



**AIR and WATER
Pollution Patrol**
BROAD AXE, PA.

Aug. 1, 1980

Dr. Harold K. Denton, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton:

The statement in your letter to me, of October 9, 1979, stated that the information relating to the investigation of the effect of quarry blasting at the Montgomery County Limerick Nuclear Reactor as raised in my letter to you of April 12, May 14, and June 10, 1979, would be forthcoming.

Subsequently another letter to me of January 28, 1980, stated that summaries of meetings, correspondence, site visits, reports, etc., involving Philadelphia Electric Company, relative to the blasting would be sent to me. Copies of the letter were sent to Senator Richard S. Schweiker on February 21, 1980, and on February 14, 1980 to Congressman Lawrence Coughlin, both of whom live in Montgomery County, Pa.

As per third paragraph of letter to Senator Schweiker, the statement suggests the extent of concern relative to the effect of dynamiting at the adjacent Trap Rock Quarry consisted only of PECO monitoring "a (one) blast in the quarry and found the peak particle velocity at 4000 feet from the blast to be 0.03 inches per second "at ground level". One blast is not at all a true test. No mention is made of the size of the blast and the point at which the ground level velocity was recorded is far greater than the reactor buildings sites. Nevertheless as it relates to the one blast, I ask that you send me a copy of the record, with date and written confirmation by Trap Rock Quarry that PECO "monitored a blast in the Quarry" at a time that predated PECO's construction permit. I ask because in the sixth paragraph of the February 21, 1980 letter to Senator Schweiker, there is an apparent conflict of information as to whether PECO had monitored a blast in the quarry previous to obtaining a construction permit. In that paragraph the Nuclear Regulatory Commission and the U. S. Geological Survey wrote (on December 18, 1979) quote: "With the cooperation of the Trap Rock Quarry of Pottstown, we obtained important information on the blasting methods used". I feel that not only the "methods used" but the effect of 60 years blasting should have been known before any construction was started.

Corroborating the negligence in not previously having obtained that valuable information, in the same paragraph, quote: "Monitoring records taken by the Quarry's seismological consultants during previous blasts at the quarry were available for our inspection". Why were such monitoring

8010280070



AIR and WATER Pollution Patrol

BROAD AXE, PA.

(2)

records, and information not sought by PECO in 1970 before construction began, instead of being obtained by the NRC and Geological Survey in December 1970? And why was a construction permit issued without such information?

Omission of the consideration for vibratory motion from the blasting as it also relates to curing of concrete (whose deleterious effect PECO knew about), demonstrates a pattern of negligence, not only with concrete placing, but also as it relates to cracks and possible fault shifts in the sub-rock under the already built containment building. These effects could cause piping ruptures, with potential for a serious accident in the future.

PECO's indication that vibration adversely affects curing of concrete, as per the seventh paragraph of letter to Senator Schweiker quote: PECO "used a procedure which considered concrete curing time, size of blast and distance between the blast and the concrete for those times when PECO, itself, conducted its own blasting on the Limerick site! But we charge such precautions were not taken for blasts conducted by the Trap Rock Quarry operation from 1974 to end of 1970 at times concrete was placed, unless such records are provided.

You stated, Dr. Denton, in the same letter to Senator Schweiker that the NRC Office of Inspection and Enforcement does keep a control during construction on recently placed concrete, as it may be affected by vibratory motion. As per section 2.206 of 10 CFR, therefore, I would like the NRC to send me copies of that construction control for concrete placed by PECO from 1974 to 1970, in particular records of controlled delays on the dates Trap Rock Quarry blasted. If such records were not made, it would represent five years during which the effects of vibration on curing and settling of concrete were neither considered nor controlled. The only mention of anything even weakly approaching such control as indicated above, is from PECO's mention of having "monitored a blast in the quarry". It has now come to our attention that many tests are being conducted now, including transducer checks on the cooling towers, all of which should have been considered previous to design and construction.

Further negligence, as it relates to the NRC improperly relying on PECO for information, is evident from the fact that it was PECO who called one day before to notify me of changes as to where the Dec. 18, 1970 meeting to discuss blasting was to be held. Since I called for the investigation, and since I asked that PECO be investigated, proper



AIR and WATER
Pollution Patrol
BROAD AXE, PA.

(3)

procedure for last minute changes would have the NRC, not PECO contacting me for anything relating to the meeting. As it relates to the exclusionary procedural rules of the NRC, no where in those rules does it state that PECO should notify me.

It was further obvious that the NRC was improperly depending on PECO to predetermine the question of the Dec. 13, 1979 meeting relative to blasting when, following the meeting (which I boycotted because PECO and not NRC was apparently running the show) the Pottstown Mercury of Dec. 10, 1979 began its report of the meeting by stating that, "On the basis of information supplied by PECO, the NRC concluded there was no adverse effect by the quarry blasting on the foundation of the Limerick reactor building". Therefore, without supporting data, or deferred answers which PECO promised NRC to supply by January 1980, (but which I have not yet seen from NRC) neither our group, nor the public can possibly evaluate the conclusion by NRC, namely that there has been no adverse effect relative to cracks under the Limerick reactor foundation due to 60 years of blasting before the reactor construction, and five years of dynamite concussion since start of the reactor construction. At no time since the Dec. 13, 1979 meeting has PECO or NRC provided any information whatsoever on the true stability of the rock structure under the now-built nuclear reactor building.

From the many forgoing factors,** we feel the NRC, in depending on data from PECO, is negligent, and apparently has not made the safety of the public its first responsibility as is its duty. We await answers to questions raised above, therefore, in a continuing effort to insure the foundation under the now-built reactor buildings, considered adequate" by the Bechtel Corporation, are more than just adequate. We ask for proof through supportive data and records which you are required to make public.

Very truly yours,

Frank R. Romano, Chairman
Air & Water Pollution Patrol
61 Forest Ave.
Ambler, Pa. 19002

FRR/jch

** Including material in enclosed letter.



AIR and WATER
Pollution Patrol
BROAD AXE, PA.

June 10, 1980

Dear Editor:

Immediately after the U. S. Geological Survey experts concluded that reduced rumblings indicated the improbability of a volcanic eruption, all Mt. Saint Helens broke loose.

And three months ago, with an even greater improbability, the Abington-Glenside area shook and sent a shock wave through the Conshohocken area of the Schuylkill and one hundred miles beyond. Recognizing what might have happened if the reactors at Limerick were in operation, a Pennsylvania university geologist stated that if those reactors were being built in the Conshohocken area, he would publicly protest their completion. But another 3.7 magnitude earthquake, moving just ten degrees more westerly, could send shock waves through, and possibly activate three dormant earthquake faults in the immediate reactor site area.

One of them, the Sanitoga Fault, is within 1300 feet of the area, with fault lines running directly beneath the now in-place reactor vessel. This unbelievably hazzardous condition can be seen in the Bechtel Corporation drawings supplied to Philadelphia Electric before construction began.

As if that was not sufficient for the Nuclear Regulatory Commission to reject the site, the Pottstown Trap Rock Quarry is today, as it has for the past 60 years, dynamiting the same rock upon which the reactor buildings sit.

As a result of our group having questioned the NRC relative to the effects of dynamiting on the foundations of the reactor buildings, P.E. has been ordered to conduct tests. These tests should have been done before construction began. Our group charges the NRC with negligence in giving P.E. a construction permit without adequate studies on the faults, in particular, as these foundation defects have been affected by continued blasting since construction began in 1974.

In spite of the many objections to that site, Vincent Boyer, Vice President of P.E., told Congressman Peter Kostmayer's Subcommittee on Energy and Environment that he is opposed to conversion to coal, and that "an evacuation plan would only be window dressing". Apparently knowing that the increased cost of such a plan to save lives would make nuclear power more costly than coal, Mr. Boyer said an evacuation plan wasn't needed "because there would never be an accident".

But nothing other than converting Limerick to coal can prevent a nuclear disaster at that site, because only God could devise the evacuation plan which would prevent the death of thousands on the night Montgomery County's Mount Saint Helens Limerick reactor shakes loose.

FRR/jc

Frank R. Romano, Chairman
Montg. Co AWPP
61 Forest Ave. Ambler, Pa.