

267

LAW OFFICES  
CONNER & WETTERHAHN, P.C.  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

RELATED CORRESPONDENCE

TROY B. CONNER, JR.  
MARK J. WETTERHAHN  
ROBERT M. RADER  
DOUGLAS K. OLSON  
JESSICA H. LAVERTY  
NILS N. NICHOLS  
ROBERT H. PURL  
BERNHARD G. BECHHOEFER  
OF COUNSEL

June 3, 1985

DOCKETED  
USNRC

(202) 833-3500

CABLE ADDRESS: ATOMLAW

'85 JUN -4 A10:53

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Samuel J. Chilk  
Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

In the Matter of  
Philadelphia Electric Company  
(Limerick Generating Station, Unit 1)  
Docket No. 50-352 06

Dear Mr. Chilk:

Although it is recognized that the Nuclear Regulatory Commission adjudicatory tribunals no longer have jurisdiction over water-supply issues for the Limerick Generating Station, for the information of the Commissioners and the boards, I am enclosing an application filed with the Delaware River Basin Commission under Section 3.8 of the Compact for approval of the use, during 1985, by Limerick Unit 1 of the consumptive use water allocations of Titus Units 1, 2 and 3 and Cromby Unit 2 during coordinated operation of the Limerick, Titus and Cromby units.

Sincerely,

*Troy B. Conner, Jr.*  
Troy B. Conner, Jr.  
Counsel for the Applicant

TBC/dlf  
Enclosure  
cc: Service List

8506040675 850603  
PDR ADOCK 05000352  
G PDR

1503

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

EDWARD G. BAUER, JR.  
VICE PRESIDENT  
AND GENERAL COUNSEL

EUGENE J. BRADLEY  
ASSOCIATE GENERAL COUNSEL

DONALD BLANKEN  
RUDOLPH A. CHILLEMI  
E. C. KIRK HALL

T. H. MAHER CORNELL  
PAUL AUERBACH

ASSISTANT GENERAL COUNSEL

EDWARD J. CULLEN, JR.

THOMAS H. MILLER, JR.

IRENE A. McKENNA  
ASSISTANT COUNSEL

RELATED CORRESPONDENCE

DOCKETED  
USNRC

'85 JUN -4 AIO:54

May 30, 1985

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Ms. Susan Weisman, Secretary  
Delaware River Basin Commission  
P.O. Box 7360  
West Trenton, New Jersey 08628

Dear Ms. Weisman:

Transmitted herewith for filing with the Commission is Philadelphia Electric Company's (PECO) Application under Section 3.8 of the Compact for approval of the use, during 1985, by Limerick Unit 1 of the consumptive use water allocations of Titus Units 1, 2 and 3 and Cromby Unit 2 during coordinated operation of the Limerick, Titus and Cromby Units in such a manner as not to exceed consumptive use withdrawals now authorized for the Titus and Cromby Units. The approval is requested for such periods during 1985 when current flow and dissolved oxygen constraints would otherwise prevent the withdrawal of water by the Limerick Unit for consumptive use.

The filing consists of six copies of the following documents: a) completed DRBC Application Form, including Attachments 1 and 2 and Exhibits 1 through 8 thereto; b) completed DRBC Environmental Form; and c) completed Applicant's Statement - Project Review Fee Form.

Enclosed is Philadelphia Electric Company's check in the amount of \$100 to cover the Project Review Fee.

The affidavit of Vincent S. Boyer, Senior Vice President, Nuclear Power, PECO, which is part of Attachment 2 of the Application, indicates that a full power license from the Nuclear Regulatory Commission for Limerick Unit 1 may be issued by the end of June, 1985; that in order to proceed with the power ascension program after issuance of the license it is necessary to have in place a supplemental cooling water system; that delays in proceeding to full power will delay commercial operation of the unit, and that the cost of not operating the unit for lack of water is estimated to be \$49 million per month.

Accordingly, the Company requests immediate action on its Application, pursuant to Section 2-3.9(d) of the Commission's Rules of Practice and Procedure to protect the public interest and to avoid substantial and irreparable injury to the public and to the Company.

Communications regarding this Application should be directed to the undersigned.

We have been authorized by Metropolitan Edison Company, the owner and operator of the Titus Generating Station to state that they have reviewed the enclosed Application and that Metropolitan Edison joins in the Application to the extent it relates to the operation of the Titus facility.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Edward G. Bauer, Jr.", with a stylized, cursive flourish at the end.

Edward G. Bauer, Jr.

EGB, JR:pkc

Enclosures

0015q

# DELAWARE RIVER BASIN COMMISSION

Type of Application: ~~(Check one or more - see reverse side)~~

- (a) Addition to the Comprehensive Plan.....( )
- (b) Change in a Comprehensive Plan Project.....(x)
- (c) Approval under Section 3.8 of the Compact.....(x)
- (d) Inclusion in "A-List" of the Water Resources Program.....( )

Pursuant to the Delaware River Basin Compact and the Rules of Practice and Procedure of the Delaware River Basin Commission, application is hereby made for review of the project described below:

(A) Application From:  
Name Philadelphia Electric Company  
Mailing Address 2301 Market Street,  
Philadelphia, PA 19101  
Telephone 841-4000  
Name of Counsel Edward G. Bauer, Jr.  
and Eugene J. Bradley  
Name of Engineer V. S. Boyer

For Use of Commission

Docket No. \_\_\_\_\_

Date Received \_\_\_\_\_

Action by Commission

- (B) Type of Project: (Check)
- (1) Impoundment.....( )
  - (2) Withdrawal of Water.....(x)
  - (3) Disposal of Wastes.....( )

- (4) Stream Encroachment.....( )
- (5) Well.....( )
- (6) Other.....( )

(C) Description of Project:

For 1985, withdrawal of water from the Schuylkill River for consumptive use at Limerick Generating Station Unit No. 1 when existing flow and dissolved oxygen constraints prevent withdrawal by using, at Limerick Unit 1, consumptive water in amounts authorized to be withdrawn, but not withdrawn, at Titus Generating Station Units 1, 2 and 3 and Cromby Generating Station Unit 2.

Signature of Authorized Person

Name V. S. Boyer

Title Senior Vice President,

Date Nuclear Power

MAY 30 1985



Delaware River Basin Commission

ENVIRONMENTAL FORM

Applicant Philadelphia Electric Company  
Title of Project Interim Consumptive Water Supply  
Location Limerick Generating Station

Date MAY 30 1985

DRBC Docket No. \_\_\_\_\_

1. List any significant environmental impacts, beneficial and adverse, caused by the proposed action.

The beneficial impact of the requested use of water for consumptive purposes will be to permit scheduled operation of Limerick Unit 1. See DRBC FEA for Neshaminy Water Supply System (August 1980); DRBC Level B Study; and AEC/NEC FES for Limerick (November 1973 and April 1984). Use of Titus Station's water will enhance the 23 mile reach between Titus and Limerick due to the delay in consumptive use of the water. Use of Cramby Station's water allocation will have a minimal impact on the 9 mile reach between Limerick and Cramby. See Attachment 1.

2. What mitigating measures will be used to reduce or alleviate the adverse environmental impacts?

The proposed use of operational stations' water will not change the intended purpose of the present water allocations. The impact on the Schuylkill River would be minimal. Thus, no mitigating measures need be undertaken.

3. Summarize the alternatives considered.

The alternatives considered were (1) no action, (2) release of water from the Ontelaunee Reservoir, (3) release of water from Green Lane Reservoir, (4) release of water from Blue Marsh Reservoir or other DRBC water supply storage, and (5) release of water from Beachwood Pit. See Attachment 2.

4. List any known objectors to the proposed action.

None.

## APPLICANT'S STATEMENT — PROJECT REVIEW FEE

(See Reverse Side For Additional Information)

1. Name and Address of Applicant Philadelphia Electric Company  
2301 Market St., Philadelphia, PA 19101

2. Name of Project Limerick Generating Station  
Interim Consumptive Water Supply Docket # \_\_\_\_\_

## 3. Type of Project

Check Applicable Item(s)

- \_\_\_\_\_ (a) impoundments  
 \_\_\_\_\_ (b) diversions of water into or out of the Delaware River Basin  
 \_\_\_\_\_ (c) industrial water use and waste treatment facilities  
 X \_\_\_\_\_ (d) electric generating and transmission facilities  
 \_\_\_\_\_ (e) petroleum product pipelines  
 \_\_\_\_\_ (f) stream encroachments; and  
 \_\_\_\_\_ (g) withdrawal of ground water

## 4. Project Cost Factors (Complete all lines using Zero where applicable)

Item	Estimated Cost
a. Design	\$ 0
b. Supervision of Construction	\$ 0
c. Legal Services	\$ 0
d. Contract Administration	\$ 0
e. Land	\$ 0
f. Materials	\$ 0
g. Construction and Fabrication	\$ 0
TOTAL ESTIMATED PROJECT COST	\$ 0

Footnotes/Remarks \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## 5. Filing Fee Schedule (Check applicable item(s))

(The filing fee is the greater of (a) or (b))

Computation:

- X \_\_\_\_\_ (a) minimum fee: \$100. for any project; or (a) \$ 100.  
 \_\_\_\_\_ (b) alternative fee: (b)  
 \_\_\_\_\_ (1) 1/10 of 1% of estimated project cost up to \$1,000,000. (1) \$ \_\_\_\_\_  
 \_\_\_\_\_ (2) 1/50 of 1% of remaining cost above \$1,000,000; but not (2) \$ \_\_\_\_\_  
 to exceed a maximum fee of \$50,000 as to any one project,  
 exclusive of added environmental fees.  
 Total \$ 100.00 \*

## 6. Filing Fee Required with Application

\*Please enclose check in this amount with application. Check should be made payable to Delaware River Basin Commission.

NOTE: Should this project require an Environmental Impact Statement or an Environmental Assessment, you will be notified at a later date and an Applicant's Statement-Environmental Review Fee will be forwarded for completion and payment of applicable fee.

*Vincent S. Boyer*  
 Signature of Certifying Official

MAY 30 1985

Date \_\_\_\_\_

Senior Vice President, Nuclear Power

Title

## ACKNOWLEDGMENT BY DRBC OF FEE PAYMENT

Received Check No. \_\_\_\_\_, dated \_\_\_\_\_, Bank No. \_\_\_\_\_  
 in amount of \_\_\_\_\_

COPIES: (1) Administrative Division Copy — white  
 (2) APPLICANT — Retain This Copy — pink  
 (3) Applicant — DRBC Reprinted Copy — yellow  
 (4) Project Review Copy — blue

Signature

ATTACHMENT 1

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Under DRBC Docket No. 69-210 CP (Final) (Revised) (May 29, 1985), Philadelphia Electric Company ("PECo") is presently prohibited from taking water from the Schuylkill River for consumptive use at Limerick Generating Station Unit No. 1 during 1985 unless certain flow and dissolved oxygen conditions exist. Water may not be used for the operation of the unit when flow as measured at the Pottstown gage is less than 530 cfs (342 mgd) or after June 15, when dissolved oxygen (DO) levels measured at various locations are below 5.1 mg/l minimum daily averages and 4.2 mg/l minimum instantaneous value.

Given the projected occurrence of these flow and DO parameters during existing drought emergency conditions, water available for consumptive use will be insufficient to sustain the power ascension testing program planned for Limerick No. 1 during 1985. PECo therefore proposes to obtain a supply of cooling water for the unit during 1985 by coordinating the operation of Limerick No. 1 with certain other electric generating units on the Schuylkill, (Cromby Unit 2, owned and operated by PECo, and Titus Units 1, 2 and 3 owned and operated by Metropolitan Edison Company (Met Ed)) in such a manner as not to exceed consumptive use withdrawals now authorized for the Titus and Cromby Units, when the flow and DO constraints prevent the withdrawal of water.

Titus Units 1, 2, and 3 are three coal fired steam electric generating units having a total electric generating capacity of 234

MWe. Titus is located on the west bank of the Schuylkill River two miles downstream from Reading, PA and approximately twenty-three miles upstream from Limerick. In July 1976, the DRBC granted a certificate of entitlement to Titus Station to use, withdraw or divert surface water of the Basin pursuant to Section 5-1.3 of Commission Resolution No. 74-6 in the amounts of 54.834 million gallons per month for consumptive use and 5212.582 mg/month for non-consumptive use. With the addition of a cooling tower to Titus in 1979, DRBC issued Docket Decision No. D-74-32, revised October 1980, which acknowledged that the addition of the cooling tower would result in a 3.5 mgd (105 mg/month) maximum consumptive use. In relation to Limerick operations, this 3.5 mgd would enable operation of Limerick Unit No. 1 up to approximately 15% of full power and will allow completion of approximately one week of its full power test program.

Cromby Unit No. 2 is an oil fired generating unit with a capacity of 201 MWe, located on the west bank of the Schuylkill River approximately nine miles downstream from Limerick. In July 1976, the DRBC granted a certificate of entitlement to Cromby Units Nos. 1 and 2 for 88.410 mg/month for consumptive use and 11,074.470 mg/month for non-consumptive use. Using the capacity ratio of Cromby Unit No. 1 to Cromby Unit No. 2 (150 MWe to 201 MWe respectively), Cromby Unit No. 2 has a maximum consumptive usage of 50.628 mg/month (1.7 mgd).

Together, Cromby Unit No. 2 and Titus Unit Nos. 1, 2, and 3 have been authorized to use Schuylkill water for consumptive uses equivalent to a maximum withdrawal of 5.2 mgd. This daily amount of water, when used for operation of Limerick Unit No. 1, would enable the unit to generate power at levels up to approximately 25% of full



power, would enable the Limerick unit to complete the initial four weeks of the planned power testing program and would enable the unit to operate at a base capacity throughout the summer.

PECo is requesting that the above described 5.2 mgd consumptive use authorized for Cromby Unit 2 and Titus units be declared available for use by Limerick Unit 1, to be used by Limerick Unit 1 as the power ascension testing program of that unit warrants. Thus, if Limerick is available for operation but its operation would otherwise be prohibited because of existing flow and DO consumptive use restrictions, Limerick would be permitted to operate to the extent that its consumptive uses would be compensated for by equal reductions in the consumptive uses of the Cromby and/or Titus units. Whenever the resultant power generation at Limerick is less than the power which would have been supplied from the Titus and/or Cromby units, the difference in power generation will not be produced by units utilizing consumptive water from the Delaware River Basin.

The plan of operation would be to continuously schedule the test and operating program for Limerick Unit No. 1 for three days in advance, updating the program each day. The consumptive water requirements for each day's operation would then be calculated taking into account the expected meteorological conditions. This calculation would recognize the availability of the 3.5 mgd available for consumptive uses from the Titus units and the 1.7 mgd from Cromby Unit No. 2. The calculations would determine which, if any, of these units could be scheduled to operate and at what levels.

DRBC has previously determined that the supply of cooling water for Limerick provides a benefit to the environment. As DRBC stated in its most recent environmental review of the supply of supplemental cooling water for Limerick, "documents prepared after DRBC's Final EIS on the Point Pleasant Diversion Plan, Issued In 1973, support the conclusion that the proposed project would be a feasible and beneficial use of water resources." DRBC Final Environmental Assessment for the Neshaminy Water Supply System, Part III, p. 2-53 (August 1980). DRBC reached the same conclusion in granting final Section 3.8 approval to the Point Pleasant project in Docket No. D-79-52 CP at p. 5 (February 18, 1981). Accordingly, DRBC has recognized that the use of Basin water resources to provide cooling water for Limerick constitutes a beneficial use.

As to the specific need for the electrical power to be granted by the Limerick Generating Station, DRBC has relied upon the findings of the Nuclear Regulatory Commission (previously the Atomic Energy Commission) in its own environmental statements for Limerick. See Docket No. D-69-210 CP (Final) at pp. 1, 6-8 (November 5, 1975). In issuing construction permits for Limerick, the AEC determined that there is a need for the electrical power to be generated by Limerick. See AEC Final Environmental Statement Related to the Proposed Limerick Generating Station, Units 1 and 2, docket Nos. 50-352 and 50-353, Ch. 9 (November 1973). At the operating license stage, the NRC similarly found a substantial benefit to the environment to be derived from the

operation of the Limerick Station in the annual production of approximately 10 billion kWh of base load electrical energy. See NRC Final Environmental Statement Related to the Operation of Limerick Generating Station, Units 1 and 2, Docket Nos. 50-352 and 50-353, Section 6.4.2 (April 1984).

Further, in an order entered August 27, 1982, the Pennsylvania PUC expressly stated the "(t)he public interest requires . . . (t)imely completion of Limerick Unit 1" and further stated "we encourage the Company to complete this unit as rapidly as possible consistent with the public safety". Pennsylvania PUC, Opinion and Order, Docket No. I-80100341 (August 27, 1982) (emphasis added) (pp. 23-25). Accordingly, there exists a substantial benefit to the environment and the public in the commencement of commercial operations at Limerick as soon as possible.

As Limerick is downstream of Titus, the Schuylkill River will be enhanced in the 23-mile reach between the two stations by a maximum of 105 mg/month due to the delay in consumptive use of the water. While Limerick is upstream from Cromby, the adverse impact on the reach in between the two stations should be minimal, as the distance is only 9 miles and the consumptive use only 50.628 mg/month or 2.6 cfs. It is emphasized that the flow in the Schuylkill River below Cromby Station would be unaltered. With the retirements of PECO's Barbadoes Station and units at Schuylkill Station, PECO has enhanced the water quality of the Schuylkill River by not using its 63,437 mg/month (3.3 cfs) entitlements for consumptive use and 5,538,429 mg/month entitlements

for non-consumptive use for these stations. PECO has also terminated using 269.435 mg/month entitlements for consumptive use on the Delaware River with the retirement of Chester Station, units at Delaware Station, and planned retirement of Richmond Station. We believe some credit should be given for the discontinued consumptive water usage.

The proposed coordinated use of consumptive water among the Schuylkill River Generating Stations will not result in any additional environmental or overall consumptive water effects on the basin.



## ATTACHMENT 2

### Application of Philadelphia Electric Company For Authorization of Consumptive Water Use During Coordinated Operation of Certain Schuylkill River Generating Facilities

#### Alternatives Considered

PECo has considered various alternatives for a temporary supply of supplemental cooling water to Limerick for the period of 1985 when docket decision constraints preclude withdrawals from the Schuylkill and Perkiomen. An alternative is not realistic and need not be considered unless capable of being promptly implemented. Thus, an alternative cannot require construction or major modification of existing facilities. The alternatives considered and a brief discussion of each follow:

- (1) No action - Due to flow and DO constraints imposed by DRBC on withdrawals of water from the Schuylkill River for consumptive use, the Schuylkill will be largely unavailable for such withdrawals during the period June to October, 1985. Because the permanent supplemental water supply from the Point Pleasant project will be unavailable for this period, Limerick cannot continue with start-up and ascent to

full power testing without an Interim source. The cost of not operating Limerick for lack of water during that period is estimated to be \$49 million per month. See Affidavit of Vincent S. Boyer, Senior Vice President, Nuclear Power *May 31, 1985* (attached).

- (2) Ontelaunee Reservoir - This reservoir is located on Maiden Creek, a tributary to the Schuylkill River upstream of the Limerick plant, and is owned by the City of Reading for use as a water supply source. Ontelaunee has 11,640 acre-feet of total storage. The City of Reading was granted an allocation of 35 million gallons per day of water by the DRBC on August 27, 1969 in Docket No. D-69-139 CP. The water supply system is presently reported to use an average of 20 mgd with a maximum usage of about 25 mgd. The City of Reading and the municipalities served by the water system are served by comprehensive systems of sewerage collection which discharge to complete treatment facilities and thence into tributary streams and the Schuylkill River.

Inquiries have been made to the City of Reading and a presentation was made to the City Council as to the city's interest in selling unused water from their allocation to PECO. An application for approval of such usage would have to be made by the City to the DRBC. To date, the City has not indicated an interest in making any water available to PECO for 1985, or any other period of time.

- (3) Green Lane Reservoir - This reservoir is located on the Perkiomen Creek. It is owned by the Philadelphia Suburban Water Company ("PSW Co.") and is used in combination with other reservoirs and wells for water supply. Total storage is 13,430 acre-feet. Green Lane is not large enough to meet the combined needs of PSW Co. and Limerick. (Letter to Nicholas DeBenedictis, DER Secretary from Robert A. Luksa, Executive Vice President, Philadelphia Suburban Water Company, June 4, 1984).
- (4) Blue Marsh Reservoir - This reservoir is located on the Tulpehocken Creek, a tributary to the Schuylkill River upstream of the Limerick plant. On March 15, 1985, PECO filed with the DRBC an application under Section 3.8 of the Compact for releases from Blue Marsh or other DRBC water supply storage during 1985 for use at Limerick Generating Station Unit No. 1. This request was rejected by the DRBC on May 29, 1985 in Docket No. D-69-210 CP (Final) (Revised)
- (5) Beechwood Pit - PECO expects to file with the DRBC an application for approval of the withdrawal of water from the Schuylkill River for consumptive use at Limerick Unit 1 when such withdrawals would otherwise be prevented by the flows and dissolved oxygen constraints of Docket No. 69-210 CP (Final) (Revised) (May 29, 1985), to the extent Schuylkill River flow is augmented by discharges from the Beechwood Pit, a former strip mine controlled by the Reading Anthracite Company and containing approximately 2.2 billion gallons of water. This source of water is a potential

supplement to the water supply sought by the instant application and could provide sufficient water to meet Limerick's consumptive needs for 1985 when the Schuylkill River would be otherwise unavailable. Approval by regulatory agencies, the DRBC and the DER, of certain aspects of the discharge from the pit would be required before this water could be used. There is no certainty that these approvals will be granted.



COMMONWEALTH OF PENNSYLVANIA

:

ss.

COUNTY OF PHILADELPHIA

:

VINCENT S. BOYER, being first duly sworn, states as follows:

1. My name is Vincent S. Boyer. I am Senior Vice President, Nuclear Power of Philadelphia Electric Company ("the Company"), owner and operator of the Limerick Generating Station.

2. On October 26, 1984, the U. S. Nuclear Regulatory Commission issued a license authorizing fuel loading and low power testing program which has been completed. The schedule for the power ascension phase of operation of Unit 1 of the Limerick Generating Station is such that the Plant is now ready to proceed to power levels greater than allowed under our existing license. On May 24, 1985 an Atomic Safety and Licensing Board of the NRC issued an Order which authorized the issuance of a full power operating license for Limerick Unit 1. Prior to such license being issued the NRC must first make the authorizing Order effective, after receiving comments. In view of the current status of the NRC licensing proceedings, issuance of a full power license could occur by late June, 1985.

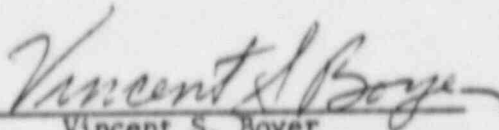
3. In order to proceed with the power ascension program for Unit 1 after the issuance of a full power operating license by the NRC, it is necessary to have in place a supplemental cooling water supply.

4. The partially constructed Point Pleasant diversion will not be completed in time to supply Unit 1's supplemental cooling water needs when it is anticipated that the NRC will authorize the Company to proceed to full power operation.

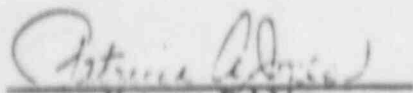
5. Consequently, an interim supply of cooling water will be required to operate Unit 1 at sustained high power levels until the Point Pleasant Project is completed.

6. Delays in proceeding to full power will result in a delay in the commercial operation of the Unit. Such delays will increase the costs of Limerick Unit 1 by \$34 million per month. This cost figure is made up of \$24 million per month Allowance for Funds Used During Construction (AFUDC) and \$10 million per month operational, security and maintenance costs. In addition, the fuel costs of the Company's customers will be increased by \$15 million a month for each month of delay.

7. Delays in the full power operation of Unit 1 may also impact on the restart of construction of Unit 2. The Pennsylvania Public Utility Commission is presently conducting proceedings on whether construction at Unit 2 should be continued, but in compliance with a prior order issued by the PUC, construction of No. 2 Unit has been suspended until Unit No. 1 is placed in commercial operation.

  
\_\_\_\_\_  
Vincent S. Boyer

Subscribed and sworn to  
before me this 31<sup>st</sup> day  
of May 1985.

  
\_\_\_\_\_  
Notary Public

PATRICIA A. JONES  
Notary Public, Phila., Phila. Co.  
My Commission Expires Oct. 13, 1986

Exhibit 1

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Abstract of Proceedings Authorizing Project

DRBC Docket No. D-69-210 CP (Final) (November 5, 1975) approved the Limerick Generating Station Project pursuant to Section 3.8 of the Compact. Incorporated in this Docket were Schuylkill River flow and temperature restrictions which would largely prohibit consumptive water withdrawals during the period June to October, 1985. The temperature restraints were temporarily suspended and a dissolved oxygen monitoring program imposed in lieu thereof in Docket No. D-69-210 CP (Final) (Revised) (May 29, 1985).

## Exhibit 2

### Application of Philadelphia Electric Company For Authorization of Consumptive Water Use During Coordinated Operation of Certain Schuylkill River Generating Facilities

#### Standard or Policy Under Consideration

The primary purpose of the DRBC in establishing limits for consumptive use of water is to minimize the adverse environmental effects of withdrawals for consumptive use during periods of low natural stream flow and low dissolved oxygen levels. The proposal set forth in this Application is consistent with this purpose in that the level of consumptive use presently authorized for the units in question will not be increased with the operation of Limerick Unit 1 as proposed herein.



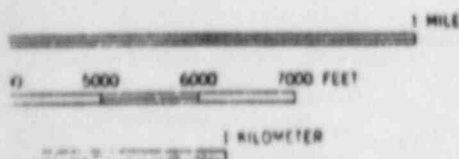
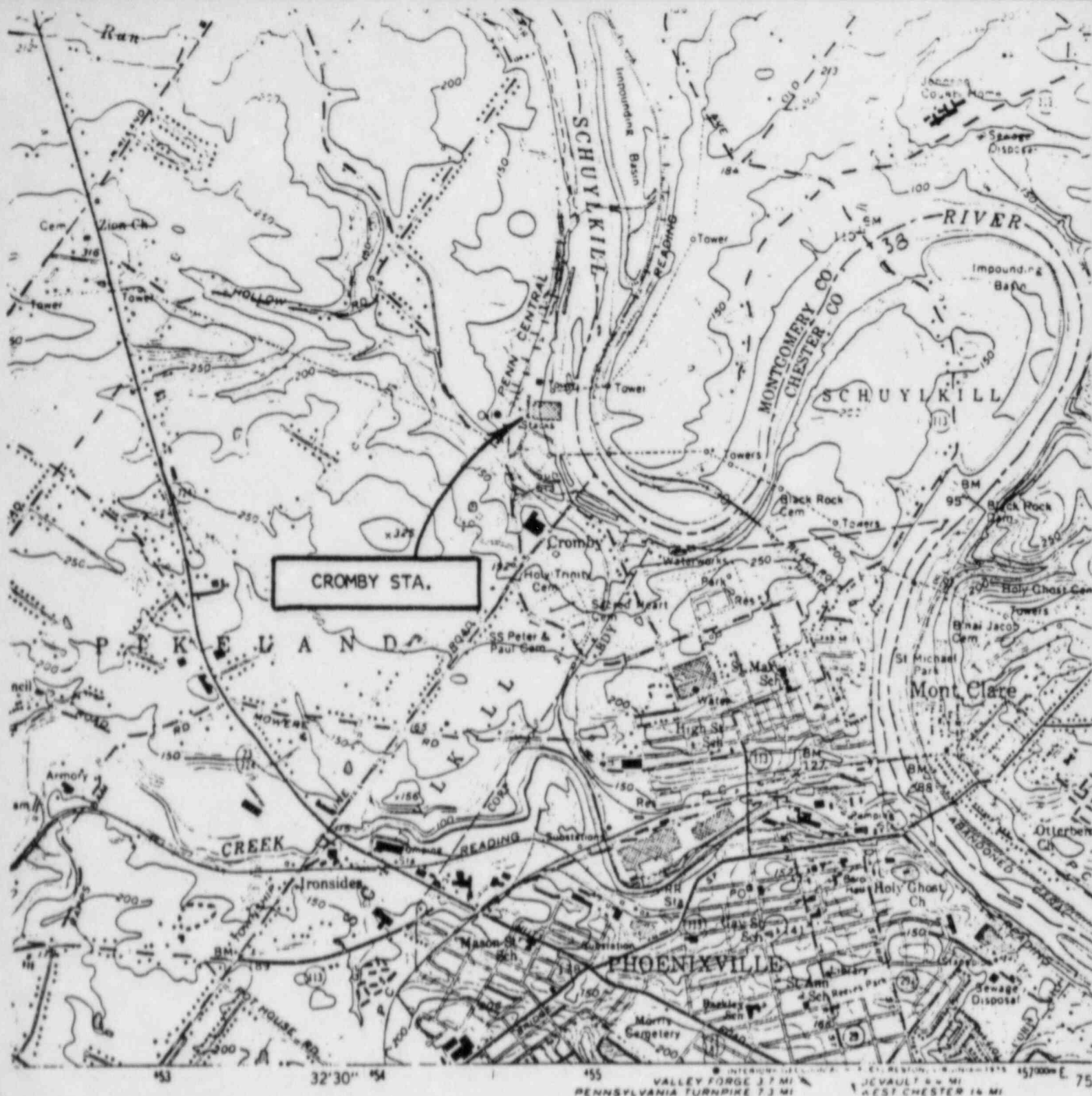
Exhibit 3

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Section of the United States Geological  
Survey Topographic Map Showing the  
Territory and Watershed Affected

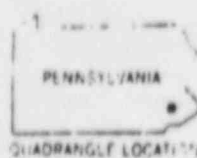
The maps attached detailing the location of Titus Station and  
Cromby Station were prepared from the United States Geological Survey  
Reading and Phoenixville Quadrangles, respectively.





FEET  
SUM OF 1929

ACCURACY STANDARDS  
ESTON, VIRGINIA 22092  
SOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy-duty	—————	Light-duty	—————
Medium-duty	—————	Unimproved dirt	.....
U. S. Route		State Route	

PHOENIXVILLE, PA.  
N4007.5—W7530/7.5

1955

PHOTOREVISED 1968 AND 1973

AMS 5864 II NE—SERIES V831

Exhibit 4

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Description of Specific Effects  
of Non-Structural Projects

The specific effects of the non-structural projects are discussed  
in Section 1 of Environmental Form and Attachment 1 hereto.



## Exhibit 5

### Application of Philadelphia Electric Company For Authorization of Consumptive Water Use During Coordinated Operation of Certain Schuylkill River Generating Facilities

#### Report of the Applicant's Engineer Showing the Proposed Plan of Operation of the Project

The resumption of the startup program and approach to full power for the Limerick Generating Station Unit No. 1 is expected to begin following issuance of a full power license by the Nuclear Regulatory Commission. A gradual ascension to full power is planned with tests being conducted at several discrete power levels. The total test program is estimated to require a period of approximately six months, including time for review and approval of test results and for some adjustment and tuning of control systems.

If Limerick is available for operation but its operation would otherwise be prohibited because of existing flow and DO consumptive use restrictions, Limerick would be permitted to operate to the extent that its consumptive uses would be compensated for by equal reductions in the consumptive uses of the Cramby and/or Titus units. Whenever the resultant power generation at Limerick is less than the power which would have been supplied from the Titus and/or Cramby units, the difference in power generation will not be produced by units utilizing consumptive water from the Delaware River Basin.

The test and operating program for Limerick Unit No. 1 would be continuously scheduled for three days in advance, updating the program each day. The consumptive water requirements for each day's operation would then be calculated taking into account the expected meteorological conditions. This calculation would recognize the

availability of the 3.5 mgd available for consumptive uses from the Titus units and the 1.7 mgd from Cromby Unit No. 2. The calculations would determine which, if any, of these units could be scheduled to operate and at what levels. This plan of operation is further discussed in Attachment 1 of this application. The flow and dissolved oxygen constraints imposed in Docket No. 69-210 CP (Final) (Revised) (May 29, 1985) would be inapplicable to this plan of operation.

Exhibit 6

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Map of Any Lands to be Acquired or Occupied

This is a non-structural proposal. There are no lands to be  
acquired.

Exhibit 7

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Estimate of Cost of Completing  
the Proposed Project

This is a non-structural proposal which involves no expenditures  
for its completion.

Exhibit 8

Application of Philadelphia Electric Company  
For Authorization of Consumptive Water Use  
During Coordinated Operation of Certain Schuylkill River  
Generating Facilities

Description of Construction Procedures

This is a non-structural proposal which involves no construction activity.