



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

RULES AND DIRECTIVES  
BRANCH  
USNRC

2013 JUL -3 PM 2:43

RECEIVED

5/7/2013

78 FR 26663

12

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM -03

Add= L Perkins (LHP)

NRC

## SUPPLEMENTAL COMMENTS

on GEIS Supplement 49 for Limenick

NUCLEAR generating station Units 1+2

DRAFT      Docket ID NRC 2011 0166

June 27, 2013 from Tina Daly

my address is not for general circulation  
and is enclosed on a small card with these  
comments

I submitted comments at the NRC meeting in  
Pottstown, PA on 5-23-2013. A copy of those  
comments are attached to these Supplemental  
Comments.

I see it is necessary to have a copy of the GEIS in  
order to really know everything. One should have  
been supplied with the SGEIS.

There are F Z M A + A; T A almost 260. It makes  
THTR. Of course my favorites are ALARA, BMP,  
+ for US in PA: MDPH, PR ?? really - you can't write "rare"?,  
and TMDL for TMD UPLOAD-oops!

I love the idea of "Probabilistic risk assessment" p. xiii  
line 13. What? How to wiggle out of reality.

\* F = Far      A + A = Abbreviations + Acronyms  
M = Many      T A = There Are      THTR = This is Hard to Read

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6-27-13  
Daly

I love: "NRC staff BELIEVES are LIKELY to continue to exist...." wiggle wiggle wiggle. p. xix line 13

I love: "The comments CONSIDERED to be within the scope of the environmental license renewal...." Judging the public and ignoring the public. Oh my. p. 1-3 line 6

Where is the safety report? Can we see it + comment in public? p. 1-3 line 23

Mitigation of adverse impacts means you still allow adverse impacts and try not to do worse things, but you might, p. 1-4 line 29

MINIMIZE means it is still there but may be less. p. 2-1 line 36.

Keep in mind The National Academy has said there is NO safe level of exposure to ionizing radiation. p. 2-1 line 35 + ff are about minimizing, controlling, meeting standards that allow exposure etc. ALARA is a laugh. Calculate p. 2-2 line 9 - not PREVENT, not measure BUT calculate - (how??)

Objective is to LIMIT releases 2-2 line 13, NOT STOP BUT LIMIT.

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Daly

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P. 2-2 line 23 REDUCE to ALARA

I mean really, this is all very silly but  
VERY SCARY.

Waste from Laundry P 2-2 line 38,

Does it stay in the Sample tank forever?

What happens to it?

2-5 Where is the Pump House shown on 2-17?

P. 2-6 line 9 - A favorite line

"diluted with air"

Its still there.

P. 2-6 line 18 Permanent Disposal

There is NO such thing as

disposal or Permanent - just moving it around.

Another favorite p 2-7 line 33

"...using Corporate procedures"

What are they?

EXELON wants Upgrades.

Keep that in mind.

What is how may differ with UPGRADES.

line 34 p. 2-8

"...does not EXPECT..."

nicely vague

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Point: LNG or LGS

LGS lulls the mind.

It does not say Nuclear

so one does not worry.

Great PR

Using LNG or LGS numbs the mind

P. 2-15 PECO has been told NOT to use

Biological or Chemical "Techniques"

on our land.

P. 2-16 line 1, "clay lined" how do you

know it doesn't leak? INSIGNIFICANT

INTERFACE - how do we know? No info

given.

2-17 Where is this? Very Vague.

P. 2-30 line 28 ... shaking WOULD LIKELY

result..." too vague and wishful.

P. 2-30 line 30 "adequately conservative" vague

and pathetic considering all things Japanese.

PA DEP Should think again about RAM in

the river and their designation for fishes. P. 2-32 line 33,

This document should show RAM levels in water

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and fish if fishing is encouraged in rivers with RAM.

DILUTION is not a solution for pollution.

P. 2-45 line 11

Exelon has not conducted any sampling

or monitoring of aquatic biota in Possum

Hollow Run -

WHY NOT ?? almost criminal - has DEP??

Read the NPDES permit application, and weep.

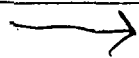
Where are the Dredge spoils for the Vincent Dam  
that <sup>were</sup> removed from the Schuylkill River

Several years ago? Were they tested for  
RAM? Why is this information so hard to get?

NO foot notes. Where does info come  
from?

LLW is one tick off HLW. Remember?

LLW can be very hot,



Page 2-24 line 35

CONRAIL Rail line

Page 2-24 line 33

"All activities on the LGS Site are

Under the control of Exelon"

EXACTLY what does that mean?

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Is Conrail under the control of Exelon?

Please Be SPECIFIC.

Who would be liable for a train accident on this part of the railroad?

→

NEW SINCE LNG started  
Changes to Conrail  
that very well might  
IMPACT US ALL

See attached Article about Paulsboro, NJ  
and Conrail and liability.

When LNG began Conrail was owned by  
one entity and since then has changed  
hands.

I think it's a common carrier But it  
may be that users contract between  
themselves and Conrail or CSX or NS

All of this is IMPORTANT

mixed in with Exelon

stating on P 2-24 line 33 that  
it controls ALL activities.

N R C MUST STOP The approval  
of the GEIS . . . . .

and ALL relicensing

UNTIL

The public is informed about the Railroad  
and who is liable for what at this site.

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p. 2-69 and commuting routes

NEW population growth

See attached news article

There has been major population growth and use of roads.

Just go on 422 at rush hour.

Leave your NEC Desk and come try driving around. Many roads are already clogged.

Because health can be adversely impacted by exposure to RAM there are costs to schools

to the health system

These are either NOT discussed or the discussion is inadequate.

Taxes

Does Linenak Nuclear PP pay its fair share of taxes.

Probably NOT.

There are NO Definitions. What does

"refurbishment"

mean

?



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6-27-13

P. 4-1 There is no NO mention  
of issues related to the Rail line  
(thru the site) which I view  
AS VERY CRITICAL  
for the public to understand  
in detail.

What is Exelon's relationship with the Railroad(s)?

4-1 → tables refer to GEIS  
so citizens have a hard time  
getting needed info

4-21 HUMAN Health

Did we know about Baby Teeth + Strontium 90  
when the plant began?

Have we learned NOTHING about  
RAM + cancer + other illnesses  
in 40 years?

Come on.

NRC relied on Exelon for info  
on Health?

can you see cancer on a  
site visit?

Did you ignore ACE re  
scoping?

What info, not paid for by Exelon or

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other corporate interests did NRC  
evaluate for this?? I see none or too few  
in your bibliographies,

Page 4-22 line 27

normal operations  
is operating "normal"?  
wiggly room

all this about radiological impacts of  
so called Normal operation,

(Define the term "normal").

must be prefaced with the National  
Academy finding that there  
is no safe level  
of exposure to ionizing  
radiation

The rest is fluff.

Back to xvii line 1

Rules - a revised rule is EXPECTED  
to be published

Let's put this application aside  
for about 15 years until the  
rules are in and in effect and  
the public knows what they say.

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Daily

6-27-13

Re page 4-41 4.12 Cumulative Impacts  
I suggest that someone read this  
out loud to NRC and then test  
them to see if they can explain  
it, what gibberish.

Marcellus shale page 4-47 line 28

Please note article attached  
from Phila. Inq. 5-29-13.

NEW Since LNPP went on line

Please explain this

Page 4-48 line 12 (4.12.3.4 conclusion)  
This is COMPLETELY ILLOGICAL  
and dangerous.

NEW Since LNPP went on line

Stresses on the river

recently for 8 years agonized  
over + Exelon WON - river is  
now augmented and ground water  
in Schuylkill <sup>COUNTY</sup> ~~township~~ + the river  
are DEVOTED to LNPP.

Yes - increasing urbanization

Yes increasing demand for water

people have a right to clean water  
depend on factors NRC staff can't quantify -

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6-27-13

how can you write that + then make a conclusion?

IF NRC can't do it -

DO NOT grant the relicensing.

Decommission at ONCE.

Page 4-5 line 39

Spent Fuel Storage

NEW since LNPP began

a defacto HLW Dump

What rules govern it? Linenck Township Zoning?

and Building codes?

Who has liability?

Page 5-1 Postulated Accidents

leads to 5.3 SAMA

1 Concur with NRC

1 Add to the 3 Railroad issues.

Liability + who has it

is a concern overall

Closure and Decommissioning should be clearly understood by the local population.

IF the life is extended what will be left at the end and who is liable?

So do a complete EIS for decommissioning.

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What? p 7-1 line 27

There are NO site-specific

issue related to decommissioning.

The site will be the same whether or not

The plant operates?

Of course there are issues and NRC

should spell them out.

Brownfields is the biggest public

scam there is, its about LIABILITY

and transferring it on to the public.

The spent rods will be there. What happens to them?

Closure - what happens to radioactive

materials like cement, steel, water, soil,

etc. in closure?

What happens to the HCL pool?

How long is Exelon liable?

What gets dumped on others?

The alternative I chose is Closure Now.

9-1 Conclusion

How any sane person can conclude

that nuclear energy is less impacting

than sun + wind should not be

working for the public.

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6-27-13

This is NOT the time to approve this SEIS.

This is NOT the time to consider extending

the license to operate.

This is the time to close this NPP.

Venting

Terror Threats

Earthquakes

Expected regulatory changes

DO NOT renew

while these issues + many

others are not resolved.

This is a terrible document.

Too vague.

Self serving.

NRC needs to be reorganized

and REGULATE

and get out of the corporate bed.

I expect to see all points answered

with time for rebuttals.

There has been no public hearing. Why not?

There should be;

The end

# Chester County one of the fastest-growing in Pennsylvania

5-30-13

By Michael P. Rellahan  
mrellahan@21st-centurymedia.com

Chester County remains one of Pennsylvania's fastest growing counties in population, according to figures released recently by the U.S. Census bureau, but it is also bucking a trend in the state in where its population growth is taking place.

Although the overwhelming number of new residents in the county found their home in one of its 57 townships, there was significant growth from July 2010 to July 2012 in its 15 boroughs, the numbers show.

"Chester County is different than the statewide trends," said David Ward, the assistant director of the county Planning Committee, who spoke about the new census numbers on Friday. "We are seeing as much reinvestment in the boroughs as new development in the townships."

The growth in borough populations, Ward and others said, was driven by a number of factors, including the fact that infrastructure such as roads and water and sewage systems are largely in place, and that younger residents are finding it more affordable to locate in those largely urban areas.

According to the Census Bureau's estimates, the county's population rose by 7,697 over the two-year span from 2010 to 2012, from 498,886 to 506,575, an increase of 1.5 percent. (The county's population topped the 500,000 mark in July 2011, with an estimated 503,662 residents.)

Only Montgomery County, with an increase of 8,579 residents, had a larger growth than Chester County, although its rate of 1.1 percent was behind Chester's. Philadelphia gained the largest number of new residents in the time period of any municipality, with 21,601.

Pennsylvania now has more than 12,763,000 residents, adding 61,157 over the period.

Of the counties close to Chester in growth, Lancaster added 7,375 residents, Allegheny added 5,990, and Lehigh added 5,748.

Nearby, Delaware County added 2,126 new residents, and Bucks County added 1,804.

Of the growth within the county, West Goshen led all municipalities, with 826 new residents added to its 2010 population of 22,926, a 3.8 percent growth rate, meaning that it was the third-fastest grow-

ing township in the state, behind leader Upper Macungie in Lehigh.

West Goshen is the second-largest township in the county in population, behind Tredyffrin, which has an estimated 29,457 residents.

According to the data, nearly three quarters (74.0 percent) of the growth in the state's population since 2010 can be attributed to townships. From 2010 to 2012, the population of its 1,547 townships grew from 7,098,888 to 7,143,594.

Cities also experienced growth over the time period, gaining 17,313 people, or 28.3 percent.

Meanwhile, the state's boroughs showed a decline of 2.3 percent.

In Chester County, boroughs increased in population overall, rising by 970 residents, or an increase of 12.6 percent.

Leading the way was West Chester, the county seat, which added 396 residents, making it the third-fastest growing borough in the state, behind Mount Joy in Lancaster.

Avondale added 125 residents, followed by Phoenixville with 78, Elverson with 54, and Kennett Square with 41.

Only Modena failed to add new residents, losing one person in the census estimates.

West Chester Borough Manager Ernie McNeely said the growth in population was most likely attributable to the development of two new townhouse developments, one on the former Bishop Shanahan High School property on West Gay Street, and the other on the former Hoffman Lumber Yard site on South Franklin Street.

McNeely said that rather than bring municipal challenges to the borough, the population increase has been a benefit, as the new residents pay earned-income taxes into its budget. "Those are working folks paying taxes that contribute to the borough," he said.

In addition, the developments do not require the borough to add to its existing infrastructure the way township development might.

Meanwhile, townships are having to gauge how best to handle the new population. Michael Lynch, township manager in East Bradford, said his municipal leaders had been able to stabilize growth in some part by purchasing open space and development rights of acres of undeveloped land in the township.

For a longer version of this story,  
log onto [www.pottsmmerc.com](http://www.pottsmmerc.com)

Daly  
4-27-13  
C. H. Adams

### Power producer's shares fall

824-13 P1

Shares of several regional power producers were drubbed Tuesday after the regional grid's annual auction attracted a record amount of new generation, effectively pushing down electricity prices for regional generators such as Exelon Corp. Deutsche Bank downgraded Exelon from a "buy" to "hold" after PJM Interconnection on Friday lowered capacity prices for 2016-17, citing an abundance of new natural gas-fired generation and increases in power imports from neighboring regions. Exelon's shares closed down \$2.61, or 7.5 percent, on Tuesday at \$32.04. Shares of FirstEnergy Corp., another big power generator, were off \$2.76, or 6.5 percent. — Andrew Maykuth

### New CEO at Exelon Generation

Exelon Corp. named a new chief executive of Exelon Generation, its Kennett Square subsidiary that manages 35,000 megawatts of power plants, including the nation's largest fleet of nuclear reactors. Kenneth W. Cornew, who was formerly president and chief executive of Exelon's Constellation business unit in Baltimore, will also assume the titles of senior executive vice president and chief commercial officer of the Exelon parent company. Exelon Generation previously was overseen by

employers added fewer jobs than forecast in economic recovery was slowing. The jobless, during the Great Recession, the jobless rate to

Christopher M. Crane, who became Exelon's president and CEO last year after Exelon merged with Constellation. — Andrew Maykuth

### EnerSys declares first dividend

The industrial battery-maker EnerSys Inc. of Reading, announced its first stock dividend — 12.5 cents per share to holders of record as of June 14. The company also said it launched a \$65-million share buyback, running through March 31, 2014. In addition, EnerSys reported fiscal fourth-quarter earnings of \$37.7 million, or 77 cents per share for the three months ended March 31, compared with 94 cents per share for the same period a year earlier. Net sales for the latest quarter were \$572.2 million, down 4 percent from the year-ago quarter. Before the announcements, EnerSys shares closed at \$49.28, up 89 cents, or 1.8 percent. — Reid Kanaley

### Reverse split for WPCS shares

WPCS International Inc., the Exton communications-engineering company, said it concluded a one-for-seven reverse stock split in an effort to keep its listing on the Nasdaq Capital Market by maintaining a share price above \$1. The shares, which closed at



# Conrail responds to a Paulsboro lawsuit

Railroad companies maintain they should be exempt from strict liability in derailment damages, injuries.

By Andrew Seidman  
INQUIRER STAFF WRITER

5-29-13  
Conrail and its parent companies, in a substantive response to one of a flood of lawsuits filed against them after the November train derailment and chemical leak in Paulsboro, maintain that they are "exempt from strict liability" for injuries and damages because they are common carriers legally obliged to transport hazardous freight.

The companies filed the response last Wednesday in the Court of Common Pleas in Philadelphia, where Conrail has its headquarters.

The strict standard of liability holds that the defendant is legally responsible for injuries regardless of intent or carelessness.

"The logic is, if you choose to, say, use dynamite in a construction project, you ought to be able to bear the risk that you injure someone. Common carriers don't have that choice," said Jay M. Feinman, a professor at the Rutgers-Camden School of Law. "By law, they have to accept shipments from anybody who pays the freight."

Some courts have departed from that rule, he said.

The suit, filed May 2 by 20 Paulsboro and Westville residents in the Philadelphia Court of Common Pleas, seeks compensatory and punitive damages, as well as medical monitoring to detect health risks related to significant exposure to the toxic chemical vinyl chloride.

"The Railroad Defendants engaged in an abnormally dangerous activity ... in a manner the Railroad Defendants knew to be dangerous and without taking proper precautions," the suit alleges.

It adds that the railroad companies' "willful and reckless conduct" caused the derailment and subsequent spill of vinyl chloride.

The plaintiffs are represented by the Philadelphia firm Messa & Associates.

Nearly 700 residents had to leave Paulsboro, some for weeks, after a freight train derailed off an automated drawbridge, sending four tanker cars into Mantua Creek and releasing thousands of gallons of hazardous vinyl chloride into the atmosphere.

In their response, Conrail, Norfolk Southern Railway Co., and CSX Transportation Inc. argue that the complaint "does not contain factual allegations showing that Plaintiffs suffered any significant exposure to vinyl chloride, that such an exposure would put any specific plaintiff at a significantly increased risk of developing any specific disease, or that a reasonable and effective medical-monitoring regimen exists for that disease."

The response does not address the charge of negligence. At least a dozen lawsuits have been filed against Conrail in relation to the train derailment.

In an earlier response to a separate lawsuit, filed by more than 50 Paulsboro residents in the Court of Common Pleas, Conrail denied that there was a massive spill of vinyl chloride as a result of the collapse of the East Jefferson Street Bridge.

That response, filed in December, attributes any injuries sustained by the plaintiffs to their "own negligence."

"The bottom line is, if they're not held strictly liable, they were almost certainly negligent and they'll be held liable for negligence," said Mark R. Cuker, an attorney representing plaintiffs in the December suit.

His suit, which seeks medical monitoring and compensatory and punitive damages, does not hold Conrail to the strict liability standard.

Contact Andrew Seidman  
at 856-779-3846,  
aseidman@phillynews.com or  
@AndrewSeidman on Twitter.

Comments on GEIS for License of Renewal  
of Nuclear Plants Supplement 49 Regarding  
LIMERICK generating station Units 1 + 2  
Draft Report

Docket ID NRC 2011-0166

By Tina Daly May 23, 2013

Sunnybrook Ball Room NRC Public Meeting

My name is Tina Daly. I live within 10 miles  
of the Limerick Nuclear Generating Station. I have  
been following the process since the days of  
Limerick Ecology Action. I was one of 2 citizens  
who commented on the latest air permit and  
one of very few who commented on the NPDES.

Also I spent years on the DRBC Water Augmentation Request  
that dedicates the Schuylkill River to  
nuclear power.

I am opposed to re-licensing and I believe  
this plant should be SAFELY decommissioned  
as soon as possible and with full on the record  
public participation at every step.

The DSEIS is completely self-serving  
and shows how far NRC is mired with  
Exelon. Nuclear REGULATORY means

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Regulate. NRC is paid for by all of us and should be fair and impartial. It is strange that the NRC wrote the DSEIS; the NRC set up the interior rules including small, medium + large impacts and whether something is new or old and the NRC will decide whether or not to relicense. What a farce. This is not a good way to make decisions.

The public notice was not informative. Obviously, NRC is not interested in public input.

The notice appeared on 5-9-13 and today is about 2 weeks later. I can not adequately review this document in that time frame. I do thank the NRC for making paper copies available on request.

This is a meeting being transcribed. Are we "on the record" as we would be at a Hearing?  
Is NRC on the Record?

The NEPA Sec. 1502.2(f) says agencies shall not commit resources prejudicing selections of alternatives before making a final decision. On p. iii it says:  
the USNRC's preliminary recommendation is that the adverse environmental impacts of license renewal for LGS are not great

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enough to deny the option of license renewal for energy planning decision makers.

I think NRC is not in tune with NEPA. Does this break the law?

Throughout the SDEIS we are told there is no new information to change the past EIS and decisions.

The fact is there are lots of new pieces of information.

NEW: On 6-29-2005 The National Academy's National Research Council released BEIR VII #2 which says that

The smallest dose of low level ionizing radiation has the potential to cause an increase in health risks to humans.

The science shows that there is no threshold of exposure below which low level ionizing radiation can be demonstrated to be harmless or beneficial.

The National Academy and Councils include top scientists.

This is NEW since LGS started up.

It is NOT considered here. It MUST be considered because LGS is emitting chronic on going radioactive effluents

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into the air, water, soil and bodies of living things.

Maps are not any good. Quicks: Show me the Stan on page 2-3. Show me township names. Where is the location on 2-17? Etc. They have circles at varying distances from the LGS + so cannot be compared.

References: References include work by private firms for corporations as far as I can see. Who paid for these? Where did the money come from?

It seems that NRC did not use work done by such organizations as the Union of Concerned Scientists, Beyond Nuclear, ACE. This is an example of how NRC is in bed with one side.

NEW: above ground on site storage of spent fuel is new. These Casks could be a target. This is a de facto a high level waste dump and though there was a land of hearing in Limerick Township about cement pads - there has been no public discussion about this highly dangerous place.

New rules about spent fuel may be released in the fall of 2014. Re licensing MUST be delayed at least until these rules are finalized and public hearings held. I wonder if Exelon is trying to get in before the rules are finalized?

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S-23-13

What is the status of the NPDES permit,  
It allows radioactive waste into a source of  
Drinking water.

Where is the safety evaluation?

On p. 2-6 line 18 "Permanent Disposal" - There is NO  
Such thing.

on p. 2-49 line 48 "Corporate Wildlife Habitat  
Certification" This throws references about wildlife  
into question to say the least.

Historic Resources

looked at land disturbance + not air + water  
no maps

p. 2-84 2, 3

no federally OWNED properties within  
50 miles except Valley Forge National  
Historic Park.

On p. 2-4 is a map showing 50 mile  
radius

maybe the feds don't own Independence  
National Park, Hopewell Furnace, John Heinz  
NWR etc.

Is this how the NRC looks at national  
treasures in Phila?

I live in a national historic district, NOT shown nor mentioned.

5-23-13

Federal money is being spent on the Highlands.

Limencik emits ionizing radiation.

There is no safe level of exposure to ionizing radiation.

This is a toxic trespass - exposure to something one does not agree to. And Exelon is exposing me and making money while they are doing it.

NRC is a lackey to the Nuclear Industry.

NRC should not consider this premature license application + its circular arguments expressed by NRC in the DSEIS at this time. NRC should be reorganized into a non-biased REGULATORY Commission PRIOR to any further decision making.

I will extend my remarks prior to the deadline.