

The Alliance For A Clean Environment  
P.O. Box 3063  
Stowe, PA 19464

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Rules and Directives

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Chief  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mailstop T-6 D 59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Generic Environmental Impact Statement regarding the application by Exelon to extend the Peach Bottom licenses from 2013 to 2033.

The Alliance For A Clean Environment (ACE) is an area group focused on the harmful environmental health impacts of this region, specifically the Greater Pottstown Area. ACE has been on a quest for answers to the documented severely elevated cancers, elevated infant mortality, and other environmentally related illnesses in the Greater Pottstown Area, as well as Montgomery County. Research and information on human health effects of radiation have led us to believe that radiation emissions from the Limerick Nuclear Power Plant have played a significant role in our health crisis. Enclosed is a summary of some of the statistics.

We have learned that cancer deaths near the Peach Bottom plant rose in Lancaster and York Counties after Units 2 and 3 began operations.

- Increases were noted in radiation-sensitive cancers, including leukemia, breast, thyroid, bone and joint, Hodgkin's disease, and multiple myeloma.
- The number of women diagnosed with breast cancer in Chester, Lancaster, and York Counties nearly doubled between 1985 and 1998.
- Thyroid cancer in the three counties jumped from 26 to 110 between 1985 and 1998. The current rate is 28% above the rate for the U.S. Thyroid cancer is considered one of the more radiation-sensitive cancers.

According to a report by Sandia National Laboratories on November 1, 1982, called Calculation of Reactor Accident Consequences (CRAC-2), the "peak early deaths" from an accident at Peach Bottom are estimated at 72,000, with "peak early injuries" estimated at 45,000.

Up to 1993, Peach Bottom 2 and 3 released 2.21 curies of long-lived radioactivity into the air (19<sup>th</sup> highest of 72 U.S. plants). The total of liquid mixed fission products ranked 14<sup>th</sup> according to the NRC, Radioactive Materials Released from Nuclear Power plants, annual reports.

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Add = D. Wheeler (dxw)

Peach Bottom is obviously an enormous health risk to over a million residents in that region. In fact, Pottstown, an area already hard-hit by high rates of diseases like cancer, is located about 45-50 miles northeast (downwind from Peach Bottom).

- Pottstown residents ingest airborne particles (either breathed or from the local municipal water) routinely escaping from Peach Bottom.
- The Pottstown area gets much of its milk from dairies located in Lancaster and York Counties, near Peach Bottom. Residents, both near Peach Bottom and elsewhere like Pottstown, ingest Peach Bottom fallout in milk.
- Pottstown would also be strongly affected by escaping downwind radiation in case of an accident at Peach Bottom caused by operators. If prevailing winds blow at about 10 miles per hour, harmful radiation would arrive in Pottstown in as little as 5 hours after the accident.
- Pottstown residents would also be harmed in case of a terrorist attack on Peach Bottom. There would be no way to safely evacuate such a heavily populated area.

It is time to close nuclear plants when permits end, not renew their threat to human health for another 20 years, especially those like Peach Bottom that have caused such enormous human health and safety risks already. Common sense suggests that the older the plant, the more the risks.

In fact, it seems that there is no really safe way to dispose of spent fuel rods (waste) from these plants. Transporting them across the country is playing an extremely dangerous game for obvious reasons. Leaving them on site presents enormous additional risks to the surrounding populations, as they are potentially much more harmful than even the radiation escaping from nuclear power plants on a daily basis.

A terrorist attack at a nuclear plant would unleash harmful radiation from two sources: a. the reactor core, and b. the spent fuel rods. There is no way to save the health of those exposed as the result of a terrorist attack or an accident.

It seems both irresponsible and irrational to extend the life of Peach Bottom from 2013 to 2033. ACE urges you to protect public health and safety for the enormous population, which can be adversely affected by what happens at Peach Bottom, including our over-exposed population already facing a health crisis in Pottstown.

**PLEASE DENY THIS PERMIT!**

Sincerely,

*Lewis Cuthbert*  
Dr. Lewis Cuthbert