



ER 83/1571

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

FEB 8 1984

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Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

The Department of the Interior has reviewed Supplement No. 1 to the draft environmental impact statement (OLS) for Limerick Generating Station, Units 1 and 2, Montgomery County, Pennsylvania, and has the following comments.

Supplement No. 1 addresses only the potential escape of radioactive byproducts into the environment from a nuclear accident and potential effects of such an escape on humans.

However, the consequences of severe accidents on the Schuylkill River are not made clear. Fallout on open water bodies is cited as a potential pathway for doses resulting from atmospheric releases but effects were not estimated specifically for this site, apparently because an investigation at another site found that these doses could be substantially eliminated by the "interdiction of the aquatic food pathway" (p. 5-33, par. 3). At the Limerick site this interdiction must be presumed to mean shutting off the water intakes on the Schuylkill River serving about 1.9 million people downstream from the reactors. It would be important to know for how long the intakes must remain closed. To evaluate this, not only the fallout of radionuclides into open water but also the runoff of contaminated materials from the land must be considered.

Potential adverse effects to fish and wildlife resources from exposure to radioactive materials are not considered. The Fish and Wildlife Service is supporting efforts by the Pennsylvania Fish Commission to restore anadromous fish runs to the Schuylkill River. The Schuylkill River also serves as a major flyway for raptors and waterfowl from central New York State and the Great Lakes. Effects of potential contamination on these fish and wildlife resources should also be considered.

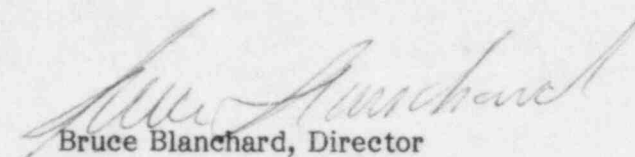
For information on fish and wildlife populations in the area of concern you may wish to contact the Pennsylvania Fish Commission (P.O. Box 1673, Harrisburg, Pennsylvania 17105; 717-787-2579) and the Pennsylvania Game Commission (P.O. Box 1567, Harrisburg, Pennsylvania 17120; 717-787-3633). For further assistance, please contact the Field Supervisor, U.S. Fish and Wildlife Service, 315 S. Allen Street, Suite 322, State College, Pennsylvania 16801 (814-234-4090 or FTS 727-4621).

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We hope these comments will be helpful to you in the preparation of a final statement.

Sincerely,



Bruce Blanchard, Director
Environmental Project Review