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AIR and WATER Pollution Patrol

BROAD AXE, PA.

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555DOCKETED
USNRC

'84 MAR 30 A11:30

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHDocket Nos. 50-352
and 50-353

Lawrence Brenner, Chairman; Dr. Peter Morris; Dr. Richard Cole
Gentlemen:

NEW ADDITION TO CONTENTION RELATING TO ASBESTOS
FIBER DISCHARGES FROM LIMERICK REACTOR OPERATION
INTO THE SCHUYLKILL RIVER AND AIR

On March 16, 1984, John S. Kemper of Philadelphia Electric Company wrote Mr. A. Schwencer, Chief, Licensing Branch No. 2, Division of Licensing, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 re the 401 Water Quality Certification--Operating License and the NPDES Permit for Plant Operating Discharges.

Philadelphia Electric interpreted that the 401 Certification issued Dec. 13, 1973 satisfied the requirements of 401 (a) (3) for the Operating License.

While the DER concurred, and the NRC agreed that the certification issued Dec. 13, 1973 made a separate OL Certification unnecessary, Air & Water Pollution Patrol contends that P.E. not be permitted to revise its listing of State Permits as approved under EROL Section 12.1.2. AWPP's contention is based on the fact that the discharge of asbestos fibers (shed from asbestos-cement drift eliminators in towers) into the Schuylkill River* had not been identified nor included in its plant operation discharges description.

Respectfully submitted,
AIR & WATER POLLUTION PATROL

Frank R. Romano
Frank R. Romano, Chairman
61 Forest Ave.
Ambler, Pa. 19002

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PDR ADCK 05000352
G PDR

*Together with air discriminated asbestos fibers.

I certify the above has been served upon the latest service list.

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