

United States of America
Nuclear Regulatory Commission DOCKETED
USNRC

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

81 OCT 27 P2:54
Docket Nos. 50-352
PD
OFFICE OF SECRETARY
DOCKETING & 50-353
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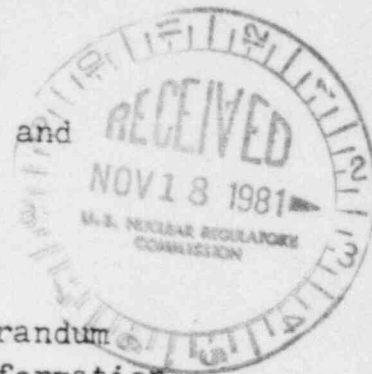
22 October 1981

Response to Board for specific information, Staff and
Applicant. Supplement to Petition to Intervene.

The Atomic Safety and Licensing Board in its memorandum
and order of 14 October 1981 has requested specific information
from this petitioner. In addition the applicant has filed an
answer to this petitioner's petition to intervene, dated
25 September 1981. In addition the NRC Staff has filed a response
to various petitioners in its filing of 8 October 1981.

Additional Information from Petitioner

The Board has inquired about my relationship with ECNP,
another petitioner in this proceeding. On 29 March 1979 I
filed a petition under 10 CFR 2.206 with the Commission
as the secretary of ECNP, which I was at the time. At the
time that ECNP drew up its contentions in the TMI, Unit 1
restart proceeding, I suggested a contention similar to
the 2.206 petition specified above. I then argued this matter
in a prehearing conference on 14 November 1979. I do not
recall discussing this matter (with respect to TMI Unit 1)
with any of the ECNP personell after that day. I had no further
input to the ECNP handling of the case, ~~or~~ and I am unaware of
the outcome. I must add that I did not see the applicant's
and Staff's answer to the ECNP contentions until the earlier
session of the perhearing conference on November 8 - 10.
In November 1979, I was Co-Director of ECNP. As of 1 September 1981
I do not hold any office in ECNP. I did not decide to petition
in this matter until after 1 September, and filed on 18 September.



On 1 April 1981 I sent \$6.00 to ECNP to renew my subscription to the ECNP newsletter. I do not consider that to be membership. Of the last 4 ECNP meetings (monthly) July - October, I have attended only one. Such meetings are always open to the public.

In light of my experience in the TMI -1 restart proceeding, I could not be guaranteed that my views would be represented by ECNP. In addition, the procedures of building a case would be greatly hampered by having to go thru an intermediary, at a time when the intermediary is busy with their own case. I do not expect any difficulty in cooperating with ECNP and the other petitioners in this matter as parties to this proceeding.

Standing

The Applicant and the Staff object to my being admitted as a party because I reside too far from the site. I have recently visited Spring City for a day, and Limerick for a day. I have also visited overnight with friends at Phoenixville, Pottstown and Limerick. Last summer I vacationed for four days with my ~~xx~~ two children at Ricketts Glenn State Park, about 83 miles from the ~~x~~ site. I also note that in the WASH - 740 update study it is stated that in the case of an accident that there would be deaths " out to 150 km." (95 miles) (WASH-740 update at 84-5). I also note that Marvin L. Lewis of Philadelphia, was allowed as a limited participant in the TMI - 1 Restart proceeding. ~~xxxx~~ Philadelphia is about 80 miles from TMI. I have also visited New Hope, Pa for recreational activity, which is about 33 miles from the site.

My request for intervention rests upon a combination of standing as a right as discussed above and also as a matter of discretion.

It is clear that since the TMI-2 technical specifications proceeding held no days of actual hearing, that there is little record. There is the record of the prehearing conference. I put forth three contentions. One was similar to another party and has been resolved by negotiation. A second was unique, and has been settled by negotiating with the Staff and the Applicant. This

contention involved specifications for operability of neutron monitoring equipment, which I have had experience using. At the moment this settlement is being drafted by the Staff. I will probably withdraw my last contention as being, at this time, rather moot. This contention involved the possible leak of liquid from the containment. I understand that as a result of that being raised as a contention, that the NRC did work on that possibility more seriously.

Aspects

There are at least two aspects which I would like to address as contentions in this proceeding. At this point they are not focused well enough to be contentions. It is expected that they will be incorporated in the joint statement of contentions requested by the board by 17 November 1981.

1 ECCS, HPCI

Each of the plants at Limerick is being built with one High Pressure Coolant Injection (HPCI) pump in the Emergency Core Cooling System (ECCS). The chance of failure of one pump is considerable. Two pumps would have a much higher probability that at least one would be operable if needed. Particularly in view of the high population near the site (Philadelphia) a better than usual engineered safeguards system should be provided, namely two HPCI pumps. It is noted that this is the practice on PWRs.

Secondly, there may be a range of size of pipe break that could not be adequately responded to by the present one HPCI. Note statement on page 6.5-21 of PSAR.

Thirdly, the technical specifications at present may permit plant operation with the one HPCI down for maintenance. If so, this is inappropriate. I will check this out in the Technical Specifications for the contention. At this point I have not been thru the technical specifications.

2 Radon

I do regularly breathe the air in State College, Pa.,. This air very frequently contains radon from the decay of radium in mill tailings piles in other parts of the United States. Some of those tailings piles in whole or in part will be due to the Limerick plants. This radon will effect my health and the health of my progeny for a very long time. They cannot petition this board for standing in this matter, so I must.

The evaluation of the radon-222 problem by the applicant (which I have not seen) is undoubtedly incomplete. The Environmental Impact Statement to be produced (at some future date) will be inadequate. The simple laws of radioactive decay need to be injected into this proceeding.

Conclusion

The Board has requested some specific information regarding my relationship to ECNP, which is adressed in the first section on additional information. It would not be proper to require the petitioner's interests to be represented by a specific party such as ECNP. In fact such a requirement could also prejudice the participation of ECNP. The further issues of Standing and aspects are addressed in the other sections. This includes the issues raised by the Board in addition to those of the Staff and the applicant.

Respectfully submitted,

William A. Lochstet

William A. Lochstet, Ph.D.

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Certificate of Service

'81 OCT 27 P2:54

PD

I hereby certify that copies of " Response to Board for specific information, Staff and Applicant. Supplement to Petition to Intervene" have been served upon those persons on the attached Service List by deposit in the United States mail, first class, postage prepaid this 22 d day of October 1981.

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