

AIR and WATER Pollution Patrol

BROAD AXE, PA 1884 MAR 22 10:519, 1984

Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 10555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating station
Units 1 and 2)

Docket Nos. 50-352
and 50-353

Judge Lawrence Brenner, Chairman; Dr. Peter Morris & Dr. Richard Cole

REQUEST FOR RE-CONSIDERATION OF AWPP'S ASBESTOS CONTENTION

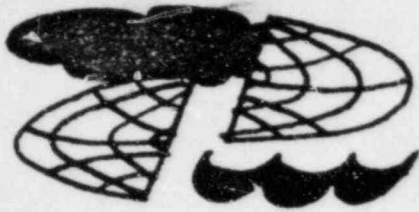
As a result of the March 15, 1984 hearing before the Board in which the AWPP (Romano) contention relating to asbestos was discussed, and a decision made without sufficient information attested to, AWPP moves that the Board re-consider. AWPP moves that this be done on the basis that while the EPA has not, as yet, called asbestos fibers in drinking water hazardous, as per American Water Works Association Mainstream, Vol 27, No 11, November 1983:

"The U.S. Environmental Protection Agency will propose a ban on the manufacture of asbestos-cement pipe, according to Edward A. Klein, an agency official involved in the control of toxic substances. The ban is not imminent but could come within the next few years. The USEPA expects to publish its proposed rule prohibiting the use of asbestos in a number of construction projects, including asbestos-cement (A-C) pipe, next July. At that time public input will be sought on the scientific basis for the rule and on the regulatory procedures in the rule. The next step in US EPA's development of a regulation is consideration of the comments and publication of a final rule."

It's purpose is to eliminate the ingestion of asbestos fibers via municipal drinking water systems using asbestos pipe.

Further, at the March 15 meeting, the Applicant was not required to provide information on the amount of asbestos-cement used in the Drift Eliminators in its cooling towers at Limerick, even though Mr. Boyer was present, and could have been asked to supply the information.

The question of how much asbestos could be present in water discharged into the Schuylkill, therefore, could not be used in



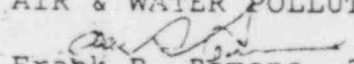
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(2)

Request for re-consideration of Asbestos contention continued:

in the Board's decision not to permit the asbestos contention.

Further, while AWPP discussed the possible dissemination of asbestos fibers from the tower into the air, which the EPA does designate as hazardous. (40-CFR.20 to .25 discusses asbestos relating to removal to avoid contact, & as it relates to airborne asbestos see the National Emissions Standards for Hazardous Air Pollutants, under Section 112 of the Clean Air Act). Therefore, the Board did not adequately address this known point involving a hazzard to the public.

Respectfully submitted.
AIR & WATER POLLUTION PATROL

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FRR/jch