following comments have been categorized under the area of Opposition to License Renewal. The following comments are general in nature and express opposition to nuclear power and/or the license renewal of LGS.

Identifiers: 1-5-OR, 1-20-OR, 1-21-OR, 1-29-30, 6-5-OR, 6-9-OR, 6-11-OR, 10-1-OR, 19-3-OR, 25-4-OR, 26-1-OR, 27-2-OR, 28-1-OR, 29-2-OR, 30-10-OR, 35-1-OR, 35-7-OR, 38-1-OR, 40-1-OR, 40-6-OR, 41-4-OR, 42-3-OR, 43-1-OR, 44-1-OR, 44-4-OR, 44-11-OR, 45-1-OR, 45-11-OR, 46-1-OR, 48-1-OR, 52-1-OR, 52-1-OR, 53-1-OR, 57-1-OR

Response: *These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

11. Outside of Scope (OS)

The following comments were determined to be outside of scope of the environmental review. Except where noted, comments are represented below as direct quotes; however, original formatting from source documents may not be completely met, as comments have been received in several different media.

Comment: 1-2-OS; There is no way for either NRC or Exelon to ensure the safety of the environment or the residents impacted by this plant. It cannot be made fail safe.

Comment: 1-7-OS; After only 26 of 40 years, numerous signs of aging and risk have been identified. Corrosion, deterioration, fatigue, cracking, thinning with loss of material, loss of fracture toughness are all documented in Exelon's own renewal application in the aging management section. Instances of equipment fatigue and cracking of vital equipment include the reactor vessel and coolant system.

Comment: 1-8-OS; Aging equipment, after only 26 years suggests that NRC should not just close the plant by 2029, but also ramp up their oversight vigilance during the remaining 18 years of the current license.

Comment: 1-9-OS; In the past few years, Limerick has had numerous unplanned shutdowns suggesting there are already significant problems. Three occurred in one week in June 2011. Loss of coolant leaks and accidents at Limerick have already been documented. Serious radioactive contamination could go undetected and unreported for years from the corroding infrastructure, much of it underground.

Comment: 1-39-OS; ...accidents and leaks from corroding, deteriorating equipment plus miles of buried pipes and cables. Many problems and shutdowns have already occurred at this facility in its first 26 years of operation. They are a matter of record.

Comment: 4-11-OS; And the one thing that's really important is that NRC and the nuclear industry are claiming that age is no issue while at the same time they admit that some parts are too big and too expensive to replace.

Comment: 5-2-OS; There are two different parts of our application, the safety review and the environmental review. For the safety review, we took an in-depth look at the history and the condition of the safety equipment in the plant. We did that to determine whether the necessary maintenance was being performed on that equipment and to make sure that the equipment will be able to operate when it's needed, not only for today, but also for an additional 20 years of operation. When you look back at Limerick, when it was built, all the equipment was new. It was thoroughly tested to make sure it would perform properly, but like anything else equipment does age. That doesn't mean it won't work, but it does age and certain activities need to be done to the equipment. So we perform preventive maintenance. Sometimes we refurbish the equipment. Some equipment is replaced. There may be modifications done to upgrade the equipment in the plant and in fact, as Bill Maguire has stated, Limerick had spent over \$200 million in the last couple years alone to improve and modernize the equipment and enhance plant operations and safety. We also then reviewed calculations that were performed as part of the original design of the plant that were done to ensure that the plant could operate safely for 40 years. We analyzed those calculations and were able to confirm that the plant would be able to operate safely for 60 years. Overall, our conclusion from our engineering review was that Limerick could operate safely for up to 60 years.

Comment: 16-5-OS; And with respect to the NRC's environmental review, the NRC in my view failed to properly consider the embrittlement of this nuclear reactor vessel. When these nuclear reactors are operating the neutrons cause the metal in the reactor vessel to become brittle over time. And after numerous years of operation these reactor vessels could crack because they're so brittle. But the NRC doesn't properly evaluate that and the NRC doesn't require the licensee to do destructive testing and analysis of the reactor's metal vessel prior to rubber-stamping a 20-year extension to these licenses. Twenty years from now, oh actually 20 years from 2024 which will be 2044 this reactor is going to be even more critically brittle and the NRC's not going to understand the dynamics of that and the reactor could crack and it's going to melt down because you can't recover from a loss of coolant accident of that magnitude.

Comment: 21-1-OS; My concern is that this hastened license renewal process is inappropriate for engineering reasons. I worked in a variety of different areas in the construction of that power plant and there were continual deviations that were provided, whether it was in-storage maintenance monitoring of the condition of the components that were used to the actual construction of that plant. I could cite you several examples. What I would like to ask of the public is that the people that had worked at that nuclear power plant take a look at this licensing renewal and understand that they need to review those failures and those deviations that were provided to go ahead with the construction of that plant with non-conformances that were reviewed, but not reviewed in light of what we understand and know today about earthquakes or other anomalies. We need to have enough time to make the evaluation on those deviations. The cooling pools. The fuel pool girders that are placed there. There are rebar concrete reinforced supports where a quality engineer, he was supposed to be accepting the very highest grade of concrete to be placed in a 36-8 hour pour there and he didn't pay attention. And the coffer dam was being built down in the river and up comes this sand mix with a very low strength and gets pumped up into those fuel pool girders in a layer and the engineer said well, boy, that was a terrible mistake, but it'll be okay. We need to go back and take a look at all of those mistakes and make sure that they're not written off because a layer in a structure under load caused by an earthquake, that's an issue. It might not be an issue for the strength of the fuel pool girders to support those fuel pools that when we see them in Japan and they catch fire because they're extremely hot and you need to address that. I was on that pour but I wasn't the

engineer that made that error, but there's a number of errors that were made. And I don't see or understand that the NRC or the review or the licensing application taking a look at those failures and those errors and addressing them in light of the knowledge that we have today.

Comment: 22-7-OS; And I would like to finally address an issue that the speaker on the cell phone brought up. He talked about embrittlement of concrete over the lifetime so far of the nuclear reactor containment vessel. That's an internal environmental matter. I don't know if it's quite in the scope of what the NRC plans to talk about or plans to look at, but something that I have not read about at all is an NRC requirement for destructive testing.

Comment: 22-8-OS; What I haven't heard anything about except generalizations is has anybody done any destructive even borehole testing of these containment vessels and their support pourings to find out has there been in fact any deterioration of the concrete, the rebar and anything else that went in there. The stuff that's buried in the concrete, the wire, all of those things that are buried in the concrete. If you haven't bothered to open that stuff up since the plant was built how on earth do you know what condition it's in? Shouldn't that be a requirement to do some destructive, open the bottom testing, go all the way through and make sure what you think is there is what's there and in the condition that it should be in to last for another 20 or 40 years?

Comment: 25-3-OS; ...it seems to me that the situation of unprotected above ground cask holding radioactive waste, as well as past safety failures and deviations in operations must be reviewed and addressed.

Comment: 30-6-OS; There are many other environmental friendly sources of energy and Limerick is anything but that. As a matter of fact, Limerick is a TIME BOMB, placed at the wrong location, on the wrong land, too close to major populations, run by a for profit company who cannot even handle the basic maintenance issues of power lines, in an aged building without the newest technology nor able to stand a real earthquake, and on and on.

Comment: 30-9-OS; Lastly, some who have a vested interest in working at the plant, etc. are quick to state that it is safe, etc. – not now, nor has it ever been fool proof against disasters, technical glitches, etc.

Comment: 30-12-OS; Why was Limerick taken "offline" three times in as many months? Is NRC checking?

Comment: 37-10-OS, 39-11-OS; Accidents and leaks from corroding, deteriorating equipment plus miles of buried pipes and cables.

Comment: 38-2-OS; I'm worried about Exelon Generation Co., LLC's safety record and I hope you will consider my opinion on this matter.

Comment: 40-2-OS; Limerick was built to last 40 years. The older any facility gets, the more likely breakdowns and equipment failure will occur. When it's a nuclear power plant, meltdown could result from corroding, deteriorating, and aging pipes, cables, and equipment – honestly, a number of things. Miles of deteriorating underground buried pipes and cables are a major concern – [and how] often are these inspected? Signs of mechanical damage and breakdown already exist – three unplanned shutdowns June 2011, preceded by many others since 2007,

one with loss of cooling water. While some parts can be replaced, by the nuclear industry's own admission, some equipment is too big and expensive to replace. Limerick is showing signs of stress and no one knows just how bad this will be by the time the current license is up. To add 20 more years to that, without having a clue as to what the condition will be, would be beyond careless.

Comment: 42-1-OS; Statistics regarding nuclear accidents at similar aging structures are well documented. Those two towers are ticking time bombs and the NRC knows this and needs to shut them down. Following the Japanese nuclear disaster our Limerick nuclear plant hit the statistical at risk list again.

Comment: 44-2-OS; There is no "independent" testing being done at Limerick. The results of testing are provided by their own company, who has a vested interest in the outcome of those results, so how could you ever believe that they would be honest about the results? Seriously??

Comment: 44-7-OS; There should also be a concern for accidents and leaks from corroding and deteriorating equipment at the site from over the years which could cause parts of it to be shut down for periods of time, as well as the miles of buried pipes and cables. There are many concerns that should be fully looked at and considered, and just with minimal thought to them, it shouldn't take a "rocket scientists" so to speak to figure out that it is not in the best interest of the public or environment to allow them to re-license.

Comment: 45-3-OS; Everything has a life expectancy. Limerick's was 40 years. The older any facility gets, the more likely mechanical breakdowns and equipment failure will occur. When it's a nuclear plant, meltdown could result from corroding, deteriorating, and aging pipes, cables, and equipment. Miles of difficult to inspect corroding, deteriorating underground buried pipes and cables are a major concern. Signs of mechanical damage and breakdown already exist – three unplanned shutdowns June 2011, preceded by many others since 2007, one with loss of cooling water. While some parts can be replaced, by the nuclear industry's own admission, some equipment is too big and expensive to replace.

Comment: 46-2-OS; If this license renewal is granted, this plant will continue operating until 2049, at which time it will be over 60 years old. Cracks in concrete and corrosion in piping will inevitably develop as this facility ages. While some of this "wear and tear" may be evident to visual inspection, some of it will also occur in less accessible places, such as in underground piping systems. The Associated Press has shown that tritium leaks in underground piping systems frequently go undetected-sometimes for years-in aging nuclear power plants. While no leaks of this kind have so far been documented at Limerick, the odds of these sorts of problems developing will only increase with every successive decade of the plant's working life.

Comment: 51-2-OS; Relicense should not be permitted because all kinds of deterioration has occurred and is occurring and the present licenses do not run out until 2024 and 2029. They are doing this now because they know it would not pass if they waited for 2024 and 2029. This is an old plant and there is much corrosion and concrete deterioration that is going on. There are many miles of buried pipes that cannot [be] checked reliably.

Comment: 52-2-OS; The Limerick plant was built to be used for 25 years. It has now gone far beyond its limitations.

Comment: 55-1-OS; The NRC should provide a full review of environmental and public safety issues pertaining to the plant. It is understood that emergency responders providing services to the power plant understand the hazards associated with daily operations of the plant. However, in light of events in Japan and recent seismic activity in this area, the NRC should clarify the risks associated with plant operations in times of unusual activity, outage operations, and during times of natural/man-made events that may pose a risk to the plant in terms that the public will understand in an attempt to quell public concern.

Comment: 60-7-OS; Deterioration of cement and rebar-crumbles over time.

Comment: 60-12-OS; Go back and look at structural errors when plant was being built.

Comment: 60-16-OS; Accidents and leaks-many shut downs and risk of meltdown, earthquakes, hurricane, aging equipment.

Response: *These comments discuss issues related to NRC's safety review of the license renewal application as well as issues related to other safety concerns and past safety performance at LGS.*

The NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. The regulations governing the environmental review are contained in Title 10 of the Code of Federal Regulation (10 CFR) Part 51, and the regulations for the safety review are contained in 10 CFR Part 54. Because the two reviews are separate, operational safety issues and safety issues related to aging are outside the scope for the environmental review.

The principal safety concerns associated with license renewal are related to the aging of structures, systems, and components important to the continued safe operation of the facility. When the plants were designed, certain assumptions were made about the length of time each plant would be operated. During the safety review for license renewal, the NRC must determine whether aging effects will be adequately managed so the original design assumptions will continue to be valid throughout the period of extended operation, or verify that any aging effects will be adequately managed. For all aspects of operation, there are existing regulatory requirements governing a plant that offer reasonable assurance of adequate protection if its license were renewed.

The NRC assesses plant performance continuously and communicates its assessment of plant performance in letters to the licensees. These assessment letters are available on a plant performance page for each plant, and are posted on the web site as they become available. The NRC assessment reports for LGS can be access at http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/LIM1/lim1_chart.html and http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/LIM2/lim2_chart.html.

Therefore, these comments are not within the scope of the environmental review and will not be evaluated further in the development of the SEIS.

Comment: 1-42-OS; ..one that I think probably should jump to the head of the list for the NRC based on a lot of comments from a lot of other analysts and elected officials, the need for an updated evacuation plan and increased emergency planning zone (EPZ), a 10-mile radius. This

plan is seriously outdated. It is by many expert's observations fatally flawed. There will be no evacuation in the event of a worst case scenario. Several people spoke to that this evening. The population in this area has increased more than 180 percent since 1980 to 2010, U.S. Census data. Updates are obviously needed and they should be reasonable, comprehensive, detailed and accommodate all of the demographics from 1985 to today and from today until as far out as the NRC is willing to license this facility.

Comment: 8-2-OS; As we look around, we see that the population in this area is getting denser all the time. The roads are not being improved. And that leaves me with concerns about how we would effect an evacuation were one needed. I suspect strongly that we couldn't perform a good evacuation today. And I also suspect that the population will be increasing and the roads deteriorating. In fact, just this morning in the Pottstown Mercury, they were reporting on the hearing that was held on Route 422 which is our main road around here. And Barry Seymour is quoted, he's the Executive Director of the Delaware River Valley Regional Planning Commission, and he told last week's forum audience that population projections anticipate a 50 percent increase in the region and if we don't increase capacity on 422, we will have virtual gridlock all the way to the Berks County line.

Comment: 16-6-OS; The other point is the NRC's Commission over there in Rockville, in the White Flint Building, they recently adopted a new policy with respect to evacuations. They want these licensees to update their evacuation plans. Now, I would hope that the NRC staff has made that requirement to the Limerick licensee so that the people near and around within 15 miles of the nuclear plant can properly and timely evacuate the area. Again, the Associated Press's investigation, year-long investigation shows that the populations around these nuclear plants increased tenfold over the years and that the roads and the congestion, you can't timely evacuate these areas. And the NRC keeps pushing these evacuation plans onto the licensee but the NRC doesn't enforce its regulation or properly review if these plans are even effective.

Comment: 19-2-OS; Talk about evacuation when these natural disasters and realities hit us. One accident, two hour backup, almost no exaggeration, one thousand cars. There will be no evacuation. I don't want to be like scare tactics here but like I said, the weather and so forth, natural disasters has really been hitting the whole United States and the world lately so it's a reality.

There was flooding after the hurricane that we just had. Five days later there was roads closed in Pottstown, in North Coventry, East Coventry. There were, when I tried to get home from work right on Route 724, no exaggeration again from all the back roads about 500 cars. There will be no evacuation and I certainly hope that people understand I'm not trying to be scare tactics. I see this. I'm sure a lot of you have seen this and been in these situations. All with a little bit of flooding. What this does to the roads. Again, there will be no evacuation.

Comment: 22-5-OS; The environment in which this plant operates has changed because of in-migration, population increase for all sorts of reasons. Part of that's been discussed tonight in terms of evacuation routes, would you be able to get people out were there an accident. The roads haven't changed very much, the population has. That I think is a valid environmental concern that surely ought to be addressed.

Comment: 23-2-OS; The emergency planning is an area which needs to be seriously looked at. Hard and soft infrastructure on that. Hopefully that's something which is part of the ongoing

operational requirements for periodic review and update since obviously this is not a static environment we live in. That has to be changed on an ongoing basis.

Comment: 30-3-OS; The NRC had NO business allowing this plant to ever be built a) so close to such populated areas like Philadelphia (now, what the 3 largest city in the country?) within less than an hour, and exactly due SE from the site.

Comment: 30-4-OS; When Limerick was built, there was no idea that the area would grow in population like it has. For safety reasons, just look on any given day the traffic on Route 422 - stacked and stuck for miles on end. Route 422 is the #1 route for evacuations and does not handle regular commuter traffic let alone entire communities.

Comment: 34-5-OS; Developers are required to fund traffic improvements to an area to allow an area to be developed, this should apply to Limerick. The evacuation plan now will not work. When the plant was started there was no traffic out here, now it is grid lock. Limerick should fund new roads and bridge[s] to alleviate traffic jams in order to have an orderly evacuation.

Comment: 37-13-OS, 39-14-OS; Need for updated evacuation plan and increased EPZ.

Comment: 40-3-OS; Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe evacuation is not possible, even within the seriously flawed and inadequate current 10-mile evacuation plan. Until Limerick closes, NRC should expand the evacuation plan (to 50 miles) and be sure there are enough shelters and supplies available to accommodate the over 8 million people within that radius. Exelon should pay for the supplies.

Comment: 41-2-OS; Earthquakes and other natural disasters are more frequent and stronger than ever before. Limerick is 3rd on the earthquake risk list. Underground pipes and cables can shake and break, which would lead to loss of power, loss of cooling water, and meltdown. Limerick's substandard containment flaw means more radiation would be released. It is simply too dangerous to keep Limerick operating. Would you want to live within miles of this potential catastrophic disaster? Add the enormous population growth that this area has seen over the past 10 years - with little to no road improvements - and attempting to evacuate the area during a disaster would be futile. It would be virtually impossible to get out of harms way.

The older any facility gets, the more likely breakdowns and equipment failure will occur. Limerick was built to last 40 years. Limerick is showing signs of stress and no one knows just how bad this will be by the time the current license is up. To add 20 more years to that, without possibly knowing what the condition will be, would be careless. No one can predict what the condition of Limerick will be in 2024 or 2029. Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe evacuation is not an option. Plain and simple. That's a scary thought for those of us who live here!!

Comment: 45-5-06; No NRC policy, review, or report can make Limerick failsafe from a catastrophic meltdown. Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe evacuation is merely an illusion, even within the seriously flawed and fundamentally inadequate current 10-mile evacuation plan. Until Limerick closes, NRC should expand the evacuation plan (minimally to 50 miles) and be sure there are enough shelters and supplies available to accommodate the over 8 million people within the 50 miles. Exelon should pay for the supplies.

Comment: 46-5-OS; Questions about the Limerick reactors' ability to withstand accidents and natural disasters are all the more pressing because so many people could potentially be affected if something catastrophic were to occur. Since 1990, the population within a [10]-mile radius of the plant has increased by 45%, from 178,047 to 257,625. In addition, Philadelphia, with a population of 1,526,006, is only about 28 miles away. How much more might these populations increase by 2049? Bearing in mind that the NRC advised Americans within a 50 mile radius of Fukushima to evacuate last spring, one can only imagine how difficult it would be to carry out such evacuations if the unthinkable were ever to occur at Limerick.

Comment: 51-1-OS; They are only doing it because the plant has issues that they are trying to hide. The evacuation plan is a joke because we would not get out of our driveways. It would not have worked 10 years ago and certainly with the population growth it would be much worse.

Comment: 52-4-OS; The roads to any safe place are overwhelmed with congestion with normal traffic.

Comment: 54-2-OS; Since the original plant was constructed, the population in the surrounding communities has grown dramatically. Limerick Township and nearby Upper Providence Township have been two of the most rapidly growing communities in the county. This growth largely fueled by access to US Route 422 Expressway and available land with suitable infrastructure, has dramatically changed the character of the area surrounding the Limerick Power Station. In the past few years, the Philadelphia Premium Outlet Mall, a 600,000 square foot retail facility, and the adjoining Costco shopping center opened along US Route 422 about one mile north of the Limerick Power Station property. The land adjoining those facilities is being considered for various types of retail and residential uses. At one time, a large gambling casino had been proposed in this location as well. Other lands in Lower Pottsgrove Township near the Limerick Power Station have also been proposed for similar types of uses.

While the county planning commission has tried to promote lower densities of growth in proximity to the Limerick Plant, the local communities and the marketplace favor this location for significant development due to its proximity to the US Route 422 interchange at Township Line/ Evergreen Road. The growth that has taken place in the area around the power plant, and in particular the growth taking place in the area immediately adjoining the plant and the primary access to it, as well as the projected growth in the future, could complicate evacuation plans and the movement of appropriate emergency-response personnel to the plant in the event of a disaster. Certainly this access could be even more critical in the event of a natural disaster when other roads to the plant may be impassable. The environmental assessment review needs to analyze this growth in the vicinity of the power plant to evaluate what impact it would have on plant operations and whether or not safe evacuation can take place from the newly developed areas.

Comment: 54-3-OS; The growth in the whole US Route 422 Corridor has raised numerous proposals for expanding the vehicle capacity of the 422 expressway. Current peak commuting traffic tie ups on portions of the expressway serve as evidence that it may have inadequate capacity to continue to serve as a safe evacuation corridor for the region. The county transportation plan recognizes the need for various road improvements along the US 422 Corridor to address current and future traffic demands. The first priority projects in the plan include interchange improvements at the Township Line Road/ Evergreen Road intersection which is also the primary access route to the plant; needed widening and reconstruction of the

highway east of the power station between Route 29 and US Route 202 in King of Prussia, reconstruction, of US Route 422 in the vicinity of Pottstown, and the reconstruction and widening of the Route 422 Bridge across the Schuylkill River at Betzwood. A passenger train line is also proposed as a first priority in the transportation plan to provide service through the western portion of the county into Norristown. The proposed route for this train line is the existing Norfolk Southern rail line that goes through the Limerick Power Station Property. Other improvements including the widening and expansion of US Route 422 from Pottstown to Route 29 and additional interchange improvements at Township Line/ Evergreen Road are proposed as secondary priorities in the county plan. In addition to these improvements, several other localized improvements that may impact evacuation feasibility are proposed in the county plan.

Due to funding limitations in Pennsylvania, these projects are not likely to move forward at this time. The environmental impact review should consider the capacity of the roadway facilities to service the Limerick Plant, as well as provide sufficient evacuation of the area in the event of a disaster. Possible mitigation strategies to be considered in the environmental assessment review could include the role of Exelon in funding the important road improvements needed in this area to ensure safe evacuation and access to the plant in any type of disaster.

Comment: 54-6-OS; The Montgomery County Open Space Plan proposes a trail along the river through the power plant property. This trail is proposed as the Schuylkill East Trail, which would be developed as unpaved trail between Mont Clare and Pottstown. Essentially the proposed route would follow an old road way between the river and Norfolk Southern rail line through the Limerick Power Station site. Though such a trail route would appear to raise significant safety concerns due its proposed proximity to the power station, appropriate elements could be designed into any trail system to limit its threat to plant's security. We have found that trails can enhance the overall security of an area since they concentrate users along a defined corridor. Furthermore, trails can provide emergency access routes that could be used during different disaster events to evacuate people and provide access for emergency response.

Comment: 55-3-OS; It is important to note that the 10-mile Emergency Planning Zone (EPZ) is the second largest in population in the nation. As a result of recent development and type of development in the area of LGS, it is important to review the Evacuation Time Estimate Study (ETE) on a more timely basis and account for the transient population present in the hotels that have accompanied this development. Additionally, funding should be supplied for either Exelon staff or County staff to act as a transient planning and outreach specialist to assist these transient population locations with emergency planning.

Comment: 55-4-OS; It should be noted that the Evacuation Time Estimate is currently being updated. Required highway and roadway infrastructure upgrades should be included as a part of and also as a result of any changes noted in the updated ETE. Special attention for improvement should be given to the local, county and state roads used for evacuation that feed the larger highways, as many of these roadways are no longer suitable for the amount of traffic that an EPZ evacuation could produce.

Comment: 55-5-OS; The NRC should consider requiring Exelon to enhance planning for day to day emergency situations that require a response from local emergency services. Often times, Fire and EMS access is delayed due to screening of vehicles and personnel. This can cause delay in patient care to potentially life threatening illnesses.

Comment: 57-2-OS; It's in an area with high population – we could never all evacuate if necessary.

Comment: 59-1-OS; In Pottstown about ½ mile from Limerick Power Plant we have four bridges. One they are not going to fix, one just was fixed, one has been in progress of being fixed for months now, last one is a [third] of the way of being fixed. To get out of town the only other way is toward Allentown. If anything should happen, not many people could get on the one road. Please don't extend the license for Limerick.

Comment: 60-1-OS; No way to evacuate area.

Response: *These comments discuss issues related to emergency planning. The emergency plans for nuclear power plants cover preparations for evacuation, sheltering, and other actions to protect residents near plants in the event of a serious incident. Nuclear power plant owners, government agencies, and State and local officials work together to create a system for emergency preparedness and response that will serve the public in the unlikely event of an emergency. Federal oversight of emergency preparedness for licensed nuclear power plants is shared by the NRC and Federal Emergency Management Agency (FEMA).*

FEMA takes the lead in initially reviewing and assessing the offsite planning and response and in assisting State and local governments, while the NRC reviews and assesses the onsite planning and response. FEMA findings and determinations as to the adequacy and capability of implementing offsite plans are communicated to the NRC. The NRC reviews the FEMA findings and determinations, as well as the onsite findings. The NRC then makes a determination on the overall state of emergency preparedness. These overall findings and determinations are used by the NRC to make radiological health and safety in the continuing oversight of operating reactors. The NRC has the authority to take action, including shutting down any reactor deemed not to provide reasonable assurance of the protection of public health and safety.

The Commission considered the need for a review of emergency planning issues in the context of license renewal during its rulemaking proceedings on 10 CFR Part 54, which included public notice and comment. As discussed in the statement of consideration for the rulemaking (56 FR 64966), the programs for emergency preparedness at nuclear power facilities apply to all nuclear power facility's licensees and require the specified levels of protection from each licensee regardless of plant design, construction, or license date. Requirements related to emergency planning are in the regulations at 10 CFR 50.47 and Appendix E to 10 CFR Part 50. These requirements apply to all operating licenses and will continue to apply to facilities with renewed licenses. Through its standards and required exercises, the Commission reviews existing emergency preparedness plans throughout the life of any facility. Therefore, the Commission has determined that there is no need for a special review of emergency planning issues in the context of an environmental review for license renewal.

The "FEMA After Action Reports and Communication Related to Specific Emergency Exercises" document the Radiological Emergency Preparedness (REP) Partial Participation Plume Exposure Pathway Exercise for nuclear power plants. The most recent exercise for Limerick plant was conducted on November 15, 2011. The results of the Limerick and other nuclear power plant exercises are publicly viewable at <http://www.nrc.gov/about-nrc/emerg-preparedness/related-information/fema-after-action-reports.html>

Therefore, the comments are outside the scope of the license renewal review and will not be evaluated further in the development of the SEIS.

Comment: 16-1-OS; I'm very upset at the NRC's refusal to honor my enforcement petition filed 10 CFR 2.206 with respect to the Limerick nuclear plant. The NRC denied that petition on the basis that I would have an opportunity to intervene on this proceeding through the NRC's judicial process. However, that's not available to me. I made that quite clear in the 2.206 petition. Now, I don't have standing as a United States citizen because of my physical location in Jupiter to intervene in a proceeding in Pennsylvania where this plant is located. The NRC staff is incorrect in their opinion and they have a legal obligation to honor that enforcement petition and to provide an opportunity for me to address the Petition Review Board. So I want to put that on the record and I'm asking the NRC to look into that issue.

Responses: *This comment discusses concerns regarding the 2.206 petition process. Section 2.206 of Title 10 of the Code of Federal Regulations (10 CFR 2.206) describes the petition process—the primary mechanism for the public to request enforcement action by the NRC in a public process. This process permits anyone to petition NRC to take enforcement action related to NRC licensees or licensed activities. Depending on the results of its evaluation, NRC could modify, suspend, or revoke an NRC-issued license or take any other appropriate enforcement action to resolve a problem. Requests that raise health and safety issues without requesting enforcement action are reviewed by means other than the 2.206 process.*

The NRC staff reviews request in accordance with NRC Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions" (ADAMS Accession No. ML041770328). MD 8.11 specifies the criteria that are used to determine whether to accept or reject petitions for review.

By letter dated, August 1, 2011 (ADAMS Accession No. ML11214A228), it was requested that under 10 CFR, Section 2.206 that the NRC deny the licensee's application for renewal of operating licenses. The following was the basis for the request:

Petitioner contends here that the LGS Units 1 and 2 employ nuclear reactor vessels which have been in operation for a period of years sufficient to cause the metal in the nuclear reactor vessels to become dangerously brittle and subject to cracking or shattering from continued operations and stresses during an extended 20-year period beyond the original safety design basis for which the NRC granted the primary operating licenses identified above. Petitioner contends here that the licensee has not and cannot provide the NRC with sufficient and reliable test data to show that the material condition of the nuclear reactor vessels in question has not degraded and become dangerously brittle; or that continued operations of the nuclear reactors for 20-years beyond the initial 40-year license period will not cause the reactor vessels to crack or shatter and result in a Loss-of-Coolant Accident (LOCA) and cause harm to the health and safety of the public and to the environment at large.

By letter dated August 17, 2011 (ADAMS Accession No. ML112231397), the NRC staff indicated that it reviewed the request and in accordance with MD 8.11, the staff concluded that the request did not meet the criteria for review under 10 CFR 2.206. Per MD 8.11, the NRC will not review a request where there is a proceeding through which a petitioner is, or could be, a party, and through which the petitioner's concerns could be addressed.

The concerns identified in the 2.206 petition request fall within the scope of the safety review of the license renewal application. The principal safety concerns associated with license renewal are related to the aging of structures, systems, and components important to the continued safe operation of the facility. When the plants were designed, certain assumptions were made about the length of time each plant would be operated. During the safety review for license renewal, the NRC must determine whether aging effects will be adequately managed throughout the period of extended operation. For all aspects of operation, there are existing regulatory requirements governing a plant that offer reasonable assurance of adequate protection if its license were renewed.

Therefore, this comment is not within the scope of the environmental review and will not be evaluated further in the development of the SEIS.

Comment: 4-12-OS; I frankly am really concerned about NRC accommodating the nuclear industry with weakened regulations, lax enforcement, negligence and unsubstantiated denials. It's happened right here even with their fire safety regulations that are -- we're on weakened fire safety regulations even though we know that that can eventually lead to a meltdown. I know my time's up. Thank you.

Comment: 1-38-OS, 37-9-OS, 39-10-OS; Lax fire safety regulations

Response: *These comments discuss concerns regarding NRC's fire protection regulations. The NRC's fire protection regulations, inspections, and research focus on continuing nuclear power plant safety. To accomplish this, the NRC requires a robust fire protection program at every commercial nuclear power plant in the United States.*

Nuclear power plants today use multiple layers of fire protection features to keep fires from damaging plant safety systems. Some of these features include fire barriers such as insulation, fire detection systems, and fire suppression systems (such as sprinklers). If a required element of fire protection is not available, the licensee must compensate for it, often by placing dedicated personnel on a continuous fire watch. The NRC regularly inspects licensees' means of achieving and maintaining the reactor's safe shutdown capability in the event of a fire.

The National Fire Protection Association (NFPA) Standards Council approved NFPA Standard 805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants, 2001 Edition" (NFPA 805), on January 13, 2001, as a risk-informed, performance-based standard for existing light-water nuclear power plants. The NRC staff cooperatively participated in the development of NFPA 805. Published in February 2001, NFPA 805 describes a methodology for existing light-water nuclear power plants to apply risk-informed, performance-based requirements and fundamental fire protection design elements to establish fire protection systems and features required for all modes of reactor operation. In addition, it presents a methodology for establishing fire protection procedures, systems, and features for nuclear power plants that are decommissioning and permanently shut down.

The NRC has modified its fire protection regulations to allow licensees to adopt, on a voluntary basis, NFPA 805, in lieu of their existing fire protection licensing basis. This initiative is part of an NRC effort to incorporate risk information into the agency's regulations and enhance safety.

The NRC continues to oversee fire protection at nuclear power plants through inspection and oversight through its ongoing reactor oversight process. The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the SEIS.

Comment: 1-3-OS; No other facility has the potential to render the entire region uninhabitable, possibly for centuries as the result of an accident or terrorist attack. This is the highest-risk facility that could exist in any community in this country.

Comment: 1-41-OS; [T]hreats from unguarded terrorist attacks with planes and missiles and a new threat, cyber attacks. Fuel pool[s] are vulnerable to attack.

Comment: 4-3-OS; Indian Point nuke plant was sketched as a possible terrorist target in reference to 9/11 attacks. A suspected terrorist worked at Limerick for 24 years without the industry knowing it. How scary is that?

Comment: 34-6-OS; The plant is vulnerable to terrorist attacks. An airport is located next to the facility. A plane could be flown into the reactor or the emergency power supply for the water circulation system at the same time terrorist could cut all outside power to the plant this would cause a meltdown and render entire area and downwind of the area uninhabitable for hundreds of years.

Comment; 24-2-OS; I also think that it would be very prudent to put a lot of attention on terrorist attacks on the fuel pools.

Comment: 30-7-OS; The cooling towers are within basic walking distance from shopping malls and all right aside of it - please explain that - with minimal security from what many of us can see.

Comment: 36-4-OS; I also am concerned about terrorist attacks, natural [disasters] and the more common "human error." I plead with you to not renew this license.

Comment: 37-12-OS, 39-13-OS; Threats From Unguarded Terrorist Attacks With Planes and Missiles, Cyber Attacks[.]

Comment: 44-6-OS; Haven't we already seen some of the damage that a terrorist attack can cause for our country and for others? Do you really need to risk more possible attacks on a power plant that is not fully equipped for that kind of attack or for some natural disasters that can occur. This plant is not prepared from attacks with planes, missiles, and other threats such as cyber attack.

Comment: 45-4-OS; Terrorists have made it clear they intend to attack nuclear plants. Exelon has refused to pay to guard Limerick against a 9/11 type terrorist attack with plane or missile, even though the most deadly targets (Limerick's fuel pools) are vulnerable to such attacks. Limerick is a similar design to nuclear plants in Japan that are melting down and exploding. NRC's own report from 2000 shows people 500 miles away could be impacted by an accident or attack on such fuel pools. Deadly radioactive spent fuel rods are jam packed into Limerick vulnerable fuel pools five stories high. Cyber attacks, now declared an act of war, could wipe

out systems that could lead to meltdown. Hackers have penetrated the Pentagon and other well guarded systems. Exelon's new plan for cyber attacks give us little comfort.

Comment: 55-7-OS; While recreation utilization is of importance and a major mission within this country, homeland security must be of a concern with any open access within vicinity of LGS. However, we concur that with support of local law enforcement and a commitment from LGS to control and monitor access, trail though may be accomplished

Response: *These comments discuss issues related to security and terrorism. Security issues are periodically reviewed and updated at every operating plant. These reviews continue throughout the period of an operating license, whether original or renewed. If issues related to security are discovered at a nuclear plant, they are addressed immediately, and any necessary changes are reviewed and incorporated under the operating license. In addition, since 9/11, the NRC and other Federal agencies have heightened vigilance and implemented initiatives to evaluate and respond to possible threats posed by aircraft against commercial nuclear power facilities and independent spent fuel storage installations.*

While security issues are legitimate matters of concern, they will continue to be addressed through the ongoing regulatory process as a current and generic regulatory issue that affects all nuclear facilities and many of the activities conducted at nuclear facilities. The issue of security and risk from malevolent acts at nuclear power facilities is not unique to facilities that have requested a renewal of their licenses.

The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the SEIS.

Comment: 4-4-OS; The Pacific Ocean is now severely irradiated by Fukushima. Radiation impacts of Fukushima equalled over 20 Hiroshima bombs when I last researched.

Comment: 6-22-OS; After Fukushima, Limerick listed as one of the top 10 to have very serious problem when we have an earthquake.

Comment: 37-6-OS, 39-7-OS; Radiation reporting levels increased dramatically after Japan disaster.

Comment: 46-3-OS; While the problems associated with age will develop in any nuclear power plant over time, there are additional problems with the reactors at Limerick. Limerick's reactors are boiling water reactors similar to those that catastrophically melted down last spring in Japan. Although these reactors have a later containment design, they have the same fundamentally flawed reactor pressure vessel design as those that failed at Fukushima. In the BWR design, the control rods come up through the bottom of the pressure vessel, instead of dropping down from above as in other reactor designs. While the reactor pressure vessel itself is made of very thick steel, the bottom of the BWR pressure vessel contains 60 holes through which the rods enter the vessel. In the event of a meltdown, however, these same holes can provide a "path of least resistance" through which the hot molten fuel can escape with relative ease; it then only has to melt through connecting pipes that are much thinner and weaker than the metal of the pressure vessel itself. This apparently occurred at Fukushima, where authorities now admit that reactor fuel underwent not merely a "melt-down," but a "melt-through," breaching the inner

pressure vessel and in the process releasing considerable amounts of radioactive material into the environment.

Comment: 46-4-OS; One might be tempted to dismiss the comparison Fukushima on the grounds Limerick in Pennsylvania is unlikely to experience a similar combination tsunami and earthquake. While the tsunami is not an issue, however, recent analysis by the Nuclear Regulatory Commission suggest that earthquakes pose more significant threat to the Limerick reactors than was recognized at the time of their construction and initial licensure. (Incidentally, it now appears that at least one of Fukushima's reactors was significantly damaged by the earthquake even before tsunami struck.) According to the NRC's own data, Limerick's two reactors are the third and fourth most likely in the country to sustain core damage in the event of an earthquake. There is a fault line called Ramapo fault line that runs slightly north of Limerick, and two small earthquakes associated with this fault line occurred as recently as February 2009. The unexpected quake shook Virginia's North Anna nuclear plant with over two times the amount of force that was designed to withstand should make use take very seriously the NRC's data regarding Limerick's greater than previously recognized vulnerability to earthquake damage. These concerns are compounded by the fact that the manufacturer of Limerick's controls rods, GE Hitachi, recently acknowledge concerns that the control rods in its BWR might not function properly in the event of an earthquake.

Comment: 56-3-OS; ...We further note, given the extended timeframes for expiration of the existing LGS operating licenses, that they easily encompass the five year timeframe that the Commission has set out for formulation and implementation of NRC staff safety recommendations to be undertaken "without unnecessary delay" in the wake of the Fukushima accident. In light of these important nuclear safety developments, we seek no reason why this proposed NEPA analysis, and hence the entire licensing proceeding that it is required to support, could not be deferred for at least five years, until the Commission has completed its decision-making and schedule for implementation of post-Fukushima safety upgrades. As noted above, to ensure the timeliness and accuracy of the NEPA analysis, the deferral could be even longer (on the order of 7 years for Unit 1), to allow for the inclusion of the results of the extended rulemakings contemplated under the Commission's regulatory response to the Fukushima accident.

Response: *As explained above, the NRC's ongoing safety review of operating reactors is outside the scope of this environmental review for license renewal. The NRC will continue to take necessary actions to ensure that all plants including LGS operate safely under their current and extended operating periods. The NRC continues to evaluate and act on the lessons learned from the March 2011 nuclear accident in Japan to ensure that appropriate safety enhancements are implemented at nuclear power plants here in the U.S. In accordance with Commission direction, the NRC's activities are being led by a steering committee comprised of senior NRC management. Additionally, the NRC established the Japan Lessons Learned Project Directorate, a division of skilled employees focused exclusively on implementing the lessons learned.*

On March 12, 2012, the NRC issued the first regulatory requirements for the nation's reactors based on the lessons learned at Fukushima Daiichi. The NRC issued three orders requiring safety enhancements to operating reactors, construction permit holders, and combined license holders. These orders require nuclear power plants to implement safety enhancements related

to (1) mitigation strategies to respond to extreme natural events resulting in the extended loss of power at plants, (2) ensuring reliable hardened containment vents at Mark I boiling water reactors, and (3) enhancing spent fuel pool instrumentation. The plants are required to promptly begin implementation of the safety enhancements and complete implementation within two refueling outages or by December 31, 2016, whichever comes first. In addition, the NRC issued a request for information, requesting each licensee to reevaluate the seismic and flooding hazards at the site using present-day methods and information, conduct walkdowns of its facilities to ensure protection against the hazards in its current design basis, and reevaluate emergency communications systems and staffing levels.

The public can access additional information regarding the NRC response to the Japan nuclear accident on the NRC's public website..

The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the draft SEIS.

Comment: 55-8-OS; In an attempt to promote and increase community outreach, the NRC should consider requiring Exelon to reopen the LGS Information Visitor Center. As a result of the incident in Fukushima, Japan, the Montgomery County Department of Public Safety has received a higher than normal volume of inquiries concerning nuclear power generation from the public. The LGS Information Center, although dated, could be upgraded to provide this service to the community to raise awareness and promote education of the nuclear power industry. This center could also be incorporated as an educational stop on the County Trail system.

Response: *The NRC's Office of Public Affairs (OPA) is available to address the public concerns and questions regarding nuclear safety. The office follows news coverage of the agency and responds to media and public inquiries. If members of the public have questions or comments about the NRC, nuclear safety, or related topics, they can contact OPA at OPA.Resource@nrc.gov. For specific questions and concerns regarding Limerick, the public can contact the Region I OPA at OPA1.Resource.@nrc.gov. Additional contact information for OPA can be accessed at <http://www.nrc.gov/about-nrc/organization/opafuncdesc.html>.*

The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the draft SEIS.

Comment: 1-28-OS; How about the customers that paid -- I hear them talk about how great the costs are for Limerick. We paid for Limerick from 1985 to 2010 in our electric bills. And in fact the electric[ity] that was supposed to be too cheap to meter turned out to be 55 percent above the national average by 1997. So that's how cheap Limerick electric is.

Comment: 1-43-OS; Increased cost to the public. We've heard a little bit about this this evening, more cancers, more illnesses, more emergency room visits, more hospitalization from increased PM-10. Massive research on what particulate matter in terms of PM-10 does to human beings. And there are a few other things that contribute to those visits. The costs are astronomical. One case that Donna mentioned, \$2.2 million for a childhood cancer case. You do the math.

Comment: 18-2-OS; If we don't get the license which I doubt but what would -- how would we get electric if the license were canceled?

Comment: 19-5-OS; What's more important, not all this electricity that we need for all our cell phones and everything. In a way we are responsible for the fact that PECO and all these other Exelon companies are building power plants. I myself you know am guilty of a lot of this but let's just maybe for a solution besides the wind and solar power and everything stop using all this new technology. Yes, you need it for some jobs and businesses, it's good for certain things, but let's not overindulge where we need so much electricity that we are willing to risk our lives. Cancer, polluted water. There's no drinking water anymore. People have to pay to buy water that comes from natural springs. But you're using plastic bottles, you can't even trust that.

But this whole world has kind of just changed from you know nature. Let's get back to nature, let the -- instead of having all the young teenagers on their cell phones texting, using more electricity, that again it's going to cause cancer for them. Everybody has to stop and think why do we need the power plants? We really don't and again, Thomas, our wonderful caller mentioned some alternatives like the solar power, wind, but I'm just saying we are using so much electricity and stupid little video games on the computers. People get on the computers for hours at a time doing nonsense. That's taking up electricity where again why do you need all this electricity?

Comment: 48-4-OS; Prior to the construction of the Limerick power plant, everyone in our surrounding area was told that our electricity would be one of the lowest in the U.S. This was a bold face lie!!!! It is one of the highest in the U.S.!!! [Exelon] lied to us then and they will distort the facts now.

Comment: 60-6-OS; ...To expensive

Comment: 60-18-OS; Increase costs-medical problems

Comment: 60-22-OS; Nuclear energy is dirty and expensive. Since Limerick was built we have had some of the most expensive energy -- higher rates

Response: *These comments address concerns regarding the cost of energy and the need for nuclear power. The regulatory authority over licensee economics (including the need for power) falls within the jurisdiction of the States and to some extent within the jurisdiction of the Federal Energy Regulatory Commission. The proposed rule for license renewal had included a cost-benefit analysis and consideration of licensee economics as part of the NEPA review. However, during the comment period, State, Federal, and licensee representatives expressed concern about the use of economic costs and cost-benefit balancing in the proposed rule and the GEIS. They noted that the President's Council on Environmental Quality (CEQ) regulations interpret NEPA to require only an assessment of the cumulative effects of a proposed Federal action on the natural and man-made environment and that the determination of the need for generating capacity has always been the States' responsibility. For this reason, the purpose and need for the proposed action (i.e., license renewal) is defined in the GEIS as follows:*

The purpose and need for the proposed action (renewal of an operating license) is to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs,

as such needs may be determined by State, licensee, and, where authorized, Federal (other than NRC) decision-makers.

Section 51.95(c)(2) of 10 CFR states that:

The supplemental environmental impact statement for license renewal is not required to include discussion of need for power or the economic costs and economic benefits of the proposed action except insofar as such benefits and costs are either essential for a determination regarding the inclusion of an alternative in the range of alternatives considered or relevant to mitigation.

The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the draft SEIS.

Comment: 22-4-OS; I wonder how many people here are aware of something called the Price Anderson Nuclear Industries Indemnity Act. Who knows about that? The title alone should give you some pause. Why do we need a nuclear industries indemnity act? What does it do? What it does is it puts a ceiling of a few hundred million dollars on the liability that nuclear power plant owners have for the damage their plants would cause. It's basically a scheme, they pay into a pool. The problem is that ceiling was set a very long time ago. It's totally unrealistic in terms of the risk in just the value of houses in areas that are covered by a plant like this. When this plant was planned the population in the area that its plume would cover probably wasn't 20 percent of what the population is now. That is I think a valid environmental concern.

Comment: 22-6-OS; The question I ask about the money liability is -- let's just go back to the Price Anderson Act. The fact is that the nuclear industry does not pay market rates for insurance to cover it for the liabilities. This congressional act from way back in the 1960s eliminates that need. Back then the insurance industry didn't have the research to put a price on what should the Limericks of the world have to pay for a liability policy. I think there's plenty of insurance industry experience now. So my question would be if nuclear plants are so safe why do we need the Price Anderson Act?

Response: *The Price-Anderson Act Nuclear Industries Indemnity Act (Price-Anderson Act; 42 U.S.C. 2210) is a federal law that governs liability-related issues for all non-military nuclear facilities constructed in the United States. The main purpose of the Act is to partially indemnify the nuclear industry against liability claims arising from nuclear incidents while still ensuring compensation coverage for the general public. The Act establishes a no fault insurance-type system in which the first \$10 billion is industry-funded and any claims above the \$10 billion would be potentially covered by the Federal government.*

Licensees are required by the Act to obtain the maximum amount of insurance against nuclear related incidents that is available in the insurance market. Currently, this insurance amount is approximately \$375 million per plant. Monetary claims that fall within this insurance coverage are paid by the insurer. The Price-Anderson fund would then be used to make up the difference. Each reactor company is obliged to contribute up to \$111.9 million in the event of an accident, amounting to approximately \$11 billion (as of 2011) if all of the reactor companies were required to pay their full obligation into the fund. However, this fund is not paid into unless an accident occurs. If a coverable incident occurs, the NRC is required to submit a report on the cost of the incident.

If claims are likely to exceed the maximum Price-Anderson fund value, the President must submit a proposal to Congress that details the costs of the accident, recommends how funds would be raised, and includes plans for compensation to those affected.

The comments are outside the scope of the license renewal review and will not be evaluated further in the development of the draft SEIS.

12. Postulated Accidents & SAMA (PA)

Comment: The following comments have been categorized under the area of Postulated Accidents and SAMA. The following comments express concern over the impacts to the environment as a result of a postulated accident, such as earthquakes and terrorist attacks. Additionally, the comments raised concerns regarding the potential of new and significant information related to SAMA.

Identifiers: 1-1-PA, 1-13-PA, 1-24-PA, 4-1-PA, 4-15-PA, 6-7-PA, 8-6-PA, 19-1-PA, 30-10-PA, 37-11-PA, 39-12-PA, 45-2-PA, 47-1-PA, 56-1-PA,

Response: *The staff will address postulated accidents and the potential of new and significant information related to SAMA in Chapter 5 of the draft SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

13. Radioactive and Non-Radioactive Waste (RW)

Comment: The following comments have been categorized under the resource area of Radioactive and Non-Radioactive Waste. The comments express concern over the generation and storage of radioactive waste and the impact to the environment.

Identifiers: 1-10-RW, 1-11-RW, 1-14-RW, 1-30-RW, 1-36-RW, 1-37-RW, 6-4-RW, 18-1-RW, 23-3-RW, 30-7-RW, 34-3-RW, 35-5-RW, 37-8-RW, , 39-9-RW, 52-5-RW, 60-4-RW, 60-11-RW, 60-14-RW

Response: *The staff will address radioactive and non-radioactive waste management in Chapter 2 of the draft SEIS. The impacts of the waste management will be addressed in Chapters 4 and 6 of the draft SEIS. Finally, the environmental impacts of alternatives evaluated in depth will be discussed in Chapter 8 of the draft SEIS, including waste management. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

14. Socioeconomics (SE)

Comment: The following comments have been categorized under the resource area of Socioeconomics. The comments express support for LGS based on tax benefit, employment, and monetary contribution to organizations within the community. The comments express concerns related to the increase of homes and businesses in the area.

Identifiers: ,1-29-SE, 52-3-SE

Response: *The staff will address the socioeconomic impacts of renewing the LGS operating licenses in Chapters 2 and 4 of the SEIS. In addition, the socioeconomic impacts of not renewing the operating licenses will be discussed in Chapter 8. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

15. Support for License Renewal (SR)

Comment: The following comments have been categorized under the area of Support for License Renewal. The following comments are general in nature and express support for nuclear power and/or the license renewal of LGS.

Identifiers: 2-1-SR, 3-1-SR, 5-1-SR, 5-4-SR, 7-1-SR, 11-1-SR, 12-1-SR, 13-1-SR, 14-1-SR, 14-2-SRT, 17-1-SR, 20-1-SR, 50-1-SR

Response: *The comments provide no new and significant information and will not be evaluated further in the development of the draft SEIS.*

16. Surface Water (SW)

Comment: The following comments have been categorized under the resource area of surface water. The comments express concern over the environmental impacts on the surrounding water supply such as Schuylkill River.

Identifiers: 1-17-SW, 1-23-SW, 1-32-SW, 4-5-SW, 4-10-SW, 23-1-SW, 24-1-SW, 5-4-SW, 35-4-SW, 36-2-SW, 45-9-SW, 54-4-SW, 55-6-SW, 60-9-SW, 60-21-SW

Response: *The staff will address the surface water impacts of renewing the LGS operating licenses in Chapters 2 and 4 of the draft SEIS. In addition, the surface water impacts of not renewing the operating licenses will be discussed in Chapter 8 of the draft SEIS. These comments are in scope and will be represented and responded to in Appendix A of the draft SEIS.*

References

10 CFR 2. *Code of Federal Regulations*, Title 10, *Energy*, Part 2, "Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders."

10 CFR 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, "Domestic Licensing of Production and Utilization Facilities."

10 CFR 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions."

10 CFR 54. *Code of Federal Regulations*, Title 10, *Energy*, Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants."

[Exelon] Exelon Generation Company, LLC. 2011. *License Renewal Application, Limerick Generating Station, Units 1 and 2, Appendix E, Applicant's Environmental Report, Operating License Renewal Stage*. ADAMS Accession No. ML11179A104.

National Environmental Policy Act of 1969. 42 U.S.C. 4321, et seq.

[NRC] U.S. Nuclear Regulatory Commission. 1996. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*, NUREG-1437, Volumes 1 and 2, Washington, D.C., ADAMS Accession Nos. ML040690705 and ML040690738.

[NRC] U.S. Nuclear Regulatory Commission. 1999. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Main Report*, "Section 6.3 – Transportation, Table 9.1, Summary of Findings on NEPA Issues for License Renewal of Nuclear Power Plants, Final Report," NUREG-1437, Volume 1, Addendum 1, Washington, D.C., ADAMS Accession No. ML040690720.

[NRC] U.S. Nuclear Regulatory Commission. 2005. NRC Management Directive 8.11, *Review Process for 10 CFR 2.206 Petitions*. ADAMS Accession No. ML041770328.

[NRC] U.S. Nuclear Regulatory Commission. 2011a. Letter from Harold Chernoff, Branch Chief, Licensing Branch I-2 to Thomas Saporito. August 17, 2011. ADAMS Accession No. ML112231397

[NRC] U.S. Nuclear Regulatory Commission. 2011a. Official Transcript of Proceeding, "Limerick Generating Station License Renewal Public Meeting: Afternoon Session." Adams Accession No ML11287A207

[NRC] U.S. Nuclear Regulatory Commission. 2011b. Official Transcript of Proceeding, "Limerick Generating Station License Renewal Public Meeting: Afternoon Session." Adams Accession No ML11287A211

[NRC] U.S. Nuclear Regulatory Commission. 2011c. Summary of Public Scoping Meetings Conducted on September 22, 2011, Related to the Review of the Limerick Generating Station, Units 1 and 2, License Renewal Application. ADAMS Accession No. ML04069720.

Price-Anderson Nuclear Industries Indemnity Act, as amended, 42 U.S.C. 2210.

Comment Letters and Meeting Transcripts

The following pages contain the comments, identified by commenter designation and comment number, from letters, emails, and public scoping meeting transcripts.

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1 unthinkable proportions. Whether a natural disaster
2 or terrorist attack occurs, by relicensing Limerick,
3 NRC would in effect be placing Russian roulette with
4 the lives of more than eight million people. NRC must
5 close Limerick Nuclear Plant by 2029.

1-1-PA

6 There is no way for either NRC or Exelon
7 to ensure the safety of the environment or the
8 residents impacted by this plant. It cannot be made
9 fail safe. No other facility has the potential to
10 render the entire region uninhabitable, possibly for
11 centuries as the result of an accident or terrorist
12 attack. This is the highest-risk facility that could
13 exist in any community in this country.

1-2-OS

1-3-OS

14 Current 40-year operating licenses expire
15 in 2024 and 2029. Why the rush to renew these
16 licenses now?

1-4-LR

17 We urge the NRC to say no to Exelon's
18 requested license renewals. The public was led to
19 believe that Limerick's generators, fuel pools, and
20 miles of underground pipes and cables could operate
21 safely for 40 years and then the facility would close.

1-5-OR

1-6-LR

22 Is Exelon fearful that the longer they wait the more
23 serious problems may arise?

24 After only 26 of 40 years, numerous signs
25 of aging and risk have been identified. Corrosion,

1-7-OS

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1 deterioration, fatigue, cracking, thinning with loss
2 of material, loss of fracture toughness are all
3 documented in Exelon's own renewal application in the
4 aging management section. Instances of equipment
5 fatigue and cracking of vital equipment include the
6 reactor vessel and coolant system.

1-7-OS
Cont'd

7 Aging equipment, after only 26 years
8 suggests that NRC should not just close the plant by
9 2029, but also ramp up their oversight vigilance
10 during the remaining 18 years of the current license.

1-8-OS

11 In the past few years, Limerick has had numerous
12 unplanned shutdowns suggesting there are already
13 significant problems. Three occurred in one week in
14 June 2011. Loss of coolant leaks and accidents at
15 Limerick have already been documented. Serious
16 radioactive contamination could go undetected and
17 unreported for years from the corroding
18 infrastructure, much of it underground.

1-9-OS

19 There have already been two near misses at
20 Limerick from 1996 to 2001.

21 This aging plant is an accident waiting to
22 happen. Large volumes, more than 6,000 assemblies
23 weighing more than a thousand tons of highly
24 radioactive waste in the form of spent fuel rods are
25 stored in densely-packed pools, elevated five stories

1-10-RW

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1 above and outside the reinforced containment
2 structure. This plant will produce about two more
3 tons of dangerous spent fuel rods every year that it
4 operates. Limerick; in addition, is now third on the
5 earthquake risk list for nuclear plants in the United
6 States.

1-10-RW
Cont'd

1-11-RW

1-12-OS

7 With loss of cooling water, Limerick's
8 fuel rods could heat up, self ignite, and burn in an
9 unstoppable fire with catastrophic results. Exelon
10 has not been required to spend the money to guard
11 Limerick against terrorists, missiles, or air strikes
12 despite repeated requests to do so.

1-13-PA

13 Dry cask storage and transport are also
14 very dangerous alternatives. It's time to close
15 Limerick and stop producing such deadly waste for
16 which there is no safe solution. As long as Limerick
17 operates harms to us and our environment will
18 increase.

1-14-RW

19 Their harmful environmental impacts are
20 unprecedented. At the conclusion of our 11-year
21 investigation of routine radiation releases and review
22 of permits for major air pollution and a variety of
23 dangerous water contamination issues, it's clear that
24 this energy is not just dirty, it is in fact filthy.
25 Evidence that we've compiled has addressed a wide

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1 range of topics: routine radiation releases into the
2 air, radioactive wastewater discharges into the
3 Schuylkill River, radioactive groundwater
4 contamination, radioactive nuclides associated with
5 the plant detected in our soil, our sediment, our
6 vegetation, our fish, our water, and milk.

7 Research has confirmed radiation in our
8 children's baby teeth in this community. Major air
9 pollution issues under health-based standards of the
10 Clean Air Act, 32 individual sources listed. Drastic,
11 harmful increases permitted in particulate matter
12 known also as PM-10 from the cooling towers, other air
13 pollution increases also permitted.

1-15-HH

1-16-AM

14 Dangerous depletion of the Schuylkill
15 River, in and by itself, a singular reason to deny
16 this permit. The Schuylkill is a vital drinking water
17 source for nearly two million people from Pottstown to
18 Philadelphia. It is being depleted and contaminated
19 every day that this plant operates.

1-17-SW

20 Alarming cancer increases that have been
21 well documented in this community repeatedly far
22 higher than national and state averages after Limerick
23 started operating until the late 1990s. The

1-18-HH

24 findings of our investigation lead us to conclude that
25 this plant is in common language a recipe for

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1 disaster.

2 While NRC is required to prepare a
3 supplement to the Limerick Environmental Impact
4 Statement for license renewal, we have little
5 confidence in the process based on NRC's regulatory
6 history. It would be difficult to enumerate a short
7 list, so I'm going to rely on written documents.

1-19-LR

8 There are critics of the NRC out there who have done a
9 much better job than we have of generating such a
10 list, most notably a scathing indictment by the
11 Associated Press. I'm not going to re-enumerate that
12 information.

13 It's long past time for the NRC to summon
14 the courage to do the right thing in our judgment and
15 actually protect the environment and the public,
16 rather than the industry.

1-20-OR

17 Today, I am going to be submitting on the
18 record summary packets of our research on Limerick's
19 major air pollution, harms to the Schuylkill River,
20 radioactive groundwater contamination, links between
21 Limerick's radiation and our elevated cancers in this
22 community and how Limerick's nuclear power can, in
23 fact, be replaced with safer sources today.

24 Based on the compelling body of evidence
25 of environmental harms to date and the enormous

1-21-OR

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1 increased population in proximity to this facility,
2 Limerick Nuclear Plant must be closed by 2029.

3 There is no amount of energy production that is
4 worth risking the lives of so many people. Thank you

5 very much.

6 (Applause.)

7 FACILITATOR BARKLEY: Thank you, sir.

8 MR. MAGUIRE: Good afternoon. My name is
9 Bill Maguire and I am the site vice president at
10 Limerick Generating Station. And I have overall
11 responsibility for the safe and reliable operation of
12 the facility.

13 I have been working in the nuclear power
14 industry for 25 years and my career began at the
15 Limerick Generating Station as an engineer. I
16 continued with a license to be a licensed senior
17 reactor operator supervisor in the operations
18 organization and was the on-shift senior manager of
19 that facility for many years.

20 I have also worked at a few other nuclear
21 stations across the country and before rejoining
22 Limerick as the site vice president in May of 2010, I
23 was the site vice president at the Peach Bottom Atomic
24 Power Station in southeastern Pennsylvania in York
25 County.

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1 Operating Limerick Generating Station
2 safely and reliably is a responsibility that everyone
3 at the power station takes very seriously. We
4 understand our obligation to the community, to the
5 environment, and to each other to operate the plant
6 safely.

7 A key component of a thriving community
8 like ours is the availability of safe, clean, and
9 reliable electricity. And as we look into the future
10 for the power needs of Pennsylvania and the United
11 States as a whole, we can see the increasing demand
12 for this very important resource.

2-1-SR

13 At the same time, there's a growing
14 concern about greenhouse gases and climate change that
15 is a result of burning fossil fuels. To help meet
16 that growing power demand and to help keep our
17 environment clean, Exelon has applied to the U.S.
18 Nuclear Regulatory Commission for a 20-year extension
19 to the plant's operating license. Limerick's current
20 license for Unit 1 will expire in 2024 and Unit 2 in
21 2029. With license renewal, Limerick can provide our
22 region with clean power through 2049.

23 We understand our special obligation to
24 operate the plant safely and reliably and to maintain
25 a close relationship with our neighbors. We pledge to

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1 continue that special trust as we operate the plant
2 well into the future.

2-1-SR
Cont'd

3 The 104 nuclear reactors in the United
4 States provide roughly 20 percent of our nation's
5 electricity. More than 70 reactors nationwide have
6 already received approval from the Nuclear Regulatory
7 Commission for a 20-year license extension including
8 the Peach Bottom Atomic Power Station in York County.

9 Limerick Generating Station operates in a
10 manner that preserves the environment. The plant
11 produces almost no greenhouse gases. The plant
12 conducts approximately 1700 tests annually on air,
13 water, fish, soil, cow's milk, and other food products
14 to measure for environmental impact. We also maintain
15 a chain of radiation monitors surrounding the plant.

16 In 2005, the environmental management
17 systems at Limerick Generating Station achieved
18 certification under the strict criterion of the
19 International Organization for Standardization, ISO.
20 This certification is known as ISO 14001, a common
21 industry reference for the environmental
22 certification. The ISO 14001 certification requires a
23 commitment to excellence to prevent pollution and to
24 ensure continuous improvement in environmental areas.

25 In 2010, the Wildlife Habitat Council

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1 recognized Limerick Generating Station's commitment to
2 environmental stewardship by awarding us the Wildlife
3 at Work Certification. This distinction was awarded
4 to Limerick Generating Station for our commitment
5 towards establishing long-term wildlife habitat
6 enhancements that provided undisturbed habitats with
7 food, water, cover, and space for animal species
8 living on the plant station's landscape.

9 To ensure Limerick continues to operate
10 safely for years to come, Exelon is investing in
11 upgrades to plant equipment. Since 2010, Exelon has
12 invested more than \$200 million into the plant
13 including installation of new safety equipment, new
14 electrical cables, new valves, and refurbishing the
15 cooling towers. In addition, Limerick has made more
16 than \$40 million in physical security upgrades since
17 2001.

18 Our investment in the future does not stop
19 with equipment. We have hired and trained over 100
20 new employees over the last three years, mostly coming
21 from our native region here. We maintain a steady
22 workforce of approximately 850 people and during our
23 annual maintenance and refueling outages, we bring in
24 between 1500 and 2000 temporary workers that provide a
25 boost to our local economy. Hiring and

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1 retaining top talent is a key priority for Limerick
2 Generating Station.

3 Over the past 25 years, Limerick has been
4 one of the best performing and most reliable
5 generating stations in the nuclear power industry.
6 During that time, the plant has set several records
7 for continuous days of operation and has been
8 recognized by the industry for our reliable operation.

9 In March 2010, Limerick completed a successful run of
10 727 continuous days for our Unit 1 plant. This
11 represented the second longest continuous run for a
12 boiling water reactor in the United States.

13 While we do not set out to break records,
14 continuous operations are an indicator of the
15 excellent human performance and equipment reliability
16 that Limerick strikes for every day.

17 We also take pride in our investments in
18 the community. In 2010, Limerick donated more than
19 \$600,000 to the community in contributions to the
20 United Way, fire and ambulance companies, educational
21 health and youth organizations. And many of our
22 employees serve as volunteers in the local communities
23 around the plant.

24 In conclusion, Limerick Generating Station
25 looks forward to working with the Nuclear Regulatory

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1 Commission as you review our license renewal. I
2 appreciate the opportunity to speak with you this
3 afternoon. Thank you.

4 FACILITATOR BARKLEY: Thanks, Bill.

5 (Applause.)

6 FACILITATOR BARKLEY: Representative
7 Quigley.

8 REP. QUIGLEY: Good afternoon, my name is
9 State Representative Tom Quigley. I represent the
10 146th District here of which lower Pottsville is a
11 party of that district, so I want to welcome the NRC
12 here today to the beautiful Sunnybrook Ballroom for
13 this meeting and thank them for coming out to listen
14 to the public and take commentary.

15 I'm here today to voice my strong support
16 for the relicensing of the Limerick Generating
17 Station. I wanted to touch on a couple points of why
18 I feel it is important for this facility to be
19 relicensed.

20 First is the amount of electricity that is
21 produced by this facility. One of the things that
22 myself and my colleagues in Harrisburg hear
23 consistently from businesses and the Commonwealth and
24 our citizens is the demand for energy and electricity
25 now and more importantly what that demand is going to

3-1-SR.

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1 be in the future.

2 Right now this facility generates enough
3 electricity for two millions homes and without
4 producing some of the greenhouse gases that we hear so
5 much about that could be produced by coal, natural
6 gas, or oil. And I'm going to put a caveat in there
7 for my good friends out in the western part of the
8 state where coal is a big part of the Pennsylvania
9 economy and I'm suggesting that this be done to the
10 exclusion of coal and nevertheless, some of the
11 technologies that they're developing out there are
12 also important for that industry and important for the
13 Commonwealth of Pennsylvania.

14 Again, one of the concerns we hear
15 consistently from businesses is how can we come here
16 into Pennsylvania with the infrastructure. Being what
17 it is which needs to be improved for the transmission
18 of the electricity, but more importantly the
19 generation of that electricity?

20 Number two, I think is important is the
21 jobs and overall economy. Again, in these tough
22 economic times that we're facing here in the
23 Commonwealth of Pennsylvania and also in this nation,
24 one of the top issues that we hear consistently about
25 is jobs.

3-1-SR
Cont'd

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1 And as was mentioned by the site vice
2 president, over 860 people are employed here with an
3 annual payroll of \$75 million. The direct impact that
4 is to the Commonwealth of Pennsylvania, of course, is
5 realized through the state income tax and also all of
6 these local municipalities most of them enact an
7 earned income tax which again sustains their townships
8 as well as their respective school districts. To have
9 that taken away I think would have an even more
10 dramatic impact on our local economy.

11 As was mentioned the impact for the local
12 area here, the temporary workers who show up here
13 during the outages and the refueling, there's already
14 been two hotels that have sprung up along the 422
15 corridor with another one planned right up here at the
16 Sanatoga area. Again, more jobs and more economic
17 growth here for our communities.

18 Thirdly, I want to talk about the
19 communication that I've experienced in the seven years
20 that I've been in office with Exelon and with their
21 Government Affairs people as well as with their site
22 people. I've been on the site three times, twice for
23 a tour and one to make a presentation during an
24 anniversary of the facility. And I have to say that
25 it is a very secure area. I know a lot of people are

3-1-SR
Cont'd

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1 concerned about terrorism attacks or people being on
2 the property. But unless you've actually gone over
3 there and gone through a tour, seeing how things are
4 set up, seeing the armed guards there, seeing the
5 security measures that are in place, I think you come
6 away much more relieved with that. And I'm able to
7 speak to my constituents more affirmatively about the
8 safety and security of the facility.

3-1-SR
Cont'd

9 Any time that there's been the slightest
10 occurrence there, whether it will be a couple times a
11 hunter has wandered onto the property where the
12 authorities were called, the Government Affairs people
13 at Exelon are on the phone to me or with an email
14 right away to let me know what's happening before the
15 word gets out to the media or to the press. So
16 they're always very well prepared in their
17 explanations, not only of things that happen at the
18 plant itself, but also incidents and issues that occur
19 around the country and around the world.

20 Obviously, what took place in Japan with
21 the incident over there, they were on the phone with
22 me and met with me a few times to explain what took
23 place over there and how the safeguards are being put
24 in place here so that doesn't happen at this facility.

25 It was mentioned earlier the dry cask

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45.

1 storage where the spent fuel rods are now stored
2 outside in a dry cask storage facility. When that was
3 proposed back in 2005-2006, the Generating Station
4 held two open houses that were very well attended. I
5 went to both of them where they had people on there to
6 explain to the people what exactly was taking place
7 with this dry cask storage, why it was necessary. A
8 lot of questions and answers back and forth and I
9 think a lot of the people came away better informed
10 about that process.

11 Just recently at an open house, the site
12 VP who just spoke, Bill Maguire, came out to give some
13 initial comments and wound up spending the full hour
14 in an impromptu question and answer session and not
15 again just planted questions, a lot of tough
16 questions. And I think again the people came away
17 feeling confident in the openness and the transparency
18 that was displayed in that question and answer
19 session.

20 Another point of that is for relicensing
21 for the overall environment here is the good corporate
22 citizenship that the Generating Station has exhibited.
23 As was mentioned by Bill, some of the charitable
24 contributions that have gone on, not only for the host
25 community of Limerick, but also for the surrounding

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1 areas. I attended a few dedication services where
2 they provided money to the Upper Providence Elementary
3 School and the Limerick Elementary School for an
4 outside environmental classroom.

5 One of the things we talk about as
6 political leaders, and I'm on the House Education
7 Committee, is the need for our children to be educated
8 particularly in the sciences and given these budget
9 constraints that we're operating under, both the
10 school districts and the Commonwealth, it's good to
11 see a corporate citizen stepping up to the plate and
12 providing that financial support, particularly in the
13 area of science. They've also partnered with the
14 Montgomery County Community College to provide
15 assistance in support for an associate degree in
16 nuclear engineering technology.

17 Again, we hear so much about our students
18 here not being well versed in technology and
19 engineering and things of that nature. So again,
20 stepping up to the plate to provide that assistance
21 when, in fact, perhaps in these tough budget times
22 where the government might not be able to do that.

23 Last, I want to talk about overall public
24 opinion and safety issues. One of the things that I
25 looked at when I talk about safety and the feeling of

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1 comfort that people have here is how many of the
2 people who work at that plant live within the ten-mile
3 radius of the facility? And I asked that question
4 when I first was elected in 2004 and I just asked it
5 again in preparation for this hearing and 563
6 employees live within the ten-mile radius.

7 The population growth in my District in
8 the past ten years, we're getting ready to redraw our
9 lines based on the 2010 Census, so I broke it down by
10 township as to how much the population has increased
11 in those areas: Limerick Township, increasing by 33.5
12 percent; Upper Pottsgrove by 29.5; Royersford Borough,
13 where I live, 11.9; Lower Pottsgrove, 7; Pottstown, 2;
14 now this is a little bit skewed, but I have a small
15 piece of New Hanover Township which actually increased
16 by 54 percent.

17 When you look at the public opinion, and
18 again, we get calls on a lot of different issues and
19 as I mentioned that dry cask storage issue. Back
20 then, at the same time that that issue was being
21 rolled out to the public, Boyd Gaming had purchased a
22 property next to our plant was getting ready to apply
23 -- had applied for a license, casino license. At that
24 time, my office had received 2 calls in regard to the
25 dry cask storage project, over 200 calls regarding the

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1 casino application. So at the time, it appeared
2 people were more concerned about the prospect of a
3 casino being in their neighborhood than they were a
4 dry cask storage facility.

5 And lastly, as some of you heard, there is
6 a proposal right now to put a hold on Route 422. And
7 again, in the past six months with the incidents in
8 Japan, with the current earthquake we had here, with
9 the AP story telling you how these plants are all
10 falling apart, I received two calls regarding that one
11 where they could get the KI pills, one where they
12 could -- what was the evacuation plan for that, and
13 more calls and emails regarding the proposed 422. So
14 again, it appears that the constituents and the 146th,
15 they're more concerned about the prospect of paying a
16 toll to ride of 422 than they are about the nuclear
17 power plant issues.

18 So again, I strongly support the
19 relicensing of this for the reasons I mentioned.
20 Thank you.

21 (Applause.)

22 FACILITATOR BARKLEY: Thank you,
23 Representative Quigley.

24 The next three people I'd like to call,
25 first is Lorraine Ruppe, private citizen; and the

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1 next, Michael Gallagher of Exelon; and finally, I'd
2 like to call Dr. Fred Winter after that.

3 MS. RUPPE: Hi, my name is Lorraine Ruppe.

4 I am speaking here today to represent the children
5 and future generations, especially in our community.
6 Residents are fearful about the possibility of
7 disasters here in light of Fukushima in March 2011 and
8 since the earthquake and Hurricane Irene in August
9 2011 affecting our area. Climate changes, etcetera,
10 are causing disasters everywhere and continuing to get
11 worse.

12 Increasing floods, droughts, earthquakes,
13 tornados have made us all feel insecure, making
14 nuclear power increasingly risky, especially with the
15 Limerick plant basically in our backyards. Any
16 earthquake that comes through this area could be a
17 possible Fukushima, Chernobyl or Three Mile Island

4-1-PA

18 which reminds me, four months have passed since the
19 NRC failed to get back to me when I asked how close
20 the Remapo fault line is to the Limerick nuclear
21 reactors? Maybe I can get an answer today.

4-2-GE

22 Indian Point nuke plant was sketched as a
23 possible terrorist target in reference to 9/11
24 attacks. A suspected terrorist worked at Limerick for
25 years without the industry knowing it. How scary is

4-3-OS

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1 that?

2 The Pacific Ocean is now severely
3 irradiated by Fukushima. Radiation impacts of
4 Fukushima equalled over 20 Hiroshima bombs when I last

4-4-OS

5 researched. Our drinking and bathing water here is
6 being continuously polluted by Limerick every day,
7 24/7 for years with radiation and unfiltered toxic
8 contaminated mine water, thanks to the NRC and Exelon.

4-5-SW

9 This is disgusting.

10 Most of us have to depend on the water,
11 especially for bathing. Some of us pay extra for
12 water filtration or drink bottled water because we are
13 afraid to drink from the Schuylkill and because it
14 tastes really bad now. Imagine how toxic it would be
15 18 plus years from now if there was even any water
16 left.

17 There has been increased particulate
18 matter in the air and other toxics from Limerick
19 causing increased asthma, heart attacks, and strokes.

4-6-HH

20 And to add insult to injury, Limerick was granted a
21 permit to allow an eight-fold increase in air
22 pollution since 2009. Cancer rates in our area have
23 skyrocketed since Limerick has been up and running in
24 the '80s and rates have steadily increased.

25 The Toothfairy Project showed high levels

4-7-HH

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1 of strontium 90, a radionuclide in baby teeth of
2 children nearest to nuke plants. Baby teeth near
3 Limerick plant had the highest levels in the whole
4 United States. This stuff and God knows what else is
5 in our bodies now thanks to a Nuclear Regulatory
6 Commission that to put it nicely is less than
7 enthusiastic about protecting us.

4-7-HH
Cont'd

8 Solar Wind, geothermal, ocean thermal,
9 energy conservation and efficiency are now cheaper
10 than nuclear power, along with being truly clean and
11 safe. The Department of Energy 2006 report stated
12 solar alone could provide 55 times our entire nation's
13 energy needs which leads me to a point, there have
14 been numerous studies proving the many dangerous and
15 deadly consequences of nuclear power. There's no

4-8-AL

16 denying the massive devastation it has already caused
17 and will continue to cause indefinitely, but the
18 industry still goes on in their trance-like,
19 indifferent fashion as if everything is safe and
20 wonderful and will continue to be 18 plus years from
21 now or until 2049 for our community. This is what
22 really scares us the most.

23 The NRC has turned into a culture of
24 secrecy, hiding the dangers and sweeping the problems
25 under the rug. The industry's addiction to money and

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1 power has blinded them to moral life and death issues
2 and facts set right in front of their faces. But, my
3 big question of the day is why is Exelon applying for
4 an extension 18 years ahead of time? Thank you.

4-9-LR

5 (Applause.)

6 FACILITATOR BARKLEY: Thank you, Lorraine.
7 Mike?

8 MR. GALLAGHER: Good afternoon. My name
9 is Mike Gallagher and I'm the Vice President of
10 License Renewal for Exelon. I have overall
11 responsibility for the Limerick Generating Station
12 license renewal application.

13 Exelon has a great deal of experience with
14 license renewal, as we have already obtained the
15 renewed licenses for our Peach Bottom and our TMI
16 plants in Pennsylvania, our Oyster Creek plant in New
17 Jersey, and our Dresden and Quad Cities plants in
18 Illinois.

19 Just briefly about myself. I've been
20 working in the nuclear power industry for 30 years. I
21 was a licensed senior operator and plant manager at
22 Limerick and I worked at two other nuclear plants and
23 our corporate offices.

24 Mr. Maguire, the site vice president for
25 Limerick spoke about reasons for renewing the license

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1 for Limerick. I'd like to speak briefly about the
2 process for preparing this license renewal application
3 and the amount of work and engineering analysis that
4 was put into preparing the application.

5 Because the license Generating Station can
6 be operated safely and reliably, Exelon decided to
7 pursue license renewal for Limerick. Limerick is a
8 very clean energy source which produces no greenhouse
9 gas emissions. Limerick is also good for the economy
10 in that it lowers market prices on electricity for the
11 citizens of Pennsylvania to the tune of \$880 million
12 per year.

5-1-SR

13 So in 2009, we announced our intention to
14 seek license renewal for Limerick. Later that year,
15 we started the work necessary to prepare the
16 application. After over two years of work, we
17 submitted the application to the Nuclear Regulatory
18 Commission on June 22, 2011. The application, as Lisa
19 had mentioned, when you print it out it's about 2100
20 pages. And when you put it in the binders it's three
21 large binders. It's a huge amount of information.
22 But that only represents a small part of the work that
23 was done for the engineering analysis to prepare this
24 application.

25 The total amount of engineering analysis,

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1 if we printed it all out would be about 290 binders of
2 information. We invested over 60,000 manhours of
3 engineering work. Once we completed our engineering
4 work to prepare the application, we brought in experts
5 from outside Exelon to review the application to
6 ensure that it was complete, thorough and accurate.
7 Our total cost to prepare the application and get this
8 application reviewed by the NRC will be about \$30
9 million.

10 There are two different parts of our
11 application, the safety review and the environmental
12 review. For the safety review, we took an in-depth
13 look at the history and the condition of the safety
14 equipment in the plant. We did that to determine
15 whether the necessary maintenance was being performed
16 on that equipment and to make sure that the equipment
17 will be able to operate when it's needed, not only for
18 today, but also for an additional 20 years of
19 operation.

20 When you look back at Limerick, when it
21 was built, all the equipment was new. It was
22 thoroughly tested to make sure it would perform
23 properly, but like anything else equipment does age.
24 That doesn't mean it won't work, but it does age and
25 certain activities need to be done to the equipment.

5-2-OS

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1 So we perform preventive maintenance. Sometimes we
2 refurbish the equipment. Some equipment is replaced.

3 There may be modifications done to upgrade the
4 equipment in the plant and in fact, as Bill Maguire
5 has stated, Limerick had spent over \$200 million in
6 the last couple years alone to improve and modernize
7 the equipment and enhance plant operations and safety.

8 We also then reviewed calculations that
9 were performed as part of the original design of the
10 plant that were done to ensure that the plant could
11 operate safely for 40 years. We analyzed those
12 calculations and were able to confirm that the plant
13 would be able to operate safely for 60 years.
14 Overall, our conclusion from our engineering review
15 was that Limerick could operate safely for up to 60
16 years.

5-2-OS
Cont'd

17 We also took a look at the environmental
18 impacts of continuing to operate Limerick. We looked
19 at all the impacts of continued impact of the plant on
20 the environment. Our conclusion is that impacts on
21 the environment are small and I use the term small in
22 the sense that is in the regulation. The regulation
23 defines small as environmental effects are not
24 detectable or are minor.

25 We also reviewed the alternatives if

5-3-AL

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1 Limerick would not have its license renewed and
2 another source of electric generation would need to be
3 installed either here on site or someplace else to
4 generate the replacement electricity. We concluded
5 that any other means of generating the replacement
6 electricity would have more of an impact on the
7 environment than continued operation of Limerick. For
8 instance, if Limerick could be replaced by a wind
9 generation facility, the wind farm would have to
10 occupy between 10 and 40 percent of all the land in
11 the state of Delaware and that would have a huge
12 impact on the land. If a solar facility could replace
13 Limerick, it would need to cover 32 to 50 percent of
14 the entire land area of Montgomery County.

5-3-AL
Cont'd

15 In conclusion, we operate Limerick safely
16 and we can continue to operate it safely for an
17 additional 20 years. Limerick will provide
18 approximately 2340 megawatts of base-load generation
19 that's not only safe, but it's clean, reliable and
20 economical.

5-4-SR

21 Continued operation of Limerick will
22 benefit this community, the Commonwealth of
23 Pennsylvania and our nation. Thanks for giving me the
24 time for this. Thank you.

25 (Applause.)

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1 FACILITATOR BARKLEY: Thank you, Mike.
2 Dr. Winter?

3 DR. WINTER: Good afternoon. Thanks for
4 letting me speak. We have heard a lot of pros and
5 cons, haven't we? And it's hard to make a decision
6 that's for sure. But let me get going here.

7 As a physician practicing radiology for
8 over 50 years, I still have strong concern about
9 cancer sensitivities from harmful radiation exposures,
10 naturally. My medical colleagues share the same
11 concerns because we have seen our cancer rates
12 increase since the Limerick power plant started;
13 especially thyroid cancer. It jumped to 78 percent
14 higher here than the national average. And some of
15 the people I talked to, this is because people are
16 aging more now, getting older, so there are more
17 cancers. But that's not true because in other areas
18 similar to our area in Pottstown, they're not nearly
19 getting the thyroid cancers that we are. This has
20 been well established by the state.

6-1-HH

21 You wonder why some of our medical and
22 cancer fundraisers haven't reacted with more
23 responsibility in order to stop this. They're making
24 a lot of money, but not taking much effort to prevent
25 environmental damage.

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1 Yes, we are creating our own form of
2 terrorism. Now that sounds kind of funny, doesn't it?

3 But allowing any harmful environmental events to
4 occur, we are allowing our own form of terrorism, just
5 like foreign people would come in here.

6 Having attended a Hiroshima, Japan atom
7 bomb clinic right after World War II, naturally I had
8 a chance to see the worst results of harmful
9 radiation. All those little kids I saw who only lived
10 for a few days, it left me with a very sad memory. Of
11 course, what is happening here will be taking much
12 longer, but it sure is not good.

6-2-HH

13 I don't know whether you've heard that
14 some scientists are already predicting that -- I'm
15 sorry to tell you this, but nuclear energy has the
16 capacity of destroying mankind. It may take about 100
17 years, but our whole world is exposed to the harmful
18 effects, maybe not so much here in the United States,
19 but the whole world can be affected.

20 Of course, what is happening here will be
21 taking much longer, but it is sure not good news.
22 Besides harmful power plant exposures, we have
23 environmental disasters and a concern about our nearby
24 earthquake fault and others in the eastern U.S.,
25 especially one near New York City. And then there are

6-3-PA

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1 the radioactive spent fuel deadly waste material
2 sitting around, supposedly protected. We can't
3 control the use of nuclear power in the rest of the
4 world, but can keep America safer and cleaner here.

6-4-OS

5 So please, ask your politicians, reliable
6 politicians to close the Limerick power plant. Let's
7 save America for our kids and descendants. I hope you
8 will take my concerns seriously. And thank you for
9 listening.

6-5-OR

10 (Applause.)

11 FACILITATOR BARKLEY: Okay, thank you, Dr.
12 Winter. The next three people I'd like to call is Tom
13 Neafcy of Limerick Township, followed by Dr. Anita
14 Baly, and then Tim Fenchel of the Schuylkill River
15 Heritage Foundation.

16 MR. NEAFCY: Good afternoon, thank you.
17 My name is Tom Neafcy. I'm the Chairman of Limerick
18 Township Board of Supervisors and I want to thank you
19 for this opportunity to speak at this forum today.

20 As the largest private employer in the
21 region, the Board is thankful for the 860 jobs that
22 Exelon provides, the positive impact of their
23 operation, the vitality of our local community. The
24 community and local economy are enhanced by the needed
25 services provided by the township, which includes the

7-1-SR

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1 roadway network maintained by our Limerick Township
2 Public Works, public safety provided by the Limerick
3 and Linfield Fire Companies, and our local emergency
4 medical response, our public parks, our recreation
5 facilities and also the police protection that's
6 provided by Limerick's 21 sworn officers.

7 Because of Limerick Generating Station's
8 location within our borders, the Limerick Township
9 Police Department is the only municipal police
10 department in Pennsylvania with the primary
11 jurisdiction over Tier 1 critical infrastructure.

7-1-SR
Cont'd

12 This Board prides itself on the services provided
13 directly both to the residents and the businesses of
14 this community and the township's ability to maintain
15 those current levels of service during these difficult
16 economic downturns. We are thankful for the
17 generosity of the Limerick generating plant and Exelon
18 for being good corporate neighbors and the assistance
19 they provide to the community. Without their
20 financial assistance that impact to provide those
21 services to the community would fall squarely on the
22 backs of the taxpayers. They assist in our fire
23 companies. They have been corporate sponsors of our
24 Limerick Community Days. And we are confident that
25 Limerick generating facility and Exelon will continue

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1 that support in the future and be our good corporate
2 neighbor.

3 We also are in support of the relicensing
4 of the Limerick nuclear plant. Thank you.

7-1-SR
Cont'd

5 (Applause.)

6 FACILITATOR BARKLEY: Dr. Baly?

7 DR. BALY: Good afternoon. I'm Anita
8 Baly. I'm a retired Lutheran pastor and my concern
9 today is with the speed at which this application
10 process is going. I mean it seems to me that to
11 predict what environmental factors will be in place 13
12 years hence and 18 years hence, posits a kind of
13 omniscience and prescience that we should attribute to
14 Almighty God, but certainly not to any of us human
15 beings.

8-1-LR

16 I would favor a slower process. As we
17 look around, we see that the population in this area
18 is getting denser all the time. The roads are not
19 being improved. And that leaves me with concerns
20 about how we would effect an evacuation were one
21 needed. I suspect strongly that we couldn't perform a
22 good evacuation today. And I also suspect that the
23 population will be increasing and the roads
24 deteriorating. In fact, just this morning in the
25 Pottstown Mercury, they were reporting on the hearing

8-2-OS

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1 that was held on Route 422 which is our main road
2 around here. And Barry Seymour is quoted, he's the
3 Executive Director of the Delaware River Valley
4 Regional Planning Commission, and he told last week's
5 forum audience that population projections anticipate
6 a 50 percent increase in the region and if we don't
7 increase capacity on 422, we will have virtual
8 gridlock all the way to the Berks County line.

8-2-OS
Cont'd

9 Maybe we'll improve that situation, but
10 it's way too early to know if that will happen. And
11 so my plea and my concern is can we slow this down so
12 that we know, in fact, what the environmental impacts
13 are going to be closer to a time that the decision is
14 made. Thank you.

15 (Applause.)

16 FACILITATOR BARKLEY: Thank you. Tim?

17 MR. FENCHEL: Good afternoon. My name is
18 Tim Fenchel and I'm on the staff of the Schuylkill
19 River National and State Heritage Area. We are one of
20 49 congressionally-designated Heritage Areas in the
21 country and our mission is to use recreation,
22 conservation, education, cultural and historic
23 preservation and tourism as tools for community
24 revitalization and economic development with the
25 Schuylkill River Valley.

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1 The Heritage Area has had the opportunity
2 for almost seven years now to partner with Exelon
3 Nuclear and the Limerick Generating Station on several
4 local and regional projects and programs. These
5 programs have proven to have a positive impact on our
6 local communities, residents, and natural resources.
7 And I would like to take a few moments to highlight
8 those now.

9 In 2005, Exelon Nuclear approached us
10 about the possibility of partnering together on a
11 grant program that would work to restore our area's
12 critical natural resource, the Schuylkill River. The
13 river has been detrimentally impacted by hundreds of
14 years of abuse and neglect, primarily as a result of
15 our nation's history related to the Industrial
16 Revolution. But even more recently, due to
17 deforestation, farming practices, and continued open
18 space development.

19 Beginning in 2006, after the creation of
20 grant program guidelines, an advisory committee and a
21 necessary accounting and reporting structures, Exelon
22 began making annual contributions to the Schuylkill
23 River Restoration Fund. The Schuylkill River Heritage
24 Area acts as the administrator and the manager of this
25 grant program, redistributing Exelon's contributions

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1 to local and regional watershed groups, conservation
2 organizations, and local government agencies for
3 projects addressing the quality and quantity of
4 Schuylkill River water. Projects focusing on
5 agricultural remediation, abandoned mine drainage, and
6 stormwater runoff are supported through this program.

7 To date, Exelon has contributed over \$1.2
8 million to the restoration fund for watershed-wide
9 projects. Twenty-two grants have been awarded and 11
10 projects have been completed. These projects have
11 made an impact on the water quality and quantity of
12 the Schuylkill River which is a source of drinking
13 water for over 1.75 million people in southeastern
14 Pennsylvania.

15 Exelon's establishment and contribution to
16 the restoration fund has been a model program and is
17 now a uniquely valued public/private partnership as
18 several new partners have joined efforts and made
19 their own contributions to the fund. Both the
20 Philadelphia Water Department and the Partnership for
21 the Delaware Estuary have brought funding to the
22 program and supported regional watershed projects.
23 The contributions made by Exelon have been the
24 catalyst to leverage additional funds well over
25 \$600,000 for area restoration.

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1 The goal of the Restoration Fund Advisory
2 Committee is to be able to support a sustainable level
3 of half a million dollars annually for the fund and in
4 turn, conservation projects that will continue to
5 ensure the future health of the Schuylkill River.

6 In addition to our work on the restoration
7 fund, we have assisted Exelon Nuclear, East Coventry
8 Township, and Chester County in a planning effort to
9 begin the process of restoration and preservation of
10 the historic Fricks Locks Village. Earlier this year,
11 Exelon Nuclear, the current owners of the village,
12 signed an agreement with East Coventry Township to
13 stabilize, rehabilitate, and protect several of
14 Chester County's oldest buildings. Exelon has agreed
15 to spend \$2.5 million to restore the exterior of
16 several buildings as stabilized ruins. A fence will
17 be built around the grounds and the corporation is
18 donating four houses to the township worth an
19 estimated \$1 million.

20 In addition, the corporation has agreed to
21 continue to do routine maintenance on the village and
22 work with the local historical society to host guided,
23 historic and educational tours for the public.

24 From our perspective, much of the success
25 of this partnership can be assigned to the hard work,

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1 dedication and personal commitment of Exelon staff and
2 management. Based on the very positive community
3 programs and involvement we have experienced and
4 witnessed first hand as a regional organization, we
5 would like to communicate our support for the
6 relicensing and continued operation of Limerick
7 Generating Station. Thank you.

9-1-SR

8 (Applause.)

9 FACILITATOR BARKLEY: Okay, thank you.
10 The next three people I would like to call, Bill
11 Vogel, followed by Eileen Dautrich, is that how you
12 say that?

13 MS. DAUTRICH: Dautrich.

14 FACILITATOR BARKLEY: Dautrich. Okay.
15 And then Bill Albany.

16 MR. VOGEL: Hi, my name is Bill Vogel. I
17 live in Phoenixville. Units 1 and 2 had an initial
18 life expectancy of 40 years. They are now asking to
19 increase that 20 years, a full one third increase.
20 Everything has a life expectancy, machinery, as well
21 as people. Demographically, my life expectancy is 74.

10-1-LR

22 If I was to get a one third extension, like the
23 Limerick plant wants, that would take me to 111. What
24 do you think is going to happen to me between age 74,
25 my life span, my nameplate capacity, and the year when

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1 I reach 111? It's going to go down hill. That's
2 lifecycle. Machinery has them. You don't need an
3 engineer to tell you that. Just like human beings
4 have them. We become less effective, less efficient,
5 less competent.

6 The significant difference is my failure
7 will be containable. Limerick's most likely will not.

10-1-LR
Cont'd

8 If I drive over you with my car because I no longer
9 see as well or have the reflexes I once had, that's a
10 tragedy for you, your family, for me and my family.

11 The sphere of the tragedy is containable. If Limerick

12 Unit 1 or 2 fails, all hell breaks loose, no
13 disrespect. That's what a nuclear failure is, hell.
14 It affects everybody in this room, everybody in the
15 community, everybody in the tri-state area, not for a
16 week, but for decades. It's very, very last thing we
17 want to happen.

18 And I think we're putting ourselves in
19 harm's way by taking something that had a lifespan of
20 40 years and adding another 20 to it. It doesn't make
21 sense. The only way to rationalize it is through our
22 personal fear of being inconvenienced because we lose
23 a very, very good source of power. It's done a great
24 job for us. But like me, you get to a point where
25 your ability to provide a great job is at an end and

10-2-
OR

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1 things start deteriorating. Let's not put ourselves
2 in that position. Let's make an intelligent decision
3 now and allow these two units to expire at their
4 nameplate time. Thank you.

10-2-OR
Cont'd

5 (Applause.)

6 FACILITATOR BARKLEY: Thank you, Bill.
7 Eileen.

8 MS. DAUTRICH: Good afternoon. My name is
9 Eileen Dautrich. I'm president of the Tri-County Area

10 Chamber of Commerce. I'm happy to be here today to
11 provide examples of how Limerick Generating Station is
12 a valued community and business partner and echo the
13 statements already shared by several others.

11-1-SR

14 They're one of the tri-county area's
15 largest employer, providing professional employment
16 opportunities for local residents. Those local
17 residents employed by Limerick Generating Station are
18 supporting the entire tri-county business community.
19 They're purchasing personal goods and services from
20 local small businesses. The annual outage is a
21 tremendous benefit to the local economy and our local
22 businesses. Limerick encourages their outage
23 employees to visit and purchase from tri-county area,
24 local businesses, and small businesses.

25 In addition to the jobs they provide local

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1 residents, they're making a significant investment in
2 our local communities. Municipalities and residents
3 benefit from assistance received from Limerick to
4 start, maintain, expand parks, recreation, and quality
5 of life opportunities.

11-1-SR
Cont'd

6 Their corporate culture of giving back to
7 the community is practiced by their hundreds of
8 employees. Nonprofit organizations are supported by
9 Limerick Generating Station and the efforts of their
10 employees. Financial donations, as well as volunteer
11 hours and time are donated, enabling our local
12 nonprofits to provide the much needed services that
13 impact those in need throughout the tri-county area.

14 The Limerick Generating Station is
15 confident in the clean and safe environment they
16 maintain in our community. The community has been
17 invited to experience the generating station
18 firsthand. The chamber hosted a membership breakfast
19 and the site vice president, Bill Maguire provided the
20 keynote presentation. He summarized safety measures
21 and advancements at Limerick and answered questions
22 pertaining to the Limerick plant and its safety in the
23 wake of the tsunami in Japan.

24 In addition, after our breakfast, Chamber
25 members were encouraged to attend the informational

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1 see policies and procedures that people talk about and
2 they're put up on a shelf and they're followed at best
3 haphazardly with a wink and a nod and deviation from
4 the policy is not addressed.

5 One of the things that I'm continuously
6 impressed at LGS when I visit is their sound adherence
7 to policy and procedure. They don't deviate from it.

8 I've been to numerous drills at the plant, numerous
9 exercises at the plant, some of which were run by the
10 NRC and I've never seen them fail. They always come
11 out on top. In fact, in 2009, Limerick was selected
12 as a site for the first comprehensive pilot exercise
13 involving federal, state, and local law enforcement
14 SWAT teams to actually go into the power block and
15 conduct tactical operations in there, and that drill
16 was used as a boiler plate to develop policies and
17 procedures for implementation in power plants
18 throughout the country.

19 One of the -- I'm sorry, I don't believe
20 that continued operations of the power plant would
21 have any detrimental effect on public safety in the
22 southeast region. Thank you.

12-1-SR

23 (Applause.)

24 FACILITATOR BARKLEY: Okay, thank you.
25 I'd like to call the final three speakers who have

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1 signed up, John McGowan, Ted Del Gaizo, and Timothy
2 Phillips. John?

3 MR. MCGOWAN: Thank you very much. My
4 name is John McGowan and I am a life-long resident of
5 the Delaware Valley. I have lived half of my -- or I
6 should say the Limerick Nuclear Power Station has been
7 operating for half of my life. I own three
8 manufacturing companies in the Malvern area and employ
9 a number of people in those facilities who rely
10 tremendously on the Limerick Power Generating Station
11 to supply safe, reliable electrical power to keep us
12 operating.

13 Today, I would like to say that in all of
14 the years that I've lived in this area, I've never
15 worried at all about the safety of the nuclear power
16 plant. I see it every day. And it bothers me not in
17 the least. I have never seen any credible evidence to
18 suggest that there are safety problems with this
19 plant. In terms of reliability, it is the same. It
20 is running 24/7, 365 days a year and it has been doing
21 so for a quarter of a century and I hope it continues
22 to do so for many more years to come.

23 As far as its environmental impact, I
24 think it's pretty widely known that nuclear power is
25 one of the cleanest environmental energies that we

13-1-SR

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1 possess today throughout the world and to dismiss it
2 is I think a foolish notion.

3 The impact of the Limerick plant in our
4 region has been extraordinarily positive. It
5 provides, as we all know and have heard today, lots of
6 jobs, lots of good jobs, tax revenues for schools,
7 local governments and for those who live in the area
8 to enjoy the fruits of public services and it also
9 provides a lot of charitable donations to the
10 community which is very important.

11 I think that to not keep this plant
12 running and not consider a renewal of its license for
13 an extended period would be a tragic mistake for all
14 of us and I would like to end this by saying that the
15 only meltdown that would concern me is the economic
16 one that certainly would happen to this area should
17 this plant not continue to operate.

18 (Applause.)

19 FACILITATOR BARKLEY: Ted, go ahead.

20 MR. DEL GAIZO: Hi, my name is Ted Del
21 Gaizo. I'm a registered professional engineer in the
22 Commonwealth of Pennsylvania. I'm also president and
23 CEO of a small business engineering firm in nearby
24 Exton, Pennsylvania.

25 My experience in nuclear power goes back

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13-1-SE
Cont'd

1 to the 1960s where I spent 14 years in Navy submarines
2 and I personally operated, maintained, and refueled
3 nuclear power plants during that period.

4 But I'm here today as a private citizen,
5 as a resident of the area and as a member of the
6 Pennsylvania Energy Alliance to go on record and say I
7 strongly favor license renewal for the Limerick
8 Generating Station. I say that because in my personal
9 experience I know in spite of some of the things
10 you've probably heard here today, nuclear power is
11 safe, reliable, secure and clean. But in addition to
12 that, I would like to go on record, I would like my
13 neighbors to know we are lucky to have the Limerick
14 Generating Station in this area. In the industry, it
15 has a top reputation. It is one of the finest nuclear
16 power plants in America. And Exelon, if not the best,
17 is certainly one of the finest nuclear operators in
18 the world.

14-1-SR

19 I have nothing but confidence that Exelon
20 will work together with the NRC, will run through the
21 process and we will come up with the right conclusion
22 here which is license renewal should be granted to the
23 Limerick Generating Station. I think we need to keep
24 Limerick operating as long as we can.

25 In addition, in spite of some other things

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1 openness in the thinking process that goes into place
2 for renewal of any nuclear power plant.

3 And so from my perspective as a citizen,
4 as a business person who has worked in this community,
5 I understand the value this is to the region. And for
6 me, I applaud the NRC for what they're doing here. I
7 applaud Exelon for the great work that they're doing
8 there and I encourage the renewal process to take
9 place. Thank you.

14-2-SR

10 (Applause.)

11 FACILITATOR BARKLEY: Thank you. With
12 that, I have all 15 people who had signed up for this
13 meeting, have been called. Is there anyone else who
14 would like to make a short follow-up remark or would
15 like to still speak at this point?

16 Okay, if not, I'd like to make two points
17 before we wrap up. One, the NRC does have public
18 meeting feedback forms which give us feedback on how
19 you think this meeting was conducted, so I would
20 greatly appreciate you filling out one of those forms
21 for us so that we can learn how to improve. There is
22 another session of this meeting at 7 o'clock tonight.
23 You're welcome to speak again tonight.

24 And secondly, what I'd like to say is I
25 facilitate a lot of meetings throughout the Northeast

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1 meeting via conference bridge. And due to the
2 arrangements of the audio in this room it wasn't
3 possible to do it any other way than a cell phone. So
4 we're going to go to him and ask him to make a
5 statement for the period and move from there. So our
6 first speaker will be Mr. Thomas Saporito who is a
7 senior consulting associate and he actually lives in
8 Florida. So as soon as we can work having him on the
9 microphone we will have him make his statement. Are
10 we free to give it a try?

11 MS. REGNER: Go ahead. Yes. Go ahead,
12 Mr. Saporito.

13 MR. SAPORITO: Is it my turn to speak?

14 MS. REGNER: Yes.

15 MR. SAPORITO: Okay. Can you hear me
16 okay?

17 FACILITATOR BARKLEY: As best we can, yes.

18 MS. REGNER: Yes, go ahead.

19 MR. SAPORITO: All right. My name is
20 Thomas Saporito. I'm the senior consultant with
21 Saproani Associates and I'm located in Jupiter,
22 Florida. I would like to comment on the NRC's
23 environmental review but before I do that I want to
24 state that, you know, I'm very upset at the NRC's
25 refusal to honor my enforcement petition filed under

16-1-OS

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1 10 CFR 2.206 with respect to the Limerick nuclear
2 plant. The NRC denied that petition on the basis that
3 I would have an opportunity to intervene on this
4 proceeding through the NRC's judicial process.
5 However, that's not available to me. I made that
6 quite clear in the 2206 petition. Now, I don't have
7 standing as a United States citizen because of my
8 physical location in Jupiter to intervene in a
9 proceeding in Pennsylvania where this plant is
10 located. The NRC staff is incorrect in their opinion
11 and they have a legal obligation to honor that
12 enforcement petition and to provide an opportunity for
13 me to address the Petition Review Board. So I want to
14 put that on the record and I'm asking the NRC to look
15 into that issue.

16-1-OS
Cont'd

16 With respect to this environmental
17 petition the fellow who spoke earlier from the NRC, I
18 don't recall his name. It was very hard for me to
19 hear through this communication his name. But anyway,

20 one of his comments was exceptionally incorrect and he
21 misinformed the public. And I'd like to correct that
22 statement. He stated that the NRC is extending the
23 original operating license which was granted by the
24 NRC for a 40-year period of time that that initial 40-
25 year license was not based on safety considerations or

16-2-LR

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1 technical considerations. But that's absolutely not
2 true and there was recently a year-long investigative
3 report done by the Associated Press who interviewed
4 expert nuclear personnel, engineers, safety engineers
5 in the nuclear industry who told them that the 40-year
6 licenses issued by the NRC for 104 nuclear plants in
7 the United States was based on safety and technical --
8 safety technical analysis. So these proceedings,
9 these license extension proceedings like the one we're
10 currently at are a rubber-stamping of these 20-year

16-2-LR
Cont'd

11 license extensions. This is in fact a foot race
12 between the Nuclear Regulatory Commission and the
13 United States Congress where Congress wants to stop
14 this process, put a moratorium on the re-licensing
15 until the Fukushima disasters can be fully understood
16 and the enhancement enacted in August for our power

16-3-LR

17 plants here. This particular nuclear plant, these
18 plants, you know, their license is already good till
19 2024. Why are we here now 12 years ahead of time
20 trying to extend this license? And the only reason is
21 because it's a foot race the NRC's in with Congress
22 and nothing more. This has nothing to do with
23 protecting public health and safety, it's the NRC's
24 zeal to continue to rubber-stamp these license
25 extensions without allowing citizens due process like

16-4-LR

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1 I already talked about and without doing a cost-
2 intense and thorough environmental review.

16-4-LR
Cont'd

3 And with respect to the NRC's
4 environmental review the NRC in my view failed to
5 properly consider the embrittlement of this nuclear
6 reactor vessel. When these nuclear reactors are
7 operating the neutrons cause the metal in the reactor
8 vessel to become brittle over time. And after
9 numerous years of operation these reactor vessels

16-5-OS

10 could crack because they're so brittle. But the NRC
11 doesn't properly evaluate that and the NRC doesn't
12 require the licensee to do destructive testing and
13 analysis of the reactor's metal vessel prior to
14 rubber-stamping a 20-year extension to these licenses.

15 Twenty years from now, oh actually 20 years from 2024
16 which will be 2044 this reactor is going to be even
17 more critically brittle and the NRC's not going to
18 understand the dynamics of that and the reactor could
19 crack and it's going to melt down because you can't
20 recover from a loss of coolant accident of that
21 magnitude. So that's one point.

22 The other point is the NRC's Commission
23 over there in Rockville, in the White Flint Building,
24 they recently adopted a new policy with respect to
25 evacuations. They want these licensees to update

16-6-OS

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1 their evacuation plans. Now, I would hope that the
2 NRC staff has made that requirement to the Limerick
3 licensee so that the people near and around within 15
4 miles of the nuclear plant can properly and timely
5 evacuate the area. Again, the Associated Press's
6 investigation, year-long investigation shows that the
7 populations around these nuclear plants increased
8 tenfold over the years and that the roads and the
9 congestion, you can't timely evacuate these areas.
10 And the NRC keeps pushing these evacuation plans onto
11 the licensee but the NRC doesn't enforce its
12 regulation or properly review if these plans are even
13 effective.

16-6-OS
Cont'd

14 The NRC is required under the law in this
15 review, the environmental review to consider renewable
16 energy sources, alternatives. And that means need.
17 Is there really a need for these two nuclear plants to
18 operate and the answer is no. Simply stated if all
19 the customers who receive power from these nuclear
20 plants were to simply remove their hot water heaters
21 and replace them with on-demand electric water heaters
22 you would reduce the electric base load demand by 50
23 to 70 percent. You wouldn't need either one of those
24 nuclear power plants to operate. If you take that
25 further and introduce other energy conservation you

16-7-AL

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1 would actually have the licensee shut down more of
2 their other power plants because of you would need a
3 demand. If you take wind energy which is plentiful up
4 there in Pennsylvania and even the new solar panel
5 which can operate when the sun isn't shining on a
6 cloudy day you could replace even more operating power
7 plants. So these renewable energy sources even with
8 respect to wind energy since you have a common grid
9 throughout the United States you can have wind farms
10 generate power to a common grid point and supplying
11 the power that these nuclear plants are now providing.
12 The NRC's required under the law to consider these
13 alternatives to extending this license. And I would
14 hope that the NRC's final evaluation and review shows
15 a complete and thorough analysis of all these
16 renewable energy sources including installing on-
17 demand hot water electric heater and doing an analysis
18 of how many megawatts you're going to take off the
19 grid and based on those evaluations make a licensing
20 determination whether or not this license should be
21 extended. Because 20 years from now all these
22 renewable resources are going to be all that much more
23 advanced and capable of supplying all that much more
24 power than they're currently supplying. So those are
25 my comments and I would hope that the NRC takes them

16-7-AL
Cont'd

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1 seriously and applies them to this license renewal.

2 And I hope everybody heard me.

3 (Applause)

4 MS. REGNER: Can you hear that? They're
5 clapping.

6 FACILITATOR BARKLEY: Okay, at this point
7 I'll call back Mr. Saporito later and thank him for
8 his remarks and for being succinct in his remarks.
9 It's awfully awkward to provide comments via this
10 avenue.

11 The first three people I would like to
12 call are actually individuals who did not speak this
13 afternoon so I'd like to start with them. Firstly,
14 Jeff Chumnuk, then Daniel Ludewig, and then finally
15 Catherine Allison. So Jeff, if you could lead off.

16 MR. CHUMNUK: Hi, my name is Jeff Chumnuk
17 and I'm a member of Borough Council with Pottstown
18 Borough. And my comments tonight are more I guess
19 from my perspective as a newly elected official with

20 the generating station. About a year ago I had the
21 opportunity to go down to the generating station and
22 meet with Joe Saffron and the first part of my meeting
23 had to do with looking for some support for the
24 Pottstown Soapbox Derby. Through some conversation
25 while we were standing outside you know Joe

17-1-SR

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1 enlightened me a little bit on what Exelon and the
2 generating station do for the surrounding communities,
3 whether it's supporting our firefighters, police
4 departments and other civic organizations. You know,
5 from a Pottstown perspective they help us with our
6 yearly borough cleanup, our Salvation Army and now the
7 Soapbox Derby. Thank you.

8 And we were standing outside that day, it
9 was pretty nice out, and our conversation led to the
10 power plant itself. We were standing there looking
11 around, it's a pretty impressive sight. So I asked
12 him about, you know, possibly having a tour for
13 municipal officials. He said he would look into it
14 and see what he could do. A couple of months later he
15 got a group of about 20 of us and gave us a tour of
16 the plant one evening. And I have to say that from
17 the time we walked through the front gates and past
18 the security as our tour progressed, you know,
19 throughout the plant safety was paramount. Whether
20 you were having explained what the different colors
21 are on the different panels and what they mean to
22 different failsafes, why you walk certain areas
23 certain ways and what lines you had to stand behind,
24 you know, safety was paramount with them. You know,
25 from the environment, I'm looking around and this

17-1-SR
Cont'd

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1 place is spotless. And I asked why and it's because
2 they can't afford to have dirt or lint or fuzz balls
3 around because of static electricity because it could
4 create issues. So from that aspect I thought it was a
5 good tour and it made me feel good about the safety
6 aspects there.

7 To finish our tour we ended up in the
8 control room upstairs. And I'd say maybe a dozen or
9 so individuals up there monitoring you know everything
10 going on within the plant and around the plant. And
11 again, explaining the failsafes and why they're
12 double-, triple-checked to eliminate human error. It
13 was just very impressive and as an elected official to
14 go down and take a tour of the plant and understand
15 how it operates. I know when I left I personally know
16 how to issue a concern with the generating station. I
17 know I felt a lot better and a lot safer going home
18 that night. And it was also good to realize, you
19 know, as one of our region's largest employers now
20 that they are willing to give back to the community
21 and keep safety first. So thank you, I just wanted to
22 make those comments.

17-1-SR
Cont'd

23 (Applause)

24 FACILITATOR BARKLEY: Thank you, Jeff.

25 Daniel?

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1 MR. LUDEWIG: I'm Dan Ludwig. Just two
2 questions. One would be what are we going to do with
3 the 20 years of spent rods and how are you going to
4 take care of those. And secondly, if we don't get the
5 license which I doubt but what would -- how would we
6 get electric if the license were canceled? I don't
7 know who answers this..

18-1-RW

18-2-OS

8 FACILITATOR BARKLEY: I'll ask Lisa to
9 speak.

10 MS. REGNER: Yes, the spent fuel rods.
11 Limerick is licensed for an individual spent fuel pool
12 facility. They offload the spent fuel. Once they've
13 cooled to a certain level they will put those into dry
14 cask storage and store those onsite. In the
15 environmental review that's looked at generically.
16 Limerick does have storage for the spent fuel rods.
17 That's an ongoing, it's onsite and part of their
18 reactor oversight process as well. So the residents
19 that work at the plant monitor the safe operation of
20 those facilities.

21 The second question, where would the power
22 come from if Limerick were shut down? There are
23 alternate power facilities in the area. Dave, you
24 want to give that a try?

25 MR. WRONA: I'm David Wrona, a branch

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1 Can everyone hear me in the back row? I am Catherine
2 Allison and I was born and raised in this area so as
3 far as the NRC wanting to know how this impacts the
4 area I know it very well. I've also traveled the
5 world so, Europe, et cetera. So did anyone not be
6 able to hear me, just raise your hand. You're good?
7 Okay.

8 One thing I wanted to say is the NRC
9 tonight is doing a scoping basically for environmental
10 purposes for the re-licensing. What I wanted to say
11 is for years everyone, I'm being general here, but
12 most people have been talking about the effects of
13 like, you know, cancer, you know, the impact on the
14 clean air, clean water which things we are all
15 concerned about and a lot of us just didn't do
16 anything about it even though we were very concerned.

17 Now lately with the -- unfortunately it's
18 a reality now that we have hurricanes, more tornadoes,
19 tsunamis throughout the world. And I hate to say it
20 but it is a reality now that we have terrorist attacks
21 and Limerick is definitely one. I don't want to be
22 blowing this out of proportion but it's just something
23 that I know that we've all been concerned about, not
24 wanting to say yes, Limerick, and all the people that
25 built the power plant and the company say oh, there's

19-1-PA

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1 no impact to the air and the water pollution and so
2 forth. So we've kind of just blinded our, you know,
3 selves to that and let's believe then, okay, let's
4 take a minute. Let's really believe that there is no
5 impact in our clean air, clean water and those type of
6 things and cancer, et cetera. Let's just go into the
7 new reality which is terrorist attacks which would
8 happen. Let's just say for example there was human
9 error there with the spent fuel rods and something
10 happened, or a radiation leak. I just drove tonight

19-1-PA
Cont'd

11 from King of Prussia. Talk about evacuation when
12 these natural disasters and realities hit us. One
13 accident, two hour backup, almost no exaggeration, one
14 thousand cars. There will be no evacuation. I don't
15 want to be like scare tactics here but like I said,
16 the weather and so forth, natural disasters has really
17 been hitting the whole United States and the world
18 lately so it's a reality.

19-2-OS

19 There was flooding after the hurricane
20 that we just had. Five days later there was roads
21 closed in Pottstown, in North Coventry, East Coventry.
22 There were, when I tried to get home from work right
23 on Route 724, no exaggeration again from all the back
24 roads about 500 cars. There will be no evacuation and
25 I certainly hope that people understand I'm not trying

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1 to be scare tactics. I see this. I'm sure a lot of
2 you have seen this and been in these situations. All
3 with a little bit of flooding. What this does to the
4 roads. Again, there will be no evacuation.

19-2-OS
Cont'd

5 So from day one I think power plants never
6 should have been built but now that they are here why
7 would we ever want to re-license. And as our
8 gentleman caller just said, I believe his name was

19-3-OR

9 Thomas, he was very eloquent. He was stating the fact
10 why are we re-licensing them, what, 12 years ahead of
11 time. To me that is absurd. Like maybe a year before
12 or they have to do some studies, two years before.
13 Why do they want us, and I love Thomas's words,
14 rubber-stamp something? Twelve years beforehand to go
15 into what, 2024 for Unit 1 was it and 2029 for Unit 2?
16 Why do they need to push this licensing renewal?
17 You've got to stop and think. People, go home, think
18 about that. I'm not an expert like evidently our
19 caller Thomas was but again, I'm concerned about human
20 life. This is what I have at the top here. We are

19-4-LR

21 talking about human life. What's more important, not
22 all this electricity that we need for all our cell
23 phones and everything. In a way we are responsible
24 for the fact that PECO and all these other Exelon
25 companies are building power plants. I myself you

19-5-OS

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1 know am guilty of a lot of this but let's just maybe
2 for a solution besides the wind and solar power and
3 everything stop using all this new technology. Yes,
4 you need it for some jobs and businesses, it's good
5 for certain things, but let's not overindulge where we
6 need so much electricity that we are willing to risk
7 our lives. Cancer, polluted water. There's no
8 drinking water anymore. People have to pay to buy
9 water that comes from natural springs. But you're
10 using plastic bottles, you can't even trust that.

11 But this whole world has kind of just
12 changed from you know nature. Let's get back to
13 nature, let the -- instead of having all the young
14 teenagers on their cell phones texting, using more
15 electricity, that again it's going to cause cancer for
16 them. Everybody has to stop and think why do we need
17 the power plants? We really don't and again, Thomas,
18 our wonderful caller mentioned some alternatives like
19 the solar power, wind, but I'm just saying we are
20 using so much electricity and stupid little video
21 games on the computers. People get on the computers
22 for hours at a time doing nonsense. That's taking up
23 electricity where again why do you need all this
24 electricity? It could be causing cancer in your

25 children. I am not that old but I'm not that young,

19-5-OS
Cont'd

19-6-HH

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1 but I hate to tell you I have so many friends and
2 coworkers and people that are only 35, 40, 50 years
3 old, cancer. And why? We have to stop and think. Go
4 home, don't just always, you know, just go watch TV
5 and get on your computer. Stop and think what we're
6 doing to ourselves, our bodies, our children, our
7 grandchildren.

19-6-HH
Cont'd

8 This is again, this licensing renewal is
9 coming down to human lives, the quality of our lives.

10 Again, why all this cancer? Microwaves and
11 electricity. So I won't go on and on, but I just
12 think us as a group can't just all be just complaining
13 about the power companies, we are the ones using the
14 electricity. That's all I'm saying. Maybe we should
15 cut back and we won't need power plants. Thank you.

16 (Applause)

17 FACILITATOR BARKLEY: Thank you,
18 Catherine. The next three people I'd like to call
19 would be Jeffrey Norton of the P. Energy Alliance,
20 then Bill Maguire and then finally Lorraine Ruppe.
21 Mr. Norton?

22 MR. NORTON: Good evening. My name is
23 Jeffrey Norton and I'm here to represent the
24 Pennsylvania Energy Alliance which is an independent
25 grassroots diverse organization made up of community

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1 leaders and organizations who promote nuclear power as
2 a clean, safe, reliable and affordable source of
3 power. I'm going to be making essentially five points
4 in support of license renewal for Limerick Generating
5 Stations and they are that, number one, nuclear energy
6 lowers electricity prices, it protects our environment
7 against greenhouse gases, it strengthens our local
8 economies and it is safe.

9 With regard to my first point in lowering
10 electricity prices the Limerick Generating Station has
11 reduced wholesale energy costs in Pennsylvania by \$880
12 million in 2010 thus lowering electricity prices for
13 all consumers. It operates around the clock thereby
14 stabilizing the nation's electricity distribution
15 system and the electricity marketplace. The average
16 electricity production costs at nuclear plants have
17 actually declined more than 30 percent in the past 10
18 years due to various efficiencies. Nuclear power is
19 cheaper to produce than other forms of electricity
20 generation such as coal and natural gas, and helps
21 moderate the price of electricity for consumers.

22 My next point is that Limerick Generating
23 Station and nuclear plants strengthen our local
24 economies and it is a valuable economic driver for the
25 Commonwealth of Pennsylvania. Limerick Generating

20-1-SR

1 Station contributes \$113 million annually in direct
2 economic contributions to the Pennsylvania economy
3 through various employee wages and salaries, purchase
4 of goods and services from other Pennsylvania
5 businesses and in property tax payments to the local
6 governments. Limerick Generating Station also
7 contributes generously as we've also heard and in fact
8 in 2010 contributed \$600,000 to various community
9 organizations. Limerick has over 800 full-time
10 employees and employs more than 1,000 skilled
11 temporary contract employees during annual refueling
12 outages. A significant percentage of the current
13 nuclear plant workforce will reach retirement age in
14 the next 10 years creating a demand for high-paying
15 jobs in the nuclear industry. Yes, Limerick
16 Generating Station is one of Pennsylvania's most
17 valuable economic and energy assets and the
18 commonwealth should embrace it.

19 My third point is that nuclear energy
20 protects our environment from greenhouse gases and
21 reduces the need to generate electricity from fossil
22 fuels. If Limerick Generating Station were retired
23 from service replacing the electricity would require
24 increased natural gas-fired or coal-fired generation.
25 Nuclear energy is the nation's largest source of

20-1-SR
Cont'd

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1 carbon-free electricity and is critical to our
2 nation's environmental, security and energy goals.

3 My next point is that nuclear energy is
4 safe. It's always on, it's stable, it's a reliable
5 source of electricity and the station here at Limerick
6 has been built with multiple redundant safety layers.

7 And the workforce is committed to best practices and
8 continuous improvement. It is also important for our
9 nation's quest to be energy-independent. According to
10 the Bureau of Labor Statistics it's safer to work at a
11 nuclear plant than in industries such as
12 manufacturing, real estate and finance. And according
13 to the Department of Energy a person receives more
14 radiation exposure flying from Baltimore to Los
15 Angeles than by standing near a nuclear plant 24 hours
16 for a year.

17 On a personal note I've been inside
18 Limerick Generating Station several times. I've also
19 lived within 30 miles with my four boys and wife next
20 to the Limerick Generating Station and also Three Mile
21 Island. I feel safe, secure and comfortable. That is
22 why I'm in support of the re-licensing of the Limerick
23 Generating Station. Thank you very much.

24 (Applause)

25 FACILITATOR BARKLEY: Thank you. Mr.

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20-1-SR
Cont'd

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1 three people I'll call are Donna Cuthbert, followed by
2 Mike Gallagher and then followed by Dr. Fred Winter.
3 Okay, Donna.

4 MS. CUTHBERT: You know, after hearing
5 some of these gentlemen speak tonight I feel like I'm
6 living in fantasy land. For somebody to get up here
7 and actually say that there's no adverse impacts from
8 Limerick nuclear power plant is insanity. It is
9 unbelievable. I have spent the last 11 years
10 reviewing permits from Limerick nuclear power plant.

11 They are a major air polluter under the Clean Air Act
12 and to say they're not doing it anymore, they just
13 asked for the conditions that would allow an eightfold
14 increase in dangerous air pollution that actually is
15 claimed to kill people, thousands of deaths per year.
16 And they asked for an eightfold increase.

17 As a matter of fact, these are all the air
18 pollution sources and the pollutants they list in
19 their own permit. If you add that to all the

20 radiation emissions there's a broad range of
21 radionuclides. For somebody to just claim that it's
22 only tritium going into the water is insanity. It's
23 unbelievable what they expect people to believe. I
24 encourage everybody to go back to the table we have
25 and take a good look at that Schuylkill River board.

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1-22-AM

1 They are destroying the Schuylkill River. There was
2 never enough water in the Schuylkill River to sustain
3 this nuclear plant from the very beginning and now
4 we're seeing the consequences of that and they put
5 more and more pollution in it. They want to pump mine
6 water in to supplement the flow for Limerick. It's
7 contaminated and they don't filter it. And they're
8 actually asking for a huge, four times Safe Drinking
9 Water standard increase in total dissolved solids
10 which carry a lot of toxic pollutants. So they put
11 radiation into the river 24 hours a day, 365 days a
12 year, and now they're asking for these huge increases
13 and people have the nerve to get up here and say that
14 they have no environmental impacts. Frankly I've had
15 enough of this deception at the expense of public
16 health. I am sick of it.

1-23-SW

17 The facts show, when we looked at Exelon's
18 thing for environmental harms they say they were clean
19 energy. The facts show Limerick isn't clean, it is
20 filthy. It's not safe, it's a ticking time bomb. And
21 nuclear power, they say it's always on. That's not
22 true either as evidenced by shutdowns, some for long
23 periods caused by earthquakes, tornadoes, hurricanes,
24 fires, heat and drought and more. It clearly isn't
25 always on in Japan. So when you take all of this

1-24-PA

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1 together and you look at all the ways that they
2 pollute our environment with radiation and all the
3 other toxics, every day Limerick operates our children
4 face more risk. And that's what it's all about. It's
5 about the health of our region.

6 The sooner this place closes the better
7 off we'll all be. Even if you look at infant
8 mortality rates we have higher infant mortality rates
9 and neonatal mortality rates far above state averages
10 and even above Philadelphia and Reading, and we've had
11 these for quite awhile. The fact is when babies are
12 the most vulnerable in the womb what else would we
13 expect? And by the way, for those of you who have
14 been saying that ACE data is anecdotal today I have
15 news for you. This infant mortality report for
16 example is state data reported by EPA in 2003. Every
17 cancer statistic that you see back there is based on
18 Pennsylvania Cancer Registry statistics or CDC
19 statistics. So it is not anecdotal, those are the
20 cancer increases, those are the cancer above the
21 national average that have happened here since
22 Limerick started operating. That is a fact.

1-25-HH

23 So it's not anecdotal and the fact of the
24 matter is I thought this was about the environment but
25 apparently it's about money. So I decided that

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1 between the sessions I was going to change things
2 around a little bit. I could talk about the
3 environmental impacts of this place for a whole week
4 it's so bad. And I've got all the documents in our
5 office to prove it. Let's talk about, let's take a
6 minute now though and we're going to talk about the
7 cost. What is this place actually costing us? Let's

8 just think about cancer for example. We have so many
9 cancers above the national average. Childhood cancer,
10 92.5 percent higher than the national average. Think
11 about that. We track the cost of one child with
12 cancer diagnosed at six months to two years and up
13 until that time it was \$2.2 million. How many more
14 kids have that above the national average? Cost that
15 out and how many other cancers are above the national
16 average? You do the math. Figure that out.

1-26-HH

17 How about the customers that paid -- I
18 hear them talk about how great the costs are for
19 Limerick. We paid for Limerick from 1985 to 2010 in
20 our electric bills. And in fact the electric that was
21 supposed to be too cheap to meter turned out to be 55
22 percent above the national average by 1997. So that's
23 how cheap Limerick electric is.

1-27-OS

24 Then you take the property taxes. They
25 tried to get zero for their property taxes by the end

1-28-SE

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1 of the '90s and didn't pay any property taxes until
2 the early 2000s at which time they paid \$3 million
3 instead of the \$17 million they were supposed to pay.

1-28-SE
Con'd

4 So when you think about that no wonder Exelon's
5 willing to throw around a couple million in the
6 community. They owe this community a lot more than
7 what they're giving out.

8 (Applause)

9 MS. RUPPE: So then there's the cost for
10 the pollution they're putting in the river. They're
11 asking for increases in pollution. They want to put
12 more mine water in. They want to increase the total
13 dissolved salts. That's going to cost water treatment
14 systems a lot of money to try to -- for extra
15 treatment for that. It can even break down their
16 equipment, some of the stuff that's coming out of the
17 mines. And when you think about it who actually
18 ultimately pays that cost? We do. We pay for
19 increased costs for our water because they're having
20 to do that at the water treatment systems. And it
21 seems to me that if you really take a good look at
22 things Limerick has got to be the major cause for the
23 radiation in Philadelphia's water.

4-10-SW

24 So all in all taken as a whole this place
25 has unprecedented environmental harms. There is no

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1 question about that. Anybody that doesn't believe it
2 come look at the permits with me and I'll show you
3 exactly what's going on. I invite anybody to do that.

4 And the one thing that's really important
5 is that NRC and the nuclear industry are claiming that
6 age is no issue while at the same time they admit that
7 some parts are too big and too expensive to replace.

4-11-OS

8 I frankly am really concerned about NRC accommodating
9 the nuclear industry with weakened regulations, lax
10 enforcement, negligence and unsubstantiated denials.
11 It's happened right here even with their fire safety
12 regulations that are -- we're on weakened fire safety
13 regulations even though we know that that can
14 eventually lead to a meltdown. I know my time's up.

4-12-OS

15 Thank you.

16 (Applause)

17 FACILITATOR BARKLEY: Thank you, Donna.

18 Mike?

19 MR. GALLAGHER: Okay, good evening. My
20 name's Mike Gallagher and I'm vice president of
21 license renewal for Exelon. I have the overall
22 responsibility for the Limerick license renewal
23 application. Exelon has a great deal of experience in
24 license renewal. We've obtained renewed licenses for
25 the Peach Bottom and TMI plants in Pennsylvania, also

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1 FACILITATOR BARKLEY: We have an
2 inspection ongoing at that point right now regarding
3 the North Anna facility. So yes, it did experience an
4 earthquake beyond its original design. So far the
5 inspections have revealed no -- minimal damage. I've
6 only heard of one piece of equipment that experienced
7 even visible signs of problems. But the overall
8 analysis, this is continuing and the licensee has to
9 have permission from us to restart after an extensive
10 inspection.

11 MR. ELY: My concern is that this hastened
12 license renewal process is inappropriate for
13 engineering reasons. I worked in a variety of
14 different areas in the construction of that power
15 plant and there were continual deviations that were
16 provided, whether it was in-storage maintenance
17 monitoring of the condition of the components that
18 were used to the actual construction of that plant. I
19 could cite you several examples.

20 What I would like to ask of the public is
21 that the people that had worked at that nuclear power
22 plant take a look at this licensing renewal and
23 understand that they need to review those failures and
24 those deviations that were provided to go ahead with
25 the construction of that plant with non-conformances

21-1-OS

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1 that were reviewed, but not reviewed in light of what
2 we understand and know today about earthquakes or
3 other anomalies. We need to have enough time to make
4 the evaluation on those deviations. The cooling
5 pools. The fuel pool girders that are placed there.
6 There are rebar concrete reinforced supports where a
7 quality engineer, he was supposed to be accepting the
8 very highest grade of concrete to be placed in a 36-
9 hour pour there and he didn't pay attention. And the
10 cofferdam was being built down in the river and up
11 comes this sand mix with a very low strength and gets
12 pumped up into those fuel pool girders in a layer and
13 the engineer said well, boy, that was a terrible
14 mistake, but it'll be okay. We need to go back and
15 take a look at all of those mistakes and make sure
16 that they're not written off because a layer in a
17 structure under load caused by an earthquake, that's
18 an issue. It might not be an issue for the strength
19 of the fuel pool girders to support those fuel pools
20 that when we see them in Japan and they catch fire
21 because they're extremely hot and you need to address
22 that. I was on that pour but I wasn't the engineer
23 that made that error, but there's a number of errors
24 that were made. And I don't see or understand that
25 the NRC or the review of the licensing application is

21-1-OS
Cont'd

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1 taking a look at those failures and those errors and
2 addressing them in light of the knowledge that we have
3 today.

21-1-OS
Cont'd

4 Some people don't understand about
5 radiation and I read when the Japanese thing occurred
6 and I heard on the news a radiologist talking about
7 oh, the radiation is such a low amount. It really
8 isn't the low amount of radiation exposure that we get
9 incidentally in standing next to a nuclear power
10 plant. It's three ten-thousandths of a gram of
11 plutonium that is death for you if you breathe that
12 dust particle. It's almost certain death. And the
13 problem becomes you can't have -- and it's not going
14 to be a nuclear bomb. It's going to catch on fire if
15 the fuel pool girders were to fail and you'll have a
16 cloud of a material that in and of itself you might
17 not have radiation exposure to it but that particle
18 when it deposits itself can be an issue much the same
19 as fluoride is what causes thyroid cancer when it's a
20 radioactive fluoride. That's why we're very careful
21 in building a plant with no Teflon and no fluoride
22 components.

21-2-HH

23 So we need to pay attention to some of
24 that engineering and I'm not certain that that's being
25 done. I'd like to see an agency or for somebody to

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1 contact me if they know about a variety of different
2 flaws that they saw during the construction. And my
3 email address is asqchair@yahoo.com. Yes, I will be
4 the chair of the Philadelphia section of the American
5 Society for Quality coming up and I've been past chair
6 in the past so yes, I'm very quality-oriented and I'd
7 appreciate any feedback from people that have issues
8 with that construction. Thank you.

9 (Applause)

10 FACILITATOR BARKLEY: Okay. Thank you,
11 Dan. Jim Beckerman?

12 MR. BECKERMAN: Good evening. My name is
13 Jay Beckerman. I'm a resident of Phoenixville. I
14 found out about this meeting because I scan a lot of
15 newspaper websites. I found the notice of the meeting
16 on the West Chester Daily Local website. Didn't find
17 it in the Phoenixville paper, didn't see it in the
18 Philadelphia newspaper, didn't hear about it on any of
19 the local radio stations, didn't hear about it on
20 cable, didn't hear about it on any of the television.

22-1-LR

21 Once a month, what is it the first Tuesday
22 about 2:00 I hear the siren that we all hear. What
23 should happen in terms of people getting notice is
24 everybody who's within the plume area should something
25 happen at Limerick should find out about this meeting

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1 and I seriously doubt that that actually happened. I
2 think it was pure accident that I found it. Something
3 as serious as license renewal should get the same kind
4 of outreach that occurs when Dimerick does what it
5 should which is to mail out every year or two to all
6 of the possibly affected homes the maps and the
7 notifications of how do you evacuate. If you're going
8 to renew a plant which happens once every 20 years I
9 don't understand why the NRC doesn't require the same
10 kind of outreach public notification so people get a
11 chance to come to one-time meetings like this. I
12 think that is a basic flaw in the NRC's licensing and
13 re-licensing procedure and I think it should address
14 that.

22-2-LR

15 The slide behind me documents exactly two
16 libraries that the documents are going to go in. Why
17 not in my library in Phoenixville? Why not in
18 Montgomery County and Norristown and all of the other
19 public libraries that are in areas that can be
20 affected by the plume should something happen here?
21 Why are the documents in such a restricted area?

22-3-LR

22 I'd like to switch a little bit. I've
23 been researching, I didn't even know about this ACE
24 organization. Glad to find it. I've been researching
25 on my own information about nuclear power plants and

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1 their risks for quite awhile. An organization I ran
2 across published this book titled Insurmountable
3 Risks. The organization is called the Institute for
4 Energy and Environmental Research. It's an amazingly
5 well-researched book. I doubt very many people have
6 read it but you should. This organization is at least
7 as interested in alternative energy sources as it is
8 in having put the effort in to document what are the
9 problems with nuclear power engineering-wise. The man
10 who's head of this organization is a nuclear
11 scientist, a guy named Arjun Makhijani. He's a PhD
12 nuclear scientist. These are first-class researchers,
13 this is PhD-level stuff written for popular
14 consumption. So I'll be glad to make more detail
15 about the book available to anybody who wants to know.

16 A few questions I have, one that I've been
17 thinking about for a long time. I wonder how many
18 people here are aware of something called the Price
19 Anderson Nuclear Industries Indemnity Act. Who knows
20 about that? The title alone should give you some
21 pause. Why do we need a nuclear industries indemnity
22 act? What does it do? What it does is it puts a
23 ceiling of a few hundred million dollars on the
24 liability that nuclear power plant owners have for the
25 damage their plants would cause. It's basically a

22-4-OS

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1 scheme, they pay into a pool. The problem is that
2 ceiling was set a very long time ago. It's totally
3 unrealistic in terms of the risk in just the value of
4 houses in areas that are covered by a plant like this.

22-4-OS
Cont'd

5 When this plant was planned the population in the
6 area that its plume would cover probably wasn't 20
7 percent of what the population is now. That is I
8 think a valid environmental concern. The environment

9 in which this plant operates has changed because of
10 in-migration, population increase for all sorts of
11 reasons. Part of that's been discussed tonight in
12 terms of evacuation routes, would you be able to get
13 people out were there an accident. The roads haven't
14 changed very much, the population has. That I think
15 is a valid environmental concern that surely ought to
16 be addressed.

22-5-OS

17 The question I ask about the money

18 liability is -- let's just go back to the Price
19 Anderson Act. The fact is that the nuclear industry
20 does not pay market rates for insurance to cover it
21 for the liabilities. This congressional act from way
22 back in the 1960s eliminates that need. Back then the
23 insurance industry didn't have the research to put a
24 price on what should the Limericks of the world have
25 to pay for a liability policy. I think there's plenty

22-6-OS

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1 of insurance industry experience now. So my question
2 would be if nuclear plants are so safe why do we need
3 the Price Anderson Act?

22-6-OS
Cont'd

4 (Applause)

5 MR. BECKERMAN: I listened, I'm going to
6 switch subjects again. I listened to Mr. Gallagher
7 and I heard something I really didn't expect to hear.

8 He said that their studies said that this plant is
9 now safe to run for 60 years. That sounds to me like
10 advanced notice to the public that this isn't the
11 first renewal they're going to ask for on this plant.

12 Mr. Gallagher, are you going to ask for another one
13 20 years from now?

14 FACILITATOR BARKLEY: We haven't had any
15 licensee at this point in time ask for something
16 beyond that.

17 MR. BECKERMAN: You didn't make the
18 statement. Mr. Gallagher did.

19 FACILITATOR BARKLEY: I know and I'm not
20 going to have him address this from the audience.
21 This is a meeting with us.

22 MR. BECKERMAN: And I would like to
23 finally address an issue that the speaker on the cell
24 phone brought up. He talked about embrittlement of
25 concrete over the lifetime so far of the nuclear

22-7-OS

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1 reactor containment vessel. That's an internal
2 environmental matter. I don't know if it's quite in
3 the scope of what the NRC plans to talk about or plans
4 to look at, but something that I have not read about
5 at all is an NRC requirement for destructive testing.

22-7-OS
Con'd

6 For instance, if you want to know what a tree looks
7 like on the inside you put a borehole in it and you
8 pull a core sample out and you find out what that tree
9 looks like on the inside. If an engineer wants to
10 know what is the quality of the concrete that was
11 poured for a road -- I used to work for Florida
12 Department of Transportation -- they bore out a sample

13 and then you take a look at it. What I haven't heard
14 anything about except generalizations is has anybody
15 done any destructive even borehole testing of these
16 containment vessels and their support pourings to find
17 out has there been in fact any deterioration of the
18 concrete, the rebar and anything else that went in
19 there. The stuff that's buried in the concrete, the
20 wire, all of those things that are buried in the
21 concrete. If you haven't bothered to open that stuff
22 up since the plant was built how on earth do you know
23 what condition it's in? Shouldn't that be a
24 requirement to do some destructive, open the bottom
25 testing, go all the way through and make sure what you

22-8-OS

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1 think is there is what's there and in the condition
2 that it should be in to last for another 20 or 40
3 years? So these are questions that I'd like the NRC

22-8-OS
Cont'd

4 to go into. I thank you very much for listening.
5 Overall it's been a very informative presentation by
6 both the proponents and people who have questions and
7 I thank you for the opportunity. I would like to see
8 a meeting like this occur at a bigger venue with more
9 notice. An example would be, as I've discussed with
10 Ms. Regner is it?

11 FACILITATOR BARKLEY: Regner, yes.

12 MR. BECKERMAN: I didn't have her name
13 correct. The Philadelphia Expo Center would be more
14 central to where the plume area for this plant is.
15 It's right off 422. This is not hard to get to,
16 that's not hard to get to. It's much more in the
17 center of the population. Thank you very much.

18 (Applause)

19 FACILITATOR BARKLEY: Okay, thank you.
20 Mr. Cuthbert? Again, following Mr. Cuthbert's remarks
21 it'll be Jim Derr to wrap up the evening.

22 DR. CUTHBERT: Good evening. My name is
23 Dr. Lewis Cuthbert. I'm the president of ACE, the
24 Alliance for a Clean Environment. And my comments
25 this evening are going to differ from this afternoon

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1 because they're going to be focusing on as a general
2 topic documented evidence. We've heard a lot of
3 assertions, assumptions and claims throughout the day
4 many of which would be very difficult to substantiate
5 in our experience. Based on an 11-year investigation
6 conducted by the Alliance for a Clean Environment we
7 have formed a conclusion that we are presenting to the

8 Nuclear Regulatory Commission today and that is very
9 simply that Limerick nuclear power plant must be
10 closed by the NRC, not re-licensed until 2049. And

1-29-OR

11 that's based on a substantial body of evidence in
12 terms of documented environmental harms, threats and
13 risks that have in fact gotten into our air, our
14 water, our soil, our food, our milk and our children.

15 The evidence is not refutable.

16 So I'll be presenting as part of my
17 remarks tonight what I'm calling a short list of 14
18 reasons why the NRC may feel free to with more than
19 adequate justification deny this permit. And I'm
20 going to categorize each of them very briefly without
21 any further description or analysis. The evidence
22 comes from a variety of permits, official records and
23 reports, and Exelon's own renewal application which is
24 sizable by their own admission and in our experience
25 in taking a look at it.

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The 14 items any of which in our judgment should be adequate and sufficient to deny this permit

renewal include, number 1, radiation into air and water from routine and accidental emissions. Number

1-30-RW

2, major air pollution under health-based standards of the Clean Air Act. A Title 5 permit being issued to this facility means by definition that they are a major air polluter under the federal Clean Air Act.

1-31-AM

Number 3, Schuylkill River depletion and major drinking water contamination. Keep in mind this is a vital drinking water source for nearly 2 million people from here to Philadelphia. Number 4,

1-32-SW

radioactive groundwater contamination. Number 5,

1-33-GW

radiation reporting levels increased dramatically after the Fukushima Japan disaster. Number 6,

1-34-RW

documented alarming cancer increases especially in our children since Limerick started operating. Number 7,

1-35-HH

deadly high-level radioactive wastes that are packed in vulnerable fuel pools on this site and they are in fact unprotected. They are above ground and

1-36-RW

unprotected. Number 8, lax fire safety regulations and multiple violations. Number 9, accidents and

1-37-OS

leaks from corroding, deteriorating equipment plus miles of buried pipes and cables. Many problems and shutdowns have already occurred at this facility in

1-38-OS

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1 its first 26 years of operation. They are a matter of

1-38-OS
Cont'd

2 record. Number 10, increased risk of meltdowns from

3 more frequent and stronger earthquakes and other

1-39-OS

4 natural disasters such as tornadoes and floods, not to

5 mention mechanical failures. Number 11, threats from

6 unguarded terrorist attacks with planes and missiles

1-40-OS

7 and a new threat, cyber attacks. Fuel pool are

8 vulnerable to attack.

9 Number 12, one that I think probably

10 should jump to the head of the list for the NRC based

11 on a lot of comments from a lot of other analysts and

12 elected officials, the need for an updated evacuation

13 plan and increased EPZ, a 10-mile radius. This plan

14 is seriously outdated. It is by many expert's

1-41-OS

15 observations fatally flawed. There will be no

16 evacuation in the event of a worst case scenario.

17 Several people spoke to that this evening. The

18 population in this area has increased more than 180

19 percent since 1980 to 2010, U.S. Census data. Updates

20 are obviously needed and they should be reasonable,

21 comprehensive, detailed and accommodate all of the

22 demographics from 1985 to today and from today until

23 as far out as the NRC is willing to license this

24 facility.

25 Number 13, increased cost to the public.

1-42-OS

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1 We've heard a little bit about this this evening, more
2 cancers, more illnesses, more emergency room visits,
3 more hospitalization from increased PM-10. Massive
4 research on what particulate matter in terms of PM-10
5 does to human beings. And there are a few other
6 things that contribute to those visits. The costs are
7 astronomical. One case that Donna mentioned, \$2.2
8 million for a childhood cancer case. You do the math.

1-42-OS
Cont'd

9 And number 14, the last item on my list.
10 We have had 26 years of insults to our environment,
11 and I choose that word purposely, insults to our
12 environment and costly nuclear power. We can replace
13 it with safe, clean, renewable energy before 2029.
14 That is a matter of scientific fact.

1-43-AL

15 It is a scientific certainty that harms,
16 threats and risks to our environment and to our
17 community will increase continuously daily until
18 Limerick's current operating licenses expire in 2029.

19 It would be both unethical and irresponsible for the
20 NRC to cavalierly approve a license renewal without
21 the most rigorous review and justification in the
22 history of this agency. NRC, you have a rare
23 opportunity before you that most people and agencies
24 never are afforded. It's called a do-over, a chance
25 to correct a litany of mistakes and errors associated

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1 with this facility and with your agency since 1985.
2 Twentieth century technology and infrastructure are no
3 longer sufficiently reliable for any of you to assure
4 us that there is nothing to fear and nothing about
5 which to be concerned. Denial of documented evidence
6 is no longer an option. We'll be submitting
7 additional packets of research documentation and
8 evidence tonight along with my comments which will
9 compliment what I did earlier today. The major
10 categories that you'll be getting for additional
11 reading and review, meltdown threats, evacuation
12 plans, Exelon's inaccurate and unsubstantiated claims
13 and a criticism of the NRC's oversight track record in
14 this community. Thank you very much and please accept
15 this for review.

16 (Applause)

17 FACILITATOR BARKLEY: Okay, thank you, I
18 will. Thank you. Mr. Derr?

19 MR. DERR: Good evening. I thought I
20 would add some comments just to make sure my
21 understanding is that this is essentially the NRC's
22 opportunity of listening for things specifically to be
23 included in the environmental site review of the re-
24 licensing. And just a few things which are question
25 marks that lots of folks in the community I think will

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1 be interested in. Most of these have been touched on.

2 Mine water issue, better defining that
3 quality and flow particularly in light of the likely
4 pending changes in stormwater concerns and regulations
5 in the area. Adding that flow to the Schuylkill is
6 going to affect all the municipalities around here who
7 have to deal with stormwater.

23-1-SW

8 The emergency planning is an area which
9 needs to be seriously looked at. Hard and soft
10 infrastructure on that. Hopefully that's something
11 which is part of the ongoing operational requirements
12 for periodic review and update since obviously this is
13 not a static environment we live in. That has to be

23-2-OS

14 changed on an ongoing basis. And then to -- I'm sure
15 that the generic plan includes a pretty good
16 discussion of fuel storage long-term and short-term
17 onsite but certainly the site-specific fuel storage
18 considerations. And I want to second the comments by

23-3-OS

19 Mr. Ely of review of records of non-conformances and
20 anything that was done is part of the initial
21 construction record. And basically that's -- those

23-4-OS

22 are the things that we're going to be looking for a
23 better understanding of. Thank you.

24 (Applause)

25 FACILITATOR BARKLEY: I did have one last

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1 request for an individual to speak. She promises
2 she'll only be two minutes so we'll have her up and
3 then we'll wrap up the meeting. Thank you.

4 MS. CONFERR: Hi, my name is Traci Confer.
5 I'm with Energy Justice Network. We support clean
6 energy which we do not believe nuclear is. I would
7 like to put our name behind all of Buzz Cuthbert's

8 comments and I want to add that I want the NRC to look
9 into potential water depletion issues from shale gas
10 fracking upriver in both rivers. I also think that it

24-1-SW

11 would be very prudent to put a lot of attention on
12 terrorist attacks on the fuel pools. And those are my
13 primary comments. Thank you for your time.

24-2-OS

14 (Applause)

15 FACILITATOR BARKLEY: Okay, thank you.
16 With that I'd like to have Lisa Regner come up for a
17 minute and give closing remarks.

18 MS. REGNER: I just wanted to real quickly
19 thank our senior resident inspector who came out
20 tonight out of the goodness of her heart. She does
21 not get paid for this. Jo, would you mind standing
22 up?

23 (Applause)

24 MS. REGNER: Thank you. This is one of
25 the NRC inspectors who works at the plant day in and

NEAL R. GROSS

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1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

Mendiola, Doris

From: Camilla Lange [camillange@verizon.net]
Sent: Monday, September 26, 2011 2:20 AM
To: Regner, Lisa
Subject: NRC Public Meeting Feedback

8/26/2011
76FR 53498

Dear Ms. Regner:

I attended the NRC Limerick Generating Station License Renewal public meeting at Sunnybrook Ballroom on 9/22/11. I listened attentively to comments from all 15 speakers at the evening session and took into account all the pro and con arguments presented. Despite all the reassurances from Exelon representatives about the safety and efficacy of the generating station's nuclear power, I have serious reservations and concerns about these issues.

First of all, considering the impact of the outcome to the many area residents, this forum was not widely publicized for local citizens to be aware of this important matter and offer feedback. Secondly, it does not make sense that Exelon is pursuing renewal for a license that does not expire until 2024. This action seems very premature.

25-1-
LR

I will briefly summarize my chief concerns. The scientific statistics citing the dramatic increase in cancer rate, infant mortality, and Schuylkill River water pollution are disturbing. Also, it seems to me that the situation of unprotected above ground casks holding radioactive waste, as well as past safety failures and deviations in operations must be reviewed and addressed. I tend to agree with the fourteen reasons offered by the Alliance

25-3-
OS

For A Clean Environment why Exelon should be denied the renewal license. In my opinion, the long-term negative consequences caused by the Limerick Generating Station far outweigh any possible benefits it may contribute. Other forms of energy can and must be utilized to meet energy consumption demands.

25-2-
HH

25-4-
OR

25-5-
AI

Thank you for arranging the public meetings to discuss this serious matter. I trust you will take my comments into consideration and urge Exelon to provide other such forums with widespread notification beforehand so that more interested citizens can participate.

Sincerely,
Camilla Lange
616 W. Schuylkill Road Apt. 164
Pottstown, PA 19465
camillange@verizon.net

RECEIVED

SEP 26 11 10 04

RULES & POLICIES

SUNSI Review Complete
Temp file = ADM-013

E-RIDS = ADM-03
Add = L. Regner (LNR2)

Mendiola, Doris

From: Eric Hamell [stripey7@yahoo.com]
Sent: Wednesday, September 21, 2011 7:38 AM
To: Regner, Lisa
Subject: Limerick

Follow Up Flag: Follow up
Flag Status: Flagged

Please do NOT extend the Limerick licenses! 26-1-OR

Eric Hamell
Philadelphia, PA

8/26/2011
76FR 53498

2

RECEIVED

SEP 26 AM 10:04

RULES & NOTES

*SUNSE Review Complete
Template = ADM-013*

*E-REDS = ADM-03
Call = L. Regner (LHR2)*

Mendiola, Doris

From: steve furber [ctevewrx@yahoo.com]
Sent: Tuesday, September 20, 2011 4:17 PM
To: Regner, Lisa
Subject: Limerack Renewal

Follow Up Flag: Follow up
Flag Status: Flagged

8/26/2011
76FR 53498
(3)

I am under the belief that the natural disaster in Japan is enough for Pennsylvania to make a move toward clean energy. It is a matter of thinking ahead to the future generations and protecting quality of life for those who follow.

27-1-
AL

Renewing Limerick's license just as controversies are arising with pushes to move from dependence on Nuclear energy is a bold business strategy by them. I don't think this is the right move to make. A long term contract will limit any sort of wiggle room to address future issues that may arise.

27-2-
OR

I ask that you please consider the future of our great state. I don't think oil or nuclear energy is the way. I truly believe in heart, that in order to protect the health of our population for the future, we must change our ways today.

Sincerely,

Steven Furber

RECEIVED

SEP 26 AM 10:04

RULES AND REGULATIONS

SUNSI Review Complete
Template = ADM-013

F-RIDS = ADM-03
Cdd = L. Regner (LMR2)

RULES AND DIRECTIVES

ENCH

PUBLIC SUBMISSION: 09/27/11 8:47

As of: September 27, 2011
Received: September 22, 2011
Status: Pending Post
Tracking No. 80f27eee
Comments Due: October 28, 2011
Submission Type: Web

Docket: NRC-2011-0166

Notice of Receipt and Availability of Application for Renewal of Limerick Generating Station, Units 1 and 2
Facility Operating License

Comment On: NRC-2011-0166-0003

Exelon Generation Company, LLC; Notice of Intent to Prepare an Environmental Impact Statement and
Conduct the Scoping Process for Limerick Generating Station, Units 1 and 2

Document: NRC-2011-0166-DRAFT-0002

Comment on FR Doc # 2011-21921

Submitter Information

Name: Charlene Padworny

Address:

1117 Oakdale Dr

Pottstown, pennsylvania, 19464-2782

8/26/2011
76 FR 53498
(A)

General Comment

I object to being continuously poisoned by the Limerick Nuclear Plant's radiation and other dangerous toxins.
Please do not allow for an extension of the Limerick Nuclear Plant's operating license. I support more healthy
and efficient sources of energy such as Solar and Wind Power. Please stop ignoring the detrimental effects that
this power plant is having on our environment, health and children's health...it's time to move on to better things
for all involved!

28-1-
OR

28-2-AL

Thanks so much,

Charlene Padworny

SONSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Doc = L. Berger (KMR2)



LIMERICK GENERATING STATION
Environmental Scoping Comments
Division of License Renewal
NRC-2011-0166

RECEIVED

SEP 23 PM 4:10

FILES & DIRECTIVES
BRANCH

8/26/2011
76 FR 53498

(5)

Written Comment Form

Must be received on or before October 28, 2011. Please print clearly.

Name: Sylvia Pollick

Title: Resident of East Coventry

Organization: _____

Address: 23 EARL DR.

City: Pottstown State: PA Zip Code: 19465

Comment:
I hope Exelon Energy does not get
Renewed. I am sure we could find
alternative energy that would not be
contaminating the whole area.

29-1-AL

The Reactor time has served its years
and should not be renewed.

29-2-OR

Use other side if more space is needed.

Comment Forms may be mailed to:
Chief, Rules, Announcements, and Directives Branch
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUNSI Review Complete
Template = ADM-013

EXIDE = ADM-03
Add = L. Regner (MR2)

Gallagher, Carol

From: Joe Roberto [joe@robertoandassociates.com]
Sent: Wednesday, September 21, 2011 7:20 PM
To: Regnier, Lisa
Cc: Joe Roberto
Subject: LIMERICK

8/26/2011
76 FR 53498 (6)

RECEIVED

2011 SEP 30 PM 1:31

FILED
NRC
LIMERICK

Dear NRC:

First of all, let me ask why the lack of public notice regarding the public hearing to be held for Limerick Licensing Extension when in fact the current permit is through 2024 and Exelon is asking for another 20 year extension? Your first priority is NOT for the publically traded, for profit company to rush to get this public notice "done" as a requirement to extend the permit another 20 years out which is not due to expire for another 10+ years but to rather really solicit input from the community and folks impacted. The NRC did not do so. There was one article in the local newspapers stating that there would a public session and only saw the actual notice, by virtue of an article in the North Penn Reporter yesterday. This is not proper notice in general and not sure NRC did what is required. What is required and what have you done? And if proper notice was not done, I want another one(s) scheduled please. I, respectfully, am very interested in this answer.

FEEL FREE TO READ THE FOLLOWING AT THE PUBLIC HEARING:

Now, let's get to the big issue at hand. Limerick should NOT be approved for an extension with their permit for the following reasons:

- It is NOT due to expire until 2024 – thus, Exelon has nothing to loss but get an extension sooner than later so they can sit back and relax operating for the next 20+ years. 30-1-LR
- Limerick is designated as one of the TOP THREE nuclear plants in the country based on it's construction (which is similar to the ones in Japan – and we see how they failed) and the fact that it sits on an earthquake fault line.
- The NRC JUST a few weeks ago stated that "more information needs to be done and studied" regarding further fortifying nuclear plants regarding earthquakes. Thus, until you folks know exactly what needs to be done, etc. THERE IS NOTHING TO APPROVE as long as Limerick sits in it's current position. 30-2-GE
- Do NOT think that earthquakes only happen on the West Coast – as we JUST had a 6+ earthquake less than a month ago. BY ONLY luck was there no damage to the plant, environment or community.
- The NRC had NO business allowing this plant to ever be built so close to such populated areas like Philadelphia (now, what the 3 largest city in the country?) within less than an hour, and exactly due SE from the site. 30-3-OS
- When Limerick was built, there was no idea that the area would grow in population like it has. For safety reasons, just look on any given day the traffic on Route 422 – stacked and stuck for miles on end. Route 422 is the #1 route for evacuations and does not handle regular commuter traffic let alone entire communities. 30-4-OS
- The NRC and USA Government STILL have not decided on where to store spent nuclear rods and as we speak each spent rod is sitting in baths on the Limerick sit, stacking up – expanding even a greater hazard to the community, environment, etc. SO put simply, there is ABOSLUTELY NO REASON to approve this request for YEARS until the US Government decides how they will handle such rods and such rods and properly stored. 30-5-RW
- There are many other environmental friendly sources of energy and Limerick as anything but that. As a matter of fact, Limerick is a TIME BOMB, placed at the wrong location, on the wrong land, too close to major populations, run by a for profit company who can not even handle the basic maintenance issues of power lines, in an aged building without the newest technology nor able to stand a real earthquake, and on and on. 30-6-OS
- The cooling towers are within basic walking distance from shopping malls and all right aside of it – please explain that – with minimal security from what many of us can see. 30-7-OS

SONSI Review Complete
Template = ADM-013

REDS = ADM-013
Add = L. Regnier (24R2)

- Let's also mention a fact that Category I Hurricane Irene, which could have been a Category 3, just zipped less than 100 miles away from the site a few weeks ago and then Hurricane Lee which decided to travel further East came close to also causing chaos. Limerick is still TOO close to the disaster of Hurricanes as well. 30-8-AM
- Lastly, some who have a vested interest in working at the plant, etc. are quick to state that it is safe, etc. – no now, nor has it ever been fool proof against disasters, technical glitches, etc. 30-9-OS

Thus, I feel firmly and many in the community feel the exact same way, that there is NO REASON to approve NOW (especially so far in advance, with no answer on usage rods nor what needs to be done to prevent a meltdown due to an earthquake, etc.) or EVER since the population will only increase and the facility age further. It is the wrong timing, wrong plant, wrong place, etc. for Limerick. Maybe Exelon can put in as much effort and "energy" to develop solar fields, wind, etc... They would rather beat the hell out of a high efficiency plant at any and all cost to the environment and community. This is where the NRC does the right thing and says NO until a year before it expires. NRC needs to take a stand as you have the data and know what I have stated above is more than fair and true. 30-10-OR

Thank you for your time and attention.

Regards,

Joe Roberto



48/26/2011
76FR53496

(7)

Delaware Tribe Historic Preservation Office
1420 C of E Drive, Suite 190
Emporia, KS 66801
(620) 340-0111
bobermeyer@delawaretribe.org

September 23, 2011

Chief, Rules, Announcements, and Directives Branch
Division of Administration Services
Office of Administration
Mailstop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Request for scoping comments concerning the Limerick Generating Station, Units 1 and 2, License Renewal Application Review

Dear Lisa Regner:

Thank you for informing the Delaware Tribe on the proposed construction associated with the above referenced project. Our review indicates that there are no religious or culturally significant sites in the project area. As such, we defer comment to your office as well as to the State Historic Preservation Office and/or the State Archaeologist.

31-1-HA

We wish to continue as a consulting party on this project and look forward to receiving a copy of the cultural resources survey report if one is performed. We also ask that if any human remains are accidentally unearthed during the course of the survey and/or the construction project that you cease development immediately and inform the Delaware Tribe of Indians of the inadvertent discovery.

If you have any questions, please feel free to contact this office by phone at (620) 340-0111 or by e-mail at bobermeyer@delawaretribe.org

Sincerely,

Brice Obermeyer
Delaware Tribe Historic Preservation Office
1420 C of E Drive, Suite 190
Emporia, KS 66801

RECEIVED

SEP 27 2011

RULES & DIRECTIVES

SUNSI Review Complete
Template = ADM-013

E-R-DS = ADM-03
Add = L. Regner (AMR2)

Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer

W13447 Camp 14 Road

P.O. Box 70

Bowler, WI 54416

8/26/2011

76FR53498

8

Date Sept 28-11
Project Number Siemerick Generating Station
TCNS Number _____
Company Name United States Nuclear Reg.

We have received your letter for the above listed project. Before we can process the request we need more information. The additional items needed are checked below.

Additional Information Required:

- ☐ Site visit by Tribal Historic Preservation Officer
- ☐ Archeological survey, Phase 1
- ☐ Literature/record search including colored maps
- ☐ Pictures of the site
- ☐ Any reports the State Historic Preservation Office may have
- ☐ Has the site been previously disturbed
- ☐ Review fee must be included with letter

If site has been previously disturbed please explain what the use was and when it was disturbed.

Other comments or information needed _____

After reviewing your letter we find that:

☒ "No Properties" the Tribe concurs with a Federal agency's finding that there are no National Register eligible or listed properties within the Federal undertaking's area of potential effect or APE 36CFR 800.4 (d) (1)

32-1-HA

☐ "No Effect" historic or prehistoric properties are present but the Federal undertaking will have no effect on the National Register eligible or listed properties as defined in Sec. 800.16(i)

☐ "No Adverse Effect" refers to written opinions provided to a Federal agency as to whether or not the Tribe agrees with (or believes that there should be) a Federal agency finding that its Federal undertaking would have "No Adverse Effect" 36 CFR 800.5(b)

SONSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = L. Begner (LNR2)

NRC FORM 659
(4-2010)



U.S. NUCLEAR REGULATORY COMMISSION

NRC PUBLIC MEETING FEEDBACK

Category

3

Meeting

Date: 09/22/2011

Meeting

Title: Limerick Generating Station License Renewal Overview and Environmental

Scoping Comments Public Meeting

In order to better serve the public, we need to hear from the meeting participants. Please take a few minutes to fill out this feedback form and return it to NRC.

1. How did you hear about this meeting?

☐ NRC Web Page

☐ NRC Mailing List

☐ Radio/TV

☐ Other

Pottstown
☒ Newspaper *Mercury*

2. Were you able to find supporting information prior to the meeting?

Yes

No

Somewhat
(Please explain below)

☐

☐

☐

Didn't check

3. Did the meeting achieve its stated purpose?

☒

☐

☐

4. Has this meeting helped you with your understanding of the topic?

☒

☐

☐

5. Were the meeting starting time, duration, and location reasonably convenient?

☒

☐

☐

6. Were you given sufficient opportunity to ask questions or express your views?

☒

☐

☐

7. Are you satisfied overall with the NRC staff who participated in the meeting?

☒

☐

☐

COMMENTS OR SUGGESTIONS:

Thank you for answering these questions.

Why is the request so early - the NRC should get a Request closer to expiration date.

Also, the inspection should done closer to the expiration date. In 2023, not 2013

33-1-LR

Continue Comments on the reverse.

OPTIONAL

Name

Organization

Resident

Telephone No.

E-Mail

☐ Check here if you would like a member of NRC staff to contact you

OMB NO. 3150-0197

Expires: 09/31/2012

Public Protection Notification: If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

Please fold on the dotted lines with Business Reply side out, tape the bottom, and mail back to the NRC.

Mendiola, Doris

Subject: FW: Response from "Comment on NRC Documents"

-----Original Message-----

From: Richard Kolsch [mailto:Rklsch@aol.com]

Sent: Thursday, September 22, 2011 5:44 PM

To: INFOCOLLECTS Resource

Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Richard Kolsch (Rklsch@aol.com) on Thursday, September 22, 2011 at 17:44:25

Document Title: License Renewal Limerick PA

Comments: Comments on Limerick Power Plant License Renewal Limerick, PA September 22, 2011

1. Why is there a rush to renew the license? It is not due until 2024, approval at the earliest should be 2019. This would allow 5 years for the business plan of PECO to either continue or close the plant and make arrangements for additional power to replace the closed plant.

34-1
-LR

2. A firm closure plan should be approved before license renewal is accepted. This plan must include what is to be done with the site, where the nuclear waste will be disposed of etc. The

34-2-DC

disposal area must be at site in operation not some theoretical site like the now defunct Yucca site. The public and our future generation deserves to know what is expected to be done at the site. Radioactive material must not be allowed to remain on the site.

34-3-
RW

3. The government should conduct a survey of various illness in the vicinity of the nuclear plant prior to any renewal of a license. If this would indicate a danger living near the plant then the license should not be renewed.

34-4-HH

4. Developers are required to fund traffic improvements to an area to allow an area to be developed, this should apply to Limerick. The evacuation plan now will not work. When the plant was started there was no traffic out here, now it is grid lock. Limerick should fund new roads and bridge to alleviate traffic jams in order to have an orderly evacuation.

34-5-OS

5. The plant is vulnerable to terrorist attacks. An airport is located next to the facility. A plane could be flown into the reactor building or the emergency power supply for the water circulation system at the same time terrorist could cut all outside power to the plant this would cause a meltdown and render the entire area around and downwind of the area uninhabitable for hundreds of years.

34-6
-PA

organization: None

address1: 1694 Kepler Rd.

address2:

*SUNSI Review Complete
Template = ADM-013*

*ERIDS = ADM-03
Add = J. Beyner (LNR2)*

8/24/2011

76FR53498

11

September 24, 2011
2461 E. High St., Unit F-28
Pottstown PA 19464

USNRC
Mailstop: TWB-05-BO1 M
Washington DC 20555

USNRC Lisa Regner:

We wish to add our comments to the NRC record.

We attended one of the NRC hearings concerning Limerick's Environmental Impact (9/22/11 at 2:00 p.m.) and were appalled that local business and community leaders avoided voicing concerns about Limerick's environmental impact, mentioning its economic influence, instead. That doesn't mean that those speakers had no concerns. The NRC would be remiss to consider a "thank you for money and jobs" as part of its evaluation of community-wide nuclear safety issues connected with Limerick's re-licensing request. Nuclear energy production is not an earth-friendly or population-sustaining process. It has had terrible consequences!

Limerick Nuclear's influence is vast and horrific. This industry is a behemoth that has not been honest with the public about its true impact, forming its own "environmental" partnerships that are pure pronuclear propaganda tools. Its economic contributions are miniscule when compared to its enormous profits, while destroying our quality of life. The nuclear process's devastating environmental effect on our community cannot be understated.

Limerick Nuclear's request for re-licensing is ludicrous, considering its aging and inadequate equipment, its increased air pollution by particulate matter, its horrific destruction of the Schuylkill River and dangerous above-ground spent fuel rod storage. The fact that its request has been made in the wake of Japan's recent triple meltdowns, is mind blowing! Representative Tom Quigley's comments were not at all an accurate assessment of local sentiment!

The nuclear process is not an enlightened way to generate electrical energy. This plant needs to transition itself into a more intelligent way of generating energy by actually phasing out and safely shutting down the nuclear plant. By retraining its workers and adopting the safer green technologies, it could truly partner with the local community without putting its workers out of jobs.

Ordinary daily nuclear generation has had devastating community-wide consequences that need to be addressed. Re-licensing should not even be a consideration! The NRC must fully investigate the environmental concerns presented Dr. Lewis and Donna Cuthbert (ACE), Dr. Winter, and each resident who so civilly represented this community's concerns at the September 22, 2011 hearings. The Limerick Nuclear Power Plant should NOT be re-licensed and should, instead, begin to address the pollution issues it has already created as it seriously and carefully shuts down its reactors.

35-1-OR

35-2-OS

35-3-AM

35-4-SW

35-5-RW

35-6-AL

35-7-OR

Sincerely,

Charles and Elizabeth Shank

Charles and Elizabeth Shank
(610-323-6715)

RULES / DIRECTIVES

2011 OCT 13 AM 9:21

RECEIVED

SUNSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Add = L. Regner (LHR2)

Mendiola, Doris

From: naturalcat@comcast.net
Sent: Wednesday, October 12, 2011 5:26 PM
To: Regner, Lisa
Subject: NRC ID DOCKET 2011-0166

RECEIVED

OCT 13 AM 9:53

FILES

Dear Ms Regner

As a business owner in Pottstown and a long time resident of the area I am deeply concerned about the Limerick plant. I do not know if this plant is internally "safe" and it may very well be. I am more concerned about the effects of our surrounding air and water supply and the future of my children and grandchildren, some of whom are already inflicted with cancer and other diseases. I also am concerned about terrorist attacks, natural disasters and the more common "human error." I plead with you to not renew this license. I am very fearful.

Respectfully,

Nancy Leaming

p.s. I did attend the meeting and listen with open mind and ears but my fears were not eased.

8/26/2011

76 FR 53498

(12)

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Call = L. Regner (LWR)

8/26/2011
76 FR 53498

Mendiola, Doris

From: Cynthia Gale [cgale@barbergale.com]
Sent: Wednesday, October 12, 2011 4:31 PM
To: Regner, Lisa
Cc: Michael Gale
Subject: DO NOT RELICENSE LIMERICK NUCLEAR PLANT. PERIOD

13

RECEIVED

OCT 13 AM 9:53

FILES / NO LINES

Dear Ms. Regner,

On behalf of my family, friends, and neighbors, please do not relicense the Limerick Nuclear Power Plant. We work in Pottstown, live in Elverson, and our young daughter goes to school in Kimberton. All these locations are in harm's way of Limerick. Every day when I drop our child off at school I have a view of the Limerick towers when I travel on Route 724. I pray everyday that nothing happens when our daughter is at school. We no longer feel safe or even drink our tap water, do you?

Limerick Nuclear Plant's License Expires In 2029 - Exelon Wants To Run It Until 2049
Threats and Harms, Already Unacceptable After 26 Years, Are Increasing!

Since 1985, Unprecedented Environmental Harms, Threats, and Risks From Limerick Include:

1. Radiation Into Air and Water From Routine and Accidental Emissions 37-1-RW
2. Major Air Pollution Under Health Based Standards of the Clean Air Act 37-2-AM
3. Schuylkill River Depletion and Major Drinking Water Contamination 37-3-SW;
37-4-GW
4. Radioactive Groundwater Contamination 37-5-GW
5. Radiation Reporting Levels Increased Dramatically After Japan Disaster 37-6-OS
6. Alarming Cancer Increases, Especially In Children, Since Limerick Started Operating 37-7-HH
7. Deadly High Level Radioactive Wastes Packed In Vulnerable Fuel Pools On Site 37-8-RW
8. Lax Fire Safety Regulations 37-9-OS
9. Accidents and Leaks From Corroding, Deteriorating Equipment Plus Miles of Buried Pipes and Cables 37-10-OS
10. Increased Risk of Meltdown From More Frequent and Stronger Earthquakes and Other Natural Disasters 37-11-PA
11. Threats From Unguarded Terrorist Attacks With Planes and Missiles, Cyber Attacks 37-12-OS
12. Need for an Updated Evacuation Plan and Increased EPZ 37-13-OS
13. Increased Costs to the Public - More Cancers and Other Costly Illnesses, More Emergency Room Visits and Hospitalizations from Massive Increases in PM-10 and TDS, Treatment of Public Drinking Water, Environmental Clean-Up 37-14-HH
14. Dangerous, Dirty, Harmful, and Costly Nuclear Power Is Not Needed. It Can And Should Be Replaced With Safe, Clean, Renewable Energy. 37-15-AL

List Compiled By The Alliance For A Clean Environment - September 2011

SUNSI Review Complete
Template = ADM-013

FRIDS = ADM-013
add = L. Regner (LHR2)

8/26/2011
76 FR 53498

RECEIVED

2011 OCT 13 PM 4:35

RULES OF OBJECTIVES

From: Schweg [schweg@gmail.com]
Sent: Thursday, October 13, 2011 10:21 AM
To: Regner, Lisa
Subject: Limerick License Renewal - NRC I.D. Docket 2011-0166

I'm writing to you to state my opposition to the relicensing of the Limerick Generating Station in Limerick Township, Pennsylvania. 38-1-OR

I'm worried about Exelon Generation Co., LLC's safety record and I hope you will consider my opinion on this matter. 38-2-OS

Respectfully,
Jude Schwegel
79 South White Horse Road
Phoenixville, Pa 19460

Everybody can be great, because everybody can serve. You don't have to have a college degree to serve. You don't have to make your subject and your verb agree to serve. You don't have to know about Plato and Aristotle to serve. You don't have to know Einstein's theory of relativity to serve. You don't have to know the second theory of thermodynamics in physics to serve. You only need a heart full of grace, a soul generated by love. And you can be that servant.

SUNSI Review Complete
Template = ADM-013

ERIDS = ADM 03
Adm = L. Rogers (Luv 2)

Mendiola, Doris

From: Michael Gale [mgale@barbergale.com]
Sent: Thursday, October 13, 2011 9:26 AM
To: Regner, Lisa
Subject: DO NOT RELICENSE LIMERICK NUCLEAR PLANT. PERIOD.

And, get the US manufacturing again making wind turbines, solar panels, retrofitting older buildings to be energy efficient, not funding this an other budget-busting toxic time bombs.

Limerick Nuclear Plant's License Expires In 2029 - Exelon Wants To Run It Until 2049
Threats and Harms, Already Unacceptable After 26 Years, Are Increasing!

Since 1985, Unprecedented Environmental Harms, Threats, and Risks From Limerick Include:

1. Radiation Into Air and Water From Routine and Accidental Emissions [39-2-RW]
2. Major Air Pollution Under Health Based Standards of the Clean Air Act [39-3-AM]
3. Schuylkill River Depletion and Major Drinking Water Contamination [39-4-SW; 39-5-GW]
4. Radioactive Groundwater Contamination [39-6-GW]
5. Radiation Reporting Levels Increased Dramatically After Japan Disaster [39-7-OS]
6. Alarming Cancer Increases, Especially In Children, Since Limerick Started Operating [39-8-HH]
7. Deadly High Level Radioactive Wastes Packed In Vulnerable Fuel Pools On Site [39-9-RW]
8. Lax Fire Safety Regulations [39-10-OS]
9. Accidents and Leaks From Corroding, Deteriorating Equipment Plus Miles of Buried Pipes and Cables [39-11-OS]
10. Increased Risk of Meltdown From More Frequent and Stronger Earthquakes and Other Natural Disasters [39-12-PA]
11. Threats From Unguarded Terrorist Attacks With Planes and Missiles, Cyber Attacks [39-13-OS]
12. Need for an Updated Evacuation Plan and Increased EPZ [39-14-OS]
13. Increased Costs to the Public - More Cancers and Other Costly Illnesses, More Emergency Room Visits and Hospitalizations from Massive Increases in PM-10 and TDS, Treatment of Public Drinking Water, Environmental Clean-Up [39-15-HH]
14. Dangerous, Dirty, Harmful, and Costly Nuclear Power is Not Needed. It Can And Should Be Replaced With Safe, Clean, Renewable Energy. [39-16-AL]

List Compiled By The Alliance For A Clean Environment - September 2011

We sincerely hope you will act with your fellow citizens' health, and indeed longevity in mind.

Sincerely,

Michael Gale
172 north hanover street
portstown, pa 19464
610-705-3606 p
mgale@barbergale.com
http://www.barbergale.com
designing sustainable brands

SUN SE Review Complete
Template = ADM-013

E-REDS = ADM-03
Add = L. Regner (HURR)

8/26/2011
74FR53498

Mendiola, Doris

Subject: FW: LIMERICK

16

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SEP 27 13 PM 4:35

HILL / L. REGNER

From: Joe Roberto [mailto:joe@robertoandassociates.com]
Sent: Monday, September 26, 2011 2:46 PM
To: Regner, Lisa
Subject: RE: LIMERICK

Thanks and again, since this reactor has until 2024 – why the rush, and only one public meeting. If you have not heard it, you will. There is a major public outrage over this one meeting and not knowing about until too late. People want public meetings so that people hear that many are against this plant rather than just submitting comments to the NRC which appears to just rubber stamp license requests – which is not comforting to me and many. But I do thank you very much for the courtesy, response and review of points.

30-13-LR

There is also something that I did not comment on before – why was Limerick taken “offline” three times in as many months? Is NRC checking?

30-14-OS

Thanks,

Joe Roberto

SUNSI Review Complete
Template = ADM-013

ERIDS = ADM-03
Call = L. Regner (LHR2)

Mendiola, Doris

From: Melissa Antrim [mantrim@boscovs.com]
Sent: Friday, October 14, 2011 2:18 PM
To: Regner, Lisa
Cc: Antrim, Melissa (home)
Subject: Docket 2011-0166 - Limerick License Renewal

Via email: Lisa.Regner@NRC.gov
U.S. NRC
Ms. Lisa Regner
Mailstop TWB-05-BO1 M
Washington, D.C. 20555

8/26/2011
76 FR 53478

(17)

RECEIVED

2011 OCT 14 PM 2:56

FILES AND RECORDS
BRANCH
10/10

Reference: Request for Denial of Limerick License Renewal - NRC I.D. Docket 2011-0166

Dear Ms. Regner:

attended the recent meeting on the possible renewal of Limerick Nuclear Plant's license for 20 years past its current 2024 and 2029 expiration dates. I strongly believe, as do many of my local friends and family, that the **Limerick Nuclear Plant must be closed, not relicensed**. Approving Limerick Nuclear Plant to be relicensed until 2049 would be jeopardizing the health of thousands and thousands of people in neighboring communities. There is substantial evidence readily available which justifies closing Limerick. Renewing this license could lead to a catastrophic meltdown.

40-1-OR

Limerick was built to last 40 years. The older any facility gets, the more likely breakdowns and equipment failure will occur. When it's a nuclear power plant, meltdown could result from corroding, deteriorating, and aging pipes, cables, and equipment - honestly, a number of things. Miles of deteriorating underground buried pipes and cables are a major concern - how and how often are these inspected? **Signs of mechanical damage and breakdown already exist** - three unplanned shutdowns June 2011, preceded by many others since 2007, one with loss of cooling water. While some parts can be replaced, by the nuclear industry's own admission, some equipment is too big and expensive to replace. Limerick is showing signs of stress and no one knows just how bad this will be by the time the current license is up. To add 20 more years to that, without having a clue as to what the condition will be, would be beyond careless.

40-2-OS

Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe evacuation is not possible, even within the seriously flawed and inadequate current 10-mile evacuation plan. Until Limerick closes, NRC should expand the evacuation plan (to 50 miles) and be sure there are enough shelters and supplies available to accommodate the over 8 million people within that radius. Exelon should pay for the supplies.

40-3-OS

It doesn't take an accident or disaster for Limerick to poison the region's residents with radiation. Radiation from Limerick's routine and accidental emissions alone for the past 26 years is reason enough to deny Exelon's request. **It's not credible for NRC to claim continuous radiation levels are safe for me and my family when there is no safe level of exposure according to the National Academy of Sciences and Physicians for Social Responsibility.**

NRC never did any radiation monitoring or testing at Limerick. Evidence shows testing done by Exelon and DEP cannot be trusted. **Exposure to radiation is known to cause cancer.** It should be obvious to NRC that Limerick played a major role in our tragic, well documented cancer crisis after Limerick started operating in the mid 1980s to the late 1990s. Four cancer studies based on PA Cancer Registry and CDC data showed skyrocketing rates for several cancers far higher than national and state averages, especially in children. **Our children** had the highest levels of Strontium-90 radiation in their baby teeth of any group near any nuclear plant studied. Limerick Nuclear Plant released SR-90 into our air and water that got into the milk, vegetation, and food since Limerick started operating.

40-4-HH

SUNSI Review Complete
Template = ADM-013

EXEDS = ADM-03
Cdd = L. Regner (NRC)

Thyroid cancer increased by 128% from 1985 to 1997 - was a side note, with no family history or other obvious risk factors in my life, I was recently treated for thyroid cancer. Since my diagnosis, I have learned of many other locals like me. It's scary to think the choice of where we live could kill us.

40-5-HH

It would be careless, unethical and immoral for NRC to approve Exelon's requested license extensions for Limerick Nuclear Power Plant. **Limerick Nuclear Plant must be closed by 2029.**

40-6-OR

Sincerely,
Melissa Antrim
1008 Reading Ave
Boyertown, PA 19512

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

Mendiola, Doris

From: Michael Antrim [antrim89@gmail.com]
Sent: Friday, October 14, 2011 2:35 PM
To: Regner, Lisa
Subject: Limerick - NRC I.D. Docket 2011-0166

18

RECEIVED

2011 OCT 14 PM 2:56

RULES AND DIRECTIVES
BRANCH
LIMERICK

Reference: Request for Denial of Limerick License Renewal - NRC I.D. Docket 2011-0166

Dear Ms. Regner:

The possible renewal of Limerick Nuclear Plant's license for 20 years past its current 2024 and 2029 expiration dates more than 12 years ahead of time, worries me a great deal. It's hard to understand why something this major would be done so far in advance. It's IMPOSSIBLE to know the condition of Limerick 12-19 years ahead of time. Why on earth would this be renewed so early? It's a lengthy process that could begin earlier, but in no way should something this important be rushed through now. Why not wait until closer to the expiration dates, and then seek approval? I understand this is how the original guidelines were set up - but those are long outdated. Approving Limerick Nuclear Plant to be relicensed until 2049 would be jeopardizing the health of millions. Renewing this license could be catastrophic to millions. Someone has to speak up; someone has to step up.

41-1-LR

Earthquakes and other natural disasters are more frequent and stronger than ever before. Limerick is 3rd on the earthquake risk list. Underground pipes and cables can shake and break, which would lead to loss of power, loss of cooling water, and **meltdown**. Limerick's substandard containment flaw means more radiation would be released. It is simply too dangerous to keep Limerick operating. Would **you** want to live within miles of this potential catastrophic disaster? Add the enormous population growth that this area has seen over the past 10 years - with little to no road improvements - and attempting to evacuate the area during a disaster would be futile. It would be virtually impossible to get out of harms way.

41-2-OS

The older any facility gets, the more likely breakdowns and equipment failure will occur. Limerick was built to last 40 years. Limerick is showing signs of stress and no one knows just how bad this will be by the time the current license is up. To add 20 more years to that, without possibly knowing what the condition will be, would be careless. No one can predict what the condition of Limerick will be in 2024 or 2029. Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe evacuation is not an option. Plain and simple. That's a scary thought for those of us who live here!!

Exposure to radiation is known to cause cancer. NRC has not done any radiation monitoring or testing at Limerick. Evidence shows testing done by Exelon and DEP cannot be trusted - it's ridiculous to think they could monitor themselves. It should be obvious to NRC that Limerick played a major role in our cancer crisis after Limerick started operating in the mid 1980s to 2000. Four cancer studies based on Pennsylvania Cancer Registry and the CDC showed skyrocketing rates for several cancers much higher than national and state averages, especially in children - innocent children. Thyroid cancer increased by 128% from 1985 to 1997. I have local friends and family with thyroid cancer and brain cancer - not one, but several. Sadly, it's no longer uncommon in this area to have a personal link to cancer. However, it IS uncommon in other areas of the country. It used to be uncommon here too - prior to Limerick. Would YOU want to live here? Would YOU approve a license renewal so close to home? Your job is to safely review the facts. Don't like the money of these corporations blur the facts.

41-3-HH

Thank you for your time today. Just remember, it would be careless, unethical and immoral for NRC to approve Exelon's requested license extensions for Limerick Nuclear Power Plant. Limerick Nuclear Plant must be closed by 2029.

41-4-OR

Sincerely,

SUNSI Review Complete
Template = ADH-D13

EXIDS = ADH-D13

1 Add = L. Regner (LNR2)

8/24/2011

Mendiola, Doris

From: joanmcglone@comcast.net
Sent: Sunday, October 16, 2011 10:11 PM
To: Regner, Lisa
Subject: Limerick License Renewal

76 FR 53498

19

Dear Ms. Regner: re: Limerick License Renewal - NRC I.D. Docket 2011-0166

I am opposed to the license renewal of the Limerick nuclear plant which was designed to safely operate for 30 yrs. and should now be safely shut down. Statistics regarding nuclear accidents at similar aging structures are well documented. Those two towers are ticking timebombs and the NRC knows this and needs to shut them down. Following the Japanese nuclear disaster our Limerick nuclear plant hit the statistical at risk list again. The increased risk of cancer is well-founded in the literature also. Why does the NRC think they can play God with people's lives? It is no longer debatable, shut it down before our very lives are jeopardized!!!

42-1-OS

42-2-HH

So-called quality of life issues addressed as part of public debate, e.g. "the power is always on" seems irrelevant to us when our families are required to evacuate during a disaster. Limerick must be closed and NOT relicensed at any cost, specifically the cost of life itself!

42-3-OR

Sincerely,
Joan McGlone
Resident of Royersford borough

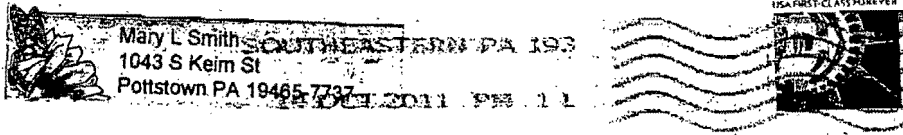
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2011 OCT 17 PM 4:18

RULES AND DIRECTIVES
BRANCH
10/16/2011

SUNSI Review Complete
Template = ADM-013

E-REDS = ADM-03
Case = L. Regner (LNR2)



U.S. NRC, Lisa Reyner, License Renewal
Mailstop TWB-05 - B01M
Washington, DC 20555



To: Lisa Reyner, License Renewal
NRC I.D. Docket 2011-0166
U.S. NRC

Do not renew Limerick
License. It is dangerous
and too old

Please listen to their neighbors
like us.

Mary Lou, Hester Smith
and neighbors
1043 S. Keim St.
Pottstown, PA 19465

43-1-OR

Committed to Community Service

Mendiola, Doris

Subject: FW: *Limerick License Renewal-NRC I.D. Docket 2011-0166
Attachments: Limerick.odt

-----Original Message-----

From: Angelbosley <angelbosley@aol.com>
To: Lisa.Regner <Lisa.Regner@NRC.gov>
Cc: AngelBosley <AngelBosley@aol.com>
Sent: Sun, Oct 23, 2011 12:48 pm
Subject: *Limerick License Renewal-NRC I.D. Docket 2011-0166

Lisa Regner:

Hello, I am attaching a letter to you regarding Limerick Power Plant trying to Re-license until 2049. Please read it. Thank you for your time and attention.

Sincerely,

Lisa Smoyer
1027 Farmington Ave.
Pottstown PA 19464
484-945-0246

8/26/2011

76 FR 53498



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OCT 24 AM 9:58

RULES FOR DIRECTIVES
EX-101
10/23

SUNSI Review Complete
Template = ADM-013

ERIDS = ADM-03

1 Add = L. Regner (NRC)

Sunday, October 23, 2011

Lisa Regner, License Renewal
Mailstop TWB-05-BO1 M
Washington DC 20555

Lisa.Regner@NRC.gov

*Limerick License Renewal-NRC I.D. Docket 2011-0166

Dear NRC/Lisa Regner:

I was unable to attend the public hearing at the time that is occurred. I would like to voice my concern to all of you through this letter. There are so many reasons why you as a group should already know that it would be in the best interest of the men, women, children, babies, fetuses, animals, fish, wildlife in general and the environment for you to refuse/oppose Limerick Power Plant from re-licensing. The problem that always seems to come up at some of these public hearings and sessions where businesses/corporations want to expand and become bigger and run their businesses long past the time that they should truly be allowed in order to keep people safe, always comes back to the issue of money, offerings, bribes, donations, etc. in the end. When these things occur, people and businesses turn a "blind eye" so to speak to the dangers of allowing a business like the Limerick Power Plant to renew its license again. That is unacceptable! I expect and demand better service from you to help protect myself and my family from harm!

44-1-OR

There is no "independent" testing being done at Limerick. The results of testing are provided by their own company, who has a vested interest in the outcome of those results, so how could you ever believe that they would be honest about the results? Seriously??

44-2-OS

There is concern that should be faced regarding the Schuylkill River and the affects it is going to have on the public if it becomes depleted, and/or toxic due to the contaminates going in it. It is disgusting and heart wrenching to know that officials and organizations are not paying attention to what can happen to the public if Limerick Power Plant continues to operate longer then expected. Ignoring the obvious problems our community is facing and hoping that after they serve their term, it will be someone else s problem to deal with is unacceptable. Now is the time. Step up and do what is morally right for humanity.

44-3-SW

44-4-OR

We as a society need to wake up and start paying attention to the massive harm power plants can cause to the people, animals, water, air, etc. Why does everyone want to pay attention when it is way too late?? There are safer alternative forms of energy available to our country/communities. We should be working on them and training employees, who currently work for the nuclear power plants, how to work with safer forms of energy to help our country move forward in today's society.

44-5-AL

Haven't we already seen some of the damage that a terrorist attack can cause for our country and for others? Do you really need to risk more possible attacks on a power plant that is not fully equipped for that kind of attack or for some other natural disasters that can occur. This plant is not prepared for attacks with planes, missiles, and other threats such as a cyber attack. There should also be a concern for accidents and leaks from corroding and deteriorating equipment at the site from over the years

44-6-PA

44-7-OS

(Page 2 of 3)

which could cause parts of it to be shut down for periods of time, as well as the miles of buried pipes and cables. There are many concerns that should be fully looked at and considered, and just with minimal thought to them, it shouldn't take a "rocket scientists" so to speak to figure out that it is not in the best interest of the public or environment to allow them to re-license.

44-7-
OS
Cont'd

The most alarming and compelling thing to me as a taxpayer, homeowner, and mother is the overwhelming and alarming cancer increases to the public after Limerick had started operating. The CDC website showed a 92.5% higher than the national average for childhood cancer in six communities close to the Limerick Nuclear Plant which included, Pottstown, West Pottsgrove, Lower Pottsgrove, Upper Pottsgrove, North Coventry, and Douglass Berks Township from cancers diagnosed from 1995-1999. The Pennsylvania State Cancer Registry For Montgomery County- from 1985-86 to 1996-97 also shows cancer rates skyrocketed in Montgomery County where the Limerick Nuclear Plant is located during the Mid 80's to 90's after they opened. Prostate Cancer increased 132%, Thyroid Cancer increased 128%, Kidney cancer increased 96%, Multiple Myeloma increased 91%, Hodgkin's Disease increased 67%, Non-Hodgkin's Lymphoma increased 61%, Breast cancer increased 61%, Pancreas cancer increased 54%, and Leukemia increased 48%.

44-8-HH

Radiation exposure can cause cancer and other serious disease and disability, at any level of exposure according to the National Academy of Sciences and Physicians for Social Responsibility. Permissible radiation levels does not mean that they are safe levels for everyone in the community. Most permissible levels are based on the average healthy adult. They are not levels that were based or researched for fetuses, infants, toddlers and children or pets. Fetuses, infants, children, pets and the elderly and immuned compromised individuals are at most risk of health problems. There is a broad range of dangerous radionuclides routinely released into our air and water from the Limerick Nuclear Plant as well as any accidental releases. Permissible radiation levels does not mean that they are safe radiation levels, it only means that they are allowed.

44-9-
HH

I have children as well as other loved ones that have or have had allergies, asthma, learning disabilities, speech disabilities, behavioral disabilities, thyroid conditions, cancers, skin disorders and irritation, etc. I know neighbors and other community members that have suffered from the same and more. We deserve to live in a community where our air and water isn't being contaminated constantly with hazardous chemicals, radiation, etc. when there are other energy alternatives out there that are being used that are safer for the community.

44-10-AL

I expect you to do what is morally right now for me, my family, my neighbors, my community, and the pets, wildlife, air, water, and environment in whole by rejecting, refusing and opposing Limerick Power Plant from re-licensing to run their business longer then originally planned for 2029. Don't turn a "blind eye" now. Do your job knowing that you are doing what is morally right and safe for humanity and for my children and for the future of generations to come. Please help women have a chance to carry a baby full term without complications due to any possible air and water pollution that may have been caused by allowing more radiation into the environment when there are safer alternatives for energy.

44-11-
OR

44-12-AL

(Page 3 of 3)

One person/individual can make a huge difference in the life of others whether or not you realize it. It can have a domino effect on others. Please step up and be that one person that we truly need right now to do what is right. Why does it have to take someone to be personally affected by a situation or to have a loved one suffer or die to step forward and do something? Please don't wait. Now is the time. Please be courageous enough to stand up and fight for what is right for this community and for humanity in a whole, no matter how hard or long the task may seem, it will be worth it in the end!!!

I appreciate your time and attention in this matter. Thank you.

Sincerely,

Lisa Smoyer- Upper Pottsgrove Resident
1027 Farmington Ave.
Pottstown PA 19464

CC: Friends, Family and some community members

October 8, 2011

U.S. NRC
Ms. Lisa Regner
Mailstop TWB-05-BO1 M
Washington, D.C. 20555

Lisa.Regner@NRC.gov

8/26/2011

76FR53498

22

RECEIVED

OCT 24 PM 2:37

FILES AND DIRECTIVES
NRC
10/10

Subject: **Deny Limerick License Renewal - NRC I.D. Docket 2011-0166**

Dear Ms. Regner:

I urge NRC to deny Exelon's request to renew Limerick Nuclear Plant's license for 20 years past its current 2024 and 2029 expiration dates. Limerick Nuclear Plant must be closed, not relicensed, for many valid reasons. Approval for Limerick Nuclear Plant to be relicensed until 2049 would be reckless and would show blatant disregard for the health and safety of the public. There is more than sufficient evidence of harms and threats to justify closing Limerick. There are too many things beyond NRC's control that could lead to a catastrophic meltdown.

45-1-OR

Limerick is 3rd on the earthquake risk list. It is too dangerous to keep Limerick operating. Earthquakes and other natural disasters are more frequent and stronger. Underground pipes and cables can shake and break, then lead to loss of power, loss of cooling water, and meltdown. Limerick's substandard containment flaw means more radiation would be released.

45-2-PA

Everything has a life expectancy. Limerick's was 40 years. The older any facility gets, the more likely mechanical breakdowns and equipment failure will occur. When it's a nuclear plant, meltdown could result from corroding, deteriorating, and aging pipes, cables, and equipment. Miles of difficult to inspect corroding, deteriorating underground buried pipes and cables are a major concern. Signs of mechanical damage and breakdown already exist - three unplanned shutdowns June 2011, preceded by many others since 2007, one with loss of cooling water. While some parts can be replaced, by the nuclear industry's own admission, some equipment is too big and expensive to replace.

45-3-OS

Terrorists have made it clear they intend to attack nuclear plants. Exelon has refused to pay to guard Limerick against a 9/11 type terrorist attack with a plane or missile, even though the most deadly targets (Limerick's fuel pools) are vulnerable to such attacks. Limerick is a similar design to nuclear plants in Japan that are melting down and exploding. NRC's own report from 2000 shows people 500 miles away could be impacted by an accident or attack on such fuel pools. Deadly radioactive spent fuel rods are jam packed into Limerick's vulnerable fuel pools five stories high. Cyber attacks, now declared an act of war, could wipe out systems that could lead to meltdown. Hackers have penetrated the Pentagon and other well guarded systems. Exelon's new plan for cyber attacks gives us little comfort.

45-4-OS

No NRC policy, review, or report can make Limerick failsafe from a catastrophic meltdown. Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe

45-5-OS

SUNSI Review Complete
Template = ADM-013

E-REDS = ADM-03
Add - L. Regner (LNR2)

evacuation is merely an illusion, even within the seriously flawed and fundamentally inadequate current 10-mile evacuation plan. Until Limerick closes, NRC should expand the evacuation plan (minimally to 50 miles) and be sure there are enough shelters and supplies available to accommodate the over 8 million people within the 50 miles. Exelon should pay for the supplies. Unless this is done, Limerick should be closed as soon as possible.

45-5-OS
Cont'd

But, it doesn't take an accident or disaster for Limerick to poison the region's residents with radiation. Radiation from Limerick's routine and accidental emissions alone for the past 26 years is reason enough to deny Exelon's request. It's not credible for NRC to claim continuous radiation levels are safe for me and my family when there is no safe level of exposure according to the National Academy of Sciences and Physicians for Social Responsibility.

45-6-HH

NRC is failing to acknowledge obvious health harms from Limerick's continuous additive, cumulative, and synergistic radiation releases which get into our water, food, soil, vegetation, milk, and our bodies. NRC has no idea what health harms some of the region's residents experienced from Limerick Nuclear Plant. NRC never did any radiation monitoring or testing at Limerick. Evidence shows testing done by Exelon and DEP cannot be trusted.

45-7-HH

Exposure to radiation is known to cause cancer. It should be obvious to NRC that Limerick played a major role in our tragic, well documented cancer crisis after Limerick started operating in the mid 1980s to the late 1990s. Four cancer studies based on PA Cancer Registry and CDC data showed skyrocketing rates for several cancers far higher than national and state averages, especially in children. Our children had the highest levels of Strontium-90 radiation in their baby teeth of any group near any nuclear plant studied. Limerick Nuclear Plant released SR-90 into our air and water that got into the milk, vegetation, and food since Limerick started operating. Thyroid cancer increased by 128% from 1985 to 1997. Other cancers rose dramatically as well.

45-8-HH

Limerick Nuclear Plant is slowly destroying the vital public drinking water source for almost two million people from Pottstown to Philadelphia. Radioactive and heated wastewater is discharged by Limerick Nuclear Plant into the Schuylkill River 24/7. Limerick's cooling towers are causing significant depletion. To supplement the flow to operate Limerick, Exelon wants to pump more contaminated mine water into the river. No one can credibly assure us if drinking water will remain safe even until 2029 when Limerick's original license expires.

45-9-SW

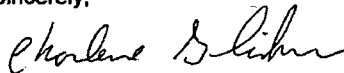
Limerick contaminated groundwater. Radioactive leaks and spills over the years were never cleaned up. More radioactive leaks can be expected in the future through earthquakes, deterioration, and corrosion. Many residential wells are very close to Limerick.

45-10-GW

It would be both unethical and immoral for NRC to approve Exelon's requested license extensions for Limerick Nuclear Power Plant. All of the unprecedented harms, threats, and risks from Limerick Nuclear Plant will increase if NRC approves an additional 20 year Limerick license extension, until 2049. Limerick Nuclear Plant must be closed by 2029.

45-11-OR

Sincerely,



1618 Benjamin Dr.
Ambler, PA 19002

Oct. 21, 2011

Ms. Lisa Regner
Project Manager
NRC Environmental Review Project

Dear Ms. Regner:

I am writing to express my opposition to the re-licensure of Limerick nuclear power generating station, which is located about 20 miles from my home. There are several reasons why this re-licensure is not in the best interests of people living in the surrounding community.

46-1-OR

If this license renewal is granted, this plant will continue operating until 2049, at which time it will be over sixty years old. Cracks in concrete and corrosion in piping will inevitably develop as this facility ages. While some of this "wear and tear" may be evident to visual inspection, some of it will also occur in less accessible places, such as in underground piping systems. The Associated Press has shown that tritium leaks in underground piping systems frequently go undetected—sometimes for years—in aging nuclear power plants.ⁱ While no leaks of this kind have so far been documented at Limerick, the odds of these sorts of problems developing will only increase with every successive decade of the plant's working life.

46-2-OS

While the problems associated with age will develop in any nuclear power plant over time, there are additional problems with the reactors at Limerick. Limerick's reactors are boiling water reactors similar to those that catastrophically melted down last spring in Japan. Although these reactors have a later containment design, they have the same fundamentally flawed reactor pressure vessel design as those that failed at Fukushima.ⁱⁱ In the BWR design, the control rods come up through the bottom of the pressure vessel, instead of dropping down from above as in other reactor designs. While the reactor pressure vessel itself is made of very thick steel, the bottom of the BWR pressure vessel contains 60 holes through which the rods enter the vessel.ⁱⁱⁱ In the event of a meltdown, however, these same holes can provide a "path of least resistance" through which the hot molten fuel can escape with relative ease; it then only has to melt through connecting pipes that are much thinner and weaker than the metal of the pressure vessel itself.^{iv} This apparently occurred at Fukushima, where authorities now admit that reactor fuel underwent not merely a "melt-down," but a "melt-through," breaching the inner pressure vessel and in the process releasing considerable amounts of radioactive material into the environment.^v

46-3-OS

One might be tempted to dismiss the comparison with Fukushima on the grounds Limerick in Pennsylvania is unlikely to experience a similar combination tsunami and earthquake. While the tsunami is not an issue, however, recent analysis by the Nuclear Regulatory Commission suggests that earthquakes pose a more significant threat to the Limerick reactors than was recognized at the time of their construction and initial licensure. (Incidentally, it now appears that at least one of Fukushima's reactors was significantly damaged by the earthquake even *before* the tsunami struck.)^{vi} According to the NRC's own data, Limerick's two reactors are the *third* and *fourth* most likely in the country to sustain core damage in the event of an earthquake.^{vii} There is a fault line called the Ramapo fault line that runs slightly north of Limerick, and two small earthquakes associated with this fault line occurred as recently as February 2009.^{viii} The unexpected quake that shook Virginia's North Anna nuclear plant with *over two times the amount of force that it was designed to withstand* should make us take very seriously the NRC's data regarding Limerick's greater than previously recognized vulnerability to earthquake damage.^{ix} These concerns are compounded by the fact that the manufacturer of Limerick's control rods, GE Hitachi,

46-4-PA

recently acknowledged concerns that the control rods in its BWRs might not function properly in the event of an earthquake.^x

46-4- PA
Cont'd

Questions about the Limerick reactors' ability to withstand accidents and natural disasters are all the more pressing because so many people could potentially be affected if something catastrophic were to occur. Since 1990, the population within a ten-mile radius of the plant has increased by 45%, from 178,047 to 257,625.^{xi} In addition, Philadelphia, with a population of 1,526,006, is only about 28 miles away. How much more might these populations increase by 2049? Bearing in mind that the NRC advised Americans within a 50 mile radius of Fukushima to evacuate last spring, one can only imagine how difficult it would be to carry out such evacuations if the unthinkable were ever to occur at Limerick.

46-5-OS

Finally, my concerns regarding the impact of this nuclear power plant on my community are not limited to catastrophic scenarios that might potentially occur. There have been some recent studies published in health journals that show a higher incidence of certain illness—particularly among children—in communities surrounding nuclear power plants.^{xii} While these studies were conducted in a variety of locations, they seem to be consistent with some of the data that Pottstown's local Alliance for a Clean Environment presents on its website regarding increased cancer and leukemia rates—also especially among children—in the greater Pottstown area.^{xiii}

46-6-HH

For all of these reasons, I am asking the Nuclear Regulatory Association to deny Exelon's request to extend Limerick's operating license for an extra twenty years.

Thank you for your time.

Sincerely,

Lori Molinari

Mendiola, Doris

From: Regner, Lisa
Sent: Thursday, October 27, 2011 10:17 AM
To: Gallagher, Carol
Cc: Mendiola, Doris
Subject: Limerick Comment dictated to PM (docket NRC-2011-0166)

8/26/2011

76 FR 53498

Environmental Scoping comment dictated to PM (L. Regner) on October 27, 2011:

I'm against it for two reasons:

Limerick Generating Station is old and I don't think it is strong enough to withstand plane impacts, earthquakes, or tornadoes that occur here.

47-1-PA

I am fully aware of the amount of cancer that is prevalent in this area.

47-2-HH

Doris Meyers

Read back to Ms. Meyers twice by PM to ensure accuracy of dictated statement.

Lisa M Regner, Senior Project Manager
Division of License Renewal
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Lisa.Regner@NRC.Gov
Office: O 11 H-23
Mail Stop: O 11 F-1
(301) 415-1906

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OCT 28 10:36

RULES / L. REGNER

*SUNSI Review Complete
Template = ADM-013*

*FRIDS = ADM-03
Add = L. Regner (LNR2)*

Mendiola, Doris

From: quteasz@comcast.net
Sent: Thursday, October 27, 2011 3:03 PM
To: Regner, Lisa
Subject: Limerick Nuclear Plant Relicensing

Hello Ms. Regner:

Just a quick note requesting the NRC to NOT allow the relicensing of the Limerick, Pa., nuclear plant at this time. 48-1-OR

I moved to Pottstown, Pa., some time ago in perfect health. In 2006, I was diagnosed with prostate cancer. Although, I cannot prove it was a direct cause of the nuclear power plant, I feel that much further, unbiased studies and tests need to be done prior to the relicensing of the Limerick plant by reputable sources not by corporate interests groups that can manipulate the statistics in Exelon's favor. Wouldn't it be in the best interest of our community and surrounding communities if the higher cancer rate was due to the Limerick power plant???? This question is a "no brainer". 48-2-HH
There is plenty of time for testing to be done prior to the relicensing.

Also, why the hurry??? Common sense would indicate that Exelon knows something to which we are not aware. Why must the license be renewed at this time when they are licensed through 2024 and 2029???? Again, WHY THE HURRY??? 48-3-LR
To relicense now is not in the best interest of everyone in our area.

Prior to the construction of the Limerick power plant, everyone in our surrounding area was told that our electricity would be one of the lowest in the U.S. THIS WAS A BOLD FACE LIE!!!! IT IS ONE OF THE HIGHEST IN THE U.S.!!! 48-4-OS
Exelon lied to us then and they will distort the facts now.

PLEASE DO NOT BE IN A HURRY TO RELICENSE LIMERICK WITHOUT COMPLETE AND HONEST TESTING BY AN IMPARTIAL COMPANY. There is plenty of time after the test results.

Thank you for reading my e-mail. I hope God guides your agency into making the correct decision.

Ken Sekellick
661 N. Price St.
Pottstown, PA. 19464

quteasz@comcast.net

RULES AND OBJECTIVES
POLICE
1963

SEN OCT 23 AM 10: 47

8/26/2011
76FR53498

936 Shenkel Road
Pottstown, PA 19465
October 25, 2011

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26

U. S. NRC
C/O Lisa Regner, License Renewal
Mailstop TWB-0505-B01 M
Washington, D. C. 20555

Re: Limerick License
Renewal
NRC I.D. Docket 2011-0166

Dear Lisa, NRC:

As a physician, I am writing to help you understand that nuclear reactors are not safe. I attended the medical clinic in Hiroshima right after the bombing and saw the radiation horrors caused by nuclear bombing. I have kept a close watch on similar problems by nuclear energy in the medical field since then, not only worldwide, but because of our nearby nuclear power plant. Here are some concerns.

According to the National Center for Disease Control, Pennsylvania ranks No. 1 for the highest incidence of Thyroid cancer. This occurred after installation of nuclear power plants in our area as well as in the rest of the State. Medical journals are reporting high rates of cancer near nuclear plants. An earthquake in our area is not too far fetched. And, of course, the threat of terrorism with vulnerable spent fuel are always a concern.

6-6-HH

6-7-PA

Incidentally, baby teeth studies have revealed Strontium 90 radioactive particles which can affect the child's immune system for more illness.

6-8-HH

We can't control the use of nuclear in the rest of the world, but we can keep the U. S. safer by eliminating nuclear energies. Fortunately, many of our European allies including Australia have decided to phase out reactors. We should join them to reduce human suffering. Also this can reduce our increasing costs of health care!

6-9-OR

Please listen to this advice after years of doing my best for America. Rely on more and truly safe and renewable sources like solar, wind and geothermal power. A patriotic duty to protect our kids.

6-10-AL

Limerick Power Plant is ranked in the top 3 riskiest nuclear power plants in the U.S.A. Limerick Power Plant must be closed not relicensed.

6-11-OR

Sincerely yours,

/s/ Fred S. Winter
Fred S. Winter, M. D.

SUNSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Call = L. Regner (LIR2)

8/26/2011

76FR53498

28

Anthony Gonyea
Onondaga Nation
Hemlock Rd. Box 319B
via Nedrow, NY 13120

Oct. 15, 2011

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OCT 23 PM 4:55

RULES OF PROCEDURE

David J Wrona
US Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Project ID: Limerick Generating Station
Limerick Township of Montgomery County, PA

Dear Mr. Wrona,

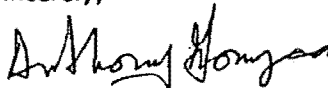
Thank you for providing the Onondaga Nation with information about this project. If anything changes are made, I would like to be consulted. I realize that Unit 1 and Unit 2 have licenses that may be renewed in 2024 and 2029 respectively, therefore you may send updates and information until then.

49-1-HA

In the event that during project construction, any archeological resources or remains, including, without limitation, human remains, funerary objects, sacred objects, or objects of cultural patrimony are uncovered, please immediately stop construction and contact me at (315)952-3109, or the Onondaga Nation's General Counsel Mr. Joseph Heath at (315)475-2559.

If you have any comments or questions about this matter, please do not hesitate to let me know. Thank you for your help.

Sincerely,



Anthony Gonyea
A Faithkeeper for the Onondaga Nation
Onondaga Nation Historic Preservation Office
Section 106 Representative

SOUSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Add = L. Begner (LHR2)

Mendiola, Doris

From: Deb Penrod [deb24532@comcast.net]
Sent: Thursday, October 27, 2011 8:06 PM
To: Regner, Lisa
Subject: greetings from a SUPPORTER of Limerick nuclear plant

Hi,

I wanted to let you know that I am a complete and full supporter of the Limerick Nuclear plant. I am also supportive of the scientific judgement and expertise of those such as yourself who have the job of making the decisions.

50-1-SR

(I saw your name in an article in the Mercury where the writer was requesting that objections be sent to you. I thought I would take advantage of the contact information to state a contrary position.) I grew up in coal-mining country, and never saw a stream or a creek with clear water uncontaminated by acid mine runoff until I was in my late teens. Opponents to nuclear power have usually never lived near coal truck entrances to mines and coal plants, and have probably never lost family members to mine cave-ins or black lung. Risks should be minimized as much as possible, but the world will always have something that someone objects to. Unscientific or fear-based objections to nuclear power are unproductive and do not advance safe or reasonably priced power.

I work in the pharmaceutical industry (I was first educated as a pharmacist, and then as an attorney; I now help to get new vaccines approved, and to help increase vaccination rates). The parallel I see is with the group of people who see disaster in every prescription drug product, and complain about everything the FDA approves or does. Nothing is ever 'safe' enough for them.

Please renew Limerick, using the best scientific information and risk/benefit analysis available to you.

50-2-SR

Thank you.
Debby Penrod
215 Amanda Smith Drive
PO Box 516
Pottstown, PA 19464

SONSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
All = J. Regner (MR2)

Mendiola, Doris

From: DocKoenig@aol.com
Sent: Thursday, October 27, 2011 8:49 PM
To: Regner, Lisa
Subject: Fwd: Nuclear Limerick

8/26/2011
76 FR 53498

30

From: DocKoenig@aol.com
To: LisaRegner@nrc.gov
Sent: 10/27/2011 7:36:13 P.M. Eastern Daylight Time
Subj: Nuclear Limerick

Hello Lisa Limerick should not be licensed or relicensed at this time. They are only doing it because the plant has issues that they are trying to hide. The evacuation plan is a joke because we would not get out of our driveways. It would not have worked 10 years ago and certainly with the population growth it would be much

51-1-OS

worse. Relicense should not be permitted because all kinds of deterioration has occurred and is occurring and the present licenses do not run out until 2024 and 2029. They are doing this now because they know it would not pass if they waited for 2024 and 2029. This is an old plant and there is much corrosion and concrete deterioration that is going

51-2-OS

on. There are many miles of buried pipes that cannot be checked reliably. Cancer rates are higher than the national average and NRC is going with the status quo. Also

51-3-HH

Limerick is built on a fault. Please protect our citizens from possible disaster and do not relicense Limerick, Sincerely Charlie Koenig

51-4-GE;
51-5-OR

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OCT 23 PM 4:52

REGNER, LISA
NRC

SUNSI Review Complete
Temp Etc = ADM-013

FRIDS = ADM-03
1. Call = L. Regner (4422)

Mendiola, Doris

From: John & Joyce Webber [jbwebberpc@comcast.net]
Sent: Friday, October 28, 2011 2:41 PM
To: Regner, Lisa
Subject: Exlon Limerick Relicensing

As a resident of New Hanover Twp., Montgomery County, PA (less than 5 miles from Exelon's Limerick Nuclear Power Plant), I urge you to vote AGAINST the premature relicensing of that facility.

52-1-OR

(1) The Limerick plant was built to be used for 25 years.

52-2-OS

(2) It has now gone far beyond its limitations.

(3) The area around the facility has exploded with homes and businesses

52-3-SE

(4) The roads to any safe place are overwhelmed with congestion with normal traffic. (5) The plant can no longer store its used fuel rods and has asked permission to begin transporting them to another facility.

52-4-OS

(5) It is one of the six most dangerous plants in the country because of its proximity to an earthquake fault.

52-5-OS

(6) The surrounding area has abnormally high cancer rates among adults and children.

52-6-HH

For all these reasons and many others too numerous to mention, it would be a truly disastrous mistake to extend Exelon's Limerick license for 20 years beyond the current licenses that do not expire until 2024 & 2029!

Please consider the thousands and thousands of people who would be lost to an accident that could be prevented.

Sincerely,

Joyce B. Webber
2338 Holly Drive
Gilbertsville, PA 19525
610-326-2584

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OCT 29 PM 4:52

FILES FOR COPIES
2011
OCT 29
12:00 PM

SUNSI Review Complete
Template = ADM-013

EAIDS = ADM-03
Call = L. Regner (LHR)

Mendiola, Doris

From: Anita Baly [ajbaly@yahoo.com]
Sent: Friday, October 28, 2011 3:06 PM
To: Regner, Lisa
Subject: Limerick Plant Relicensing Application is Too Early

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OCT 28 PM 4:53

RULE 600 JUDICIAL

32

Dear Lisa,

It was good to meet you at the September 22, 2011 hearing the NRC held at Sunnybrook.

As I stated then, I continue to be concerned and puzzled about the very early and pre-mature application of Exelon to extend the licenses of the towers. One of those towers does not come up for renewal until 2024 and the other 2029. I ask the NRC not to work on the relicensing question for this facility for at least ten years. The wait could only ensure better information. The public cannot possibly benefit from a decision to renew the licenses at this time. The best decision will be made based on the best possible information. The NRC does not have that best information this early. Much will happen in the next ten years. I urge the NRC to wait and see how any of it affects the prospect of continuing these plants at that later date.

8-5-LR

What can happen in the next ten years that we can all learn from relevantly could be anything. It may be better information about how natural disasters are affecting nuclear facilities; we may know more about weather patterns that could cause damage. We will certainly know more about the world situation in terms of advances in terrorist technological capabilities and goals. We will know more about how well nuclear plants in general and the Limerick facility are faring as they continue to age. If someone steps forward to fund studies, we will know yet more about cancer rates in the nuclear zone. (We do know something about that now: Joseph Mangano and others have done studies already that I assume he has provided to you, and I urge you to consider carefully.)

One big concern--because of Japan's recent experience and the fact that we had an earthquake here in the Limerick plant's territory--is refurbishing the plants so they can withstand earthquakes. It has been widely reported--by MSNBC and the AP, using NRC data--that the Limerick plant has the nation's third highest risk of being damaged by an earthquake. When the plant was built, no one thought this area would get earthquakes. Now we do. I understand that Congress is now or soon will be considering increasing earthquake preparedness capabilities at the plants. I fear that if you grant Exelon carte blanche now, the NRC would encourage them to do less than they should to make the plants safer.

8-6-PA

There can be no good reasons for relicensing now. Please wait as long as possible to do that. Better information helps everyone who wants an outcome that is right and socially beneficial--not just profitable for Exelon.

Thank you for your consideration.

Anita Baly

SOUSI Review Complete
Template = ADM-013

FAIDS = ADM-013
All = L. Regner (WR2)

8/24/2011
76FR 53498

To: U.S. NRC

33

Lisa Regner

Mailstop TWB-05-301M

Washington, D.C. 20555

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SEP 1 2011 9:03

FILES
LIMERICK

From: Charlotte Derr
545 Rosedale Drive
Pottstown, PA 19464

Re: Limerick License Renewal - NRC 2011-0166

I implore you to not relicense the Nuclear Power Plant of LIMERICK when its license expires in 2029. If I had my wish, the power plant would be closed years before 2029.

53-1-OR

We need cleaner air and water. We need to decrease radiation. We need CLEAN, SAFE, RENEWABLE ENERGY!

53-2-AL

Thank you for your time and consideration. Future generations are at stake.

FRIDS = ADM-013

SUNSI Review Complete

Template = ADM-013

Sincerely,

Charlotte Derr

Add = L. Regner (LMR2)



MONTGOMERY COUNTY PLANNING COMMISSION

box 311 • norristown • pennsylvania • 19404-0311 • 610-278-3722
office location: suite 201 • one montgomery plaza • swede & airy streets • norristown pa
FAX 610-278-3941 • Website www.planning.montcopa.org

October 25, 2011

Chief, Rules Announcements, and Directives Branch
Mail Stop: TWB-05-B01M
US Nuclear Regulatory Commission
Washington, DC 205550001

RE: Environmental Scoping Comments
Limerick Nuclear Generating Station
Division of License Renewal
NRC-2011-0166

Dear NRC Staff:

We have examined the proposed relicensing review information presented by NRC staff at the Public Hearing held in Pottstown on September 22 and the information posted on the web site operated by the NRC. We feel that it is vital that any decision regarding the relicensing of the Limerick Nuclear Power Station reflect careful consideration of all relevant public health and safety, security, and environmental issues that pertain to nuclear power generation in general and the unique conditions at the nuclear power generating station situated in Limerick Township. It is our understanding that an Environmental Impact Statement will be developed which addresses relevant environmental impacts pertaining to socioeconomics, environmental justice, and noise; cultural resources, archeology, and geological science; atmospheric science, air quality; hydrological sciences; transportation and land use; radiation protection; nuclear safety, fuel cycle, waste, and accident analysis; construction, operation, refurbishment, and decommissioning; regulatory compliance; aquatic ecology; and water quality. Further it is our understanding that a detailed safety review will be conducted to review design assumptions; assess aging management of safety systems; and determine if new monitoring and inspections are needed during the expanded licensing period.

While we implore the NRC to do a full review of both environmental and public safety issues pertaining to the plant- particularly addressing radioactivity exposures during normal operation of the power station and during various types of unusual events and disasters- we additionally feel that the impact review preceding any relicensing decision should also address specific issues pertaining to the plant based upon it's conformity to the Montgomery County Comprehensive Plan and overall county development policies. Below we have itemized issues with respect to land use change and growth around the power plant, transportation and evacuation capacity, Schuylkill River, and county trails that we feel warrant consideration in the environmental impact study.

SONSI Review Complete
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ERIDS = ADM-03
Cell = L. Begner (LHR2)

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8/26/2011
76 FR 53498

NRC Staff

-2-

October 25, 2011

Land Use Change and Growth around the Power Plant:

Since the original plant was constructed, the population in the surrounding communities has grown dramatically. Limerick Township and nearby Upper Providence Township have been two of the most rapidly growing communities in the county. This growth largely fueled by access to US Route 422 Expressway and available land with suitable infrastructure, has dramatically changed the character of the area surrounding the Limerick Power Station. In the past few years, the Philadelphia Premium Outlet Mall, a 600,000 square foot retail facility, and the adjoining Costco shopping center opened along US Route 422 about one mile north of the Limerick Power Station property. The land adjoining those facilities is being considered for various types of retail and residential uses. At one time, a large gambling casino had been proposed in this location as well. Other lands in Lower Pottsgrove Township near the Limerick Power Station have also been proposed for similar types of uses.

54-2-OS

While the county planning commission has tried to promote lower densities of growth in proximity to the Limerick Plant, the local communities and the marketplace favor this location for significant development due to its proximity to the US Route 422 interchange at Township Line/ Evergreen Road. The growth that has taken place in the area around the power plant, and in particular the growth taking place in the area immediately adjoining the plant and the primary access to it, as well as the projected growth in the future, could complicate evacuation plans and the movement of appropriate emergency response personnel to the plant in the event of a disaster. Certainly this access could be even more critical in the event of a natural disaster when other roads to the plant may be impassable. The environmental assessment review needs to analyze this growth in the vicinity of the power plant to evaluate what impact it would have on plant operations and whether or not safe evacuation can take place from the newly developed areas.

Transportation and Evacuation Capacity:

The growth in the whole US Route 422 Corridor has raised numerous proposals for expanding the vehicle capacity of the 422 expressway. Current peak commuting traffic tie ups on portions of the expressway serve as evidence that it may have inadequate capacity to continue to serve as a safe evacuation corridor for the region. The county transportation plan recognizes the need for various road improvements along the US 422 Corridor to address current and future traffic demands. The first priority projects in the plan include interchange improvements at the Township Line Road/ Evergreen Road intersection which is also the primary access route to the plant; needed widening and reconstruction of the highway east of the power station between Route 29 and US Route 202 in King of Prussia, reconstruction of US Route 422 in the vicinity of Pottstown, and the reconstruction and widening of the Route 422 Bridge across the Schuylkill River at Betzwood. A passenger train line is also proposed as a first priority in the transportation plan to provide service through the western portion of the county into Norristown. The proposed route for this train line is the existing Norfolk Southern rail line that goes through the Limerick Power Station Property. Other improvements including the widening and expansion of US Route 422 from Pottstown to Route 29 and additional interchange improvements at Township Line/ Evergreen Road are proposed as secondary priorities in the county plan. In addition to these improvements, several other localized improvements that may impact evacuation feasibility are proposed in the county plan.

54-3-OS

NRC Staff

-3-

October 25, 2011

Due to funding limitations in Pennsylvania, these projects are not likely to move forward at this time. The environmental impact review should consider the capacity of the roadway facilities to service the Limerick Plant as well as provide sufficient evacuation of the area in the event of a disaster. Possible mitigation strategies to be considered in the environmental assessment review could include the role of Exelon in funding the important road improvements needed in this area to ensure safe evacuation and access to the plant in any type of disaster.

54-3-OS
Cont'd

Schuylkill River:

Since the last impact statement was prepared in 1973, the Schuylkill River has been designated as a state scenic river and as a heritage area for both the state and federal government. Due to these designations and the efforts of non-profit organizations and local government, access to the river has been expanded so that the river has become a recreation and heritage tourism destination. Use of the river in the vicinity of the plant will continue to grow. With the return of American Shad made possible through down stream fish ladders, interest in the river could even grow further in the future.

54-4-SW

The Limerick Plant withdraws sizeable portions of river water. During low flow periods, additional quantities of water are released into the river from the Wadesville Mine and Still Creek Reservoir in Schuylkill County to compensate for the water withdrawn at the plant. This process was initially approved by the Delaware River Basin Commission (DRBC) in 2003 and kept active through a series of docket amendments. Future river water use is dependent upon the ability of this water make up system to operate within various water quality and flow parameters set by DRBC. It is important to evaluate the viability of the use of the river water and water make up system to provide needed water through the expanded plant lifetime. Analysis of this aspect of plant operation needs to account for the water quality impact from the total dissolved solids in the Wadesville water among other parameters. If resumed use of the Delaware water diversion is anticipated, an evaluation of that system is required to ensure that the capacity is available in the conveyance system and that water quality objectives can be met for discharge into the East Branch of the Perkiomen Creek.

County Trails and Open Space:

The county has been working hard to develop an interconnected system of open space and trails along the Schuylkill River and within other natural resource areas of the county. In doing this, the county has provided funding to local municipalities and non-profit conservation organizations to purchase open space and park land; acquired county land and agriculture easements; and developed trails. The Limerick Generating Station site contains significant land along the Schuylkill River that has been identified as part of the Schuylkill River Greenway in the county plan. The use and management of these lands relative to the county open space and natural areas inventory plans should be evaluated in the relicensing process.

54-5-LU

The Montgomery County Open Space Plan proposes a trail along the river through the power plant property. This trail is proposed as the Schuylkill East Trail, which would be developed as unpaved trail between Mont Clare and Pottstown. Essentially the proposed route would follow an old road way between the river and Norfolk Southern rail line through the Limerick Power Station site. Though such a trail route would appear to raise significant safety concerns due its proposed proximity to the power

54-6-
OS

NRC Staff

-4-

October 25, 2011

station, appropriate elements could be designed into any trail system to limit its threat to plant's security. We have found that trails can enhance the overall security of an area since they concentrate users along a defined corridor. Furthermore, trails can provide emergency access routes that could be used during different disaster events to evacuate people and provide access for emergency response. This trail and the management of undeveloped portions of the Limerick Power Station site should be considered in the environmental assessment.

54-6-OS
Cont'd

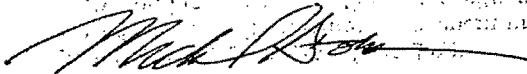
Community Outreach and Education:

As part of the environmental assessment process and the evaluation of the plant safety and long term operational capacity, we think that it is important for the NRC to maintain close communication with the community surrounding the plant. Overall education about the plant and the associated risks presented by its operation should be provided in a variety of ways so that the public is better informed about the plant and the overall evaluation taking place as part of the relicensing.

54-7-LR

If you have any questions, please contact me. Also, we offer our assistance in providing local information that may be helpful to your review.

Sincerely,



Michael M. Stokes
Assistant Director
mstokes@montcopa.org
(610) 278-3729

c. Thomas Sullivan, Public Safety Department

COUNTY OF MONTGOMERY

Commissioners

JAMES R. MATTHEWS
CHAIRMAN

JOSEPH M. HOFFEL BRUCE L. CASTOR, Jr.

THOMAS M. SULLIVAN
DEPARTMENT DIRECTOR



Montgomery County
Department of Public Safety
Operations Center
50 Eagleville Road
Eagleville, PA 19403
(610)631-6500 FAX (610)631-6536
www.dps.montcopa.org

October 25, 2011

Chief, Rules Announcements, and Directives Branch
Mail Stop: TWB-05-B01M
US Nuclear Regulatory Commission
Washington, DC 205550001

Re: Environmental Scoping Comments
Limerick Nuclear Generating Station
Division of License Renewal
NRC-2011-0166

Dear NRC Staff:

The Montgomery County Department of Public Safety would like to offer the following comments regarding the NRC relicensing review information presented at the Public Hearing held in Pottstown on September 22, 2011.

- The NRC should provide a full review of environmental and public safety issues pertaining to the plant. It is understood that emergency responders providing services to the power plant understand the hazards associated with daily operations of the plant. However, in light of events in Japan and recent seismic activity in this area, the NRC should clarify the risks associated with plant operations in times of unusual activity, outage operations, and during times of natural / man-made events that may pose a risk to the plant in terms that the public will understand in an attempt to quell public concern. 55-1-OS
- We concur that the NRC require Exelon to conform to the Montgomery County Comprehensive Plan to not only ensure cooperation in the community, but also in the region. Additionally, it is also suggested that Exelon be included in pending roadway infrastructure improvements projects as both a stake holder and possible source of funding. 55-2-OS
- It is important to note that the 10 - mile Emergency Planning Zone (EPZ) is the second largest in population in the nation. As a result of recent development and type of development in the area of LGS, it is important to review the Evacuation Time Estimate Study (ETE) on a more timely basis and account for the transient population present in the hotels that have accompanied this development. Additionally, funding should be supplied for either Exelon staff or County staff to act as a transient planning and outreach specialist to assist these transient population locations with emergency planning. 55-3-OS
- It should be noted that the Evacuation Time Estimate is currently being updated. Required highway and roadway infrastructure upgrades should be included as a part of and also as a result of any changes noted in the updated ETE. Special attention for improvement should be given to the local, county and state roads used for evacuation that feed the larger highways, as many of these roadways are no longer suitable for the amount of traffic that an EPZ evacuation could produce. 55-4-OS

*SOUSE Barrier Complete
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*E-RIDS = ADM-23
Add = L. Feyner (LNR2)*

*8/26/2011
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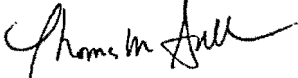
RULES AND DIRECTIVES

October 25, 2011

- The NRC should consider requiring Exelon to enhance planning for day to day emergency situations that require a response from local emergency services. Often times, Fire and EMS access is delayed due to screening of vehicles and personnel. This can cause delay in patient care to potentially life threatening illnesses. 55-5-OS
- A note should be added regarding the diversion of Delaware River water to the East Bank of the Perkiomen. Due to the residential build-up along the Perkiomen Creek area, additional consideration should be presented and discussed with the Army Corps of Engineers and the National Weather Service regarding potential flooding impact this may have on the area. 55-6-OL
- While recreation utilization is of importance and a major mission within this county, homeland security must be of a concern with any open access within the vicinity of LGS. However, we concur that with support of local law enforcement and a commitment from LGS to control and monitor access, trail throughput may be accomplished. 55-7-OS
- In an attempt to promote and increase community outreach, the NRC should consider requiring Exelon to reopen the LGS Information Visitor Center. As a result of the incident in Fukushima, Japan, the Montgomery County Department of Public Safety has received a higher than normal volume of inquiries concerning nuclear power generation from the public. The LGS Information Center, although dated, could be upgraded to provide this service to the community to raise awareness and promote education of the nuclear power industry. This center could also be incorporated as an educational stop on the County Trail system. 55-8-OS

If you have any questions please feel free to contact me.

Very truly yours,



Thomas M. Sullivan
Director of Public Safety

CC: R. Graf, C.O.O.
M Stokes, Assistant Director of Planning
S. Mickalonis, Deputy Director for Emergency Mgt.
J. Wilson, Radiological Planning Specialist



October 28, 2011

Via Electronic Mail

Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Electronic Mail: cindy.bladey@nrc.gov

RE: Natural Resources Defense Council Comments on Limerick EIS Scoping Process
NRC Docket ID: NRC-2011-0166

Dear Ms. Bladey:

The Natural Resources Defense Council (NRDC) comments today on the Nuclear Regulatory Commission's (NRC) *Notice of Intent To Prepare an Environmental Impact Statement and Conduct the Scoping Process for Limerick Generating Station, Units 1 and 2*, (hereinafter "Limerick EIS Scoping Process"). 76 Fed. Reg. 53498 (August 26, 2011).

Summary of Comments

Our comments specifically address the NRC's National Environmental Policy Act ((NEPA) 42 U.S.C. § 4321, *et seq.*) obligations and the need for any environmental analysis the agency conducts to include an up-to-date "Severe Accident Mitigation Alternatives" (SAMA) analysis that fully incorporates current insights into severe nuclear accident causation and mitigation. While we recognize that, as a private entity, the relicensing applicant, Exelon Generation Company, is not directly bound by NEPA, the same is not true for the NRC. Given that the applicant's ER generally serves as the basis for the Commission's eventual Draft Environmental Impact Statement (Draft EIS), and Exelon suggests it need not revise and update its SAMA analysis, we are raising this NEPA concern at this early stage in hopes that this matter may be addressed before the agency moves to relicense a facility based on a legally insufficient NEPA review.

Specific Scoping Comments

The original SAMA analysis for the Limerick Generating Station (LGS) is a 1989 report that was issued as the result of a ruling by the U.S. Court of Appeals for the Third Circuit,¹ which concluded that the NRC had failed to consider a “reasonable set” of Severe Accident Mitigation Design Alternatives (“SAMDA”). In 1989, the NRC subsequently adopted this SAMDA analysis and agency staff concluded they had “discovered no substantial changes in the proposed action as previously evaluated in the FES [Final Environmental Statement] that are relevant to environmental concerns nor significant new circumstances or information relevant to environmental concerns and bearing on the licensing of [LGS]”.

As the original LGS SAMDA effort in 1989 was the first mandated effort to focus on SAMAs,² the notion that an updated SAMA analysis need not be completed at the license renewal stage (for the exact reactor site that gave birth to the regulatory requirement) we find highly objectionable, particularly in light of the catastrophic nuclear accident that befell similar Boiling Water Reactor (BWR) units in Japan in March, 2011. It has become clear in the 770 years of combined U.S. BWR operational experience since 1989 that domestic and international events provide numerous examples of “new information” and make a strong case for the need to reconsider all that has been learned about newly discovered risks and vulnerabilities of nuclear power plants.

56-1-PA

It has been noted³ that global core damage events happen at a rate that exceeds NRC’s presumptions of what should be considered safe at plants within the U.S., which implies that either the NRC estimates for domestic plants are wrong or that international nuclear plants have a core damage frequency much higher than what the NRC deems safe. Either scenario is troubling and deserves the industry’s full attention and effort. Exelon’s 1989 effort in response to the Court was, respectfully, less than one would have hoped for in light of the seriousness of the issue. The LGS 1989 SAMDA can in no way claim necessary conservatism with regard to public safety over the total timeframe of a possible sixty year reactor lifetime.

In contrast to the 1989 SAMDA, relatively recent SAMA analyses conducted in other license renewal applications, such as those for sites at Nine Mile Point, Three Mile Island, and the Joseph M. Farley Nuclear Plant, to name a few, were considerably more thorough and addressed a range of detailed alternatives. Pursuant to regulatory analysis techniques supplied by NRC⁴ and aided by an industry-supplied guidance document⁵, most modern-day SAMA analyses are designed using a fairly prescriptive set of initial assumptions, baseline calculations, and cost-benefit arithmetic recipes that employ the use of sophisticated codes in their evaluation of potential risk and the benefit of removing this risk.

¹ *Limerick Ecology Action v. NRC*, 869 F.2d 719 (3rd Cir. 1989)

² Or. SAMDAs in this case, and we use the terms interchangeably for the purposes of these comments.

³ *Global Implications of the Fukushima Disaster for Nuclear Power*, T. Cochran, M. McKinzie (NRDC), World Federation of Scientists’ International Seminars on Planetary Emergencies, Erice, Sicily, Aug 2011.

⁴ NUREG/BR-0184 *Regulatory Analysis Technical Evaluation Handbook*, Jan 1997

⁵ NEI 05-01 [Rev. A] *Severe Accident Mitigation Alternatives (SAMA) Analysis – Guidance Document*, Nov 2005

The most common code used is the MELCOR accident consequence code system (MACCS2)⁶, which provides a modeling framework for calculating the off-site consequences of a severe accident. This code accepts an advanced set of input parameters, including population density distributions within 50 miles, detailed regional economic data obtained from multiple sources, nuclide release scenarios accounting for reactor core inventory, emergency response and exposure variables, and meteorological data for plume migration pathways. The current state of knowledge regarding the assumptions and understanding of severe accident events has expanded and improved in the intervening twenty-two years since the initial SAMDA analysis for LGS.

56-1-PA
Cont'd

While we acknowledge that this analysis was limited by the knowledge available at the time, the limitations and shortcomings of a previous era in no way disqualify the claim that, in light of numerous advances in modeling capabilities, a library of discovered cost-beneficial SAMAs, and the saliency of severe accident risks following the disaster at Fukushima Daiichi, not only is there new and significant information, there are significant *volumes* of this information acquired since 1989.

In the licensee's current environmental report, the identification and treatment of new and significant information (four items in total) were developed only in the narrow context of how they may affect the dated SAMDA analysis. It should go without saying that this approach does not comprise all of the applicable new and noteworthy severe accident mitigation strategies bearing on the site in question, or serve to remedy gaps and omissions in the original SAMDA analysis.

The entire set of first-stage envisioned alternatives in the initial SAMDA analysis was no more than fifteen options. The "analysis" in the current environmental report consists of perfunctory, "back-of-the-envelope" calculations in lieu of a proper SAMA analysis. The current operator Exelon referred to these considerations as representing an "abundance of caution." We disagree.

One of the largest problems with the calculations offered, aside from only focusing on an arbitrarily limited number of alternatives, is that licensee evaluated each item of new information in isolation of the other factors that would also change the cost-benefit conclusion for a particular alternative. The effects of each changed parameter (e.g., population, offsite economic risk, cost per person-rem averted, and seismic hazards) should be evaluated in a comprehensive model that shows the aggregate benefit, as performed in all current day SAMA analyses. Unfortunately, their analysis barely scraped the surface of how this new information should actually be considered in the context of environmental impacts.

In comparison, a "reasonable set" of alternatives for another recently relicensed plant included an initial consideration of 128 SAMA candidates developed from previous lists at other plants, NRC documents, and documents related to advanced power reactor designs.⁷ After screening this initial set for non-applicable or previously implemented designs as well as combining/dropping common-benefit options, the applicant was still left with a set of forty unique SAMA candidates, for which it was required to enter preliminary cost estimates in a so-called "Phase I Analysis." A

⁶ NUREG/CR-6613, Vol. 1, *Code Manual for MACCS2, User's Guide*, D. Chanin & M.L. Young, May 1998.

⁷ Joseph M. Farley Nuclear Plant - *Application for License Renewal, Appendix D. Environmental Report, Attachment F. Severe Accident Mitigation Alternatives*, Sept 2003.

total of fifteen SAMA candidates survived this screening to enter more detailed cost consideration in the Phase II analysis, of which none were deemed cost-beneficial. However, in another renewal application,⁸ the SAMA analysis found eleven potentially cost-beneficial options from an initial set of thirty-three.

In an NRC report discussing insights on SAMAs in connection with plant license renewals,⁹ the agency authors list numerous potentially cost-beneficial SAMAs relating to station blackouts, protection and support systems, procedures and training, and external events such as flood, fire, and seismic hazards. The authors note that "averted onsite costs (AOSC) is a critical factor in cost-benefit analyses and tends to make preventative SAMAs more attractive than mitigative SAMAs." This AOSC factor was not considered in either the original SAMDA or the recently submitted environmental report.

Finally, NRDC believes that in addition to a comprehensively updated SAMA analysis, the licensee or agency must conduct a study that, as part of the supplemental environmental impact statement, presents postulated accident scenarios showing the full range and weight of environmental, economic, and health risks posed by these accidents. This type of study should model site-specific severe accidents and illustrate the full consequences of a range of severe accident scenarios so that the public and their policy makers can make informed decisions whether to continue plant operations after the existing licenses expire, thereby continuing to run the risk of a severe nuclear accident, invest in additional accident mitigation capabilities, or alternatively, avoid these risks altogether by relying on a portfolio of low carbon electricity generation alternatives that could meet future electricity service needs over the license extension period.

The SAMA analyses are inadequate in this regard because they only address isolated issues in a cost-benefit analysis that discounts the cumulative impacts on displaced populations, regional economic losses, and environmental cleanup. These types of calculations do not present a clear picture of the potential hazards or costs experienced in the event of a severe accident. Instead, they tend to mask the full range of accident consequences that policy makers may wish to avoid. Recently, NRDC produced an analysis, of the type we believe should be included in the Limerick NEPA analysis, to inform ongoing relicensing efforts at the Indian Point nuclear plant site.¹⁰

In order to illustrate the full extent of a major accident, the NRDC study used the U.S. Department of Defense computer model HPAC (Hazard Prediction and Assessment Capability)¹¹ to calculate site-specific release radiological source-terms, resulting fallout plumes, and data on the effects on nearby populations. The results were compared to similar modeling of the Fukushima disaster to provide a sense of scale, and to estimate the rough magnitude of financial

56-1-PA
Cont'd

⁸ Three Mile Island Nuclear Station Unit 1 – License Renewal Application, Environmental Report, Appendix E: SAMA ANALYSIS

⁹ Perspectives on Severe Accident Mitigation Alternatives for U.S. Plant License Renewal, T. Gosh, R. Palla, D. Helton, U.S. NRC, Sept 2009 (Accession No.: ML092750488)

¹⁰ Nuclear Accident at Indian Point: Consequences and Costs, M. McKinzie, Oct 2011 (http://www.nrdc.org/nuclear/indianpoint/files/NRDC-1336_Indian_Point_FSR8medium.pdf)

¹¹ Hazard Prediction and Assessment Capability (HPAC), version 4.0.4, Washington, D.C.: Defense Threat Reduction Agency, Apr 2004

and economic damages that would be incurred if a severe accident were to occur at Indian Point. This is not a hypothetical issue. Policy makers in several countries, including Germany and Switzerland, have made decisions not to grant nuclear plant license extensions to avoid having to endure the continuing risk of severe nuclear plant accidents.

Regardless of Exelon's own corporate understanding of its legal obligations, NEPA is clear in its well-established mandates and what it requires of the NRC. NEPA requires that federal agencies characterize environmental impacts broadly to include not only ecological effects, such as physical, chemical, radiological and biological effects, but also aesthetic, historic, cultural, economic, and social effects.¹² NEPA requires an agency to consider both the direct effects caused by an action and any indirect effects that are reasonably foreseeable. Effects include direct effects caused by the action and occurring at the same time and place and indirect effects caused by the action, but later in time or farther removed in distance, but still reasonably foreseeable.

56-1-PA

Most specifically, NEPA directs that NRC take a "hard look" at the environmental impacts of its proposed action, in this instance the relicensing of two BWR Mark 2 units for an additional 20 years, and compare them to a full range of reasonable alternatives. "What constitutes a 'hard look' cannot be outlined with rule-like precision, but it at least encompasses a thorough investigation into the environmental impacts of an agency's action and a *candid acknowledgement of the risks that those impacts entail.*" *Nat'l Audubon Soc. v. Dept of the Navy*, 422 F.3d 174, 185 (4th Cir. 2005) (emphasis added). As a stalking horse for the NRC's draft EIS, the applicant's ER does not meet this standard. In taking the "hard look" required by law, the NRC must therefore address the potential environmental impacts of a range of severe accidents—and accident mitigation strategies—especially in light of the new information provided by the Fukushima nuclear disaster on the performance of BWR radiological containment in a prolonged loss-of-coolant, core-damage scenario.

For the reasons stated above, NRDC urges that NRC direct that a thorough and lawful SAMA analysis be conducted as part of (or supplement to) the required supplemental environmental impact statement, the draft of which is currently scheduled for August 2012 and the final SEIS, currently scheduled for February 2013. Additionally, the full cumulative effect of severe accidents must be studied and presented as part of these documents. These analyses must make every effort to meet the current expectations of what these studies should encompass and use the necessary guidance and tools commonly utilized by the industry and NRC. The NRC's legal obligation to consider new information and determine its nuclear safety significance exists independently of whether a SAMA has or has not been prepared previously: in the event a SAMA has not been prepared, then new and potentially significant nuclear safety information must be included in the initial SAMA; if a previous SAMA exists, then it must be updated to reflect this new information, and the resulting costs and benefits of the full spectrum of reasonable accident mitigation alternatives must be considered as part of the Draft Supplemental Environmental Impact Statement, and issued for public comment.

Finally, we have grave misgivings regarding the future time-dependence, accuracy, and relevance of the licensee's current ER, as presumptively incorporated in the NRC's planned

56-2-LR

¹² 40 C.F.R. § 1508.8

SEIS for LGS license extension, given that such license extension will not become effective until the current unit operating licenses expire in 2024 (for Unit 1) and 2029 for Unit 2. We submit that any decision to relicense these units must be supported by the most timely NEPA and SAMA analysis obtainable within a reasonable interval (e.g. five years) prior to actual expiration of the existing licenses.

56-2-LR
Cont'd

Intervals of 12 and 17 years are not required for corporate planning purposes and are far too long to credibly sustain the accuracy and relevance of NEPA analyses, or for the NRC to accurately project both the future condition of the plant, the future state of nuclear safety knowledge, trends in local resource use, population, and the affected environment, and the future range of reasonable electricity supply alternatives to LGS license extension. By comparison, major government owned nuclear installations, such as nuclear laboratories and weapon production sites, are required to conduct site-wide NEPA reviews of their operations and facility plans every five years. Using this federal standard for timeliness, the NRC's NEPA analysis for LGS relicensing should not commence before 2019, for Unit 1, and before 2024 for Unit 2, or should be subjected to mandatory reassessment and supplementation after those dates.

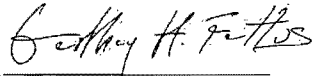
We further note, given the extended timeframes for expiration of the existing LGS operating licenses, that they easily encompass the five year timeframe that the Commission has set out for formulation and implementation of NRC staff safety recommendations to be undertaken "without unnecessary delay" in the wake of the Fukushima accident. In light of these important nuclear safety developments, we seek no reason why this proposed NEPA analysis, and hence the entire licensing proceeding that it is required to support, could not be deferred for at least five years, until the Commission has completed its decision-making and schedule for implementation of post-Fukushima safety upgrades. As noted above, to ensure the timeliness and accuracy of the NEPA analysis, the deferral could be even longer (on the order of 7 years for Unit 1), to allow for the inclusion of the results of the extended rulemakings contemplated under the Commission's regulatory response to the Fukushima accident.

56-3-OS

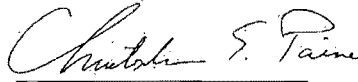
Preparation of the applicant's ER, and the NRC's subsequent SEIS, could then take account of these required safety modifications and enhanced severe accident coping strategies, and these would be reflected in a significantly revised SAMA analysis. In these comments, we are not formally advocating such a deferred pathway for the LGS relicensing proceeding, but merely note its plausibility and inherent advantages for all parties to the proceeding. Without such a deferral, the only sensible alternative course is to ensure the incorporation of the most up-to-date nuclear safety knowledge – "new and significant information" – regarding BWR Mark 2 reactors and severe accident mitigation into the current licensing proceeding.

Thank you for your consideration of these comments. Please do not hesitate to contact us at (202) 289-6868 if you have any questions.

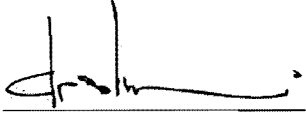
Sincerely,



Geoffrey H. Fettus
Senior Project Attorney



Christopher E. Paine
Director, Nuclear Program



C. Jordan Weaver, Ph.D.
Program Scientist

Mendiola, Doris

From: lorraineruppe@aol.com
Sent: Friday, October 28, 2011 6:33 PM
To: Regner, Lisa
Subject: Fwd: Faultlines close to Limerick Nuclear Plant

Ms. Regner,

Please include this for the record concerning relicensing of Limerick Power Plant.

-----Original Message-----

From: lorraineruppe <lorraineruppe@aol.com>
To: letters <letters@pottsmmerc.com>
Sent: Mon, Oct 24, 2011 9:09 pm

Letter to Editor

Exelon is rushing the timeline to reissue a license (18 years ahead of time) to run Limerick Nuclear Plant into the unknown, yet it took more than 5 months for the NRC to get back to me concerning an already known survey of fault lines. 4-13-LR

It took five months for the Nuclear Regulatory Commission to answer my question concerning how close the nearest fault line is to Limerick Nuclear Plant. No wonder! Two faults are dangerously close. Chalfont Fault is only 9 miles East. Ramapo Fault is 17 miles Northwest. This is alarming! 4-14-GE

The 9-21-11 Mercury article said "whether or not earthquake risk is a factor in the current relicensing request for Limerick remains to be seen". It would be grossly unacceptable for the NRC to ignore Limerick's extreme vulnerability to earthquake damage..

Earthquake risk should be on the top of NRC's relicensing concerns for Limerick. Earthquake risks are far greater for Limerick than previously realized-increased by 141%. We now know Limerick is 3rd on nation's earthquake risk list. Plus, evidence shows earthquakes in the East can be far stronger than Limerick's "design basis" can withstand. 4-15-PA

There's a good chance that an earthquake can exceed Limerick's design basis, causing a severe nuclear accident, jeopardizing the health, safety and financial well being of our entire region.

The Virginia 8-24-11 earthquake caused shaking in PA at Limerick Nuclear Plant. Since January there have been 2 small earthquakes in Philadelphia, only 21 miles from Limerick.

Shaking and breaking in miles of Limerick's buried underground pipes and cables can lead to nuclear disaster. It's disquieting that NRC uses a "visual inspection" to determine damage on buried pipes. Problems may not be identified until it's too late.

For years the NRC allowed Exelon to do its own studies, to stall and avoid responsible action on fires and earthquakes. To save money, Exelon typically concludes Limerick is "safe enough". This is unacceptable!

10-5-11, the Mercury reported a flaw was found in the mechanism to shut down the nuclear plant. The warning was tied to renewed focus on earthquake risk. It's difficult to see how Limerick's design flaws can be fixed, even if Exelon WOULD spend the money.

There is no proof whatsoever Limerick's design can withstand other threats ranging from hurricanes, tornadoes, floods, or terrorist attacks to an impact from a jet airliner.

We need precaution before there is a catastrophe. NRC should close Limerick as soon as possible.

Lorraine Ruppe

SUNSI B.C. New Complete
Template = ADM-013

FRIDS = ADM-03
Add = L. Regner (LHR2)

Mendiola, Doris

From: sunbeamsky [sunbeamsky@aol.com]
Sent: Monday, October 31, 2011 2:28 PM
To: Regner, Lisa
Subject: power plant renewal

57-1-OR

Just wanted to voice my opinion for a no vote to renew the license for the Limerick power plant.

It's in an area with high population - we could never all evacuate if necessary. I also feel it's presence has led to and increase of cancer in our area.

57-2-OS

57-3-HH

Sharon Yohn

8/24/2011

76FR 53498

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2011 NOV - 1 PM 3:20

RULES AND DIRECTIVES
COMMITTEE
2011

SUNSI Review Complete
Template = ADM-013

ERIDS = ADM-03

Call = L. Regner (HRA)

Mendiola, Doris

From: Smokowicz, April [April.Smokowicz@graphicpkg.com]
Sent: Wednesday, November 02, 2011 8:49 AM
To: Regner, Lisa
Cc: msworkdog@verizon.net
Subject: Pottstown Mercury article 10/27/11

Good Morning

I know this is late according to your article, but I wanted to still send you some information.

I feel that there is a lot of people that had not known to report anything because of not knowing who to go to. I don't understand why the hospitals don't give statistical information based on areas?

58-1-HH

Anyway my daughter Tracey had Leukemia at the age of 2 1/2. Was a patient at Children's Hospital until she was 5. With several years of chemotherapy she is now 18 and in remission. We had lived on Limerick Center Road for most of our young lives and now with our kids. I don't know what other information you would need but I would be happy to get you whatever you might need.

Thank you,

Michael Smokowicz

676 King Road

Royersford PA 19468

610-792-3270

8/24/2011

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FILED IN 58-1-HH
NOV 02 2011

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FRIDS = ADM-03
Add = L. Regner (LRR2)

8/26/2011
76 FR 53498

(41)

Sir or Madam

In Pottstown about 1/2 mile from the Limerick Power Plant we have four bridges. One they are not going to fix, one just was fixed, one had been in progress of being fixed for months now, last one is a 1/3 of the way of being fixed. To get out of town the only other way is toward Allentown if anything should happen. Not many people could get out on the one road. Please don't extend the license for Limerick.

59-1-OS

Barbara Miller
761 N. Hanover St.
Pottstown, Pa
19464

P.S. After they fixed the bridges. Still what about know we had that earthquake in Virginia with changes in weather all over the world I think it's a sign of things to come.

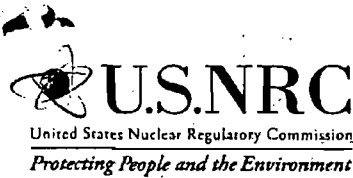
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Template = ADM-013

EADS-ADM-03
Add =
L. Regner (LHR2)



LIMERICK GENERATING STATION
Environmental Scoping Comments
Division of License Renewal
NRC-2011-0166

Written Comment Form

Must be received on or before October 28, 2011. Please print clearly.

Name: Debra Schneider
Title: Citizen
Organization: United States of America
Address: 585 MANATAWAY ST.
City: Pittsboro State: PA Zip Code: 19404

Comment:

	No Way to Evacuate Area	60-1-OS
	Earthquake Fault	60-2-GE
	Do not extend - plenty of SAF	60-3-AL
	Alternatives - water - solar - wind - Geothermal	
60-4-RW	Spent fuel - Storage - Uranium Mining - Dirty	
	12 years ahead of time - currently	60-5-LR
	Certainly no way to guarantee safety	
	Too expensive	60-6-OS
	- Deterioration of Cement + Rebar - Crumbles over time	60-7-OS
	- They want increase emissions - Pollutants	60-8-AM
	- Dirty polluted mine water	60-9-SW
	- High infant mortality rates + neonatal	60-10-HH
	- Cancer increases	
	- Thyroid Cancer rates 70% higher	
	- Nuclear Waste - Nothing Clean	60-11-RW
	Use other side if more space is needed. - Go back + look at Structural Error's when plant was being built	60-12-OS

Comment Forms may be mailed to:
Chief, Rules, Announcements, and Directives Branch
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

NRC Should not be
considering this so far in
advance - No way to assure
safety - Shut it down -

60-13-LR

Do you want to live near Limerick Dr.?

The Is Suppose to be protecting

Comment (Continued): The People's interests -

- Radiation in air & water

60-14-RW

- Radioactive ground water

- Cancer increase esp. children

60-15-HH

- Deadly waste - abate ground & imports

- Accidents & leaks - Many shut down

- Risk of Meltdown - Earle's

60-16-OS

- Hazard, nuclear - Aging equipment

- Updated evacuation plan

60-17-OS

- ~~severe risk~~ increased population

- Increased costs - medical problems

60-18-OS

- Can Replace with Clean, renewable energy before current license expires

60-19-AL

- Should have been more public

notice of hearing - Mail

60-20-LR

offices so people have an opportunity to attend

- Deplete water due to fracking up river.

60-21-SW

- Nuclear Energy is Dirty & Expensive

60-22-OS

- Since Limerick was built we have had

some of the most expensive energy - higher rates

? After Fukushima - Limerick listed as one of top 10 to have very serious problem when we have an earthquake -

60-23-OS

If needed, use additional sheets.

? Storage of spent fuels - Look at Fukushima similar system

60-24-OS

? Mining & Enriching of Uranium & Plutonium - Dirty -

60-25-OS

