

May 15, 2009

Mr. Sohan Garg
Chief, Permits Section
Water Management Program
Southeast Section
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Exelon Generation Co. LLC 23-3064219
Bradshaw Reservoir ID 45224
Limerick Generating Station, Units 1 & 2

Subject: Comments on Draft Bradshaw Reservoir NPDES Permit PA0052221

Reference: PADEP Letter dated 4/8/09.

Dear Mr. Garg:

The subject draft permit has been reviewed, and the following comments are being submitted for consideration:

1. Page 15, Part C – additional requirements, Footnote (4) states that "During the month of May through September, grab samples shall be collected for 5 consecutive days." For the purpose of reporting analysis results for dissolved oxygen, fecal coliform, and pH, this is interpreted as a requirement to use five consecutive samples, not necessarily samples taken on five consecutive days. Please provide clarification if this is not the intent of the footnote.
2. The current permit requires annual sampling for thirteen parameters, consisting primarily of metals. In comparison, the draft permit replaces these, with the exception of cyanide and phenolics, with nutrient based parameters on a quarterly sampling frequency.

The only treatment process performed at the Water Processing Facility along the East Branch Transmission Main is disinfection/oxygenation via ozone injection. Delaware River water introduced at the Point Pleasant Pumping Station is pumped to the East Branch Perkiomen Creek, enroute to Limerick Generating Station, without the addition of any chemicals or nutrient based material. Consequently, removal of sampling requirements for parameters other than fecal coliform, dissolved oxygen, and pH is requested.

Should you have any questions concerning any of these comments, please contact Mr. Robert Alejnikov at (610) 718-2513. It is also requested that a copy of the Response to Comments

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Document be forwarded to Limerick Generating Station when complete. Thank you for your attention and cooperation regarding this matter.

Sincerely,



Edward W. Callan
Plant Manager - LGS
Exelon Generation Company, LLC

cc: S. Collins, Region 1 Administrator, USNRC
S. Hansell, Resident Inspector, USNRC
Document Control Desk, USNRC, Wash. DC

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