

EDO Principal Correspondence Control

FROM: DUE: 09/22/11

EDO CONTROL: G20110636
DOC DT: 08/23/11
FINAL REPLY:

Representative Jim Gerlach

TO:

Belmore, OCA

FOR SIGNATURE OF :

** GRN **

CRC NO: 11-0503

Borchardt, EDO

DESC:

ROUTING:

Drinking Water Threat - Limerick Nuclear Power
Plant (EDATS: SECY-2011-0485)

Borchardt
Weber
Virgilio
Ash
Mamish
OGC/GC
Leeds, NRR
Dean, RI
Burns, OGC
Schmidt, OCA

DATE: 08/30/11

ASSIGNED TO:

CONTACT:

EDO

Rihm

SPECIAL INSTRUCTIONS OR REMARKS:

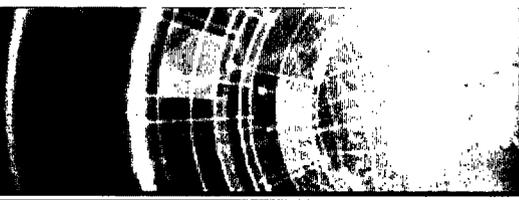
Please prepare response in accordance with OEDO
Notice 2009-0441-02 (ML093290179). NRR and
Region I to provide input to Roger Rihm, OEDO, if
required. Roger Rihm will coordinate response with
OGC and OCA.

Template: SECY-017

E-RIDS: SECY-01

EDATS

Electronic Document and Action Tracking System



EDATS Number: SECY-2011-0485

Source: SECY

General Information

Assigned To: OEDO

OEDO Due Date: 9/22/2011 11:00 PM

Other Assignees:

SECY Due Date: 9/26/2011 11:00 PM

Subject: Drinking Water Threat - Limerick Nuclear Power Plant

Description:

CC Routing: NRR; RegionI; OGC; OCA

ADAMS Accession Numbers - Incoming: NONE

Response/Package: NONE

Other Information

Cross Reference Number: G20110636, LTR-11-0503

Staff Initiated: NO

Related Task:

Recurring Item: NO

File Routing: EDATS

Agency Lesson Learned: NO

OEDO Monthly Report Item: NO

Process Information

Action Type: Letter

Priority: Medium

Signature Level: EDO

Sensitivity: None

Urgency: NO

Approval Level: No Approval Required

OEDO Concurrence: NO

OCM Concurrence: NO

OCA Concurrence: NO

Special Instructions: Please prepare response in accordance with OEDO Notice 2009-0441-02 (ML093290179). NRR and Region I to provide input to Roger Rihm, OEDO, if required. Roger Rihm will coordinate response with OGC and OCA.

Document Information

Originator Name: Representative Jim Gerlach

Date of Incoming: 8/23/2011

Originating Organization: Congress

Document Received by SECY Date: 8/26/2011

Addressee: Nancy Belmore, OCA

Date Response Requested by Originator: NONE

Incoming Task Received: E-mail

Belmore, Nancy

From: Savett, Scott [Scott.Savett@mail.house.gov]
Sent: Tuesday, August 23, 2011 9:19 AM
To: Belmore, Nancy
Subject: From Congressman Gerlach's Office

Nancy,

It was a pleasure speaking with you.

Can we get a written response to the concerns expressed below?

Thanks for your help!!!

Scott Savett
Office of Congressman Jim Gerlach
Work #: 610-409-2780
Fax #: 610-409-7988
Email: Scott.Savett@mail.house.gov
To sign up for the Congressman's E-Newsletter [click here](#)

From: aceactivists@comcast.net [mailto:aceactivists@comcast.net]
Sent: Monday, August 15, 2011 11:17 AM
To: Savett, Scott
Subject: Drinking Water Threat - Meeting Requested

Scott,

We reviewed sevcearl Limerick's permits since we met with you. Threats to drinking water are so much worse than we knew previously and are about to increase.

We could come to your office, or you could come to ours if Congressman Gerlach is willing to let you meet with us.

Donna Cuthbert

August 15, 2011

To: **Congressman Gerlach**

From: **Dr. Lewis Cuthbert, President**
Alliance For A Clean Environment
1189 Foxview Road
Pottstown, PA 19465
aceactivists@comcast.net

Re: **Meeting Requested Related To:**
Limerick Nuclear Plant's Increasing Threats to the Schuylkill River, The Drinking Water Source for Almost Two Million People, From Pottstown To Philadelphia

This is about Limerick Nuclear Plant's adverse impacts on the long-term viability of the Schuylkill River as a safe, ample drinking water source for almost two million people from Pottstown to Philadelphia.

Our review of Limerick Nuclear Plant's NPDES permit confirms that Limerick Nuclear Plant discharges radioactive and heated wastewater into the Schuylkill River 24 hours a day, 365 days a year. This has been going on since Limerick started operating in 1985.

Limerick's cooling towers also deplete the Schuylkill River by billions of gallons each year. Major depletion has occurred each year since Limerick Nuclear Plant started operating in 1985, even with supplementation, and will continue as long as Limerick operates.

To save money, since 2003, to supplement the flow for Limerick operations, Exelon pumped unfiltered contaminated mine pit water into the headwaters of the Schuylkill River. Exelon is currently asking the Delaware River Basin Commission (DRBC), a tri-state agency responsible to protect water, for approval to pump more mine pit waters from additional mines into the Schuylkill River unfiltered.

Exelon is also asking DRBC to eliminate temperature restrictions in the Schuylkill River, lower flow restrictions, reduce monitoring, and eliminate future public participation.

Shamefully, instead of filtering Limerick's radioactive, heated discharges into this source of drinking water, Exelon is asking DEP to allow Limerick's NPDES pollution limit to be increased to four times Safe Drinking Water Standards for Total Dissolved Solids (TDS). TDS can transport radionuclides and other dangerous toxics involved in Limerick's operations into the river. Limerick's current TDS limit is double Safe Drinking Water Standards. Approval of Exelon's requests would further jeopardize public health and increase water treatment costs for public water systems from Limerick to Philadelphia.

To make matters worse, Exelon is planning Uprates and Relicensing, which would both require more Schuylkill River water use and result in even more radioactive and otherwise toxic wastewater discharges into the Schuylkill River, for 20 additional years after 2029, until 2049. A DEP publication confirms that by 1999, the Schuylkill River already reached record low levels. How many more years can the river continue to sustain billions of gallons of depletion each year by Limerick Nuclear Plant?

Lower flows will concentrate the on-going and increasing contamination. Synergistic, additive, and cumulative radiation damage is unknown. Some radionuclides discharged with Limerick Nuclear Plant's wastewater into the Schuylkill River have very long half-lives. Elevated radiation levels have already been detected in Philadelphia water.

Limerick Nuclear Plant's unprecedented assault on drinking water for almost two million people from Pottstown to Philadelphia can and must be avoided. Increasingly lower flows, with ever-increasing radioactive and other dangerous toxic contamination, and even less safeguards are clearly a recipe for a drinking water disaster.

What happens if drinking water from the Schuylkill River becomes too contaminated to be safe to consume?

- Significant depletion will continue every year from Limerick's cooling towers, as long as Limerick operates.
- Contamination will also increase each year from Limerick's dangerous radioactive and other toxic discharges into the river, plus from adding contaminated mine pit waters into the river to supplement the flow.

There is a dangerous push to reduce and/or eliminate even the weak regulations and oversight that now exist. Consequences of reduced flows with added contamination, and dangerously high river temperatures from Limerick Nuclear Plant operations will go undetected and/or unaddressed, seriously jeopardizing the ecosystem, wildlife, and all who use the river for recreation, as well as for drinking water.

Current economic conditions and stressed municipal budgets both suggest water treatment systems may be unable to pay increased costs for filtration, treatment, and/or new equipment needed to deal with ever-increasing threats to health and damage to equipment from increases in discharges due to Limerick operations. Impacted water treatment systems include; Pottstown, Phoenixville, Aqua PA, American Water Works, and Philadelphia.

- **Exelon must pay to filter dangerous discharges associated with Limerick Nuclear Plant operations OR CLOSE, instead of increasing threats while passing the financial burden and health risks onto the public.**

- **Limerick's energy production can and should be replaced with energy that won't continue to further jeopardize the drinking water for almost two million people.**

History suggests DRBC and DEP will approve all of Exelon's requests, regardless of increased costs to the public, increased threats to public health, or increased damage to the river and its ecosystems. Approvals only help Exelon avoid responsible actions and related costs.

- ✓ DRBC repeatedly failed to take action or provide adequate responses to questions and concerns. The attached letter summarizes our frustration.
- ✓ DEP failed to respond to serious questions and concerns raised about Limerick's NPDES permit. Our attached letter to DEP explains the serious nature of the problems.

These serious issues need to be discussed and addressed before DEP and DRBC allow a bad situation to get worse. To deny or ignore obvious evidence of serious threats and harms does not make them disappear, but instead contribute to an eventual drinking water disaster.

We believe Limerick's threats to public drinking water from Pottstown to Philadelphia can and must be reduced, but it has become increasingly evident that will not happen without a full understanding and intervention by elected officials.

- **PLEASE give us up to one hour to provide documentation and discuss the issues outlined here and in the attachments. We ask to meet:**
 - Any time between 11:00 A.M. and 2:00 P.M.
 - Any day the week of September 19, 2011

As soon as possible, we would appreciate an e-mail response related to a meeting date and time at aceactivists@comcast.net.