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**Docket:** NRC-2011-0166

Notice of Receipt and Availability of Application for Renewal of Limerick Generating Station, Units 1 and 2 Facility Operating License

**Comment On:** NRC-2011-0166-0049

Exelon Generation Company, LLC, License Renewal of Nuclear Plants and Public Meetings for the License Renewal of Limerick Generating Station, Units 1 and 2

**Document:** NRC-2011-0166-DRAFT-0047

Comment on FR Doc # 2013-10788

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78 FR 26663

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## General Comment

To the Commissioners and Chairman,

These are comments specific to the licensing of the of the Limerick Generating Station for an added 40 years. My interest is that I live in Philadelphia and do business in the area of LGS. In an accident scenario, I shall have to give aide and succor to escapees from the emergency planning zone.

My principle problems with the extension of this license concern the newly discovered facts which show that the original basis for allowing nuclear power are just plain wrong or used in an inappropriate manner. These original basis include , but are not limited to, probable risk assessment, prediction of health effects, and design of nuclear power plants.

1. P. R. A. Probable risk assessments are used to emphasize the likelihood that the plant will survive for a specific period. PRA demand the conclusion that enough plants operating long enough will suffer a devastating and 'beyond design basis accident.' The public does not see the dark side of the PRA analysis!

The accidents at TMI#2 and Chernobyl and Pleasantville (AKA Fukushima) demonstrate the above.

2. The recent discoveries concerning epigenetics put the past predictions of health effects on future generations into grave doubt. The predictions based on Mendel's observations do not nor were meant to predict neotany due to genes being switched on or off by uncontrolled radiation.

3. The design of nuclear power plants is deficient on its face.

A. Nuclear power plants were originally designed to store 40 years of spent fuel on site! Due to low burn up (fuel produced less energy that originally predicted before failure), spent fuel pools could not meet the storage need for 'low burn up fuel failures.'

B. In 1979 the commenter won a 'pro se' contention on 'filters' ('Lewis Contention') at the NRC ASLB TMI #1 Restart Hearings which required the licensee to upgrade its filters. The licensee agreed, and commenter heard nothing.

SUNSI Review Complete

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