



# AIR and WATER Pollution Patrol

BROAD AXE, PA.

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

May 29, 1985

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

Docket Nos. 50-352<sup>OL</sup>  
and 50-353

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD  
Christine Kohl, Chairperson

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
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Air and Water Pollution Patrol/Romano appeals the BOARD'S ORDER IMPLEMENTING ITS GRANT OF APPLICANT'S MOTION FOR EXEMPTION FROM REQUIREMENT OF 10CFR 50.47(a) AND (b) FOR A PERIOD OF TIME CONTENTIONS OF GRATERFORD INMATES ARE CONSIDERED BY THE BOARD-- AUTHORIZATION FOR DIRECTOR OF NUCLEAR REACTOR REGULATION TO ISSUE FULL POWER LICENSE.

The degree of carelessness with which the Board glosses over a life and death situation re Limerick is evident in the 5/24/85 Order which calls for full power operation not only of Unit #1 but also Unit #2. The order seems contemptuous of the situation which as of now finds the Unit 2 reactor does not even exist as fact (check Pa. PUC)

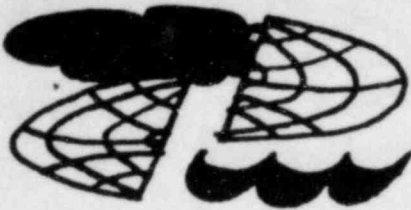
Further, it is apparant that the ALSB 's view of the evacuation plan for Limerick does not include all human beings. The Board would decide which human beings qualify to be considered for inclusion in a plan that might evacuate, for example the prisoners at Graterford. The fact is that there can be more "prisoners" imprisoned in the homes of people being radiated during a General Emergency accident. The Board has barely mentioned "sheltering" as an option to create the impression that the unworkable evacuation plans at Limerick do work. The Board used the term as if it was a protective aid being provided with the studied assurance by the Board to diminish the effect of lethal radiation disseminated in a reactor accident.

The fact is that Margaret Reily, Chief of Pennsylvania's Bureau of Radiation Protection, testifying before the Atomic Safety and Licensing Board, revealed the death-trap nature of "sheltering" when she stated that sheltering might be effective up to 2 hours from inhaled particles. She did not even mention the greater hazard of gamma radiation.

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

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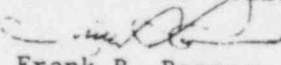
AWPP/Romano's Appeal of Board's Order of May 24, 1985 continued:

The quasi-criminal negligence in the deficiencies in the required "workable" nature of the Limerick evacuation plan, its planners and its Montgomery County Emergency Co-ordinator, Mr. Lindly Bigelow, is evident in the contemptuous answer by Mr. Bigelow, who when questioned by me as to what people do after 2 hours, calmly dismissed the deadly situation by saying, "they have a problem". He said that in the presence of Mr. Pennington, the representative of Mr. Paul Bartle, Chairman of the Montgomery County Board of Commissioners, who himself, on Jan. 15, 1985, before Judge Helen Hoyte's Board stated (Tr.18,614, line 13) he was not aware that a situation could develop where there would be no evacuation (that option was "sheltering").

When asked if sheltering would improve his feeling on the unworkability of evacuation, Mr. Bartle (Tr 18,616, Line 15) said he could not answer to sheltering .

AWPP appeals on the basis that making a decision involving, Units 1 and 2, disqualifies the Order for the obvious reason that Unit 2 is not even constructed and the criminal negligence evident in the "sheltering" death trap.

Respectfully submitted,  
AIR & WATER POLLUTION PATROL

  
Frank R. Romano, Chairman  
61 Forest Ave.  
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I certify the above has been served on the latest Service List.