



**AIR and WATER
Pollution Patrol**
BROAD AXE, PA.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of PHILADELPHIA ELECTRIC CO.:
LIMERICK GENERATION STATION, UNITS 1 AND 2:

DOCKET NOS. 50-352
50-353

PETITION FOR ADDITIONAL INTERVENTION CONTENTION

There is on record my previously filed contentions as per 10 CFR 2.714 with intervenor status. Intervenor Romano/Air and Water Pollution Patrol (AWPP) now forwards an additional contention which has developed over time, and upon which I seek to augment safety reasons why the U.S. Nuclear Regulatory Commission must withhold an operating license from Applicant's two nuclear reactors at Limerick, Pa.

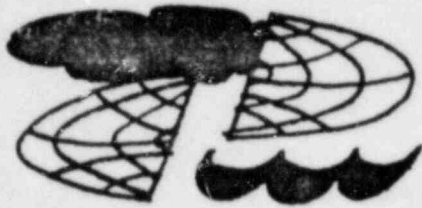
This contention concerns what can be designated the Three Mile Island Test of Capability. Failure of this public safety test thus far is factual and indisputable evidence of the lack of capability of the entire nuclear establishment to handle the most glaring safety problems ever brought to light via nuclear reactor operation. The TMI accident and the ensuing four years of lack of capability to clean up such a problem was totally missed by computer models, predictions and assumptions of experts, and now must be considered in all future licensing procedures as it affects the safety of the public.

I refer to the abysmal failure, after four years of make-shift effort, of the nuclear establishment (which includes the Applicant) to solve the life-threatening, generic nuclear reactor problem. The complete and safe solution of this problem must be the test of complete control necessary before people are to be risked to possible hazards via reactors currently seeking licenses to operate.

I content that the Applicant (P.E.) who now seeks an operating license is not capable of handling the generic TMI nuclear problems that have remained unsolved at the crippled Three Mile Island Unit 2 nuclear reactor with no assurance of when or if it will be solved. Of this problem Governor Thornburg says, quote: "Every day that passes increases the threat that some event will happen there".

I contend that having failed to remove the life-threatening situation, the nuclear establishment (which includes the Applicant) must be required to first pass the TMI Test of Capability, namely, to safely and completely clean up the crippled TMI 2 reactor...before any yet unlicensed reactor in Pennsylvania (or the U.S.) is granted an operating license.

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AIR and WATER Pollution Patrol BROAD AXE, PA.

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PETITION FOR ADDITIONAL INTERVENTION CONTENTION continued:

I content that the granting of a license for P.E. or any other entity to operate a nuclear reactor at Limerick without assurance inherent in the TMI Test of Capability will risk the health and lives of me, my family and members of The Air and Water Pollution Patrol (AWPP) and create the cruel and unusual punishment of psychological stress suffered, and continuing to be suffered after four years, by the people of the Three mile Island area and beyond...which includes me and my family, and members of the Air and Water Pollution Patrol (as well as the general public). I contend it is the duty of the NRC to require the TMI Test Of Capability to allay fears of me, my family, members of AWPP (and the general public) that licensing of P.E.'s reactors can result in an accident which will threaten...every night and day for years...as it is continuing to do at TMI...waiting every day and every night, frightened by every siren and every fire whistle that engenders run for your lives semi-panic.

Very truly yours,

Frank R. Romano, Chairman
Air and Water Pollution Patrol
61 Forest Ave.
Ambler, Pa. 19002

I hereby certify that copies of the foregoing have been served by First Class Mail upon the latest Service List: Lawrence Brenner, Esq., Administrative Judge; Dr. Richard Cole; Dr. Peter A. Morris; Stephen H. Lewis, Esq.; Robert L. Anthony; Mr. Marvin Lewis; Judith A. Dorsey, Esq; Alan J. Nogee; Edward G. Bauer, Jr.; Robt. W. Adler; Ann Hodgson; Thomas Gerusky; Director PEMA; Steven P. Hershey, Esq.; James M. Neill, Esq.; Donald S. Bronstein, Esq; Joseph White III; Dr. Judith H. Johnsrud; Walter W. Cohen; Robert J. Sugarman; W. Wilson Goode; Atomic Safety and Licensing Appeal Panel; Atomic Safety and Licensing Board Panel; Docketing and Service Section; Troy B. Conner, Jr., Esq; and Randall Brubaker.