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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

JUN 6 1984

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

The Department of the Interior has reviewed the final environmental impact statement for the Limerick Generating Station, Units 1 and 2 (OLS), Montgomery County, Pennsylvania and has the following comments.

Surface Water Hydrology

We understand the Neshaminy Water Resources Authority has withdrawn support for the Point Pleasant Diversion and has cancelled their contract for the pumping station. The Public Utility Commission (PUC) ruled that Philadelphia Electric Company could only supply consumption make-up water for one unit at Limerick through Bradshaw Reservoir. The PUC has delayed their approval to even build Bradshaw Reservoir, an integral part of the Point Pleasant Diversion Project. The final EIS for the Merrill Creek reservoir project has been delayed and has not been distributed by the Delaware River Basin Commission (DRBC) for review and comment. The DRBC has proposed to allocate all available storage in Blue Marsh reservoir for flow augmentation during drought emergencies.

Therefore, the Limerick Generating Station will be without a source of consumptive loss make-up water when flows in the Schuylkill River cannot meet the criteria for withdrawals. Until an adequate make-up water supply can be identified within the Schuylkill River Basin, we cannot agree that operating Units 1 and 2 of the Limerick Generating Station will not have significant adverse impacts to fish and wildlife resources during low flow events. For example, throughout the text, fishery impacts and operating schedules are based on the assumption that 3,000 CFS flow will be available at the Trenton gage. However, a review of the data indicates that flows decreased significantly below 3,000 CFS in 1977, 1980 and 1981. Since the Delaware River fishery must survive during extreme low flow conditions, we believe the final statement should address worst case conditions, not what flows may be available from storage.

Water Quality

We disagree that the fish flesh analysis from locations above and below the Point Pleasant intake site are not indicative of water quality at the site. The site downstream of the intake has consistently been high in cadmium and lead over the past 7 years of record. The sample taken upstream of the intake in 1983 also showed high levels of cadmium and lead comparable to those from fish sampled further downstream. We

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believe that this evidence indicates a water quality problem in the vicinity of the intake. It should also be noted that fish flesh analyzed in 1972 from the Perkiomen basin showed much lower levels of cadmium and lead.

Unit 1 is scheduled to start operating in 1985. Even if the Point Pleasant Diversion is constructed, the Merrill Creek reservoir will not be operational until 1988 or later and, therefore, will not be available for make-up water purposes. These facts further support our recommendation for an evaluation of impacts during extreme low flow conditions.

Sincerely,

Terence A. Martin

for

Bruce Blanchard, Director
Environmental Project Review