



Keystone Alliance

3700 Chestnut St., Philadelphia PA 19104
(215) 387-5254

March 31, 1981

Robert L. Tedesco
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Tedesco,

A very preliminary assessment of Philadelphia Electric's Probabilistic Risk Assessment for the Limerick Generating Station reveals that the document is totally inadequate, and fails to meet the very purpose for which it was requested by the NRC.

In his testimony to the Committee on Interior and Insular Affairs of the House of Representatives on May 27, 1980, Mr. Harold Denton testified that: "This evaluation would utilize the methodology used in the reactor safety study, sometimes called WASH-1400, but would include specific information relating to the Limerick site in order to arrive at a relative risk comparison for the Limerick generating station as compared to the WASH-1400 reference plant." (p.11) "... to have them undertake a detailed risk assessment report using the specific population density around Limerick, the specific meteorology of the plant, the evacuation times and the specific plant design so I will get a much better objective understanding of whether the design features compensate for the population density or whether there is an undue risk in the operation of this plant." (p.12)

The Risk Assessment as submitted fails to accomplish these goals:

1. The document contains no CCDF of either early or late cancers where Limerick is compared to WASH-1400 only on the basis of design changes and site specific characteristics. PECO's comparisons also include a different data base and methodology which the Company admits produced a smaller risk than WASH-1400's. There is thus no basis on which to make the proper comparison intended.
2. There is no CCDF for property damage, as requested in your letter to Mr. Boyer of January 26, 1981.
3. The Limerick PRA used population density figures from 1970, despite the fact that the Company has population projections for the year 2000 in its evacuation plan. What good is it to know the consequences of an accident happening 15 years before a plant comes on line? All CCDF's should utilize year 2000 or later projections.
4. The evacuation time assumptions utilized were the same as for the WASH-1400 report, despite the enormous increase in population density. The Lewis Commission criticized the WASH-1400 evacuation times as being optimistic.

Because of these clear and grave problems, we hereby request that you immediately return the entire Operating License to Philadelphia Electric until they have completed the PRA to the specifications required in Mr. Denton's testimony and your letters to Mr. Boyer of January 5 and 26. As you stated, "it would be inappropriate to commence review of your FSAR prior to receipt of your final Risk Assessment Study Report." I look forward to your prompt action and reply. Thank you.

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Sincerely,

Alan J. Noguee
staff

cc: Harold Denton
Darrell Eisenhut
Donald Sells