

AIR and WATER
Pollution Patrol
BROAD AXE, PA.

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OFFICE OF SPECIAL
DOCKETING & SERVICE
BRANCH

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Units 1 and 2)

Docket nos. 50-352 OL
and 50-353 OL

Re: SPECIAL PREHEARING CONFERENCE ORDER OF JUNE 1, 1982

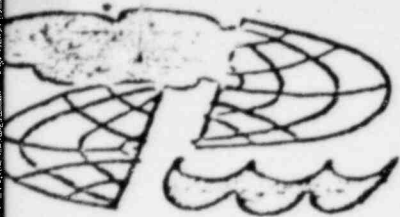
Intervenor AIR & WATER POLLUTION PATROL (ROMANO) states that misinterpretation, technicalities, and typographical errors caused misunderstanding. Intervenor requests reconsideration of denied contentions, or portions thereof, clarification submitted this June 16, 1982 as follows:

V-4 (AWWA)

Relative to statement in June 1, 1982 Order, top of page 147, "Intervenor (AWPP) asserts that Applicant has improperly averaged temperature data in evaluating the meteorological effects of the cooling tower plume, and by so doing has not adequately studied the potential for air crashes resulting from turbulence created by cooling tower discharge, changes of Visual Flight Rules (VFR) conditions, and carburetor icing potential. Staff argues that the contention is without basis in that temperatures are not averaged in calculation of plume effects." It further states that "Because the contention is erroneously based on the premise of the alleged use of average temperature to calculate plume characteristics, the Staff recommends denial of this contention".

Note: The important point is not whether the contention is erroneously based, but does the contention point out a hazardous condition not fully considered. Further, I referred not to just air crashes--but dangerous flying conditions, and restriction of freedom to fly into areas changed from permitted VFR conditions to non-permitted VFR flying conditions.

To aid clarification re temperature (averaged or not), the Staff must, first, reread my "Response to NRC and Applicant's Challenge to Romano (AWPP) Contentions", dated Dec. 21, 1981, in particular the last paragraph of the first page; the 2nd paragraph of page 2, and the first and 2nd paragraph of page 3. Second, nowhere had the Applicant stated how often, irrespective of upper air "soundings" and computer runs, will there be marginal Visual Flight Rule conditions changed to non-Visual Flight Rule conditions...denying me, as a pilot, the freedom to fly at those times, and endangering me as a result of decreased visibility and ceiling. My contention, therefore, better clarified, is that relative to marginal VFR conditions existing during any day or night, the Applicant has made no studies that show there will be no dangerous effect on me because of alteration of VFR conditions resulting from the discharge of millions of gallons of water as vapor per day from the operation at Limerick.



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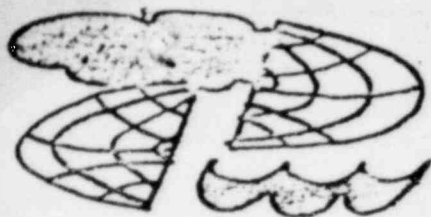
Response to Special Prehearing Conference order of 6/1/82--contd:

At bottom page 147 (last paragraph) the Applicant states nothing is alleged to show any releases from the cooling tower would affect what I stated, namely, "changes in Visual Flight Rule conditions." In answer I did not at all allege... I stated the absolute scientific principle (and NOT for just any release) that release of moisture into the air at, or near dewpoint conditions, will result in condensation of the moisture with subsequent formation of clouds, rain, dangerous aircraft clear ice, or snow...depending on the temperature, as Applicant admits in ref: LGS, EROL 5.1.4.2.1 (page 5.1-25); second paragraph of page 5.1-26; in particular 5.1.4.2.3 re changes in visibility and ceiling to change marginal Visual Flight Conditions to non-Visual Flight Conditions. The essential ingredient in my contention is stated in the last sentence, bottom page 5.1-23 and top of 5.1-24.

Re my assertion of adverse effects from radionuclides that could be released by the Limerick reactor operation, again, the technicality variation on manner of stating the basis cannot invalidate the danger of nuclear emissions and, in fact, I already am affected psychologically in particular for my family and children and their children. Last month's referendum on the restart of TMI Unit 1 in Cumberland, Lebanon, and Dauphin Counties in Pennsylvania demonstrates two out of three people are psychologically stressed sufficient to vote NO to TMI restart...just as people are opposing start up of Limerick.

The Staff (p.149 top) states the contention should be admitted except that there is insufficient "basis". Staff misconstrues what I meant by the "highest concentration of radioactive release". Without challenging it...but irrespective of the extremely ambiguous "as low as reasonably achievable" standard, and notwithstanding that "corrective action (same paragraph) is required" when actual releases during any calendar quarter exceeds one-half the design objective-annual exposure.

However, before and during the corrective action when there has been abnormal design radioactive releases, no corrective action occurs in my concern for adverse health effects already occurred and occurring. And on p. 149, last paragraph... it states: "Finally, Intervenor's example, to support his assertion that 'The body is not affected by the average annual releases but by the highest concentration of radioactive release,' is meaningless." Just as assigning my statement to reference in Appendix 1 instead of 10 CFR Part 20, the above quoted statement should have read, "The body is not affected by the term 'average annual release' which is just a numerical expression, but would absolutely be more adversely affected by the actual and individual exposures possible in one week for example, as compared to the average annual release divided by the 52 weeks." The degree to which the statement was literally misinterpreted is indicated by the superfluous effort to inform me that, as stated near bottom of p. 149, "Any radiation dose affects the body, whether absorbed in a short term or a long term." But the same total amount absorbed in 1 week affects the body much more adversely than that same amount spread over one year. Further I would not be intervening on the basis of health hazards if I, and millions of Pennsylvanians opposed to Limerick were not afraid of every and all releases, in particular releases which would, if recurring, amount to many order of mag-



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Response to Special Prehearing Conference Order of 6/1/82--contd:

nitudes over so-called projected annual releases.

As it relates to my use of an example involving "12 units of radioactivity (sic)", bottom of p. 149, the typographical error writing "2" instead of "12" in the fore part of that sentence, caused misunderstanding.

The basis correctly written is that if the 12 units is the "annual release" shown as the expected summation of all releases during a stated 12 month period there is a suggestion of small releases spread out over a whole year averaging one unit per month. However, if the 12 units were received in one calendar quarter, with corrective action "required" and no further releases for the balance of the year, it would still be regarded on paper, as within the 12 units permitted on the "annual basis". But the health effect of the body having received 4 units for each of the three months would be more adverse than when the 12 units are recorded AS HAVING BEEN RELEASED in one year's operation.

As it relates to my contention VI (Quality Assurance Deficiencies) not involved in the June 1, 1982 Order, I want to state that my seismic concerns which the Staff previously dismissed should be re-considered in light of the Diablo Canyon seismic fiasco, and particularly the Zimmer Nuclear facility where quasi-fraudulent, and slovingly careless disregard for specific procedures and workmanship now justifiably prevents the opening of a practically completed plant. Think of the disaster that such shameful violation of the trust of the NRC and the people of the Cincinatti area could have brought. The same problems of seismic nature, and quality assurance have been referenced in my previous statements of contentions re Limerick, and must now be given more weight in your deliberations.

Respectfully submitted

Frank R. Romano, (AWPP)
61 Forest Ave.
Ambler, Pa. 19002
646-1057(215)

I hereby certify that copies re Order of June 1, 1982 response for consideration were sent first class to: Lawrence Brenner, Esq., Dr. Richard F. Cole, Dr. Peter A. Morris, Max Weiner, Atomic Safety and Licensing Board Panel, Mr. Edw. G. Bauer, Jr., Troy B. Conner, Jr., Esq, Mr Charles Bruce Taylor, Dr. Judith Johnsrud, Thomas Gerusky, PEMA, Robert L. Anthony, Judith Dorsey, Esq., Donald S. Bronstein, James Neill, Esq., Walter W. Cohen, Robert Adler, Randall Brubaker, Joseph White, III, Alan J. Nogee, Robert J. Sugarman, Atomic Safety and Licensing Appeal Panel, Docketing and Service Section.

Dated: June 16, 1982


Frank R. Romano