



CITY OF PHILADELPHIA

LAW DEPARTMENT
15th Floor, Municipal Services Building
Philadelphia, Pa. 19107

August 12, 1983

Secretary
United States
Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Limerick Generating Station, Units 1
and 2, Docket Nos. 50-352 and 50-353,
Draft Environmental Statement

Dear Secretary:

Enclosed herewith please find an original and three
copies of the City of Philadelphia's Comments relating
to the above-listed document.

Sincerely,

Martha W. Bush

Martha W. Bush
Deputy City Solicitor

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COMMENTS OF THE CITY OF PHILADELPHIA
RE: DRAFT ENVIRONMENTAL STATEMENT
RELATING TO THE OPERATION OF
LIMERICK GENERATING STATION,
UNITS 1 AND 2, DOCKET NOS.
50-352 AND 50-353

The City of Philadelphia hereby notifies the Commission of its comments on the above-listed document. At this time, pending submission of the supplement to the Draft Environmental Statement ("DES"), the City has no comments on the substance of the DES. However, the City believes that conclusions as to environmental impacts of Unit No. 2's operation are premature and issuance of such conclusions at this time is a violation of the National Environmental Policy Act of 1969 (NEPA).

Unit No. 2 is not projected by the Applicant to be completed until late 1988. Because of the long period of time between issuance of the DES at issue (June, 1983) and potential operation of the plant (October, 1988), environmental impacts cannot be accurately or reasonably assessed, e.g., existing water and air quality conditions. Furthermore, many of the environmental standards that are applied in a DES are evolving standards, e.g., clean air and water standards and acceptable low level radiation levels. To approve Unit No. 2's operation long before its expected operation deprives the public of legally enacted environmental requirements concurrent with the Unit's initial operation.

For these reasons, the City of Philadelphia respectfully urges the Commission to hold in abeyance any conclusions as to the environmental impacts of Unit No. 2's operation until an environmental analysis and review can be made consistent with environmental conditions and standards at operation.

Respectfully submitted,

Martha W. Bush

MARTHA W. BUSH
Deputy City Solicitor