

2349

**General Information****Assigned Office:** OEDO**OEDO Due Date:** 04/29/2013**Other Assignees:****SECY Due Date:** 05/01/2013**Date Response****Requested by Originator:****Other Parties:****Subject:** Issues at Limerick Nuclear Power Plant (Constituent Correspondence)**Description:****CC Routing:** NRR, OCA, OGC, Region I**ADAMS Accession Numbers - Incoming:** ML13095A016**Response / Package:****Other Information****Cross Reference No:** LTR-13-0278**SRM\Other:** No**Process Information****Action Type:** Letter**OEDO Concurrence:** No**Signature Level:** EDO**OCM Concurrence:** No**Special Instructions:****OCA Concurrence:** Yes

Please prepare response in accordance with OEDO Notice 2009-0441-02 (ML093290179). NRR and Region I to provide input to Roger Rihm, OEDO, if required. Roger Rihm will coordinate response with OGC and OCA.

**Document Information****Originator Name:** Representative Jim Gerlach**Date of Incoming:** 03/27/2013**Originator Org:** Congress**Document Received by OEDO Date:** 04/03/2013**Addressee:** Nancy Belmore, OCA**Incoming Task:** E-mail**OEDO POC:** Roger Rihm

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

*Date Printed: Apr 02, 2013 15:21*

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**PAPER NUMBER:** LTR-13-0278 **LOGGING DATE:** 04/02/2013  
**ACTION OFFICE:** EDO  
  
**AUTHOR:** REP James Gerlach  
**AFFILIATION:** CONG  
**ADDRESSEE:** Nancy Belmore  
**SUBJECT:** Constituent Correspondence regarding specific issues at Limerick Nuclear Plant  
  
**ACTION:** Signature of EDO  
**DISTRIBUTION:** RF, OCA to Ack.  
  
**LETTER DATE:** 03/27/2013  
**ACKNOWLEDGED** No  
**SPECIAL HANDLING:** Constituent Correspondence  
  
**NOTES:**  
**FILE LOCATION:** ADAMS  
  
**DATE DUE:** 05/01/2013 **DATE SIGNED:**

EDO --G20130265

**Remsburg, Kristy**

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**From:** Savett, Scott [Scott.Savett@mail.house.gov]  
**Sent:** Wednesday, March 27, 2013 3:51 PM  
**To:** Belmore, Nancy  
**Subject:** From Congressman Gerlach's Office (ACE)

Nancy,

Can you provide our office with a written response addressing the concerns of ACE as laid out below?

Thanks for your help!

Scott Savett  
Office of Congressman Jim Gerlach  
Work #: 610-409-2780  
Fax #: 610-409-7988  
Email: [Scott.Savett@mail.house.gov](mailto:Scott.Savett@mail.house.gov)  
[www.gerlach.house.gov](http://www.gerlach.house.gov)

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**From:** [aceactivists@comcast.net](mailto:aceactivists@comcast.net) [mailto:[aceactivists@comcast.net](mailto:aceactivists@comcast.net)]  
**Sent:** Wednesday, March 27, 2013 3:37 PM  
**To:** Savett, Scott  
**Please send response to [aceactivists@comcast.net](mailto:aceactivists@comcast.net) or call (610) 326-2387.**

Specific Issues:

- Exelon's 12-12 Evacuation Plan for Limerick Nuclear Plant Is Unworkable and Fatally Flawed
- Limerick's Unprecedented Threats to Drinking Water For Almost Two Million People From Pottstown to Philadelphia Are Being Ignored/Dismissed by NRC in Relicensing.
- NRC's Irresponsible Delay of Fukushima Safety Measures For Limerick. Limerick is 3rd on the nation's earthquake-risk list. Fracking in PA is increasing risk of earthquakes which can trigger meltdowns. **NRC IS DELAYING AND EVEN IGNORING SAFETY MEASURES RECOMMENDED BY THEIR OWN STAFF. THIS CAN RESULT IN UNTHINKABLE CONSEQUENCES TO EVERYONE IN THE GREATER PHILADELPHIA REGION.** two years after Fukushima, NRC did nothing to enhance the safety of Limerick Nuclear Plant related to radiation released offsite in an accident / meltdown. This is negligent and unacceptable!
- NRC is pushing to relicense Limerick before NRC even completes its court-ordered study on high-level radioactive wastes in September, 2014. There is no acceptable excuse to fail to consider Limerick's "spent fuel" for Limerick's EIS and the relicensing process. Limerick's reactor license for Unit 1 doesn't expire until 2014, 10 years after the study will be completed. Unit 2 expires in 2029.
- Emergency Enforcement Petition to Revoke Operating Licenses for GE Mark II Reactors like Limerick, In Violation Of Safe Operation and Unreliable Containment.
- NRC's Failed Oversight and Enforcement at Limerick Nuclear Plant. NRC'S mission is protecting public health and safety. Instead, NRC weakened regulations, provided dangerous loopholes, failed to provide meaningful enforcement for violations, and failed to require immediate action on important safeguards post-Fukushima. NRC is protecting Exelon's profits, not public health and safety of millions of people in the Greater Philadelphia Region impacted by Limerick Nuclear Plant operations.

**NRC Reports Reveal That Our Region Has More Cause For Alarm Than Ever Before.**

**ACE Reviews of NRC Documents Provide Evidence of NRC's Negligent Oversight and Enforcement:**

- NRC Letters to Exelon Related To Limerick Nuclear Plant
- NRC Integrated Inspection Reports and Notices Of Violations For Limerick
- Safety Evaluation Report Related to Limerick License Renewal - July 2012
- Safety Evaluation Report Related to Limerick License Renewal - January 2013

## **NRC'S REGULATORY NEGLIGENCE ON KEY HEALTH AND SAFETY ISSUES INCLUDE:**

1. NRC 'S FAILURE TO REQUIRE EXELON TO REPLACE AGING EQUIPMENT AND SYSTEMS PRIOR TO RELICENSING LIMERICK
  - **It is beyond negligent and unacceptable to allow Exelon to avoid costs to immediately deal with the broad range of aging problems documented at Limerick Nuclear Plant.** NRC is whitewashing evidence in its own safety evaluations for relicensing confirming after only 25 years of operation, Limerick is documented to be experiencing corrosion, cracking, pitting, fatigue, fouling, erosion, thinning through loss of material, embrittlement, and leaching of steel and other metals making up bolts, piping, welds, ducts, liners, cladding, external surfaces, and walls. Still, NRC overlooked seriousness threats to our future and caved in to Exelon's self-serving demands to avoid costs.
2. NRC IS WHITEWASHING LIMERICK VIOLATIONS AND FAILING TO HOLD EXELON ACCOUNTABLE WITH MEANINGFUL ENFORCEMENT
  - **Allowing Exelon to avoid immediate public notification, with full and accurate disclosure for accidents is unacceptable.** This can have profound health and safety consequences to our entire region, evidenced by the 3-19-12 radioactive spill into a vital drinking water source for almost two million people. The public was not told until 23 days after the spill with no time for prevention.
3. NRC IS NOT REQUIRING EXELON TO IMMEDIATELY COMPLETE IMPLEMENTATION OF IMPORTANT NEW SAFETY RULES RECOMMENDED BY NRC'S OWN STAFF AFTER FUKUSHIMA
  - **This is unbelievable, given the potential consequences.**
4. NRC HAS DECIDED NOT TO CONSIDER THE RESULTS OF ITS NEW COURT-ORDERED STUDY ON HIGH-LEVEL RADIOACTIVE WASTES, IN ITS DETERMINATION ON RELICENSING LIMERICK
  - **This is unacceptable.**
5. NRC IS REFUSING TO REQUIRE EXPANDED EVACUATION AND INGESTION PATHWAY ZONES
  - **This is regulatory malpractice.** Our Region Was Too Heavily Populated For Safe Evacuation Before Limerick Construction Was Completed. Now, With Increased Population and High Radiation Levels Documented Over A Hundred Miles From Fukushima, NRC Is Refusing To Protect Area Residents and Businesses By Expanding Evacuation Zones.
6. BACK-UP POWER REQUIREMENT IS WOEFULLY INADEQUATE TO PREVENT MELTDOWNS
  - **This is unacceptable given the potential consequences.**
7. EARTHQUAKE RISK STILL UNADDRESSED AT LIMERICK
  - **Limerick Is Now 3rd On The Nation's Earthquake Risk-List.** Increased Risk For Earthquakes In Our Region Can Trigger Meltdowns At Limerick.
8. FILTERED VENTS THAT COULD REDUCE RADIATION RISKS ARE NOT BEING INSTALLED AT LIMERICK
  - **NRC Should Not Allow Exelon to Avoid This Cost. It's About Public Health and Safety.**
9. LAX FIRE SAFETY - Fire can lead to meltdowns, yet Limerick Nuclear Plant has never been required to follow the safest fire safety standards. Instead, Limerick has been allowed to follow nuclear industry- designed and weakened fire rules.
  - **This is unacceptable given the potential consequences at a nuclear plant.**
10. REVISED AMENDMENT FOR HOT SHUTDOWN IS FAR LESS PROTECTIVE - Limerick should not wait 7 days (instead of 12 hours), to go into hot shutdown when monitoring systems are inoperable. (12-19-11 Limerick Operating Permit Amendment).
  - **This is unacceptable given radiation could be escaping within 1/2 hour of an accident!**
11. UPDATES - ALREADY APPROVED, INCREASE OUR RADIATION EXPOSURE AND INCREASE MELTDOWN RISKS
  - **NRC Should NOT Allow Exelon To Operate Limerick Beyond its Design Capacity. No One Knows The Potential Consequences.**
12. DRINKING WATER THREATS ACROSS SIX COUNTIES FROM LIMERICK OPERATIONS ARE BEING IGNORED BY NRC
  - **Safe Water, essential for health, is becoming more scarce due to Limerick operations. Radiation discharges increase health risks.**

# IRSN

INSTITUT  
DE RADIOPROTECTION  
ET DE SÛRETÉ NUCLÉAIRE

Direction Générale  
BP 17  
92262 Fontenay-aux-Roses Cedex

PRIORITAIRE

BOULOGNE BILLANC  
HAUTS DE SEINE  
19 03 13  
3580 IO 046884  
015E91 920580

ERI  
001  
LAPOS  
FM 011

*Chaisman*

Commission Washington  
Airtel Stop O-1664  
WASHINGTON - DC 20555-0001  
UNITED STATES OF AMERICA

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