From: Bower, Fred
Sent: Tuesday, December 24, 2013 12:45 PM
To: aceactivists@comcast.net
Cc: Ayala, Juan; DiPaolo, Eugene; Barber, Scott; Pinkham, Laurie; Thompson, Margaret; Scott, Michael; Screnci, Diane; Sheehan, Neil; McNamara, Nancy; Tifft, Doug
Subject: RE: Higher Rad-Alert Radiation Readings (EDATS 2013-0355)

Dr. Cuthbert (ACE),

I am writing in response to your email to Mr. Eugene DiPaolo dated November 26, 2013. Your email was a follow up to our November 22 response to questions you asked about elevated readings on citizens' Rad-Alert instruments.

Our inspectors reviewed the radioactive releases at Limerick during the week in question and also reviewed any operational events that could possibly result in any unmonitored releases. Our review indicated normal stable readings on the effluent radiation monitors. There were no unusual plant transients and no problems with fuel that occurred that could explain your monitor readings. Other explanations include temperature inversions that result in increased radon levels, and spurious electric spikes especially if surge suppressors are not used with your instrument. We did not identify any problem at Limerick that would cause higher readings on your or your constituents' Rad-Alerts.

In your recent reply, you questioned the accuracy and reliability of the radiation readings provided by Exelon. The NRC conducts periodic effluent monitoring inspections to verify the accuracy of the installed instrumentation. For example, in July 2013, an NRC Radiation Specialist inspector performed the following related to the effluent control program at Limerick.

- Assessed detection sensitivities for environmental samples, reviewed quality control charts for laboratory radiation measurement instrument, and reviewed the results of the vendor's quality control program, including the inter-laboratory comparison.

- Evaluated missed and/or anomalous environmental samples and results were identified and reported including corrective actions.

- Reviewed the assessment of any environmental sample results detected above the lower limits of detection, associated evaluation, and associated radioactive effluent release data.

- Evaluated various structures, systems, or components that involve or could reasonably involve licensed material to determine whether licensee implemented a sampling and monitoring program for detection of leakage to ground water.

- Observation of the collection and preparation of environmental samples from different environmental media (air, water).

- Reviewed the results of inter-laboratory and intra-laboratory comparison program to verify the adequacy of environmental sample analyses.

These types of inspections are performed to assure a high degree of confidence in Exelon's monitoring equipment. By assuring that Exelon's radiation monitoring instrumentation is accurate, we can assure that information that we gather from it is credible. Thus, it was appropriate for our inspector to use that information in responding to your questions and we believe the information was accurate. Therefore, we do not believe that Limerick was the source of elevated readings on citizens' Rad-Alert instruments.

We believe that our ongoing oversight of Limerick's radiation releases and our program's that assure the accuracy of this instrumentation provides a reasonable assurance of safety.

Since your email makes the statements that include:

- "This process is a farce." and
- "It is negligent for NRC to fail to do its own radiation monitoring."

I would like to remind you that other NRC processes exist. Specifically, if you feel that NRC staff have grossly mischaracterized or mismanaged our oversight of Limerick's radiation releases, you may contact the Office of the Inspector General (OIG) at NRC. The OIG has a Hotline (**1-800-233-3497**) program to provide the NRC employee, other government employee, licensee/utility employee, contractor employee, and the public with a confidential means of reporting incidences of suspicious activity to the OIG concerning fraud, waste, abuse, and employee or management misconduct. Mismanagement of agency programs or danger to public health and safety may also be reported through the Hotline.

It is not OIG's policy to attempt to identify people contacting the Hotline. People may contact the OIG by telephone, through an online form, or by mail. There is no caller identification feature associated with the Hotline or any other telephone line in the Inspector General's office. No identifying information is captured when you submit an online form. You may provide your name, address, or phone number, if you wish.

Sincerely,

Fred Bower
Chief | Projects Branch 4 | Division of Reactor Projects | Region I | U.S. NRC
2100 Renaissance Boulevard, STE 100, King of Prussia, PA 19406 | (: (610) 337-5200 | **BB**: (610) 731-1920 |
*: Fred.Bower@nrc.gov

From: aceactivists@comcast.net [mailto:aceactivists@comcast.net]
Sent: Tuesday, November 26, 2013 3:53 PM
To: DiPaolo, Eugene
Cc: Evan Brandt
Subject: Re: Higher Rad-Alert Radiation Readings

Mr. DiPaolo,

Thank you for your response today.

Our responses to you are in red below, following each of your statements.

If you receive any additional information that could actually explain a reason for the radiation spikes we recorded from Friday through today, please inform us as soon as possible. We are still

very concerned and intend to continue to take radiation readings.

Thank you,
Dr. Cuthbert

RE: Higher Rad-Alert Radiation Readings

From : Eugene DiPaolo <Eugene.DiPaolo@nrc.gov> Tue, Nov 26, 2013 01:07 PM
Subject : RE: Higher Rad-Alert Radiation Readings
To : aceactivists@comcast.net
Cc : Fred Bower <Fred.Bower@nrc.gov>

Dear Ms. Cuthbert,

This note is in reply to your email on November 22, 2013, regarding your concern of higher "Rad-Alert" radiation readings experienced that afternoon by you and others for several hours.

Based on your request and concern, we conducted a prompt review of effluent releases from the Limerick Generating Station conducted over the past week as well as the current year.

Did you or any NRC official take any actual radiation readings on or off the Limerick site in response to our report of increases in RadAlert readings?

The review included the time periods you mentioned in your email. The review also included onsite review of data and recordings as well as technical reviews by NRC region-based radiation specialists.

This suggests NRC simply reviewed Exelon's radiation data. Is that true? Does Exelon track continuous air monitoring data by the minute, for alpha, beta, and gamma radiation totals? If not, the have nothing to compare to our RadAlert monitoring to.

Why didn't NRC take continuous readings over several hours to determine the degree of radiation spikes we reported?

We don't know why NRC has confidence in Exelon's data when elsewhere Exelon failed to provide full and accurate disclosure related to radiation. If Exelon controls the calibration of instrumentation, as well as location of sample collection and all data collection, we can have no confidence in NRC's review. Now, we have actual readings from our RadAlert, with no reliable answers from NRC.

Our reviews did not identify any abnormal or unexpected radioactive releases from the Limerick Generating Station, either in gaseous or liquid effluents, that would cause the readings you indicate.

This response gives us little comfort. There are increases whether or not NRC failed to identify "abnormal" or "unexpected" radioactive releases. The fact that we are expected to continuously be forced to put up with any amount radiation released from Limerick into our environment and our children is an injustice of major proportion. It is insulting and infuriating that NRC expects this.

Our review of effluent trend reports did not identify any increases in releases either short term, for the past week, or lon term.
That is not surprising since you are using Exelon's data. But, how far back did you check?

Our reviews of NRC required dose projections, conducted by the licensee for 2013, did not identify any abnormal dose to members of the public.

This process is a farce.

Our review of data indicated the projected doses were determined to be well within NRC As Low AS Reasonable Achievable (ALARA) requirements.

NRC's ALARA requirements are meaningless. ALARA allows Limerick to release any amount of radiation with NRC blessing, as long as Exelon claims radiation levels can't be reduced. This turns out to be a lie when it comes to radiatic releases into the Schuylkill River. TDS could be filtered and radiation would be reduced. Filtration should be possible for gases intentionally released which would limit radiation in our air.

In addition, our reviews did not identify any abnormal releases associated with fuel or any problems associated with fu that would have caused your increased readings.

Explain exactly how NRC has made this determination.

In summary, we did not identify any problem at Limerick that would cause higher readings on your "Rad-Alert".

It is clear once again NRC chose not to verify Exelon's data with its own independent radiation monitoring. We still g the higher radiation readings this morning. IT IS NEGLIGENT FOR NRC TO FAIL TO DO ITS OWN RADIATION MONITORING.

We hope that this adequately addresses your concern that the readings may be due to some problem at the Limerick Generating Station.

IN NO WAY DID THIS RESPONSE ADQUATELY ADDRESS OUR CONCERNS ABOUT BEING POISONED WITH LIMERICK'S RADIATION AT AN EVEN HIGHER LEVELS THAN WE HAVE IN THE PAST.

Thank you for your email.

Gene DiPaolo
USNRC Senior Resident Inspector
Limerick Generating Station
Office: 610-327-1345
Cell: 484-459-9521

From: "Eugene DiPaolo" <Eugene.DiPaolo@nrc.gov>
To: aceactivists@comcast.net
Cc: "Fred Bower" <Fred.Bower@nrc.gov>
Sent: Tuesday, November 26, 2013 1:07:36 PM
Subject: RE: Higher Rad-Alert Radiation Readings

Dear Ms. Cuthbert,

This note is in reply to your email on November 22, 2013, regarding your concern of higher "Rad-Alert" radiation readings experienced that afternoon by you and others for several hours.
Based on your request and concern, we conducted a prompt review of effluent releases from the Limerick Generating Station conducted over the past week as well as the current year. The review included the time periods you mentioned in your email. The review also included onsite review of data and recordings as well as technical reviews by NRC region-based radiation specialists.

Our reviews did not identify any abnormal or unexpected radioactive releases from the Limerick Generating Station, either in gaseous or liquid effluents, that would cause the readings you indicate. Our review of effluent trend reports did not identify any increases in releases either short term, for the past week, or long term. Our reviews of NRC required dose projections, conducted by the licensee for 2013, did not identify any abnormal dose to members of the public. Our review of data indicated the projected doses were determined to be well within NRC As Low AS Reasonable Achievable (ALARA) requirements. In addition, our reviews did not identify any abnormal releases associated with fuel or any problems associated with fuel that would have caused your increased readings.

In summary, we did not identify any problem at Limerick that would cause higher readings on your "Rad-Alert". We hope that this adequately addresses your concern that the readings may be due to some problem at the Limerick Generating Station.

Thank you for your email.

Gene DiPaolo
USNRC Senior Resident Inspector
Limerick Generating Station
Office: 610-327-1345
Cell: 484-459-9521

From: aceactivists@comcast.net [mailto:aceactivists@comcast.net]
Sent: Friday, November 22, 2013 8:18 PM
To: DiPaolo, Eugene
Subject: Higher Rad-Alert Radiation Readings

Gene,

We have been contacted by residents about higher than normal radiation readings.

Since this afternoon we and others have been getting radiation readings on our RadAlerts significantly higher than normal.

Because higher readings have been persistent now over several hours, we feel it is important to get answers.

Is there a problem at Limerick to cause higher readings or are the higher radiation levels due to Limerick burning new High-Burn Fuel?

Please check into this and respond as soon as possible. We are concerned.

Thank you very much,

Donna Cuthbert