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The Honorable Ivan Selin
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Selin:

Background:

The Philadelphia Inquirer of 2-26-93 reported that Limerick Nuclear Power Plant will use slightly irradiated fuel from the abandoned Shoreham Nuclear Reactor. The complications of this use raise many concerns: transportation of slightly used fuel, slightly used fuel compatibility in areas used for unirradiated fuel, handling precautions, violations of the Safety Evaluation Report(SER), lack of regulations, and lack of Environmental Assessment or Environmental Impact Study required by NEPA.

Concerns:

1. Transportation of slightly used fuel:

The transportation of the slightly used Limerick enriched uranium fuel raises many concerns. Slightly used fuel is seldom transported hundreds of miles between user locations. This transportation of used fuel between Shoreham and Limerick is a novel, unique and original maneuver. As a novel, unique and original maneuver with consequences of major proportions, the transportation of slightly used fuel requires an Environmental Impact Statement.

Other concerns related to the local area include lack of FEMA, CNSI and local budgets directed to the Local Emergency Planning Committee to purchase necessary emergency equipment for radiation accidents.

The concern about FEMA involves the lack of funding of emergency response other than response to nuclear attacks. (Phila. Daily News, Page 10, Paper: FEMA focusing on Armageddon.)

At a meeting in King of Prussia, PA, the CNSI contractor for the proposed low level radioactive waste site in Pennsylvania informed me that CNSI was required to provide equipment for radiation accidents related to low level radioactive waste. CNSI suggested that I have the LEPC contact them. I went to a Philadelphia City Budget Hearing on 3-6-93 and informed the City Council of this source of funding and equipment for radiation emergencies. The city has so far responded with its usual lack of enthusiasm and action.

This all leads to a concern that the local area is unprepared for the transportation of used fuel.

I am also concerned that storage and loading of used fuel at the Limerick Nuclear Power Plant will cause dangers not included in SER, FEMA, PEMA and LEPC planning and response.

I request a reply. Any attention which you give this matter will be greatly appreciated and will demonstrate the concern of the NRC.

Respectfully submitted,

Marvin Lewis

3-8-93.

APPENDIX

Shoreham

Limerick

Percent of enrichment

Dimensions of
Bundles
Rods

Connecting hardware to
SCRAM
Drives

Safety related interfaces

Routes of new fuel
thru local roads
thru nuclear plant

Routes of used fuel
thru local roads
thru nuclear plant.

Questions.

1. Have the local authorities including LEPCs been informed of routing and need for response in accordance with the Federal Community Right to know Act?(EPCRA or Title 3 of CERCLA.)
2. Is the TRU or plutonium content of the used fuel sufficient to classify as TRU contaminated?
3. If the used fuel will require reworking or refitting to use at Limerick, where has the impact of this reworking and or refitting been reported?