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Public Comment: NRC Draft EIS for approving Exelon's License Renewal Application For Limerick Nuclear Plant
Docket ID **NRC-2011-0166**

We are very disappointed with the NRC's interpretation of the information submitted through public comments during the autumn of 2011 for Limerick's Draft EIS, 2013. We read the EIS public comments that were transcribed for the NRC and it seems that the NRC discarded every public comment from the public except those from Exelon executives, employees, or who benefited financially from Limerick operations. We do not understand the NRC's blindness to the lack of public protections that we face as a consequence of this NRC decision. We do not understand how any environmental impact resulting from Limerick operations could be viewed as "small", as the NRC has claimed in its presentation of Limerick's Draft EIS for license renewal.

NRC seems to go through the motions of public meetings without being impacted by public concerns about issues that directly affect us. It is hardly helpful to NRC to have the public's distrust. But when the NRC treats the public as if we have no value beyond our usefulness as taxpayers, valued only for our ability to fuel massive nuclear subsidies, then mistrust follows.

NRC's lax regulation of Exelon's Limerick plant adds a financial burden to the public's impacted health, safety, and the environment. The public bears much of Exelon's business costs, cost over-runs, and costly miscalculations (like its decommissioning fund shortfall). This is a miscarriage of justice. Worse, the public, which is required to sacrifice our finite water resources to Limerick's nuclear process, could end up being just so much acceptable collateral damage if Limerick suffers a catastrophe. We could lose everything just to preserve Exelon's financial interest in Limerick.

The Draft EIS is a perfect example of NRC's manipulation of perception. The NRC made statements at its meeting that were contrary to our interpretation of the EIS transcript. NRC seems to believe that if NRC says something is true, then it *becomes* truth. This is a problem of incalculable magnitude because it means that NRC's statements can't be relied upon to accurately assess the safety of Limerick Nuclear Plant operations or its true current or potential environment impacts.

One evening earlier this year, we went to a small sparsely attended NRC public meeting at the Limerick Township Building. Despite NRC's statements that it is fully engaged with the public, it looked like the public was not really welcome. Tables and chairs were stacked against the walls (except for a table by the door covered with NRC brochures). The year before, there had been cloth-covered tables in the open with chairs around them, as well as chairs ringing the room.

When we asked who we could talk to about Limerick's safety issues, we were introduced to two NRC representatives. As we all introduced ourselves, they helped us get out folding chairs and we sat down cordially. We chatted amiably, but none of our questions were answered.

We asked about the tonnage and condition of Limerick's highly-packed fuel pools, the "Untimely Declaration of Notification of Unusual Event Following an Earthquake", and Exelon's deferral of safety upgrades (until the expiration of the current permit), a decade away, which Exelon might or might not address. We got no answers.

The year before, we had come to discuss our new discovery of the Sanatoga Fault map and our earthquake concerns. But NRC officials expressed ignorance of the map, implying they knew nothing of the fault and stood by NRC's decades-old original earthquake analysis for Limerick.

We also expressed concerns about the tons of pollution caused by chemicals that come out of the cooling towers as PM-10 with attached radionuclides, along with millions of gallons a day of river water which forms the steamy plumes that can contribute to a multitude of health problems and depletes our river. An NRC official told us that it was just steam, "like steam from your tea kettle". But we understand from the Title V Permit that chemicals added to the towers amount to thousands of pounds of pollution, not "just steam".

At the Draft EIS meeting, we faced the same problem. As ACE research assistants, we had contributed to preparing ACE graphics for the meeting. But as we asked questions about the areas of concern that we and other members had so carefully illustrated, the NRC representatives listened politely, but did not seem to have any background concerning the issues that worried us. How can an agency regulate a utility without preparing its agency members with necessary information to interface with the public on the safety issues of a particular plant?

A Japanese film crew was at the meeting. Last Friday evening, June 21st, we saw a few sound bites of the U.S. NRC public meeting aired on NHK news. We were dismayed because the selection of spliced pieces was being used in Japan to promote nuclear energy resurgence by promising better public involvement with Japan's NRA (its version of the NRC) based on the illusion that it exists in the U.S. It is beyond our understanding how the U.S. could encourage Japan by allowing this erroneous perception of welcomed public involvement with the NRC in the U.S. to lure the Japanese public into submitting to the unnecessary, devastating, and inevitable harms created by nuclear energy production.

It reminded us of Limerick's promise of energy that would be "too cheap to meter". And it is symbolic of NRC's Draft EIS, which is based not on fact, but on the NRC's stubborn refusal to acknowledge the destruction of the environment that its decisions affect, which imperils public health, safety, and welfare. We feel that the NRC's assessment of Limerick's environmental impacts as "small" is an injustice to millions of people and an affront to society's moral responsibility to be stewards of the environment for our posterity. We beg the NRC to reconsider its choice to re-licensing Limerick.

Charlie & Betty Shank