

July 10, 2002

Mr. Thomas DiBello
Chairman, Board of Supervisors
Limerick Township
646 West Ridge Pike
Limerick, PA 19468

Dear Mr. DiBello:

I am responding to you at the request of the Chairman of the Nuclear Regulatory Commission (NRC) regarding the concerns you expressed in a letter to Senator Arlen Specter dated April 30, 2002. Your concerns focused on the Linfield Energy Center project (hereafter, the project), a 550-megawatt gas-fired power plant planned to be built in close proximity to Limerick Generating Station (LGS) Units 1 and 2. On May 22, 2002, I provided an interim response to you addressing your concerns on the security and safeguards issues related to the project. In addition, the interim response clarified that the NRC does not have regulatory authority over certain other concerns you expressed, for example, alleged violations of Limerick Township ordinances.

From the information currently available about the project, construction of the facility will not begin for approximately 1 year, and will take approximately 2 years to complete. As a result, details necessary to perform a comprehensive review of the impact of the project on LGS Units 1 and 2 are not available at this time. Nevertheless, in a letter dated May 24, 2002, the NRC requested that Exelon Generation Company, LLC, the licensee for LGS (the licensee), perform an assessment of the impact of the project on the safe operation of LGS.

The licensee completed their assessment of the project and reported the results in a letter to the NRC dated June 24, 2002. The licensee noted that a detailed review of the impact of the project on the safe operation of LGS is necessary, but that information necessary to perform such a review, including construction drawings with materials, components and dimensions, are not available at this time. In the interim, the licensee performed a preliminary assessment using currently available information. The licensee considered the requirements in Title 10 of the *Code of Federal Regulations (10 CFR)*, Section 100.10, "Factors to be considered when evaluating sites," Regulatory Guide 1.70.8, "Nearby Industrial, Transportation, and Military Facilities," and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," during this preliminary assessment. The licensee's assessment results did not identify any hazards associated with construction or operation of the project that would impact the safe operation of LGS. The licensee plans to perform a more detailed assessment of the project in accordance with 10 CFR 100.10 after construction drawings are available, and prior to pre-operational testing of the project.

The NRC staff independently evaluated the licensee's assessment of the hazards posed by the project. The staff concluded that, based on currently available information, the Linfield Energy Center does not pose a hazard to the safe operation of LGS, and that the construction activities and pre-operation testing performed in the vicinity of the gas pipeline will be bounded by the

pipeline breach analysis currently documented in the Limerick Units 1 and 2 Updated Final Safety Analysis Report (UFSAR). The NRC staff concurs with the licensee's plan to reassess the impact of the project on LGS as additional information becomes available.

In your letter to Senator Arlen Specter dated April 30, 2002, you identified three issues that were not addressed in my letter to you dated May 22, 2002, that I will address herein. The first issue concerns the location of the proposed project relative to the LGS exclusion zone of 2500 feet from the reactor. The exclusion area for a nuclear power plant is defined as the area surrounding the reactor, in which the licensee has the authority to determine all activities including exclusion or removal of personnel and property from the area. The exclusion area for LGS Units 1 and 2 is 2500 feet from the reactor units. The property within LGS's exclusion area is either owned or controlled by the licensee. The licensee has determined that the property proposed for the project is beyond the LGS exclusion area.

You were also concerned that the project would be located within 75 feet of the community's primary water source, the Perkiomen pipeline, which you state is used to cool the Exelon nuclear reactor. The Perkiomen pipeline only supplies water to LGS and is not a source of water for the community. With respect to LGS, the pipeline serves no safety-related function. The purpose of the pipeline is to replenish water in the cooling tower due to evaporation. No reliance on this water source is assumed in any safety analysis approved by the NRC. As a result, loss of this water source will have no impact on the safe operation of the LGS nuclear reactors.

Finally, you were concerned that the project would be constructed adjacent to two major natural gas pipelines, the Perkiomen pipeline, and LGS's nuclear reactors, and that the proximity of these four entities will constitute a potentially devastating terrorist target. The NRC staff evaluated the interrelationship of these facilities and pipelines as they relate to NRC-regulated activities for LGS and came to the following conclusions. As stated in the previous paragraph, the loss of the Perkiomen pipeline results in no impact on the safe operation of LGS. In addition, the hazard analysis completed by the licensee determined that the project does not have an impact on the safe operation of LGS. The natural gas pipelines adjacent to LGS and the proposed project have existed since the initial construction of LGS and were previously evaluated by the licensee for explosion, missile generation, and flammable gas clouds. The results of the evaluation were found to be within the requirements of 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," and are documented in the LGS Units 1 and 2 UFSAR. The NRC staff has no basis to determine whether the location of the proposed project will enhance the site as a potential terrorist target. However, based on the information currently available, the NRC staff has concluded that the proximity of the Linfield Energy Center, the natural gas pipelines, and the Perkiomen pipeline to LGS will not have an adverse affect on the safe operation of the LGS nuclear reactors.

T. DiBello

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The NRC staff will continue to monitor the progress of the Linfield Energy Center project and ensure appropriate actions are taken should a future hazard analysis determine that the project has an adverse impact on the safe operation of LGS Units 1 and 2. I trust that this information is useful to you in addressing your concerns about the proposed construction and operation of the Linfield Energy Center.

Sincerely,

/RA by JZimmerman for SRichards/

Stuart A. Richards, Director
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

cc: The Honorable Mary Ann Dailey
Pennsylvania House of Representatives
House Box 202020
South Office Building
Room 408
Harrisburg, PA 17120-2020

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Stuart A. Richards, Director
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

cc: The Honorable Mary Ann Dailey
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DISTRIBUTION:

Docket Nos. 50-352 and 50-353

PUBLIC	PD1-2 R/F	BPlatchek, RI	OGC
WTravers	WKane	CPaperiello	Burns/Cyr
PNorry	JCraig	OPA	HMiller, RI
SCollins/JJohnson	SRichards	OCA	JDavis, NSIR
BSheron/KJohnson	CGratton	GImbro	
WBorchardt	MO'Brien	RZimmerman, NSIR	
JClifford	LCox	TWalker, RI	
MShanbaky	JZwolinski	KGibson	

SECY (SECY# LTR-02-0324)

PACKAGE NUMBER: ML021610409
ACCESSION NUMBER: ML021610389

INCOMING NUMBER: ML021260429
*See previous concurrence

OFFICE	PDI-2:PM	PDI-2:LA	NSIR	DIPM/IEHB*	DE/EMEB*	PDI-2:SC	PDI:D
NAME	CGratton	MO'Brien	JDavis	KGibson	Elmbro	JZimmerman for JClifford	JZimmerman for SRichards
DATE	7-2-02	7/2/02	7/9/02	7/1/02	7/2/02	7/10/02	7/10/02

OFFICIAL RECORD COPY

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