



## MONTGOMERY COUNTY PLANNING COMMISSION

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June 27, 2013

Ms. Cindy Bladey  
Chief, Rules, Announcements, and Directives Branch  
Mail Stop: TWB-05-B01M  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Comments on the Draft Plant Specific Supplement 49 to NUREG-1437  
Limerick Nuclear Generating Station  
Division of License Renewal  
NRC-2011-0166

Dear Ms. Bladey:

We have reviewed the draft plant specific Supplement 49 to the generic environmental impact statement for the license renewal regarding the Limerick Generating Station, Units 1 and 2. Our comments on the draft are listed below.

We expect the Nuclear Regulatory Commission to do a full review of both environmental and public safety issues pertaining to the Limerick Generating Station as discussed in the Environmental Impact Statement and we hope that any relicensing decision will also address specific issues pertaining to the plant based upon its conformity to the Montgomery County Comprehensive Plan and overall county development policies in the area surrounding it. Overall, we are particularly concerned about growth around the power plant, transportation and evacuation capacity, the Schuylkill River, and future education about the Limerick Generating Station.

### Land Use Change and Growth around the Power Plant:

As the Environmental Impact Statement indicates, the population in the 50-mile radius of the plant was 6,819,505 in 1980 and is expected to reach 9,499,925 by 2030, a 39 percent increase in population. It is also noted that according to 2010 Census, there are 1,365,850 people residing within 20 miles of the Limerick Generating Facility. Limerick Township, where the plant is located, and nearby Upper Providence Township have been two of the most rapidly growing communities in the county. This growth occurring along the US Route 422 Expressway has dramatically changed the character of the area surrounding the Limerick Generating Station. In the past few years, the Philadelphia Premium Outlet Mall, a 600,000 square foot retail facility, and the adjoining Costco shopping center opened along US Route 422 about one mile north of the Limerick Generating Station property. The land adjoining those facilities is being considered for various types of retail and residential

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uses. Other lands in Lower Pottsgrove Township near the Limerick Generating Station have also been proposed for similar types of uses.

While the county planning commission has tried to promote lower densities of growth in proximity to the Limerick Generating Station, the local communities and the marketplace favor this location for significant development due to its proximity to the US Route 422 interchange at Township Line/ Evergreen Road. The growth that has taken place in the area around the power plant, and in particular the growth taking place in the area immediately adjoining the plant and the primary access to it, as well as the projected growth in the future, could complicate evacuation plans and the movement of appropriate emergency response personnel to the plant in the event of a disaster. Certainly this access could be even more critical in the event of a natural disaster when other roads to the plant may be impassable. The Environmental Impact Statement needs to analyze this growth in the vicinity of the power plant to evaluate what impact it would have on plant operations and whether or not safe evacuation can take place from the newly developed areas within the extended licensing period.

#### Transportation and Evacuation Capacity:

The growth in the whole US Route 422 Corridor has raised numerous proposals for expanding the vehicle capacity of the 422 Expressway. Congested traffic conditions are a way of life along the expressway and raise concern about future viability of the expressway and other local arterial roads as a safe evacuation routes for the region. The county transportation plan recognizes the need for various road improvements along the US 422 Corridor to address current and future traffic demands. The current county comprehensive plan recommends several measures to enhance transportation capacity in this portion of the county, though due to funding limitations in Pennsylvania, these projects are not likely to move forward at this time. Possible mitigation strategies to be considered in the license renewal could include the role of Exelon in funding the important road improvements needed in this area to ensure safe evacuation and access to the plant in any type of disaster.

#### Schuylkill River:

The Limerick Plant will depend upon river water for a longer period of time as a result of the license renewal. During low flow periods, additional quantities of water are released into the river from the Wadesville Mine and Still Creek Reservoir in Schuylkill County to compensate for the water withdrawn at the plant through a docket approved by the Delaware River Basin Commission (DRBC). Since the relicensing action would extend the time period of this flow augmentation system, continued monitoring and analysis of the river is vital to ensure that the water quality of the river is not impaired by the total dissolved solids in the Wadesville water among other parameters. This is particularly important due to the role of the Schuylkill River, a state scenic river, which is an important regional water supply source and recreation area. If resumed use of the Delaware water diversion is anticipated, an evaluation of that system should be undertaken to ensure that the capacity is available in the conveyance system and that water quality objectives can be met for discharge into the East Branch of the Perkiomen Creek.

#### Community Outreach and Education:

The relicensing process has raised local questions about the Limerick Generating Station. It will become more of a permanent element of the community with extension

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of the license as requested. Therefore, it is vital to have an effective and continuous education program about the generating station and the associated risks presented by its operation. Education can take the form of many types of activities that further engage local residents and keep them better informed about the plant and their role and responsibilities in the event of an emergency at the facility.

If you have any questions, please contact me. Also, we offer our assistance in providing local information that may be helpful to the US Nuclear Regulatory Commission in their review of this license renewal application.

Sincerely,



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c. Thomas Sullivan, Public Safety Department