



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

JUN 27 2018

David J. Wrona, Chief Project Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation
U.S. NRC
Mail Stop T6-D59
Washington, D.C. 20555-0001

RE: Draft Plant-Specific Supplement 49 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants – Limerick Generating Station, Units 1 and 2, CEQ No. 2013123

Dear Mr. Wrona:

The U.S. Environmental Protection Agency (EPA) Region 3 reviewed the Draft Generic Environmental Impact Statement (DGEIS) for the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The DGEIS was prepared in order to assess the potential impact related to the license renewal for the Limerick Generating Station (LGS), Units 1 and 2 for an additional 20-year period. The LGS is located in Limerick Township (adjacent to the Schuylkill River which provides a portion of its cooling water needs) Montgomery County, Pennsylvania, 1.7 miles southeast of the Borough of Pottstown. The purpose and need for the proposed action (issuance of a renewal license) is to provide an option that allows for the power generation capability beyond the term of the current nuclear power plant operating license to meet future system generating needs.

As part of the NEPA review process, EPA has developed a set of criteria for rating Draft Environmental Impact Statements. The rating system provides a basis upon which EPA makes recommendations to the lead agency. Based on this rating, EPA has considered the Draft Generic Environmental Impact Statements for the license renewal of Limerick Units 1 and 2 as an Environmental Concerns 1 (EC-1). An EC rating means the review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. The numeric rating assesses the adequacy of the Environmental Impact Statement. The 1 rating indicates that the DGEIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information. Our rating system can be found at: <http://www.epa.gov/Compliance/nepa/comments/ratings.html>.



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EPA concluded this rating in part due to deficient information on the potential environmental impact associated with the onsite disposal of spent fuel subsequent to the decommission of Units 1 and 2. Section 6 of the draft generic EIS provides information on impacts associated with spent nuclear fuel both "Onsite and Offsite"; however it does not provide sufficient detail of potential environmental impacts of onsite storage subsequent to reactor decommission. EPA recommends that the Final EIS address this aspect of the project's future activities.

EPA suggests that the Final GEIS include greater detail of the potential environmental impacts and the measures taken to address the increased population surrounding the facility from both the aspect of emergency notification/evacuation planning and from cumulative effects perspective. As you may be aware there has been substantial population growth around the area of the LGS. While Section 5 provides details on postulated accidents, and Section 4.12.8 includes a summary of cumulative impacts, it is unclear in both cases, how the increase growth has been factored into the analysis.

As new science emerges on the topic of Climate Change, the facility should consider adaptations that might be appropriate for the future. Please address this issue in the Final EIS.

Additionally, one of the leading causes of water quality impairment in Schuylkill River watershed is related to stormwater runoff. Over the last 20 years stormwater management practices have evolved from peak flow attenuation to low impact development. Please include any information on if or how the facility will upgrade its stormwater management practices over the re-licensing period. EPA recommends the facility consider upgrading its stormwater management practices to current standards.

EPA appreciates the opportunity to comment on the DEIS and look forward with the continued to development of the Final Environmental Impact Statement. As we are planning to meet with representatives of the facility within the next few weeks, we would like to reserve the ability to provide further comment if needed. If you have any questions regarding our comments, please feel free to contact me at (215) 814-3322 or Kevin Magerr at (215) 814 5724.

Sincerely,



Barbara Rudnick, NEPA Team Leader
Office of Environmental Programs

