The Alliance For A Clean Environment
1189 Foxview Road Pottstown, PA 19465
(610) 326-6433

December 22, 2007

Richard Barkley, Technical Communications Assistant
Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Barkley,

The Alliance For A Clean Environment (ACE) is writing to the Nuclear Regulatory Commission (NRC) regarding our concern about a trash-to-ethanol plant being proposed by Limerick Supervisors that would be just over 1 mile from Limerick Nuclear Power Plant. While we realize this is not something that NRC normally addresses, we believe it has a direct bearing on Limerick Nuclear Power Plant viability and safety.

ACE's initial investigation suggests several serious concerns related to Limerick Nuclear Power Plant should prohibit a trash-to-ethanol plant from being in that location. Among them are water needs, security concerns, and the potential for ethanol explosions and fires too close to Limerick Nuclear Power Plant.

Potential Water Shortages

Limerick Nuclear Power Plant requires enormous amounts of water every day to operate. Ethanol plants also require enormous amounts of water every day to operate. It takes 3 to 4 gallons of water to produce 1 gallon of ethanol. The trash-to-ethanol plant would be competing with the nuclear power plant for use of available water from the Schuylkill River. This is a grave concern given the facts, especially in times of drought.

Because of residents' concerns over water shortages similar to those experienced in Georgia and other places across our nation, ACE took pictures of the Schuylkill River in October, 2007. We found extremely low flows to be alarming. Where you once needed a boat to cross the Schuylkill River, it was now so shallow you could easily walk across the river. Some sections on both sides of the river were completely dried up.

There is cause for concern about the Schuylkill River continuing to be able to sustain Limerick Nuclear Power Plant's water requirements and still provide water for over 1 million people from Pottstown to Philadelphia. Before Limerick Nuclear Power Plant was built, Exelon requested to be permitted to withdraw 69 million gallons of water per day to operate the nuclear plant. Obviously, there was concern about an ample water supply in the Schuylkill River even then. Exelon was permitted to supplement the Schuylkill River water supply with 1 billion gallons of water per year from the Delaware River. At some point, Exelon discharged 1 billion gallons of water per year into the Schuylkill River from the Tamaqua Reservoir. Currently, Exelon is dumping 1 billion gallons of contaminated mine water per year into the headwaters of the Schuylkill River from the Wadesville Mine to ensure enough water for Limerick Nuclear Power Plant. Exelon is in the process of looking for additional mine pool water.

A trash-to-ethanol plant would be competing with Limerick Nuclear Power Plant for water from the Schuylkill River. The trash-to-ethanol plant would result in an unnecessary strain on the water supply needed for Limerick Nuclear Power Plant and the public. That is clearly both unsustainable and unacceptable. The nuclear power plant will continue to need extraordinary amounts of water until and unless it closes. What would happen if there is not enough water for Limerick Nuclear Power Plant operations? Wouldn't the consequences be either shut down or disaster?

The amount of actual water needed for this proposed trash-to-ethanol plant is unknown and would be based only on assumptions and estimates. There are no trash-to-ethanol plants up and running in the world, much less running for enough time to accurately establish the amount of water needed for this plant. The trash-to-ethanol plant's water needs could be far higher than requested in a permit, as evidenced with air pollution permits for corn ethanol plants.

Clearly, precaution and prevention are imperative.

- **ACE encourages NRC to consider the consequences of water shortages and speak up now before this becomes a very serious problem that cannot be solved.**

INCREASED SECURITY CONCERNS

The proposed trash-to-ethanol plant would result in increased security threats at Limerick Nuclear Power Plant as a result of vastly increased industrial rail traffic through the nuclear power plant property.

3,000 tons of waste would be transported daily into Limerick, likely by rail, much of it through Limerick Nuclear Power Plant property. It would take nearly 700 trash trucks in and nearly 700 trash trucks out of Limerick every day.

1. Hundreds of rail cars would be transporting wastes into Limerick every day. Hundreds of empty cars would go out every day. Vast numbers of rail cars would be stored on the tracks waiting to be processed every day. All of this presents inherent risks on the railroad tracks running directly through the nuclear power plant property.

2. Anything can be hidden with massive amounts of waste, including explosives, which could be ignited as the train goes through the nuclear power plant property. This could provide a diversion and opportunity for an attack at the nuclear plant by terrorists.

3. Trains frequently derail and overturn. This would create an environmentally dangerous event. Cleanup on Exelon's property would require many workers. Would clean-up workers all be properly screened? Who would pay for additional screening and associated background check?

4. Would NRC require Exelon to pay for extra security guards during clean-up events? If not, who would pay or wouldn't there be any extra guards?

Ethanol Explosions, Fires, and Spills Related To Close Proximity To Limerick Nuclear Power Plant.

There is a long list of news articles about ethanol explosions, fires, and spills throughout our nation. The proposed trash-to-ethanol plant would present extraordinary threats and challenges related to an ethanol explosion or fire either at the ethanol plant or on the rail line transporting ethanol out from the ethanol plant in Limerick. Major Concerns:

1. Limerick Nuclear Power Plant is just over 1 mile away from the proposed trash-to-ethanol plant in Limerick. Ethanol is highly explosive. Ethanol explosions have gone over 100 feet in the air. Ethanol explosions have occurred on site at ethanol plants requiring vast numbers of fire companies and responders, including from a lightning strike. This could have major implications just over 1 mile from Limerick Nuclear Power Plant.

2. Ethanol would be transported in massive amounts on the rail line right through Limerick Nuclear Power Plant property and stored on the rail line waiting for transport. There have been disastrous train derailments throughout the nation involving ethanol. Some have required evacuation far beyond 1 mile. What dangerous impacts would result if an ethanol derailment, explosion, and fire occurred on the Limerick Nuclear Power Plant property or anywhere close to it?

3. Ethanol fires are extremely hard to extinguish, since water cannot be used. Some ethanol fires have lasted for several days. What about the impacts of intense heat from long burning fires so close to Limerick Nuclear Power Plant, especially if that happened in the heat of the summer? What impacts would that have on stored fuel rods that depend on air intakes into the casks for cooling? What impacts could occur from smoke entering air intakes at Limerick Nuclear Power Plant?

Precaution and prevention are crucial for many reasons. The proposed trash-to-ethanol plant in Limerick, just over 1 mile from Limerick Nuclear Power Plant, will clearly bring unnecessary and unacceptable increased threats to the safety and security of Limerick Nuclear Power Plant.

ACE believes it is incumbent on NRC to protect Limerick Nuclear Power Plant's interests in this matter, as well as the public's interests related to the increased potential for a disaster at Limerick Nuclear Power Plant. We urge NRC to speak out now in opposition to a proposed trash-to-ethanol plant in Limerick in this location that would jeopardize the operation at Limerick Nuclear Power Plant.

We look forward to a response and a copy of any and all correspondence NRC sends Limerick Supervisors, federal officials, or anyone who can stop this threat to the nuclear plant.

Sincerely,

Lewis Cuthbert

Dr. Lewis Cuthbert
ACE President

Cc: Senator Casey
Senator Specter
Congressman Gerlach
Congressman Sestak
Pottstown Mercury