



# AIR and WATER Pollution Patrol

BROAD AXE, PA. March 6, 1985  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

## BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL PANEL

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

Docket Nos. 50-352  
50-353

Attn: Christine Kohl, Chairman; Garry J. Edles; Dr. Reginald L. Gotchy  
Gentlemen:

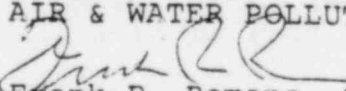
Re the Nuclear Regulatory Commission's Benjamin Vogler's statement of "500 Feet below clouds", I think it is important for the record to indicate two fundamental points not brought up at the Appeal Hearing but which were already on the record. I bring these two points up because it is extremely important that they be reviewed.

### 1) Definition of a cloud:

The witnesses for the Applicant attached much of their testimony to rules which apply to clouds. They arbitrarily defined the plume as a cloud. They had no authority to define a plume as a cloud and, therefore, testimony that applied to clouds cannot be used for a plume as it relates to FAA distance from cloud rules.

### 2) Visible and invisible plumes:

The record in the Applicant's FSAR or equivalent states that invisible plumes can occur as much as 50% of the time. Mr. Vogler's reference to "500 feet below clouds" (referring to the plume as a cloud) is invalid not only because of improperly defining the plume as a cloud, but also because high moisture conditions which would affect carburetor ice could be present in an invisible plume. The invisible plume, thereby, could become a menace to unsuspecting pilots...inparticular the many student pilots in the unusually high number of airports surrounding Limerick.

Respectfully submitted,  
AIR & WATER POLLUTION PATROL  
  
Frank R. Romano, Chairman  
61 Forest Ave.  
Ambler, Pa. 19002

8503250184 850322  
PDR ADOCK 05000352  
G PDR