



# AIR and WATER Pollution Patrol

BROAD AXE, PA. May 21, 1985  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

DOCKETED  
USNRC

In The Matter Of  
PHILADELPHIA Electric Company  
(Limerick Generating Station  
Units 1 and 2)

Docket Nos. 50-35202  
and 50-35302

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## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

As per 10CFR-2.711 (a) (1) (i)-(v), this request merits reopening inasmuch as it is timely in that the decision to declare a Drought Emergency by the Delaware River Basin Commission (DRBC) took place on May 13, 1985. The declaration based on the pleadings of Philadelphia Water Company and Chester County water officials concerned for threat to the needs of their users the denial of which could cause greater harm to those millions of people than to the Applicant who already has 30% electrical over-capacity without Limerick.

It is obvious that a natural situation has occurred, which in the absence of the Applicant's responsibility to have sufficient water available (re Point Pleasant) to protect the public, it now seeks water to further threaten the public. If the Board had knowledge of the degree of natural reduction in water availability with harm and danger to the public if it made a decision to allow low power or full power operation--it would postpone or deny such licensing now.

As it relates to the second and fourth factors, as a Biochemist-bacteriologist understanding the biochemistry of the interactions of organic matter, dissolved oxygen, and toxic chemicals, there is no party with such contention coverage, leaving me, members of AWPP and the public unprotected.

As it relates to AWPP with Romano, with over 20 years experience in environmental analysis, in particular water, his witness capability can assist unbiased supply of facts relating to the effect of low flow and the danger to the public from increased toxic chemicals, viruses, etc., unlike Philadelphia Electric which supplied the Board with biased analysis of the Schuylkill water by Radiation Management Corporation later found to be owned by Philadelphia Electric.

Irrespective of the fact that the Graterford Prison Inmates Contention is

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**AIR and WATER  
Pollution Patrol**  
BROAD AXE, PA.

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Request to reopen record continued:

not disposed of, any delay that resulted in a more complete record, and more importantly weighed on the side of environmental and safety to the health of the public merits the time for hearing---what with the Applicant's electrical overcapacity without Limerick.

Respectfully submitted,  
AIR & WATER POLLUTION PATROL

*Frank R. Romano*  
Frank R. Romano, Chairman  
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FRR/jch

We certify the above has been served on the latest Service List.