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License Renewal EIS
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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING TO DISCUSS THE DRAFT SUPPLEMENTAL
ENVIRONMENT IMPACT STATEMENT FOR THE LICENSE RENEWAL
OF LIMERICK GENERATING STATION

+ + + + +

AFTERNOON SESSION

+ + + + +

THURSDAY

MAY 23, 2013

+ + + + +

The Meeting convened in the Sunnybrook
Ballroom, 50 Sunnybrook Road, Pottstown, Pennsylvania,
at 2:00 p.m., Richard Barkley, Facilitator, presiding.

PRESENT

RICHARD BARKLEY, Facilitator

LESLIE PERKINS

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P-R-O-C-E-E-D-I-N-G-S

2:10 P.M.

FACILITATOR BARKLEY: Good afternoon.

Can everyone hear me okay? My name is Richard Barkley. I'm the meeting facilitator for this meeting. This is related to the Limerick license renewal and Environmental Impact Statement.

I actually had a similar meeting when the EIS was initially being prepared back about 20 or 21 months ago. So many of you may know me.

What I'd like to do is just go through a couple of slides here to talk about how the meeting will be conducted. We'll have a short presentation by the staff. Then we'll move into questions. If you want to ask a question, I would have asked that you filled in a yellow card that was up front. There are 13 people at this point in time signed up. If anybody else wants to sign up, please let me know and we'll work through that. I would hope you would limit your remarks to roughly five minutes. I have some flexibility, but if you divide the time up among 13 speakers that's roughly what we have.

And again, I think I've covered most of these. When I call a speaker, I'll actually mention the next two speakers in line so that you have a chance

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1 to prepare and promptly get up here to the microphone
2 to speak from here. If you have some problem that you
3 have a challenge getting to this location, I can bring
4 the microphone to you. I'll gladly accommodate that.

5 I would ask that you silence your cell
6 phones at this time so we don't get calls during the
7 meeting. You will see me juggling a cell phone
8 personally during this meeting because I use it as a
9 timer as we go through, but I'm not accepting calls
10 along the way.

11 Let's go to the next slide.

12 We would ask that when you're up here you
13 speak very clearly into the microphone. It is being
14 transcribed, so it's important that we speak with
15 clarity and please, when you first come up here, mention
16 your name and if you have an organizational affiliation
17 that would be great, so that he can have that in his
18 notes.

19 I would ask that you do not interrupt the
20 speakers who are at the microphone. When I did this
21 meeting 20 or 21 months ago, the audience was excellent.
22 I hope we have the same exchange as we did last time.

23 If you have any problems or concerns with
24 the way this meeting is being conducted, there's an
25 issue with time, there's an issue with the order in

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1 which I call people because you need to go earlier,
2 please come see me. I'll be sitting over here to the
3 side.

4 Yes.

5 MR. PORTZLINE: You had mentioned if we
6 have any questions. So I'm asking if we ask a question
7 can we expect an answer from either the company or
8 possibly the Pennsylvania Department of Environment
9 and Protection.

10 FACILITATOR BARKLEY: With regard to
11 that, there are company representatives present here
12 and I will not put them on the spot unless they agree
13 to address an issue. I would like to have the questions
14 at the end of the comments, so if you ask a question,
15 I would like you to finish your remarks and your
16 comments, then we'll address that question along the
17 way.

18 If someone from the State of Pennsylvania
19 can address a particular question related to some
20 aspect that they regulate versus what we do, I won't
21 put them on the spot, but if they're willing to
22 volunteer, that's fine. That's typically the way it's
23 been done at other meetings. Thank you.

24 Again, if there's no other questions, one
25 thing we do have a camera crew here. This is from a

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1 Japanese TV station and they are actually doing a
2 documentary related to nuclear power, so you will be
3 on film along the way. This is a public meeting and
4 they have discussed this in advance with us. If you
5 have some problem with being on camera, please let me
6 know as well. Thank you.

7 MS. PERKINS: Thank you, Richard, and
8 thank you all for taking the time to come to this
9 meeting. My name is Leslie Perkins and I am the
10 Environmental Project Manager for the Environmental
11 Review of Limerick Generating
12 Station.

13 I hope the information we provide at this
14 presentation will help you to understand what we've
15 done so far and the role you can play in helping us make
16 sure that our Final Environmental Impact Statement is
17 accurate and complete. I would like to emphasize that
18 the Environmental Review is not yet complete.

19 Next slide.

20 I'd like to start off briefly by going over
21 the agenda for today's presentation. I will discuss
22 the NRC's regulatory role, the preliminary findings of
23 our Environmental Review which addresses the impacts
24 associated with extending the operating licenses of the
25 Limerick Generating Station for an additional 20 years.

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1 I will present the current schedule for the remainder
2 of the Environmental Review and how you can submit
3 comments outside this meeting. And I will discuss how
4 the waste confidence rulemaking and EIS impact the
5 Environmental Review for Limerick.

6 At the end of the presentation, there will
7 be time for questions and answers on the Environmental
8 Review process. And most importantly, time for you to
9 present your comments on the Draft Supplemental
10 Environmental Impact Statement.

11 Next slide.

12 NRC was established to regulate civilian
13 use of nuclear materials including facilities
14 producing electric power. NRC conducts license
15 renewal reviews for plants whose owners wish to operate
16 beyond their initial license period. NRC license
17 renewal reviews address safety issues related to
18 managing the effects of aging and environmental issues
19 related to an additional 20 years of operation. In our
20 aspects of the NRC regulations our mission is
21 three-fold: to ensure adequate protection of public
22 health and safety, to promote common defense and
23 security, and to protect the environment.

24 Next slide.

25 We're here today to discuss the potential

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1 site-specific impact of license renewal for Limerick
2 Generating Station. The Generic Environmental Impact
3 Statement, also known as the GEIS, examines the
4 possible environmental impacts that could occur as a
5 result of renewing licenses of individual nuclear power
6 plants under 10 CFR Part 54.

7 The GEIS to the extent possible
8 establishes the bounds and significance of these
9 potential impacts. The analyses in the GEIS encompass
10 all operating lightwater power reactors. For each
11 type of environmental impact, the GEIS establishes
12 generic findings covering as many plants as possible.
13 For some environmental issues, the GEIS found that an
14 generic evaluation was not sufficient and that
15 plant-specific analysis was required.

16 The site-specific findings for Limerick
17 are contained in the Draft Supplemental Environmental
18 Impact Statement, also known as the Draft SEIS, which
19 was published April 30th of this year. The document
20 contains analyses of all applicable site-specific
21 issues as well as a review of issues covered by the GEIS
22 to determine whether the conclusions in the GEIS are
23 valid for Limerick. In this process, NRC staff
24 also reviews the environmental impacts of power
25 generation alternatives to license renewal to

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1 determine whether the impacts expected from license
2 renewal are unreasonable.

3 For each environmental issue identified an
4 impact level is assigned. The NRC standards of
5 significance for impact was established using the White
6 House Council of Environmental Quality terminology for
7 significance. The NRC established three levels of
8 significance for potential impact: small, moderate,
9 and large, as defined on the slide.

10 Next slide, please.

11 This slide lists the site-specific issues
12 NRC reviewed for the continued operation of Limerick
13 Generating Station during the proposed license renewal
14 term. Overall, the direct and indirect impacts for
15 license renewal on all these issues were found to be
16 small which means that the effects are not detectable
17 or are so minor that they neither destabilize nor
18 noticeably alter any important attribute of the
19 resource.

20 Next slide.

21 This slides provides a summary of our
22 findings with respect to cumulative impact associated
23 with Limerick. Cumulative impacts include the effects
24 on the environment from other past, present, or
25 reasonably foreseeable future human actions. These

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1 impacts not only include the operation of Limerick, but
2 also the impacts of activities unrelated to Limerick
3 such as future urbanization, other energy-producing
4 facilities in the area, and climate change. Past
5 actions are those related to the resources at the time
6 of the power plant licensing and construction.
7 Present actions are those related to the resources at
8 the time of the current operation of the power plant.
9 And future actions are considered to be those that are
10 reasonably foreseeable through the end of the plant
11 operation, including the period of extended operation.

12 Therefore, the analysis considers
13 potential impacts of the end of the current license term
14 as well as the 20-year renewal license term. While the
15 level of impact due to direct and indirect impacts of
16 Limerick on aquatic and terrestrial resources were
17 found to be small, the cumulative impact, combined with
18 other resources, other sources such as increased
19 urbanization and climate change will be small to
20 moderate for aquatic resources and moderate for
21 terrestrial resources. In other areas
22 considered, the staff preliminarily concluded the
23 cumulative impacts are small.

24 Next slide.

25 The National Environmental Policy Act,

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1 also known as NEPA, mandates that each Environmental
2 Impact Statement consider alternatives to any proposed
3 major federal action. A major step in determining
4 whether license renewal is reasonable or not, is
5 comparing the likely impact of continued operation of
6 the nuclear power plant with the likely impact of
7 alternative means of power generation. Alternatives
8 must provide an option that allows for power generation
9 capability beyond the term of the current nuclear plant
10 operating license to meet future systems' generation
11 needs.

12 In the Draft Supplement, NRC staff
13 initially considered 18 different alternatives.
14 After this initial consideration, the staff then showed
15 the most likely and analyzed these in depth.

16 Finally, NRC considered what would happen if no
17 action is taken. And Limerick shuts down at the end
18 of its current license without a specific replacement
19 alternative. This alternative will not provide power
20 generation capacity nor would it meet the needs
21 currently met by Limerick.

22 The NRC's preliminary conclusion is that
23 Environmental Impact Statement of license renewal for
24 Limerick would be smaller in loads, seasonal, and
25 commercially viable alternatives. The no action

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1 alternative will have small environmental impact in
2 most areas with the exception of the social and economic
3 impacts which would be small to moderate. Continued
4 operation would have a small environmental impact in
5 all areas. The staff concluded that continual
6 operation of the existing Limerick is the
7 environmentally preferred alternative.

8 Next slide.

9 Based on a review of the likely
10 environmental impact for license renewal, as well as
11 potential environmental impacts on alternatives to
12 license renewal, the NRC's preliminary recommendation
13 in the Draft SEIS is that the adverse environmental
14 impact to license renewal for Limerick are not great
15 enough to deny the option of license renewal for energy
16 planning decision makers.

17 Next slide.

18 PARTICIPANT: Excuse me, could you put
19 that back up again. It was too fast. I couldn't read
20 it. Could you put it back up? It was much too fast
21 to read.

22 (Pause.)

23 MS. PERKINS: For the term beyond the
24 20-year period of extended operations, the NRC
25 addresses the management of spent nuclear fuel and the

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1 Waste Confidence Decision and Rule. Previous license
2 renewal Supplemental EISs noted that the environmental
3 impact of temporary storage of nuclear fuel for the
4 period following the reactor operating license term
5 were addressed by this rule. The Draft Supplemental
6 EIS does not discuss potential environmental impact of
7 storing spent fuel for an extended period after the
8 plant shuts down. That issue will be addressed in the
9 NRC's Waste Confidence Environmental Impact Statement
10 and Rule. The Draft Rule and the EIS is expected to
11 be issued in fall of 2013 and the public will have an
12 opportunity to provide comment. The final
13 rule and EIS is expected to be issued in September of
14 2014.

15 Additional information on the Waste
16 Confidence Rulemaking and EIS can be found at the NRC
17 public website at the link listed on the slide.

18 In August 2012, the Commission decided that the
19 Agency would not issue licenses dependent upon the
20 Waste Confidence Decision until the Waste Confidence
21 Rule is completed. However, the Commission directed
22 the staff to proceed with licensing reviews and
23 proceedings. If the results of the Waste Confidence
24 EIS and Rule identifies information that impacts the
25 analysis and the final SEIS for Limerick, the NRC staff

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1 will perform any appropriate review for those issues
2 and may supplement the Final SEIS before the NRC makes
3 a final licensing decision as to whether or not to renew
4 Limerick's licenses. If no changes are required, the
5 NRC staff would base its decision on the Final SEIS for
6 Limerick, the Waste Confidence EIS and Rule, as well
7 as the Safety Evaluation Report.

8 Next slide.

9 I'd like to reemphasize that the
10 Environmental Review is not yet complete. Your
11 comments today and all the written comments we receive
12 by the end of the comment period on June 27th will be
13 considered by the NRC staff as we develop the Final
14 SEIS, which is currently planned to be issued in
15 November 2013. Those comments that are within the
16 scope of the Environmental Review and provide new and
17 significant information can help change the staff's
18 findings. The Final SEIS will contain the staff's
19 final recommendation on the acceptability of license
20 renewal based on work we've already done and any new
21 and significant information we receive in the form of
22 comments during the comment period.

23 Next slide.

24 As many of you know, I am the primary
25 contact for the Environmental Review. Rick Plasse is

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1 the primary contact for the Safety Review. Copies of
2 the Draft SEIS are available on CD and hard copy on the
3 table in the back of the room. In addition, the
4 Pottstown Regional Public Library and the Royersford
5 Free Public Library had agreed to make hard copies
6 available for review. You can also find electronic
7 copies of Draft SEIS along with other information about
8 the Limerick license renewal review online.

9 Next slide.

10 The NRC staff will address written comment
11 in the same way we address spoken comments received
12 today. You can submit written comments either online
13 or via conventional mail.

14 To submit written comments online visit
15 the website regulations.gov and search for the docket
16 ID listed on the slide. If you have any written
17 comments today, you may give them to any NRC staff.
18 This concludes our presentation and I'll turn the
19 meeting back over to Richard.

20 FACILITATOR BARKLEY: Thank you, Leslie.
21 Were there any specific questions regarding these
22 slides? And if not, I'll move into the comment period.
23 Yes, sir?

24 MR. WATTERS: When you say move into the
25 comment period, I filled out a yellow card. Is that

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1 where you're going?

2 FACILITATOR BARKLEY: You'll be called.
3 Typically, it's the normal protocol to call any elected
4 or appointed public officials first. We actually have
5 just one person that I know of, Mariea Geho of East
6 Coventry Township, so I'll ask you to come up first.
7 Is there any other elected or appointed officials that
8 would like to speak?

9 Mariea, what I will do is have Dr. Cuthbert
10 come up next, followed by Charlie Shank.

11 MS. GEHO: Thank you. Can everybody hear
12 me? Do I have to hold this? I guess I have to hold
13 it. Can everybody hear me? Okay. Hi, I'm Mariea
14 Geho. I'm a supervisor for East Coventry Township
15 living across the river from Montgomery County. And
16 I just have a little blurb to say. The rehabilitation
17 of Frick's Locks Village as a historical site and
18 destination within the township is very exciting. The
19 rehabilitation work performed by Exelon has given the
20 village renewed life and has brought our history into
21 focus. The community has benefitted as a result of
22 Exelon's commitment to work with the township on
23 preserving Frick's Locks Village. And they did a
24 wonderful job. We had an opening there last week and
25 it was really great. Thank you.

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1 FACILITATOR BARKLEY: Thank you, Mariea.
2 Dr. Cuthbert.

3 DR. CUTHBERT: Thank you, Rich. Members
4 of ACE have reviewed the 585-page NRC Environmental
5 Impact Statement for the Limerick Nuclear Plant. You
6 should be ashamed of this flawed and biased report.
7 The document is incomplete, unreliable, and invalid.
8 Your EIS is riddled with faulty assumptions,
9 unsupported conclusions, glaring omissions,
10 exemptions, delays and deferrals of vitally important
11 and necessary actions and exclusions of numerous
12 environmental factors that will have adverse
13 implications for generations to come.

14 NRC's callous disregard for public health
15 and safety is shocking. You are guilty of nothing less
16 than regulatory malpractice. This public
17 meeting/hearing has been sprung like a trap on our
18 community. ACE objects to NRC proceeding on this EIS
19 at this time with important questions and issues not
20 yet addressed or answered. There is no need when
21 Limerick's current licenses do not expire until 2024
22 and 2029.

23 NRC has failed to acknowledge or respond
24 in writing to substantial written testimony submitted
25 by ACE in October 2011 on 14 major categories.

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1 Attached to this testimony today are a number of
2 photographs representing display boards along the wall
3 beside part of the audience this afternoon. They are
4 part of our testimony in addition to the written and
5 oral testimony that we're presenting today.

6 NRC has also failed to adequately respond
7 to a number of additional questions submitted by ACE
8 at your March 2013 annual Limerick performance review
9 meeting for 2012 operations. A number of serious
10 issues are going to be addressed in testimony presented
11 by a number of members of the community this afternoon.
12 Although we did receive a response with NRC, most of
13 the responses were vague, nonspecific and
14 insufficient.

15 The NRC, in our judgment, is recklessly
16 placing the cart before the horse in this Environmental
17 Impact Statement matter. NRC must stop and delay all
18 activities and actions related to Limerick Nuclear
19 Plant's relicensing including finalizing this EIS
20 until after several issues are addressed or take place.
21 Number one, Limerick's emergency evacuation plan has
22 been revised to include three specific changes:
23 immediate notification of radiation releases through
24 independent monitoring and report; expanding the
25 evacuation zone to 50 miles; and expanding the

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1 ingestion pathway zone to 100 miles.

2 Number two, the National Resource Defense
3 Council legal action appeals on Limerick's severe
4 accident mitigation analysis requirements have been
5 resolved. That's an open, legal issue.

6 Number three, Exelon has completed all
7 necessary inspections, maintenance, and corrective
8 actions at Limerick Nuclear Plant that have been
9 deferred by NRC until some time between 2017 and within
10 six months of the expiration of the current license in
11 2024.

12 Number four, NRC's court-ordered high
13 level radioactive waste study has been completed, 2014
14 or later, and all waste storage issues and rules are
15 in effect, including for Limerick.

16 Number five. Earthquake mitigation plans
17 have been completed, 2017. And all necessary changes
18 have been made at Limerick.

19 Number six. NRC required vents have been
20 install to prevent radioactive hydrogen gas buildup and
21 explosions. 2017.

22 Number seven. Exelon installs filters
23 for those vents to minimize radiation releases during
24 meltdowns. NRC's own staff has concluded the
25 consequences of not installing filters could be so bad

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1 that filters should be required regardless of expense.

2 Number eight. Exelon installs filtration
3 for Limerick's water intake to reduce harmful air
4 pollution from the cooling towers.

5 Number nine. Exelon installs filtration
6 for Limerick's radioactive and toxic waste water
7 discharge to reduce contamination of the primary
8 drinking water source for almost two million
9 Pennsylvanians.

10 And Number ten. Exelon installs
11 filtration for toxic minewater pumped into a drinking
12 water source in order to operate Limerick Nuclear
13 Plant.

14 This premature and incomplete EIS is a
15 pathetic example of a lack of courage and integrity at
16 the NRC. You have abandoned and violated your own
17 mission to protect public health and safety. You have
18 betrayed this entire region once again. NRC's failure
19 to protect our environment and residents is irrefutable
20 evidence that you no longer have a moral compass. Your
21 rush to rubber stamp Limerick's EIS and license
22 renewals is a cowardly betrayal of every man, woman,
23 and child in this community, as well as future
24 generations that will unquestionably be harmed by 20
25 additional years of operation at Limerick.

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1 It is our conclusion and recommendation
2 that the United States Senate should investigate the
3 NRC for willful blindness and regulatory malpractice
4 and disallow or forbid all permitting decisions for
5 Limerick Nuclear Plant until all unresolved findings,
6 legal issues, and recommendations including those from
7 your own staff are finalized and implemented.

8 And finally, ACE today is formally
9 requesting on the record that NRC hold a public hearing
10 in Pottstown at some date in the future to address all
11 of the relicensing issues for Limerick Nuclear Plant
12 not specifically or adequately addressed in the
13 Environmental Impact Statement.

14 Our community deserves nothing less.

15 (Applause.)

16 FACILITATOR BARKLEY: Thanks, Mr.
17 Cuthbert. Charlie Shank. And Donna, you'll be after
18 him.

19 MR. SHANK: Thank you very much. I was
20 hoping the lady who was the supervisor from East
21 Coventry would still be here but I see she has left.

22 My comments concern the groundwater, an
23 issue that is finally getting some attention at U.S.
24 nuclear plants is the leakage of radioactive water into
25 the ground, beneath and around these plants. All

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1 plants leak. These leaks come from pipes, tanks, and
2 many of the plant's systems. The NRC states that
3 events happen at all plants that are often unknown of,
4 unseen, uncontrolled, and unmonitored releases of
5 radioactive liquids into the ground. Exelon spokesmen
6 will tell you that they monitor everything and that they
7 have everything under control. Don't believe it.

8 The NRC's statement contradicts that
9 propaganda. These radioactive releases are in
10 addition to the known surface spills that frequently
11 occur. In 2006, nuclear plants started a program to
12 check into this mounting leakage problem. Fifteen
13 wells were drilled on Limerick property outside of the
14 power block areas where the reactors and other
15 equipment sit. One well, P12, south and downgrade of
16 the power block area, showed 4400 picocuries per liter
17 of tritium, well over the reasonable European safe
18 drinking water level for tritium which is 2700
19 picocuries per liter.

20 Not liking the result, that well was closed
21 and almost immediately a new well was drilled. Well
22 NWRL-9. This well west and downgrade of the power
23 block showed 1700 picocuries per liter. Over the next
24 few years as all 15 wells were tested, they all showed
25 tritium and all showed gross beta emitters. Three

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1 wells contained gamma emitters, nine had alpha
2 emitters, four out of five wells tested positive for
3 uranium. All the ground around Limerick's plant is
4 radioactively contaminated. Most water flow at
5 Limerick, both surface and subsurface, is to the south
6 and west towards Possum Hollow Creek, the Schuylkill
7 River and yes, East Coventry Township.

8 Many wells on the East Coventry side of the river
9 are in the same Brunswick fractured bedrock formation.

10 Recently Exelon re-gifted East Coventry
11 with 154 acres it had taken by eminent domain from
12 private citizens and the townships 30 years ago. This
13 land could have been subjected to possible radiation
14 contamination above and below the surface for many
15 years before it was returned. This story reminds me
16 of the Trojan horse story. With Limerick's renewed
17 license and at least 30 more years of contamination to
18 come, imagine what this land could turn into. No
19 independent radiological study was ever done before
20 this land was transferred. The people of East Coventry
21 should insist on radiological studies now and in the
22 future.

23 I am very grateful for Mr. Michael Moyer,
24 East Coventry supervisor, for his ability to see the
25 possible serious problems with this situation and

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1 question this decision. I say beware of utilities
2 bearing gifts.

3 I support Dr. Cuthbert's call for a
4 congressional investigation of the NRC. And I call for
5 the public meeting on the relicensing to also be held
6 right here in Pottstown so we can all attend. I thank
7 you very much.

8 (Applause.)

9 MS. CUTHBERT: NRC's Environmental Impact
10 Statement makes illogical, inaccurate, absurd, and
11 indefensible claims, claiming Limerick's
12 environmental impact small is an offensive lie. NRC
13 fails to honestly assess Limerick's past, current, and
14 additive harm since 1985. NRC did not do testing.

15 ACE repeatedly requested comprehensive,
16 independent monitoring and testing for this EIS.
17 Instead, we got a despicable whitewash. ACE
18 documented how and why Limerick Nuclear Plant presents
19 unprecedented environmental threats and health harms
20 to our region in written testimony to NRC in October
21 2011. Based on that, we reject NRC's invalid,
22 unsubstantiated prediction of small future harms from
23 Limerick.

24 NRC failed to respond to our massive
25 documentation. Would acknowledging facts require NRC

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1 to close Limerick? NRC wouldn't give ACE one hour for
2 a meeting with NRC's Environmental Review Team. NRC
3 clearly doesn't want to face the facts.

4 ACE's display boards at this meeting are
5 intended to identify significant harms NRC chose to
6 ignore for Limerick's EIS. ACE analyzed Limerick's
7 air and water pollution permits and Exelon's
8 radiological monitoring reports which document
9 enormous harms. NRC's PR people are embarrassingly
10 uninformed about Limerick's air and water pollution.
11 Instead of giving ACE an hour, NRC met with agencies
12 that just issued five-year pollution permits with
13 exemptions for high levels of dangerous pollution in
14 violation of protective laws.

15 Radiation reports for Limerick confirm
16 many radionuclides are in our air, water, soil,
17 sediment, and fish. Yet, NRC keeps claiming
18 Limerick's radioactive releases are just tritium.
19 Over 100 radionuclides are associated with Limerick
20 operations. NRC looks foolish.

21 One Limerick radionuclide is confirmed in
22 the babies' teeth of our children at some of the highest
23 levels in our nation. Additive, cumulative, and
24 synergistic harmful since 1985 are unknown, but clearly
25 enormous.

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1 NRC never did independent testing for each radionuclide
2 or toxic chemical in each round of exposure. NRC's EIS
3 conclusions rely on self-serving biased calculations,
4 estimates, monitoring, and reports totally controlled
5 by Exelon, the company with a vested interest in the
6 outcome that has shown it can't be trusted.

7 Exelon's deceptive radiation monitoring
8 tactics were identified by ACE. Included radwaste
9 monitoring declared inoperable for over a year.
10 Exemptions from reporting using lame excuses like
11 misplaced monitors.

12 To base EIS conclusions on visual site
13 inspections is ridiculous. You can't see, smell,
14 taste, feel or measure radiation or other toxics that
15 are released offsite from Limerick. Thus, confirmed
16 Limerick's environmental harms are enormous, not
17 small.

18 Limerick is a major air polluter under
19 health-based standards of the Clean Air Act releasing
20 so much air pollution from the cooling towers that a
21 six-fold increase was granted in 2009 for the kind of
22 air pollution that's more deadly than ozone.

23 Limerick's PM-10 air pollution transports
24 cooling tower toxics, pathogens and radionuclides into
25 our air every day with 44 million gallons of steam.

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1 Exelon refused to install cooling towers at Oyster
2 Creek citing too much air pollution as the excuse.
3 Need we say more?

4 Limerick is slowly, but surely destroying
5 the drinking water source for almost two million people
6 from Pottstown to Philadelphia. Limerick discharges
7 a 14.2 million gallons of radioactive heated waste
8 water every day. Limerick drastically exceeds safe
9 drinking water standards. Without filtration
10 Limerick can't meet safe standards and Exelon won't pay
11 to filter.

12 The river water, sediment, and fish are
13 contaminated with many radionuclides. That includes
14 radioactive iodine like that in Philadelphia's
15 drinking water, plus many others. Limerick's
16 discharges are over heating the Schuylkill River
17 threatening the ecosystem. Limerick discharges up to
18 110 degrees into a river with an 87 degree limit every
19 day.

20 Cooling tower water used threatens
21 drinking water supplies across six counties. Limerick
22 withdraws more water than three towns
23 -- doubles what three towns take in, Pottstown,
24 Norristown, and Phoenixville. Cooling towers
25 depleted the Skuylkill River since 1985. By 1999,

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1 there were record low flows in the Schuylkill River.
2 Since 2003, Exelon pumped billions of gallons of toxic
3 unfiltered minewater into the river for Limerick
4 operations. Decades of radioactive leaks and spills
5 contaminated groundwater. Fifteen of 15 wells detect
6 beta radiation. Nine detect alphas. Three gamma.
7 Four uranium. These radioactive leaks were never
8 cleaned up and really this offensive EIS whitewash must
9 be rejected by elected officials and the public.

10 (Applause.)

11 FACILITATOR BARKLEY: Thank you, Donna.
12 Betty Shank. And then Steve Aaron is up next.

13 MS. SHANK: NRC regulations have become as
14 deteriorated and unprotective as Limerick's aging
15 equipment. That equipment is plagued by thinning,
16 pitting, fatigue, erosion, leaching, embrittlement,
17 and GE Mark II boiling water reactor stress corrosion
18 cracking. The list of opportunities for disaster is
19 endless.

20 Limerick monitoring equipment has been out
21 of service, unnoticed sometimes for more than a year,
22 and automated systems have failed, discovered only
23 after accidents occur.

24 Public statements by NRC and Exelon
25 following such events are generic and deceptive. The

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1 public receives no more respect than the river that
2 Limerick is destroying and the air that it is polluting,
3 all for Exelon's profits. NRC and Exelon
4 have gone through all the motions required for
5 relicensing, but it seems to be all for show. Hollow
6 evacuation plans, lack of meaningful regulation,
7 perfunctory public inclusion, and NRC's willful
8 blindness to the consequences of our routine radiation
9 exposure, increased public risk. It's a
10 nightmare, affecting the health of our families and the
11 environmental legacy we leave our children and
12 grandchild.

13 Back in the '80s before Limerick
14 construction was complete, a suit was filed when the
15 public understood that Limerick operations would
16 violate clean air standards and that design
17 alternatives should have been considered. The suit
18 was won in court, but successfully stalled until
19 Limerick construction was complete. Back then, too
20 many officials fell into the trap of weighing economic
21 factors more heavily than public protection.

22 Elsewhere, more enlightened thinking led to
23 cancelled construction plans and closed plants.

24 Exelon makes no secret of the fact that its
25 first concerns are profits and investors. Exelon

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1 executives believe nuclear plants create the profits,
2 but that's because the public has been forced to support
3 nuclear energy and an egregious example of corporate
4 welfare. We get sick. Our drinking water supply is
5 reduced and contaminated. Our air is polluted and
6 still we not only pay for many of Exelon's nuclear
7 business costs, but for its mistakes as well. It is
8 the height of injustice for NRC to allow this corporate
9 abuse to continue when safer electric power is
10 available.

11 When NRC and Exelon claim that Limerick
12 operations comply with NRC regulations, don't be
13 fooled. There's hardly anything left of them for
14 Exelon to comply with. It's hard to imagine the risks
15 that lie ahead in the decade that's left of Limerick's
16 current license, yet alone 20 years beyond that.

17 NRC may be approving Limerick license
18 renewal simply because it can, not because it is the
19 only option or the right thing to do. So this
20 extraordinary breach of public trust will allow Exelon
21 to continue its premeditated assault of humanity and
22 the environment purely for profit. What a travesty.
23 I fully support ACE's recommendations.

24 (Applause.)

25 FACILITATOR BARKLEY: Thank you, Betty.

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1 Steve. Following Steve will be Lorraine Ruppe.

2 MR. AARON: Good afternoon. My name is
3 Steve Aaron. I was born and raised in Montgomery
4 County and now live in Dauphin County, Pennsylvania.
5 Thank you for the opportunity to speak here today in
6 strong support of the proposed relicensing of Limerick
7 Generating Station.

8 As one of the founders of the Pennsylvania
9 Energy Alliance, I speak on behalf of a state-wide group
10 of independent community, business, and environmental
11 leaders and organizations representing a variety of
12 professional backgrounds. We formed the coalition
13 more than four years ago as a forum for like-minded
14 Pennsylvanians who believe nuclear energy is a critical
15 component of meeting our energy needs and to advocate
16 for the continued operation of clean, safe, and
17 reliable sources of electricity generation all
18 throughout Pennsylvania.

19 Our members consists of a former Secretary
20 of the PA Department of Environmental Protection, a
21 former Pennsylvania Game Commission executive, a
22 former Secretary of the PA Department of Environmental
23 Resources, and a former Secretary of the Pennsylvania
24 department of Conservation and Natural Resources.
25 Like me, these environmental stewards all believe

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1 nuclear energy has an important role to play in our
2 Commonwealth, and a green nuclear facility such as
3 Limerick operates safely and well within environmental
4 standards.

5 Nuclear energy provides clean energy that
6 helps to power our homes and businesses reliably and
7 safely. I personally have met many of the men and women
8 who work in this industry and I know them to be smart,
9 conscientious, earnest and passionate about the work
10 that they do.

11 As you know, Pennsylvania is among the
12 nation's largest producers of nuclear energy. To meet
13 our ever-increasingly demand for electricity in a way
14 that does not destroy our environment, we need a diverse
15 energy mix that includes nuclear power, cleaner fossil
16 fuels, renewable sources and energy efficiency.
17 Conservation alone will not offset the expected growth
18 in our electricity use and renewal sources like wind
19 and solar, while certainly important, are often
20 unreliable.

21 Support for nuclear power throughout the
22 Commonwealth remains strong. In 2012, the PA Energy
23 Alliance conducted a public opinion poll of nearly a
24 thousand Pennsylvanians from all across the state that
25 showed 90 percent of those surveyed believed nuclear

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1 power is an important part of meeting the country's
2 electricity needs. More than three quarters believe
3 that nuclear is a reliable source of energy and perhaps
4 most importantly for today's proceedings, more than
5 seven in ten support allowing existing nuclear power
6 plants to extend their operating licenses.

7 We are pleased to see strong support comes
8 from residents who live closest to our nuclear
9 facilities. So on behalf of the membership of the
10 Pennsylvania Energy Alliance, thank you for the
11 opportunity to share these thoughts with you today.

12 (Applause.)

13 FACILITATOR BARKLEY: Thank you, Steve.
14 Lorraine. And then Marci Dietrich will follow.

15 MS. RUPPE: Hi, my name is Lorraine Ruppe.
16 I want to add, too, that today is a really bad to hold
17 the meeting, because most people are either away, on
18 vacation, or getting ready to go away on vacation. I'm
19 concerned about an earthquake triggering one or more
20 meltdowns at Limerick Nuclear Plant. What worries me
21 are the miles of hard to inspect pipes and cables buried
22 under Limerick that can be disrupted and then incapable
23 of delivering vital electricity and cooling water to
24 prevent meltdown. NRC should be worried, too, but
25 instead gave Limerick until 2017 to come up with a new

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1 seismic risk study or plan. It's beyond negligence for
2 NRC to allow Exelon to wait years to take action.

3 Limerick is considered a high-risk nuclear
4 plant and earthquake risks are increasing. My search
5 for earthquake fault lines closest to Limerick Nuclear
6 Plant is one big reason I have no confidence in any of
7 NRC's conclusions in Limerick's Environmental Impact
8 Statement. May 2011, I asked NRC how close the nearest
9 fault lines were to Limerick Nuclear Plant. Six months
10 later in September 2011 at the first EIS hearing, I
11 repeated my request. When NRC finally responded, I
12 received a letter and a map showing earthquake fault
13 line 9 and 17 miles from Limerick.

14 Later, I learned NRC failed to disclose an
15 earthquake fault right under the Limerick site and two
16 others within two miles. Local residents discovered
17 a 1974 seismic study for Limerick in the Pottstown
18 Library, clearly identifying these faults. So why did
19 NRC fail to disclose these faults when I asked about
20 the closest earthquake faults to Limerick? Was this
21 a cover up or incompetence? Neither is good.

22 April 18, 2012, NRC's Andrew Rosebrook,
23 who sent me the map and letter, claimed to be unaware
24 of the fault under Limerick when shown the seismic maps
25 at the library.

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1 The August 2011 earthquake in Virginia
2 shook Limerick Nuclear Plant and caused a Limerick
3 notice of violation. This should have caused NRC to
4 require Exelon to reduce seismic risk immediately.
5 Rosebrook did admit that the Ramapo Fault just 17 miles
6 from Limerick is active. He also validated my concern
7 about the blasting at the quarry bordering Limerick.

8 Fracking could trigger an earthquake,
9 disrupting underground pipes and cables. Over 3,000
10 gas wells were approved in Pennsylvania. Two thousand
11 more are to be approved this year. Structural problems
12 and flaws associated with Limerick construction are of
13 concern. For example, Limerick's PAC 70 fuel pools
14 were constructed with substandard cement. After all
15 of this, NRC isn't requiring Limerick to do important
16 seismic upgrades until after 2017, even though Limerick
17 is considered by some to be third on the nation's
18 earthquake risk list.

19 By then we can have an earthquake and a
20 meltdown. Limerick should never have been built in the
21 first place. NRC falsely claims earthquake risk were
22 considered prior to Limerick approval. That's not
23 true. The first reactor was delivered to Limerick's
24 construction site in 1972, two years before this 1974
25 when the seismic study was completed. With

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1 earthquakes becoming stronger and more frequent NRC
2 owes it to us to shut Limerick down before it melts down.
3 Thank you.

4 (Applause.)

5 FACILITATOR BARKLEY: Thank you,
6 Lorraine. Marci. After Marci will be Kim Murphy and
7 then Scott Portzline.

8 DR. DIETRICH: My name is Dr. Marci
9 Dietrich. I'm a physician that's lived always in this
10 area, well, you know -- I wish I was a speechwriter like
11 you. You know? He's written all these speeches and
12 you do a great job for government people, and that's
13 your job.

14 This isn't my job. I'm a doctor. And I'm
15 not a professional speaker and I'm not a nuclear
16 engineer, but I am a physician. And I'm a physician
17 who has seen lots of patients with cancer and other
18 problems that have increased over the years, even
19 thyroid cancer.

20 What I'm hoping to do here and I'm winging
21 it because I really wasn't ready to do this, but you
22 had your meeting and I had to be here if I wanted to
23 put my two cents in. I think that we could really
24 simplify, clarify the players in all this because right
25 now this is very confusing. We hear numbers and they

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1 go right over your head, oh, it's bad. That sounds bad.
2 But then, hey, it's positive and there's tons, 500 pages
3 of this and 500 pages of that. Really, let's figure
4 out what's going on and first we need to know who the
5 players are, okay?

6 The players are the stakeholders. I'm not
7 a stakeholder, but a stakeholder would be, for example,
8 Mr. Barkley, you're a stakeholder. And Ms. Perkins,
9 you're a stakeholder. Exelon is a stakeholder. The
10 Delaware River Basin Authority is a stakeholder. The
11 previous person from the Commission, a stakeholder.

12 So now what does that make me? Well, I am
13 a citizen and I am a landholder. And I can be an
14 upholder. And what an upholder is someone who has a
15 purpose who wants to elevate something to believe in,
16 something that is extremely important. And so
17 landholder, so I have land. I have property. And my
18 property could get really messed up by radiation and
19 be contaminated and that wouldn't be good. I own my
20 body, too, and with owning my body and its relationship
21 to being radiated and having other problems, I have
22 concerns for that. So an upholder -- I'm a landholder
23 and an upholder and you guys are stakeholders.

24 I was going to bring you a stake, as just
25 a visual, but I didn't. I thought, you know. I

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1 thought about cheese and a mousetrap, you know, and how
2 energy is cheese and then the little mouse wants to get
3 the cheese and he has to take risks to get the cheese
4 and then sometimes the trap is going to close on him
5 and he's going to lose his head. So I didn't do that
6 because I thought we'd get injured with the mousetrap.
7 Think about that, injured with a mousetrap versus
8 getting injured by radiation. You know?

9 So anyway, there are more stakeholders
10 here, too. Right.

11 So there's stakeholders and there's
12 upholders and there's landholders. So we're
13 simplifying it a little bit. Now let me see, I'm
14 wondering why do we have to have a relicensing, right
15 now, for 20 more years for Exelon? I don't get it. If
16 it's already licensed now to like 2017 or 2024, 2029,
17 why are we in the world have to do this now unless we're
18 waiting for something bad to happen? We better get the
19 license on board first because if something really bad
20 happens, well, maybe we'll stop to fix it. We can't
21 get shut down if we already have the license. I don't
22 know. I was a naval officer one time, but I'm not
23 someone who knows a lot about systems.

24 So what's the rush of getting the license
25 right now? Well, I don't know.

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1 Let's talk about conflicts of interest.
2 Did you ever hear of the Six Degrees of Separation? An
3 Albright College graduate actually did that. It was
4 about Kevin Bacon. Everything is interrelated like
5 you know this person and then this person knows this
6 person and this person knows this person. Well,
7 nuclear power is a lot like that in that they're all
8 related by, unfortunately, money, stakeholders, and
9 then there's us. Us, we're over here. No money, no
10 stakeholders.

11 Now even an NRC employee is a stakeholder
12 beyond it's their job. There are very good benefits
13 to being an employee of NRC, very good benefits.
14 Vacation, three to five weeks' vacation. Retirement
15 plan, health benefits. So when it's your job, then
16 you're here and you have to be here. I'm here of my
17 own volition. I don't get a dime for coming here and
18 saying what I want to say. However, you guys are
19 getting paid to be here. I don't know that you really
20 would show up, honestly, if you weren't paid to do this
21 job. I just don't think you'd necessarily voluntarily
22 come here and do this if you weren't getting paid.

23 However, I am not getting paid a
24 dime and so here we go. I don't get benefits. I don't
25 get healthcare from NRC.

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1 Now that lady earlier that was from East
2 Coventry who basically was lauding how nice Limerick
3 was and everybody did wonderful things. What she
4 didn't ask for, she should have asked that East Coventry
5 actually be moved to a whole new part of another state
6 because that would be the safest thing for East
7 Coventry, to pick up, move East Coventry and move it
8 to another state that doesn't have nuclear power in it.

9 Now when say nuclear power is clean energy,
10 what do we mean by clean? When you're leaving
11 basically excrement from your nuclear waste facility
12 and you're burying it on site, I don't know how clean
13 that is. Clean would be to me it actually really is
14 clean. It's very good ecologically and yes, for the
15 moment, perhaps as long as no nuclear problem would
16 happen, it's a very clean energy up to a point. But
17 if a problem happens and then what's going to happen?
18 Well, it's not so clean if there's a Fukushima to
19 happen. No so clean anymore. We're not safe. Okay?

20 So then I looked up what risk is and risk
21 -- there's definitions of risk and nuclear energy often
22 has their own ideas that it's really good for risk. Low
23 risk, well, there's a couple different types of risk.
24 There's manufactured risk which is Limerick and nuclear
25 power plants, Exelon. Manufactured by man, it's not

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1 natural risk. It's not naturally-occurring
2 radiation. And then there's natural risk, i.e.,
3 unfortunately the tornadoes, problems with hurricanes.
4 Those we have to deal with. They're natural and
5 they're devastating and they hurt a lot of people, but
6 why in the world are we dealing with manufactured risk
7 in the way say as we are dealing with the idea of other
8 risk? Why should we have manufactured risk and make
9 that part of our benefit when we look at the benefit
10 of nuclear energy?

11 So getting back and I'm sorry I'm skipping
12 around like this. As I said, I'm not as well prepared
13 as I'd like to be. Getting back to the politics of this
14 again and the money, Exelon, many, many millions of
15 dollars or basically \$8 million in political
16 contributions, PACs, you name it, to all the
17 congressional people out there. And then I'm
18 wondering about poor old ACE here talking about its
19 special investigation. Fat chance that's going to
20 happen, not with Gerlach and the governor even taking
21 some money from Exelon indirectly, but from Exelon
22 employees. So why in the world -- how are you going
23 to have a congressional investigation when basically
24 there's so much money being poured into Congress that's
25 really from the nuclear energy industry. I don't think

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1 there's easily going to be a congressional
2 investigation about the NRC.

3 So I have so much that I could talk about
4 and what I really want to put at the last part of this,
5 that I didn't get into is basically we have a way of
6 quantifying and qualifying the risk now to humans and
7 that is genetic testing. We can actually test the
8 genes and do studies now of the people that live in the
9 region of a nuclear power plant. We know that nuclear
10 energy or nuclear problems occur in damaged
11 chromosomes. We now have the technology and medicine
12 and research to actually look and take blood from people
13 that live in a region of nuclear power and actually
14 demonstrate what is going on inside that person's body,
15 things that just because we don't see it on the outside
16 of a person, does not mean that there is not chromosomal
17 damage already that we can quantify, qualify in their
18 blood.

19 Why there has not been any research ongoing
20 about that, I don't know. The good old Tooth Fairy test
21 of strontium-90, that sort of has been pushed to aside,
22 but we have had the technology to actually do research
23 on genetic changes in people's blood from radiation and
24 let's look at the results of that. Let's have tests
25 done about and let's see what's going on and we can

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1 actually really take note of this and go from there
2 about what damage is really occurring and that's not
3 from a meltdown. We know that happens. We know
4 there's breakage of chromosomes and such. But what
5 really -- we can look at the silent damage that's
6 occurring from just the normal use of a power plant.

7 So just some ideas. Sorry I was a little
8 bit blunt. I have more I can say, but I'll leave that
9 to another time. So I hope you got something out of
10 that.

11 (Applause.)

12 FACILITATOR BARKLEY: Thank you, Marci.
13 Kim.

14 MS. MURPHY: Good afternoon. And thank
15 you for the opportunity to speak to you today. My name
16 is Kim Murphy and I am president of the Berks
17 Conservancy. The Berks Conservancy is a 501(c)(3)
18 nonprofit land trust and conservation organization
19 based in Berks County, Pennsylvania.

20 I am here to testify on behalf of the
21 Schuylkill River Restoration Fund that Exelon
22 supports. The Berks Conservancy has been a successful
23 annual award recipient and implementer of the
24 Schuylkill River Restoration Fund grants for
25 agricultural best management practices since the

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1 inception of the fund.

2 The implementation of agricultural best
3 management practices directly affect the quality of
4 water in the Schuylkill River watershed and are done
5 to positively impact the drinking water for hundreds
6 of thousands of people who live in our region. The
7 Schuylkill River Restoration Fund grant awards have
8 been critical to the completion of dozens of
9 agricultural best management practice projects on 11
10 different farms in Berks County. These projects are
11 done in prioritized subwatersheds of the Schuylkill
12 River watershed, generally those where they are ranked
13 as the most impaired.

14 The Schuylkill River Restoration Fund as
15 a private grant fund has granted us over \$1.3 million
16 since 2008 and has enabled us to leverage larger,
17 significant public funds including USDA Natural
18 Resource Conservation Grants.

19 Our Schuylkill River Restoration Fund
20 Agriculture Best Management Practice Project has taken
21 a holistic approach to water protection utilizing
22 conservation and nutrient management planning. The
23 north storage barnyard patrols, stormwater controls,
24 segregating clean rainwater from surface manures,
25 stream bank venting, prescribed grazing, and riparian

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1 buffer restoration.

2 Investment in conservation measures on
3 Schuylkill River watershed farms is critical on
4 numerous fronts: upgrading farm facilities,
5 especially in regard to the manure management and
6 fertilizer dollars helps to keep farmers competitive
7 and successful. When farms are competitive and
8 successful, conversion of farms to development is
9 less likely to occur, thereby retaining fields capable
10 of groundwater recharge as opposed to the impervious
11 surfaces of housing and commercial ventures which
12 generate serious stormwater and water quantity impact.

13 Proper management and timing of
14 application of manure by segregation from surface
15 waters on farms and stormwater generated on farms is
16 not only beneficial to farmers' time management and
17 bottom line, but it's also beneficial to plant growth
18 and production and to water quality as nutrients are
19 utilized by crops and not lost in streams, thereby
20 protecting water quality.

21 The implementation of this agricultural
22 best management practice, Schuylkill River Restoration
23 Fund Project has also served as the impetus for public
24 drinking water suppliers to participate and invest in
25 these projects as additional funders and has been an

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1 exemplary model for public/private cooperation and a
2 successful mode for accomplishing the work on the
3 ground for water quality.

4 The Schuylkill River Restoration Fund has
5 positively influenced the water quality and quantity
6 of the surface water of the Schuylkill River watershed
7 utilized by local and regional drinking water suppliers
8 like Philadelphia Water Department, Aqua PA, Reading
9 Area Water Authority, Western Berks Water Authority,
10 Birdsboro Water Authority, and Kutztown Borough.

11 The Berks Conservancy strongly supports
12 the continuation of the Restoration Fund for its
13 benefit to the food and water supplies security of the
14 Schuylkill River watershed and welcomes Exelon's
15 continued support. Thank you.

16 (Applause.)

17 FACILITATOR BARKLEY: Thank you, Kim.

18 MR. PORTZINE: Hello, everyone. My name
19 is Scott Portzline and I'm from Harrisburg,
20 Pennsylvania in Norfolk County. I see everyone is from
21 Norfolk County.

22 Steve, you're working with some outdated
23 data on the expected growth of energy use. It's been
24 declining. The growth is only occurring about one
25 third of what it used to be. And wind power is actually

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1 testifying that the North American Electric
2 Reliability Council testified to the Nuclear
3 Regulatory Commission that they'll probably have to
4 turn down some of their nuclear plants because of all
5 the new wind power coming on line. I think that's not
6 an exaggeration about the amount of power, but it
7 doesn't understand that nuclear power plants are not
8 going to back down on their power output. That would
9 be a dangerous thing to do that from a day-to-day basis.

10 But the point is that the expected growth
11 is not occurring in Pennsylvania or around the country.
12 And in Pennsylvania, we export power. So if we were
13 not to have the use of several of our nuclear plants,
14 it would not affect the grid.

15 I want to remind you that Three Mile Island
16 warned the world that Unit 2 was dangerously faulty and
17 of course, that's where we had an accident. I'm not
18 saying that the Limerick plant is faulty in the sense
19 that it's about to have an accident, but it does have
20 some safety deficits that could be just as dangerous
21 as what happened at Fukushima with the explosions that
22 occurred there due to the vent problem.

23 And I want to agree wholeheartedly with
24 what the spokesman from ACE said. Very good. Exactly
25 right. It's premature. The data doesn't support the

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1 conclusions that are all throughout that document.
2 And I could focus on a whole bunch of them also as the
3 two previous speakers said. But I'm just going to talk
4 a little bit about the vents.

5 The plants are no longer required to have
6 hydrogen recombiners. So during an accident event,
7 much hydrogen is created. But they no longer are
8 required to try to eliminate that problem that leads
9 to an explosion. The vents that were used in Fukushima
10 did employ the fix that was recommended here in the
11 United States by the Nuclear Regulatory Commission.
12 One hundred percent of those vents failed. It's a very
13 similar vent that's here at Limerick.

14 In an accident scenario, the releases
15 could be much more dangerous than what these reports
16 assume. This is one of the faulty data sets that I'm
17 going out. This conclusion should not be accepted by
18 anyone because the assumptions that are made are not
19 conservative meaning on the side of safety. They are
20 sometimes at best protective of their interest rather
21 than the health and safety of the people.

22 Paul Gunter and I knew during the Fukushima
23 accident that they were going to have an explosion.
24 And we talked about it the day before it happened. Paul
25 Gunter is here in the audience. He'll be speaking in

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1 a little bit, probably. And Paul Gunter got to say that
2 on CNN the day before the explosion that there was going
3 to be a hydrogen explosion because of the melting fuel
4 in the fuel rods.

5 Well, I'll tell you the rest of the story
6 another day, but you can see the transcripts on CNN.
7 Paul got blasted for that. So sometimes people dismiss
8 what anti-nuclear people or safety critics have to say.
9 I'm telling you, coming from Three Mile Island, heed
10 warning the people from ACE are saying. I really agree
11 that this whole licensing process shouldn't even be
12 happening right now.

13 Concerning evacuations, well, let me go
14 back to radiation. You had radiation detectors in the
15 building. You have hydrogen that's not being
16 accounted for properly. The Nuclear Regulatory
17 Commission no longer has their own monitors that they
18 maintain for radiation at nuclear plants. They're
19 relying on the states to do that and the licensee to
20 do that. Fortunately, at Three Mile Island, we have
21 our own radiation monitoring network from the citizens.

22 Evacuations. A year ago, I provided
23 documentation that the severe accident -- well, it's
24 called a state-of-the-art accident consequences
25 analysis, showed that it was rigged. There's probably

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1 going to be an investigation into that. May end up
2 being in Congress, possibly bordering on the criminal
3 investigations, whatever regulatory agencies,
4 whatever that would be called.

5 The premise that there's no undue risk,
6 that's what this is all about. Is there undue risk
7 associated with this relicensing? The answer is yes.
8 The premise that no undue risk will occur is always
9 about a timely evacuation. The NRC is not charged with
10 protecting your property. They're charged with making
11 sure you get out of town if something terrible starts
12 to happen.

13 Could somebody show me one accident that
14 happened in the world where a timely evacuation
15 occurred? Or even where one was ordered in a timely
16 way? It's not going to happen. Because what will
17 happen is that people at the plant will finally realize,
18 wow, the conditions are such that we've got to order
19 an evacuation which did not happen at Three Mile Island.
20 The reactor was already in the condition that the
21 evacuation should have been ordered. It was
22 pre-agreed. Yet, they didn't follow that guideline.

23 So the plant will call the governor's
24 office and the governor will say okay, thank you.
25 He'll take ten minutes to think about it. He'll start

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1 getting some phone calls saying now wait a minute, we
2 think we got this going for us. And it gets delayed
3 and it gets delayed. Next thing you know evacuation
4 gets ordered and people are going around with higher
5 degrees of radiation because they waited too long.
6 That happened at Three Mile Island. Fukushima, plenty
7 of disagreements of when evacuation should have taken
8 place, let alone the cleanup.

9 So I guess lastly I want to talk about
10 sabotage because that's what I mostly do at every
11 nuclear power plants and counterterrorism issues since
12 1984. Never went public until 1993 as a result of an
13 intrusion where a man drove a station wagon into the
14 nuclear plant at Three Mile Island into the turbine
15 building itself. It took four hours to find him and
16 of course everything was fine according to the NRC
17 report until the federal hearings came up and made them
18 reconsider security.

19 Well, things are a lot better in the
20 security state, but there's still some problems. But
21 I want to point out one specific issue using their
22 report and it's in Section 5.2. This will be the last
23 thing I have to say. In Section 5.2 regarding severe
24 accidents, they did an analysis of sabotage and said
25 that core damage and radiological release from such

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1 acts would be no worse than the damage and release
2 expected from internally-initiated events. Well,
3 first of all, that wording should be changed.

4 Internally initiated could indicate sabotage even from
5 an insider. So that should be accidental events rather
6 than internally. We're talking about sabotage versus
7 accident.

8 The second and most important of what I'm
9 saying is they say they could identify no issues that
10 were greater than internally-initiated events. What
11 if the containment building is no longer intact? What
12 if the saboteurs found a way of nuclear transport --
13 there's that nuclear term, engineering term -- of
14 radioactive material outside the containment building
15 during a sabotage event. Well, that happened at Three
16 Mile Island, not from sabotage, but the valves in the
17 drain were already lined up, where radioactivity was
18 escaping the building early.

19 What if you had a hole in the containment
20 building like at Fukushima or from a saboteur? The
21 SOARCA study that was rigged continued the analysis to
22 scenarios where the containment building remained
23 intact. I have the email from the Nuclear Energy
24 Institute stating this would solve some of our problems
25 if we just leave the containment building intact.

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1 That's why this study is wrong. Thank you.

2 (Applause.)

3 FACILITATOR BARKLEY: Our next speaker
4 will be Shirley Whyte, followed by Tana Rinehart.
5 Shirley.

6 MS. WHYTE: It is my feeling, and a lot of
7 other people I know, that the NRC should not even be
8 considering relicense of Limerick nuclear power plant
9 considering the density of our population and the
10 increasing risk that exists for a meltdown.

11 Limerick is the second most densely
12 populated nuclear plant in the nation. Relicensing
13 would be a major adjustment to millions of people in
14 the greater Philadelphia area. Evacuating from a
15 meltdown would be far worse than any evacuation
16 portrayed by Hollywood. There would be traffic
17 gridlock, accidents, panic. It will keep people
18 directly exposed to massive radiation for far too long,
19 increasing the risk of immediate radiation sickness and
20 eventually cancer and other disease and disability.
21 People could become so radioactive they might be turned
22 from a hospital. The hospitals here are not equipped
23 or prepared to have such a disaster. They train for
24 natural disasters, but not massive radiation exposure.

25 Reality suggests that the population could

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1 evacuate safely. I mean it can evacuate safely.
2 Montgomery County officials basically confirm that in
3 the 2011 testimony to you to the NRC that they already
4 knew in 1980 a public hearing on evacuation, the NRC
5 said Limerick could take double the population that
6 could be safely evacuated within 30 miles. And now
7 they know 30 miles is not nearly enough, even close to
8 the safe distance to avoid radiation plume.

9 The NRC allows Limerick to move forward,
10 despite risk to so many. And now the NRC plans to
11 relicense Limerick knowing the population density is
12 four times than the original number that they thought
13 they could evacuate safely.

14 I have devastating caused by evacuation
15 decisions by the Japanese government at Fukushima.
16 NRC was supposed to approve Limerick's evacuation plan
17 by looking at the population growth and the distance
18 needed to escape the radioactive plume. Instead, NRC
19 is dismissing lessons learned from Fukushima, trying
20 to deceive us about radiation impact,
21 weakening evacuation plans and failing to expand
22 evacuation zones.

23 In 2001, the ACE reported "Exelon seeks to
24 cut costs in planning for emergencies." The NRC
25 allowed PECO and Exelon to cut corners at the expense

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1 of public interest. NRC's new rules make no sense.
2 NRC now allows emergency drills to be run without
3 practicing for radiation releases. NRC requires fewer
4 exercises for radiation accidents. NRC's
5 recommendation is fewer people evacuate after an
6 incident to avoid a gridlock. So they'll do it in
7 stages.

8 Is the NRC abandoning the public safety for
9 NRC's profits? Changes need to be made to minimize the
10 risk of innocent people becoming nuclear refugees,
11 losing their homes and all their possessions. This
12 kind of risk cannot be dismissed for any corporation's
13 profits. In 1980, at the evacuation during PECO's VP
14 plant an evacuation could never be needed. That was
15 the same thinking about TMI in 1979. The same thinking
16 at Fukushima until it happened. It is ironic that we
17 only have to say TMI, Chernobyl, Fukushima and everyone
18 knows what happened at these places. No other
19 explanation is needed.

20 So I'm asking the NRC to close Limerick
21 before this area is known only as the next nuclear
22 disaster, before this area is known only as Limerick.
23 Thank you.

24 (Applause.)

25 FACILITATOR BARKLEY: Thank you, Shirley.

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1 Tana. Paul Gunter is up next.

2 MS. RINEHART-ULLMAN: First I want to
3 apologize for my little noisy guy. I just want to say
4 I'm a local resident. I've been born and raised in
5 Pottstown. My name is Tana Rinehart-Ullman. I'm
6 raising -- I obviously have a little guy here. I run
7 a local daycare as well. We have toured Limerick, have
8 taken the children on field trips there and they've
9 always had such excellent field trips. The kids always
10 enjoyed going there to learn about Limerick and learn
11 about nuclear power and how it benefits our community.

12 Also, they support local children's
13 organizations such as soccer clubs and other --
14 baseball teams and things. They have been great
15 supporters of the community. I would have no problem.
16 I like the safeguards. We have a very comprehensive
17 plan in place in case something would happen with
18 Limerick, what to do with the children and how to get
19 them safely out of the area. But I have no doubt that
20 we will ever, ever have to use that plan and I've been
21 working in this industry for 21 years now. Thank you,
22 Limerick.

23 (Applause.)

24 FACILITATOR BARKLEY: Thank you. Paul.

25 MR. GUNTER: Thank you. My name is Paul

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1 Gunter. And I am director of the Reactor Oversight
2 Project at Beyond Nuclear and that's in Takoma Park,
3 Maryland. And I come three hours north here because
4 the Limerick license extension process is, in fact, not
5 a local issue. It is a regional -- it is a national
6 concern and risk and threat.

7 I'm here to speak in opposition to the
8 Limerick relicensing primarily because the NRC,
9 following the Fukushima accident, should suspend all
10 relicensing license extension reviews, particularly
11 this is important because the Limerick unit is similar
12 to the General Electric boiling water reactors that
13 exploded at the Fukushima Daiichi nuclear power plant
14 site. So it's a concern that the Agency and the
15 industry are proceeding with a conveyor belt-like
16 process that is ignoring the environmental impacts.
17 It's failing to consider the environmental impacts that
18 are still coming out, that are still being revealed by
19 the accident at Fukushima.

20 I can tell you that the concern goes far
21 beyond just the fact that the NRC is ignoring these
22 concerns. The problem is that the NRC doesn't have the
23 ability or the will to actually challenge a license
24 extension for any nuclear power plant, let alone the
25 Limerick plant as it is a sister plant to Fukushima

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1 Daiichi.

2 The problem is also that we've got
3 -- the NRC has already relicensed 75 nuclear power
4 plants in the United States and they are proceeding.
5 They have yet to significantly challenge or stop a
6 license extension for any of these plants despite all
7 the questions. But for the Limerick plant, it's
8 particularly egregious because the NRC knows that this
9 power plant is in violation of its license agreement.
10 So they're talking about extending a license agreement
11 violation. And I'm specifically referring to the
12 general design criteria.

13 Let me read you what the general design
14 criteria says according to the NRC's own requirement.
15 "The principal design criteria establish the necessary
16 design, fabrication, construction, testing, and
17 performance requirements for structures, systems, and
18 components important to safety. That is structures,
19 systems, and components that provide reasonable
20 assurance that the facility can be operated without
21 undue risk to the public health and safety." How can
22 this Agency proceed with licensing, relicensing in view
23 of the dramatic failures that we all witnessed
24 world-wide on television at the moment at Fukushima
25 Daiichi and those series of explosions which now

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1 demonstrate that the General Electric Mark I boiling
2 water reactor containment system is a 100 percent
3 guaranteed failure. Three operational units at the
4 time, Units 1, 2, and 3, 100 percent failure under
5 severe accident conditions. Multiple explosions,
6 massive land contamination, marine contamination,
7 groundwater contamination, and that's the evidence.
8 That's what we all witnessed.

9 But it doesn't stop there. The NRC's own
10 general design criteria focuses on the containment
11 design itself for this nuclear power plant. These two
12 units. And that is general design criterion 16. And
13 again, this is the NRC's own language. "Containment
14 design. Reactor containment and associated systems
15 shall be provided to establish an essentially
16 leak-tight barrier against the uncontrolled release of
17 radioactivity to the environment and to assure that the
18 containment design conditions important to safety are
19 not exceeded for as long as a postulated accident
20 condition is required. The NRC knows that the
21 Limerick Units 1 and 2 containment design is very likely
22 to fail if challenged by a nuclear accident. In fact,
23 the NRC's own staff in a paper prepared for the
24 Commission, SECY-2012-0157, identifies that for the
25 General Electric Mark II boiling water reactor at

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1 Limerick, involving core damage, there is roughly a
2 50-50 chance of recovering from the nuclear accident
3 within the pressure vessel with no significant reactor
4 release from containment. That's their language.

5 The flip side is that it's a 50-50 chance that the vessel
6 will fail with a significant release from containment.

7 It goes on to say, this is the NRC staff
8 that "if the vessel fails, there's a 25 percent chance
9 that the operators might cool the molten core inside
10 the containment with no significant release to the
11 environment." Okay, the flip side of that is there's
12 a 75 percent chance that they will recover, that there
13 will be a release, a significant release. This is the
14 NRC's own estimate of Limerick 1 and 2.

15 That said, NRC states there is an 11.8
16 percent chance that a severe core damage sequence will
17 lead to early over pressure containment failure where
18 there is a 90 percent chance the molten core will bypass
19 the
20 containment system, principally the suppression pool
21 because it will burn through seals in the containment
22 and there will be a catastrophic release of unfiltered
23 radioactivity into the environment and to the
24 population down wind. That's you. That's us.
25 That's miles and miles and miles away. This is the kind

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1 of gambling that the Agency and the industry are engaged
2 in for the emolument of a few men. We don't need this
3 plant to be operating at that risk.

4 In fact, this plant should not receive a
5 license renewal and should be put into a phase out just
6 on the fact that they are in violation of their license
7 agreement. So the concern here is that we are not being
8 provided a process that fairly evaluates the risk to
9 the public health and safety and to the environment and
10 in this instance NRC stands for the Nuclear Railroad
11 Commission. Thank you.

12 (Applause.)

13 FACILITATOR BARKLEY: Okay, thank you,
14 Paul. We have about 20 minutes left in the meeting and
15 I have three speakers left to call. If there's anybody
16 else who would like to speak, please come see me. The
17 next person up is Alisa Otteni and that will be followed
18 by Less Rinehart.

19 Alisa.

20 MS. OTTENI: Hello, there. I'm Alisa
21 Otteni and as some of our previous speakers mentioned
22 I wear multiple hats. Unlike some of you guys who have
23 come three hours and thank you for coming three hours,
24 I'm a local resident. I live in Chester Springs. I'm
25 raising my kids here. I have three children at Owen

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1 J. Roberts School District which is a local school
2 district. I am a trained certified environmental
3 auditor. I have 25 years of international auditing
4 experience. I've seen quite a lot out there, trust me.
5 I have stories. But currently, for the last two years
6 I have been employed by Exelon. I work for Corporate
7 Environmental. I sit in the Kennett Square campus and
8 I support and assist Limerick Generating Station.

9 Part of my job responsibility is to provide
10 governance and oversight related to environmental
11 complaints and make sure the site follows the
12 environmental regulations and stays compliant. I
13 believe the station has a very strong environmental
14 program based on my history, my understanding of the
15 rules and audits down by international, internal
16 agencies. We get audited by more people than you've
17 probably ever imagined with acronyms that I still
18 cannot keep up with and I thought environmental regs
19 had acronyms. I'm impressed with the staff at this
20 plant. These staff are your neighbors. They work in
21 this plant. They care about their own environment,
22 just like I do. I live here. My kids go here. I care
23 about where I live.

24 And some of the other stuff I do with them
25 is on the side. My children come just like the other

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1 woman said with her child. My kids take tours of the
2 plant. They learn about how fission works and they
3 learn about how a nuclear power plant works and they
4 can talk conversationally about how Limerick works.

5 They help with the Boy Scouts and the Girl
6 Scouts with building the trails and planting the
7 pollinator gardens and bird houses. I also support the
8 station, actually multiple stations with a Wildlife
9 Habitat Council certification and the work that they
10 do for that certification. And recently we started
11 working with the Audubon Society.

12 So I'm pretty impressed and I'm here to say
13 I support the Draft EIS renewal of the Limerick
14 operating license. Thank you.

15 (Applause.)

16 FACILITATOR BARKLEY: Les.

17 MR. RINEHART: Thank you. I'm Les
18 Rinehart. I own Potty Queen. I'm a local business.
19 My business is located right in front of the power
20 plant. We have absolutely no problems with the power
21 plant. We're in favor of relicensing. I feel the same
22 commitment they do as far as environmental safeguards.
23 They do it every day. We see it. We see security
24 there. We see if anybody is out snooping around in
25 front there, they send security over right away. And

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1 they have a lot of systems in place that protect the
2 people.

3 I have lived and worked in and around the
4 power plant all my life. I've hauled trash out of there
5 when I was in high school. When the facility opened
6 up, I hauled trash out of there. Now many years later,
7 I built my business right next door. I have 32
8 employees. None of them have any problems. Exelon is
9 a great corporate neighbor. They're great for the
10 neighbors there in the community. They do a lot for
11 the community, donations and what have you.

12 We all use electric. We all turn the lights on
13 at night. We all need it. If you look around, there
14 was two local coal-fired plants that were closed down
15 recently. So we need a source. And Exelon is a good
16 source. The power plant does a great job.

17 Years ago, when I was in high school,
18 nobody wanted to build a house around the power plant.
19 Nobody -- they were scared. Now they're building right
20 next to it. And the reason they're doing that is
21 because they see the safety track record. They have
22 a safety track record there. They don't have any
23 problems. There's no incidence there that I know that
24 would make me feel uncomfortable about going into work.

25 I drink the water every day. And I repeat,

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1 I'm in favor of repermitting and thank you for your
2 time.

3 (Applause.)

4 FACILITATOR BARKLEY: Okay, thank you,
5 Les. The last person who asked to speak was Chris
6 Conroy and unless there's someone else who wants to --
7 Leroy Watters? I didn't see a card for you, but you're
8 next. How's that? Right after Mr. Conroy, all right?
9 We have plenty of time.

10 MR. CONROY: Hi, my name is Chris Conroy.
11 I live in West Chester and I work for Exelon at the
12 Limerick Station. I've worked for Limerick for about
13 the past four years. And I do believe, based on my own
14 experience that Limerick is operated in a way that's
15 safe and protective of the environment. In my opinion,
16 Exelon is a very good corporate citizen and operates
17 the plant in an environmentally-responsible manner.

18 Through my job at Limerick, I've had a lot
19 of contact with staff from various regulatory agencies
20 that issue Limerick operating permits and do
21 inspections at Limerick on a regular basis. The
22 comments and feedback that I've received from these
23 agency staff have shown me that the agencies really
24 appreciate a company like Exelon at Limerick that takes
25 environmental responsibilities and environmental

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1 compliance seriously.

2 I support the approval of the Draft
3 Environmental Impact Statement for Limerick's license
4 renewal application. Thanks.

5 (Applause.)

6 FACILITATOR BARKLEY: Come on up, Leroy.
7 I don't know where your card went, but we're going to
8 hear from you.

9 MR. WATTERS: Where's my card?

10 (Laughter.)

11 First of all, I like to speak anyhow so I
12 get input on what everyone else thinks. And I like to
13 make my stuff different. My name is Leroy James
14 Watters III and I live on Schuylkill River in historic
15 Fort Indiantown.

16 Now my love for the Schuylkill River
17 probably is because it's my favorite playground since
18 I was about nine years old. But it's also the source
19 of my drinking water. The water comes out from behind
20 the Norristown Dam in Norristown which is the county
21 seat where Pennsylvania's water comes from. And the
22 first introduction that I had with Limerick had to do
23 with a committee of the Norristown Boat Club, we were
24 concerned about them boiling off all the water. And
25 I was involved with the DRBC rules and regulations back

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1 to the original ones. And what the DRBC does is it
2 controls consumptive use because Limerick can burn off
3 a lot of our drinking water.

4 Now I've been looking forward to doing
5 something since the early '90s when I videoed a
6 dissolved oxygen violation that basically killed all
7 the clams from Limerick down because of the dissolved
8 oxygen violation because of the temperature violation
9 and a flow violation of the DRBC rules.

10 Now in '91 and '92, as a member of the
11 Telephone Pioneers of America, I was the chairman of
12 the Environmental Committee and we won awards for
13 stewardship and that's when it began, when I saw all
14 the dead clams and smelled what the problem was.

15 Now since that time with the help of my
16 wife, Lynn, we've been able to acquire USGS documents
17 of algae blooms. Now an algae bloom occurs when the
18 flow of the river is less than 730 cubic foot a second,
19 I think that is, and the temperature is above 79
20 degrees. Now those are the two rules that were in the
21 original DRBC regulations.

22 Now the high impact problem of these algae
23 blooms not only is the clam kills which are the canary
24 in the coal mines that tell you when the next living
25 thing dies, it has the impact on clogging the filters

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1 in the water main, requiring around the clock
2 monitoring. Now almost four decades I had
3 with Bell Telephone, well, now it's called Verizon, I
4 had an opportunity to be outside and witness a lot of
5 environmental issues from sewer plants to well, we
6 won't go there. But the fact is is that the last spill,
7 excuse me, wrong meeting, this has to do with the algae
8 blooms.

9 The last algae bloom which we have USGS
10 documentation, I called the DRBC and complained about
11 the condition. They referred me to the Delaware
12 Estuary who referred me to the Corps of Engineers who
13 are the ones that are responsible -- oh, excuse me,
14 after explaining the problem with the Green River and
15 the dying clams five times, I managed to get to George
16 S., we'll call him George S. And what we accomplished
17 is changing the flow from Beltzville to Blue Marsh to
18 stop the blooming and also deal with the salt line in
19 the Delaware River which is what the Army Corps of
20 Engineers and the DRBC is responsible for.

21 Now the thing is is that I have a moral
22 responsibility to share what I know and I intend, well,
23 let me say this about that. I have put some stuff on
24 YouTube that has fixed things. Now I have a very
25 embarrassing video from July 7, 1991 showing this

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1 condition on the Schuylkill River. I just may put this
2 on YouTube.

3 Now in order to resolve these problems, we
4 have to look at the environmental impact of the
5 tornadoes and you want to get this one? I remember the
6 tornado that came down and tore the roof of the NRC
7 building in King of Prussia. Now I thought that was
8 a real ha-ha. But I didn't think it was a real ha-ha
9 from the baseball size hail that hit. Does anybody
10 remember that?

11 Well, here's the thing. Fishing is down
12 because it's affected the river. Something happened
13 to all the aquatic plants that's in there. We have
14 aerial photographs that document this. The Valley
15 Forge Watershed Association which I'm part of, I'm on
16 the Community Education and Outreach, that's why I'm
17 outreaching out here to all you folks.

18 This came too fast for having official
19 comments from the watershed, from the community
20 afforded in the end, from the Norristown Boat Club and
21 everybody else that's affected by the environmental
22 quality of this river. I have that documentation.

23 I am not here talking idly. My career for
24 almost four decades in the telephone company had to do
25 with the truth and we will get to the bottom of this.

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1 And everybody is going to have an opportunity see this
2 video. God bless.

3 (Applause.)

4 FACILITATOR BARKLEY: Thank you, Leroy.
5 And we did find your card. Sorry.

6 MR. WATTERS: Like I said when things get
7 lost, it's sometimes for a benefit.

8 FACILITATOR BARKLEY: All right. Very
9 good. We have about five minutes left, if there's
10 anyone who would like to make one last remark.

11 At this point I'd like to let Leslie come
12 up and make a remark at the end?

13 DR. DIETRICH: Could I just say something
14 real quick?

15 FACILITATOR BARKLEY: From here, please.

16 DR. DIETRICH: Sorry.

17 FACILITATOR BARKLEY: He has to
18 transcribe you.

19 DR. DIETRICH: Just one small thing. I
20 wanted to say about when I was talking about risk
21 takers, this was a comment that I think the last comment
22 that really makes some sense that could bring some --
23 a little bit more clarity about risk takers.

24 The person most willing to take on risk is
25 the one unaware he is doing so. He charges no risk

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1 premium. The resulting market of equilibrium is that
2 the guy who is unaware of the risk ends up loaded with
3 it. Then the music stops.

4 FACILITATOR BARKLEY: Thank you.

5 (Applause.)

6 You are welcome to speak for one more
7 minute, please. Why don't you stay there.

8 MS. CUTHBERT: I just had a question for
9 all of you who have testified on behalf of Limerick
10 relicensing. I'd like to know if any of you have ever
11 analyzed the air permits, water permits, the
12 radiological monitoring report or the Safety
13 Evaluation Report that's being done with this
14 relicensing? That's my only question.

15 FACILITATOR BARKLEY: I won't put anybody
16 on the spot to answer that.

17 Are we ready to wrap up, Leslie? Okay.
18 With that, I really appreciate the cooperation of the
19 audience. We got through every speaker. I gave
20 flexibility to everyone as we went through who are
21 finishing up right at the marker. So again, thank you
22 for being a very positive audience. I know you feel
23 very strongly about it. We heard your comments and
24 remarks and we'll address them.

25 I would advise you again, up until June

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1 27th you can submit additional written comments to the
2 NRC so please don't let that deadline pass if there's
3 something you want to submit to us. With that, I'll
4 close the meeting. Thank you.

5 (Whereupon, at 3:58 p.m., the public
6 meeting was concluded.)
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