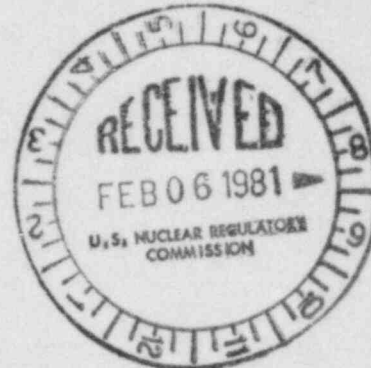




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

TERA

FEB 04 1981



Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Dear Mr. Lewis:

Your letter to Mr. Eisenhut concerning the Risk Assessment Study for the Limerick Generating Station (LGS) has been referred to me for response.

An application for an operating license is expected to be filed for LGS in the near future, at which time we will begin the safety and environmental reviews that will lead to probable public meetings and hearings and finally to a decision by an Atomic Safety and Licensing Board whether or not to issue an operating license. This process is likely to take in excess of two years to complete. As part of the review, we have asked Philadelphia Electric Company (PECo) to include its final report on the Risk Assessment Study with its application. Since the final report is not expected to be completed until March, we are anticipating some delay in the submittal of the application. I have enclosed a copy of a letter which was recently sent to Mr. Boyer of PECo. Until receipt and review of the final report the NRC reserves its judgement concerning the results presented by PECo on December 9, 1980 in Pottstown. We anticipate that our review will generate questions that will need to be addressed by PECo before our review is completed. It is our intent to place emphasis on this review in order to obtain early resolution of this area.

With regard to "today's" siting policy for new applications I am enclosing NUREG-0625, Report of the Siting Policy Task Force. This document should help clarify the direction in which the NRC is heading for plants which apply for construction permits in the future. Section 108 of Public Law 96-295 provides that new regulations be established for siting of utilization facilities (includes nuclear power plants) but directs that these new regulations "shall not apply to any facility for which an application for construction permit was filed on or before October 1, 1979." Therefore these now ("today") siting requirements cannot be backfitted to reconsider the site selected for Limerick. With respect to Mr. Denton's testimony before the Congressional Committee at Bucks County Community College, I am enclosing a recent letter from Mr. Denton to Dr. Irwin and would like to specifically call your attention to the last paragraph beginning on page 2 of that letter.

The ground rules provided to PECo for the Risk Assessment Study were contained in our request letter of May 6, 1980, results of a meeting in Bethesda on May 23, 1980 and a clarifying letter from PECo on July 21, 1980. Copies of all of these documents are enclosed for your information. We specifically asked PECo to compare the Limerick Generating Station with the Boiling Water Reactor Analysis contained in the Rasmussen Report (WASH-1400).

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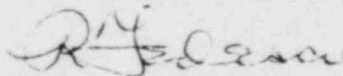
PECo has stated that the criterion of WASH-1400 contained in Dr. Lewis' report were considered and factored into the study. This will be an area that the staff will be looking at very closely in our review. In addition as we conduct the review of the operating license application we will be paying particular attention to accident scenarios that include Class 9 accidents and to the steps taken by PECO to factor in the recommendation resulting from the numerous studies associated with the accident at Three Mile Island.

In October, Mr. Eisenhut responded to a letter from Mr. Ramano concerning quarry blasting and its effect on concrete which I have also enclosed for your information. Where concrete does not meet the standards set by the American Concrete Institute and others, then steps must be initiated to correct the deficiency. The risk study assumes that the concrete meets these minimum strength requirements. This aspect will be considered and reviewed carefully in our review of the study.

We are retaining a copy of your letter with the Risk Assessment Study file in order to ensure ourselves that each of the points you have raised are adequately addressed by PECO in its final report. Where necessary, we will request further information and data to clarify areas inadequately addressed.

Thank you for your interest in the Limerick Generating Station.

Sincerely,



Robert L. Tedesco
Assistant Director for Licensing
Division of Licensing

Enclosures:
As stated