

The Alliance For A Clean Environment
1189 Foxview Road
Pottstown, PA 19465

April 11, 2011

Paul Krohn, NRC Branch Chief
Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Mr. Krohn,

The disaster in Japan caused nuclear reactors to leak radiation at dangerous levels. That nuclear disaster highlights the risks millions of residents face in the event of a similar catastrophe at Limerick Nuclear Power Plant.

The Nuclear Regulatory Commission (NRC) identifies Limerick Nuclear Plant as 3rd highest risk of catastrophic failure due to an earthquake out of 104 in the U.S. But an earthquake is just one of several things that cause a Limerick nuclear disaster.

The Japan nuclear disaster was caused by loss of cooling water which could also be caused by:

- ✓ Loss of power - Limerick back-up power is inadequate (only hours, not days).
- ✓ Fire - Limerick is not following the safest fire safety regulations.
- ✓ Terrorist Attack - Limerick is not required to guard against a 9/11 type terrorist attack with a plane or missile.
- ✓ Accidents Happen - Through Mechanical Breakdown and Human Error - i.e. Chernobyl, TMI

NRC cannot guarantee that a disaster will not occur at Limerick. Given the catastrophic consequences of a Limerick disaster, NRC's "confidence" and "expectations" that Limerick Nuclear Plant is "safe enough" are no longer good enough. Prevention and Precaution are imperative. We need NRC to:

1. Require back-up power for several days.
2. Require the safest, most protective fire safety procedures.
3. Stop allowing Exelon to remove fuel rods from the pools before the required 5 years.
4. Require Exelon to guard against a missile or air strike by plane causing fire from fuel.
5. Require more on site water storage. There is no ocean to keep Limerick's fuel rods and reactor cooled down for days or weeks. The only body of water near Limerick is the drinking water source for almost 2 million people.

We must also have an expanded evacuation zone in the event the worst happens. Americans in Japan within 50 miles of the Fukushima nuclear reactor were advised to evacuate. It is obvious that a 10-mile evacuation zone around Limerick Nuclear Plant was a political decision that is woefully inadequate. A 2006 report compiled from NRC records shows that Limerick is one of the nuclear plants with substandard containment, which means more radiation would be released. Being a GE Mark 2 design, it is even similar to the reactors in Japan.

Nearly 8 million people live within 50 miles of Limerick Nuclear Plant, but there are no plans for a 50-mile evacuation. Philadelphia is just 21 miles away. Is such an evacuation even conceivable?

Our entire region's residents are already continuously exposed to Limerick Nuclear Plant's routine radiation emissions and now Japan's radioactive fallout. Logic tells us that the additive, cumulative, and synergistic impacts from the broad range of radionuclides from all routes of exposure to which we are exposed could be harmful, especially to the most vulnerable among us, the children, sick, and elderly.

It is deceptive and even shameful to suggest we are safe from Limerick or Japan's low-level radiation because we are continuously exposed to background radiation, planes, bananas, etc. Those are additive doses, which make us more at risk from Limerick and Japan's so-called low levels of radiation, not less.

The National Academy of Sciences Report, as well as Physicians for Responsibility, say there is no safe level of exposure to radiation. Immediately after the Japan disaster started, NRC simply raised permissible radiation dose limits from 360 millirems per year to 620 millirems per year, legally sanctioning increased radiating harm. Limits were previously raised after Chernobyl from 80-100 millirems per year to 360 millirems per year. Obviously, permissible does not mean safe. It would be far more helpful if NRC would work on programs to teach people ways they could reduce harmful impacts from these unacceptable radiation exposures.

NRC has a responsibility to keep our beautiful region from becoming permanently uninhabitable, with its soil, vegetation, and water supplies contaminated for generations to come. We urge immediate action on the safety procedures listed above to protect our homes and families. Increased prevention and precaution are imperative.

Respectfully,

Dr. Lewis Cuthbert
ACE President

CC: Senator Bob Casey
Senator Pat Toomey
Congressman James Gerlach
Congressman Charles Dent
Governor Tom Corbett
PA Senator John Rafferty
PA Senator Andrew Dinniman
Philadelphia Mayor Nutter
Representative Tom Quigley
Representative Mike Vereb
Representative Tim Hennessey
Montgomery County Commissioners
Chester County Commissioners
Pottstown Borough Council
Phoenixville Borough Council
Royersford Borough Council
Limerick Township Supervisors
East Coventry Supervisors
East Vincent Supervisors
Upper Providence Supervisors
New Hanover Supervisors
Perkiomen Supervisors
North Coventry Supervisors
Lower Pottsgrove Commissioners
Upper Pottsgrove Commissioners
West Pottsgrove Commissioners