

October 8, 2011

U.S. NRC  
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**Subject: Deny Limerick License Renewal - NRC I.D. Docket 2011-0166**

Dear Ms. Regner:

I urge NRC to deny Exelon's request to renew Limerick Nuclear Plant's license for 20 years past its current 2024 and 2029 expiration dates. Limerick Nuclear Plant must be closed, not relicensed, for many valid reasons. Approval for Limerick Nuclear Plant to be relicensed until 2049 would be reckless and would show blatant disregard for the health and safety of the public. There is more than sufficient evidence of harms and threats to justify closing Limerick. There are too many things beyond NRC's control that could lead to a catastrophic meltdown.

Limerick is 3rd on the earthquake risk list. It is too dangerous to keep Limerick operating. Earthquakes and other natural disasters are more frequent and stronger. Underground pipes and cables can shake and break, then lead to loss of power, loss of cooling water, and meltdown. Limerick's substandard containment flaw means more radiation would be released.

Everything has a life expectancy. Limerick's was 40 years. The older any facility gets, the more likely mechanical breakdowns and equipment failure will occur. When it's a nuclear plant, meltdown could result from corroding, deteriorating, and aging pipes, cables, and equipment. Miles of difficult to inspect corroding, deteriorating underground buried pipes and cables are a major concern. Signs of mechanical damage and breakdown already exist - three unplanned shutdowns June 2011, preceded by many others since 2007, one with loss of cooling water. While some parts can be replaced, by the nuclear industry's own admission, some equipment is too big and expensive to replace.

Terrorists have made it clear they intend to attack nuclear plants. Exelon has refused to pay to guard Limerick against a 9/11 type terrorist attack with a plane or missile, even though the most deadly targets (Limerick's fuel pools) are vulnerable to such attacks. Limerick is a similar design to nuclear plants in Japan that are melting down and exploding. NRC's own report from 2000 shows people 500 miles away could be impacted by an accident or attack on such fuel pools. Deadly radioactive spent fuel rods are jam packed into Limerick's vulnerable fuel pools five stories high. Cyber attacks, now declared an act of war, could wipe out systems that could lead to meltdown. Hackers have penetrated the Pentagon and other well guarded systems. Exelon's new plan for cyber attacks gives us little comfort.

No NRC policy, review, or report can make Limerick failsafe from a catastrophic meltdown. Over eight million people live within 50 miles of Limerick Nuclear Plant. Safe

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evacuation is merely an illusion, even within the seriously flawed and fundamentally inadequate current 10-mile evacuation plan. Until Limerick closes, NRC should expand the evacuation plan (minimally to 50 miles) and be sure there are enough shelters and supplies available to accommodate the over 8 million people within the 50 miles. Exelon should pay for the supplies. Unless this is done, Limerick should be closed as soon as possible.

But, it doesn't take an accident or disaster for Limerick to poison the region's residents with radiation. Radiation from Limerick's routine and accidental emissions alone for the past 26 years is reason enough to deny Exelon's request. It's not credible for NRC to claim continuous radiation levels are safe for me and my family when there is no safe level of exposure according to the National Academy of Sciences and Physicians for Social Responsibility.

NRC is failing to acknowledge obvious health harms from Limerick's continuous additive, cumulative, and synergistic radiation releases which get into our water, food, soil, vegetation, milk, and our bodies. NRC has no idea what health harms some of the region's residents experienced from Limerick Nuclear Plant. NRC never did any radiation monitoring or testing at Limerick. Evidence shows testing done by Exelon and DEP cannot be trusted.

Exposure to radiation is known to cause cancer. It should be obvious to NRC that Limerick played a major role in our tragic, well documented cancer crisis after Limerick started operating in the mid 1980s to the late 1990s. Four cancer studies based on PA Cancer Registry and CDC data showed skyrocketing rates for several cancers far higher than national and state averages, especially in children. Our children had the highest levels of Strontium-90 radiation in their baby teeth of any group near any nuclear plant studied. Limerick Nuclear Plant released SR-90 into our air and water that got into the milk, vegetation, and food since Limerick started operating. Thyroid cancer increased by 128% from 1985 to 1997. Other cancers rose dramatically as well.

Limerick Nuclear Plant is slowly destroying the vital public drinking water source for almost two million people from Pottstown to Philadelphia. Radioactive and heated wastewater is discharged by Limerick Nuclear Plant into the Schuylkill River 24/7. Limerick's cooling towers are causing significant depletion. To supplement the flow to operate Limerick, Exelon wants to pump more contaminated mine water into the river. No one can credibly assure us if drinking water will remain safe even until 2029 when Limerick's original license expires.

Limerick contaminated groundwater. Radioactive leaks and spills over the years were never cleaned up. More radioactive leaks can be expected in the future through earthquakes, deterioration, and corrosion. Many residential wells are very close to Limerick.

It would be both unethical and immoral for NRC to approve Exelon's requested license extensions for Limerick Nuclear Power Plant. All of the unprecedented harms, threats, and risks from Limerick Nuclear Plant will increase if NRC approves an additional 20 year Limerick license extension, until 2049. Limerick Nuclear Plant must be closed by 2029.

Sincerely,

