

U.S. NUCLEAR REGULATORY COMMISSION . . . ATOMIC SAFETY AND LICENSING BOARD

Re: Phila. Elec. Co.

Limerick Nuclear Gen.Sta. -Units 1 & 2

DOCKETED  
USNRC  
Docket # 50- 352 & 353  
Feb. 28, 1984

'84 MAR 15 AIO:42

Addition to Anthony/FOE Application for Contention on new matter ,PECo's Application, Part 70, Docket # 70-2988, to move to site and store 764 bundles of fuel.

DOCKETING & SERVICE  
BRANCH

Anthony/FOE hereby adds to its application dated 2/23/84 for a contention against granting a license to store nuclear fuel at Limerick the following:

1. PeCo wants to bring the fuel onto the site in March 1984 and store it in wooden boxes in an especially vulnerable location for four months until it is moved inside the containment building. This violates the terms and, surely, the intention of the Commission safety requirements. The fuel will be subject to natural hazards such as tornadoes and electrical storms. The public will be put at great risk., The fuel will be at risk of theft and sabotage since PECO does not have sufficient safeguards in out-of-doors storage.

2. The moving requirements set forth in the application show that the fuel is highly dangerous or it would not have such stringent handling orders.

3. The fuel is to be stored in a place exposed to the railroad tracks, only 350-400 feet from the hypothesized site of the design TNT railway car explosion. Either fire or explosion on the tracks has the possibility to activate the fuel with disastrous consequences for the whole metropolitan area.

4. The plan to store outdoors in the chosen location exposes the community to a nuclear accident, in addition, from the possibility of activation of the fuel through an electrical accident. The site plan shows 13 KV electrical cables running under the storage location as well <sup>as a</sup> 220KV tie line directly overhead .

5. We assert that our vital interests and safety have been compromised, as have those of the community, by our being denied the application from PECO in an unexplained way, by the NRC, since the letter from E.J. Bradley to J.G. Davis was dated 1/24/84 and we did not receive a copy of the application until 2/23/84.

Cc: Judges Brenner, Cole, Morris  
NRC Staff, M.J. Wetterhahn,  
Commonwealth, Phila., others on serv. list

Respectfully submitted,  
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FROM NRC TECHNICAL EVALUATION-CONTROL OF HEAVY LOADS. 2/6/84.

TABLE 3.1. LIMERICK GENERATING STATION UNITS 1 AND 2 NUREG 0612 OBJECTIVES COMPLIANCE MATRIX

Item	Crane or Hoist Equipment (No.)	Handling System	Single-Failure-Proof System	Off-Site Radio-active Release	Damaged Fuel Criticality	Fuel Cover Inventory Loss	Safe Shutdown Equipment Loss
1	00-11201	Reactor building overhead cranes	NC	C	C	C	C
2	1A-11501 1B-11501 1C-11501 1D-11501	Diesel generator building crane	NA	NA	NA	NA	C
3	00-11501 00-11513	Spray pond pump house hoists	NA	NA	NA	NA	C
4	—a	Spray pond HIR and FSW pumps yard crane	NA	NA	NA	NA	C
5	00-11133	Control room HVAC lift beam	NA		NA	NA	C
6	1A-11203 1B-11203	Recirculation pump motor hoists	NA	NA	NA	NA	C
7	10-11216	Core Spray pump hoist		NA	NA	NA	C
8	10-11217	Core Spray pump hoist	NA	NA	NA	NA	C
9	10-11220	Containment Equipment door hoist	NA	NA	NA	NA	C
10	10-11229	CRD platform hoist	NA	NA	NA	NA	C
11	1A-11233 1A-11234 1A-11235 1B-11233 1B-11234 1B-11235 10-11230 10-11232	MSRV service hoists  MSRV removal hoists	NA  NA	NA  NA	NA  NA	NA  NA	C  C
12	10-11237	Containment hydrogen recombiner cover hoists	NA	NA	NA	NA	C