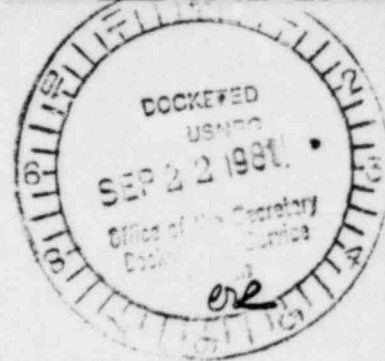


9-22-81, CR2
Acknowledged and recorded

United States of America
Nuclear Regulatory Commission



In the Matter of
Philadelphia Electric Co.
(Limerick Generating Station,
Units 1 and 2)

9/18/81
Docket Nos. 50-352 and
50-353

Request for Hearing and Petition for Leave to Intervene
in Evidentiary Hearings on Proposed Operating License

In response to the Nuclear Regulatory Commission's (NRC) notice (46 Federal Register 42557, dated 21 August 1981), and in accordance with 10 CFR part 2, I, William A. Lochstet hereby request a hearing with respect to this matter, and petition for leave to intervene in these evidentiary hearings.

- 1 Nature of the petitioner's right under the Atomic Energy Act to be made a party to the proceeding.

The rights of this Petitioner are set forth in and result from sections 1, 2, 3, 170, and 189 of the Atomic Energy Act, as amended. It is held that the operation of Limerick # 1 and 2 will adversely affect my health, mental health, security, social and political status, and genetic condition of my progeny. Therefore, my general welfare as well as health, safety and security will be affected.

- 2 Nature of the petitioners property, financial, or other interest in the proceeding.

I own real property and reside in State College, Pa., which is located approximately 190 km (120 mi.) from Limerick 1 and 2. I have legitimate reasons to travel past the plant at distances of less than 5 km (3 mi.). I thus have occasion to breathe the air

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in the vicinity of the plant. I also consume food grown in the area both on those occasions of visitation to the area and also while residing in State College. There is thus uncertainty in the amounts of radioactivity contained in the foodstuffs of these areas due to the distribution of possibly contaminated foods grown in the vicinity of Limerick 1 and 2. This cloud upon foodstuffs exists even if the action levels for condemnation are not reached. Since the linear, non-threshold relationship between radiation dose and effect must be used for public health considerations, any exposure, or any consumption of food containing radioactive products from Limerick 1 and 2 must be considered a health threat.

To avoid contaminated foodstuffs would require more care and time spent in selecting foods, and create an unreasonable burden. In some cases, the origin of the foodstuffs is difficult or impossible to ascertain, thus making such selection impossible. Such concerns in the general public could make the entire area undesirable as a place to reside and depress property values.

The fuel for Limerick 1 and 2 will be obtained, at least in part, from mines in the western United States. This operation will release radon gas into the air which is present in State College, and will have an adverse affect on my progeny.

3 Possible effect of any order which may be entered in the proceeding on the petitioner's interest.

An order which permits the operation of Limerick 1 or 2 will effect the quantities of radioactive materials emitted to the air, water and soil in the plant vicinity, and also to the overall airshed of eastern United States. In particular, if the design or technical specifications are inadequate, an unforeseen condition may result which could result in an unusually large releases. The magnitudes of normal releases which will occur if operation is permitted will also be affected

by plant design and technical specifications. If operation is not permitted or permitted will have an effect on the amount of uranium mining and thus effect the radon content of the air in State College and all of Pennsylvania and the area. It is because of this control of the releases and their health effect as described above that the petitioners interests are affected.

4 Contribution to the proceeding.

The petitioner is a party to the Three Mile Island Unit 2 Technical Specifications (Docket 50-320 OLA) proceeding and has made a substantial contribution therein. Further, the petitioner holds an earned Ph.D. in physics , and is thus knowledgeable in the matters to be considered. In accordance with 10 CFR 2.714 (a)(1)(v) the participation of the petitioner will broaden and contribute to the proceeding.

Contention 1:

The proposed operating license does not provide adequate protection of my mealth, safety and property, or those of my progeny.

Respectfully submitted,

William A. Lochstet

William A. Lochstet

119 E. Aaron Dr.

State College

Pennsylvania

16801

Certificate of Service

I hereby certify that copies of "Request for Hearing and Petition for Leave to Intervene in Evidentiary Hearings on Proposed Operating License" have been served on the following by deposit in the United States Mail, first class, postage paid this 18 th day of September 1981.

William A. Lochstet

William A. Lochstet

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555
Attention: Docketing and Service Section

Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555

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