

**Gallagher, Carol**

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**From:** Seiber, Benjamin <bseiber@pa.gov>  
**Sent:** Tuesday, June 25, 2013 3:10 PM  
**To:** Gallagher, Carol  
**Cc:** Allard, David; Janati, Rich; Adams, Tammy; Yordy, Karyn  
**Subject:** Limerick GEIS comments  
**Attachments:** Limerick\_PA\_comments.pdf

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Ms. Gallagher,

Please find attached comments from the Commonwealth of Pennsylvania regarding Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS) Limerick Generating Station, Units 1 and 2 (LGS) per docket number NRC-2011-0166-0049. The hard copy of the original letter is being mailed tomorrow. Thank you.

**Ben Seiber** | Program Analyst  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street | Harrisburg, PA 17101  
Phone: 717.783.7702 | Fax: 717.783.8965

5/7/2013

78 FR 26663

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SUNSI Review Complete  
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E-RIDS= ADM-03  
Add= L. Perkins (HP1)



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SECRETARY

June 25, 2013

Cindy Bladey, Chief  
Rules, Announcements, and Directives Branch  
Office of Administration, Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Docket ID No. NRC-2011-0166-0049

Re: Draft Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants, Supplement 49 Regarding Limerick Generating Station, Units 1 and 2

Dear Ms. Bladey:

The Pennsylvania Department of Environmental Protection (DEP) has completed its review of the draft plant-specific Supplemental 49 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants," regarding the license renewal of Limerick Generating Station (LGS), Units 1 and 2. This review pertains only to the radiological aspects of the LGS license renewal application.

DEP has no major concerns and does not object to the renewal of the LGS operating license for an additional 20 years. We do have a concern with the long-term storage of spent nuclear fuel at reactor sites. DEP encourages the NRC to continue with the timely development of an environmental impact statement to account for the long-term storage of spent nuclear fuel and high-level radioactive waste and associated transportation.

### **Radiological**

DEP has no major concerns with the radiological portion of the draft GEIS for the Limerick license renewal. DEP has implemented a comprehensive nuclear safety and environmental surveillance program at the five reactor sites in Pennsylvania, including the LGS. Routine sampling of air, milk, surface water, vegetation and fish are performed, both independently and in conjunction with the facility's self-monitoring program. Environmental dosimeters record levels of radiation exposure in the vicinity of each nuclear power plant. The program also monitors the activities associated with the management and disposal of low-level radioactive waste (LLRW) in Pennsylvania.

Prior to Exelon's submittal of the license renewal application to the NRC, DEP requested that Exelon provide a description of the on-site groundwater monitoring program at LGS. The inclusion of this program in the license renewal application is not currently required by the NRC; however, Exelon responded favorably to DEP's request. The primary purpose of the groundwater monitoring program, as described in Section 5.2 of Exelon's submittal (Sections 2.2.5 and 4.5 of the draft GEIS), is to provide timely detection and response to any radiological releases to groundwater. Based on the information provided in this document and DEP's prior review of Exelon's Radiological Groundwater Protection Program, we believe that Exelon has taken appropriate actions to protect public health and safety and the environment, both during current and extended periods of LGS operations. DEP will continue to monitor

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Rachel Carson State Office Building | P.O. Box 2063 | Harrisburg, PA 17105-2063

Exelon's activities in this area, an effort that includes regular interactions with the LGS Environmental Monitoring Program staff and analyzing samples of selected on-site monitoring wells, as deemed necessary.

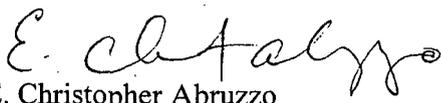
Following Exelon's submittal of the license renewal application to the NRC, DEP staff attended the NRC public meeting for the acceptance of the license renewal application on September 22, 2011. DEP staff observed selected portions of the NRC audit of the LGS Aging Management Program during October 2011 and participated in the NRC environmental audit on November 7-10, 2011. On May 23, 2013, DEP staff attended the NRC public meeting to discuss the draft GEIS and to receive comments from public stakeholders regarding environmental aspects of the LGS license renewal application.

As it relates to management and disposal of LLRW, Exelon has received approval from the NRC for storage of LGS LLRW at the Peach Bottom Atomic Power Station (PBAPS) in Delta, PA. The NRC consulted with DEP prior to approval of Exelon's request. Considering the lack of an interim LLRW storage facility at the LGS, the small number of shipments, and the existing capacity of the interim LLRW storage facility at the PBAPS, DEP determined that the transfer of LLRW from LGS to PBAPS would not pose any danger to public health, safety or the environment. However, DEP stated that it expects Exelon to immediately cease shipments of LLRW from LGS to PBAPS when a disposal facility for Class B and C wastes becomes available. The new Waste Control Specialists facility in Texas is now fully operational and, as such, Exelon has confirmed that they will begin shipments of LGS LLRW to the Texas facility and halt future shipments of LLRW from LGS to PBAPS.

Regarding the storage of spent nuclear fuel at the LGS site, DEP has publicly expressed concerns about long-term storage of spent nuclear fuel at the reactor sites. We encourage the NRC to continue with the timely development of an environmental impact statement, as part of its Waste Confidence decision and rule, to account for the long-term storage of spent nuclear fuel and high-level radioactive waste and associated transportation. The Commonwealth of Pennsylvania has been and continues to be a strong advocate for the Department of Energy's creation of a permanent repository for disposal of spent nuclear fuel and high-level radioactive waste.

Thank you for the opportunity to provide comments on the LGS license renewal application. Should you have questions or need additional information, please contact Vincent J. Brisini, Deputy Secretary for Waste, Air, Radiation and Remediation, by e-mail at [vbrisini@pa.gov](mailto:vbrisini@pa.gov) or by telephone at 717.772.2724. You may also contact David Allard, Director of the Bureau of Radiation Protection, by e-mail at [djallard@pa.gov](mailto:djallard@pa.gov) or by telephone at 717.787.2480.

Sincerely,

  
E. Christopher Abruzzo  
Acting Secretary