



AIR and WATER Pollution Patrol

BROAD AXE, PA.

April 27, 1983

U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board
Washington, D.C. 20555

'83 MAY -2 P12:02

In The Matter of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 50-353

DOCKETING & SERVICE
BRANCH

Lawrence Brenner, Chairman; Dr. Richard F. Cole; and Dr. Peter A. Morris

NEW INFORMATION CONTENTION BY FRANK R. ROMANO (AWPP)

I contend that the management of Philadelphia Electric Company has been newly demonstrated to be inadequate to insure safe operation of the Limerick Nuclear reactor. Such incapable operation threatens the health and welfare of me, my family, and members of Air and Water Pollution Patrol of Pennsylvania (AWPP).

I previously, and specifically, in letter received by the U.S. NRC Atomic Safety and Licensing Board on March 1, 1983, re the TMI Test of Capability, contended that the Applicant, as part of the nuclear establishment was not, and is not, capable of handling all recently made known problems that point to the accident-prone, thus threatening, nature of nuclear reactor operation. For example, problems made known currently at Salem: stuck valves, substitution of parts, by-passing specified procedure re inspection, etc. (as at TMI) and at Applicant-involved Salem.

While the staff denied contention (received from me on March 1, 1983) on the basis of timeliness and specificity, subsequent timely and specific evidence of inability to handle and insure against threats to me, my family, and members of AWPP include repeated carelessness, and repeated malfunctioning on safety-related equipment, and response there to...all adversely reflecting on management capability involving Applicant and Limerick.

Specifically the repeated life-threatening incidents at Salem reflects directly on management and operation of Limerick because the Philadelphia Electric Company, owning a large part of the Salem reactor, is part and parcel of the evidence of incapability demonstrated by the repeated near-miss accidents at Salem.

Lastly I contend that, based on the recent 9-0 U.S. Supreme Court decision, that if Pennsylvania and the NRC permits Limerick to operate before acceptable disposal sites are in place and ready to completely keep nuclear wastes from the biosphere for hundreds of thousands of years, Pennsylvania and NRC will be condoning and permitting, in effect, a dangerous unauthorized nuclear waste dump at the Limerick facility...in contempt of the fundamental purpose of the 9-0 U.S. Supreme Court decision, which fundamentally had the safety of the public in mind.

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Very truly yours,

Frank R. Romano, Chairman
Air & Water Pollution Patrol

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