

December 10, 1979

Mr. Harold Denton
Director
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton,

I have been reviewing the Draft Environmental Statement and Final Environmental Statement for Limerick Units 1 & 2, U. S. NRC Regulatory Guide 4.7, the Report of the Siting Policy Task Force - NUREG-0625 and the Report of the President's Commission on the Accident at Three Mile Island. There are several areas that are very disturbing to me - both the 1970 and 1980 projected populations in the surrounding Limerick, the response of the Department of Environmental Resources regarding the seismology of the area surrounding Limerick - in the Final Environmental Statement, and several responses regarding the water supply and diversion of water from the Delaware River.

I have read of the recent testimony of Mr. Robert Ryan regarding the siting of the Indian Point plant in New York, the Zion plant in Illinois and also the concern regarding six other plants in the United States. Limerick is number three on this list and echoes concerns that I have had since the accident at Three Mile Island since I live in close proximity to this site. It is a densely populated area within a radius of 10 miles of Limerick and is mainly a suburban-rural area with roads that are not much more than macadamized potholed, cowpaths.

I have recently received a reply to an inquiry that was made on my behalf by Senator Richard Schweiker. It is from Mr. Lee V. Gossick of the NRC. Enclosed is a copy of this letter and a chart that I have prepared of the population density for this area from the DES on Limerick. There is one point that is disturbing to me - the population density guide from NUREG-0625, Section 2.1.2.7 "Population Density - Practice" and Mr. Gossick's comment, "These criteria have not been retroactively applied to previously approved sites such as Limerick." The LPZ for Limerick is 1.28 miles and the nearest population center, Pottstown, Pa., is 1.7 miles. In addition to Pottstown with 25,500 population (1970) North Coventry Township with a current population of 7,600 lies parallel to Pottstown, separated only by the Schuylkill River. The LPZ at TMI is stated as 2 miles in the "Report of the President's Commission to Investigate the Accident at Three Mile Island." Why is the LPZ for Limerick smaller when the megawatt capacity is greater than TMI? These figures do not include transient population, people who would be at their places of employment in the area. According to Mr. Gossick's letter there were additional safety features incorporated in the Limerick plant to "mitigate consequences of a design basis accident." The simple fact is that if any accident would occur, design basis or other, that would result in large amounts of radiation being released, the number of people that would have to be notified and evacuated are extremely large.

The roads in this area are not conducive to a safe and effective evacuation. Nuclear accidents can occur at any time of the year including times when these roads are nearly impassable after a severe snowstorm.

It is stated in NUREG-0625 that a site which exceeds these guidelines (500/square mile) "can nevertheless be selected and approved." If these guidelines are not met and an alternative site is not available why is not another source of

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fuel recommended for the site? It is stated in the DES on Limerick on page 10-8 that, "The above disadvantages notwithstanding, the staff feels that a coal-fired plant is an alternative that can be considered." Why was this not strongly recommended at that time? It seems to me that retroactive application of population guidelines would be a serious consideration at Limerick.

Another area of concern to me is the response of the Department of Environmental Resources regarding the seismology of the area around Limerick. In the DES it is stated that "the nearest approach of a fault trace to the site is 1300 feet west; it's vertical displacement is 350 feet". In NUREG-0625 it is stated in a footnote (page 28) surface faulting is "identified as a current basis for rejection of sites." I would refer you to pages H-94 through H-98 of the Final Environmental statement for the response of the DER regarding the seismology of the area. I do understand, however, that the U. S. Geological Survey will be doing some studies on this matter.

The third significant point is the water supply to cool this plant. I would like to refer you specifically to the response of Dr. Ruth Patrick, Chairman of the Department of Limnology of the Academy of Natural Science in Philadelphia. This can be found on page H-74 through H-78 in the Final Statement. There are also several other comments regarding the diversion of water from the Delaware River. The Delaware River Basin Commission has stated recently that the Schuylkill River is one they are most concerned about as far as quality and quantity at low flow periods. How can Philadelphia Electric Company taking these huge quantities of water from the river and evaporating 35,000,000 gallons per day be justified when a fossil-fueled plant would use a significantly lesser amount?

In conclusion, there is a recommendation in the report of the accident at TMI to site nuclear power plants in less densely populated areas. Limerick is overall less than 50% complete - Unit 1 is 54% and Unit 2 is 35% completed. I understand that if the plant were modified to use coal as a source of fuel, instead of uranium, some parts of the plant could be used and some money would be lost in the construction thus far completed. This money can eventually be replaced, but the large numbers of people whose lives would be disrupted and endangered if a serious accident occurred, cannot be discounted and this fact must be given grave consideration.

I would also like to point out an inaccuracy in Mr. Gossick's letter, Pottstown, Pennsylvania is located northwest of the reactors, not southwest as Mr. Gossick stated.

I will appreciate your response to my concerns and questions. Thank you very much.

Sincerely,

Marlene G. Seidts

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cc: ✓Senator Richard Schweiker
 ✓Mr. John Ahearne
 ✓Mr. Robert Ryan
 ✓Mr. Brian K. Grimes
 ✓Gov. Thornburgh

Enclosure: As stated