



United States Department of the Interior

FISH AND WILDLIFE SERVICE
HARRISBURG AREA OFFICE
100 CHESTNUT STREET, ROOM 310
HARRISBURG, PENNSYLVANIA 17101

MAY 5 1982

ER-81/1617

Mr. R. H. Elias, Project Engineer
Bechtel Power Corporation
P.O. Box 3965
San Francisco, California 94119



Dear Mr. Elias:

Mr. Bruce Blanchard, Department of the Interior, Washington, D.C., has requested that we comment directly to you on Revision No. 3 to the applicant's Environmental Report (OLS) for the Limerick Generating Station, Units 1 and 2, Chester and Montgomery Counties, Pennsylvania. This letter provides technical assistance only and does not constitute the views of the Department of the Interior on the forthcoming application for an operating license.

Revisions for pages 2.4-3 and 2.4-4b assume that the Point Pleasant Diversion project will be built within the next two years to make up consumptive withdrawals from the Schuylkill River during low flows. In our report dated June 19, 1981, to the Philadelphia District, Corps of Engineers, we recommended that the issuance of a Department of the Army permit for this phase of the project be held in abeyance until we have had the opportunity to provide our comments based on receipt of the Corps' assessment of certain cumulative effect relationships created by other existing and anticipated fresh water diversions from the Delaware River. This recommendation was reiterated in our supplemental report dated March 26, 1982, on the proposed permit as modified by Supplement Number 1 to Public Notice NADOP-R-80-0534-3.

The revisions to be incorporated into the Environmental Report as described in Revision No. 3 provide little information pertinent to fish and wildlife resources and do not address concerns expressed by the Fish and Wildlife Service in letters to you dated September 10 and November 12, 1981, and January 29, 1982. Therefore, we recommend the environmental report be revised to address the direct, indirect and cumulative environmental impacts of project-related consumptive water withdrawals on fish and

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wildlife resources of the Delaware River, Delaware Bay, and the Schuylkill River. As our January 29 letter recommended, the Environmental Report (OLS) should likewise be revised to assess the potential long-term effects of a nuclear accident on fish and wildlife resources.

Sincerely,

/s/ Larry R. Harmon

for Norman R. Chupp
Area Manager

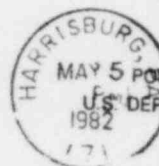
cc:

Nuclear Regulatory Commission, Washington, D.C.
Mr. Jack Miller, Pennsylvania Fish Commission, Bellefonte, PA
Mr. Jacob Sitlinger, Pennsylvania Game Commission, Harrisburg, PA
Director, OEPR, DOI, Washington, D.C.

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

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