



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

Suite 322
315 South Allen Street
State College, PA 16801

September 1, 1982

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Mr. V. S. Boyer
Sr. Vice President - Nuclear Power
Philadelphia Electric Company
2301 Market Street
Philadelphia, PA 19101

Dear Mr. Boyer:

The Department of the Interior, Washington, D.C., has requested that we comment directly to you on Revision No. 4 to the Philadelphia Electric Company's Environmental Report (OLS) for the Limerick Generating Station, Units 1 and 2, Chester and Montgomery Counties, Pennsylvania. This letter provides technical assistance only and does not constitute the review comments of the Department of the Interior on the forthcoming application for an operating license.

Changes made to the Environmental Report in Revision No. 4, as in the three previous revisions, do not address the concerns expressed by the Fish and Wildlife Service in letters dated September 10 and November 12, 1981, and January 29 and May 5, 1982. Therefore, we reiterate our recommendation that the environmental report and environmental impact statement for the operating license at Limerick be revised to answer the following questions:

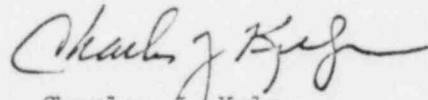
1. Will there be adequate storage of make-up water to meet consumptive water needs at Limerick and still maintain minimum flows downstream? What impact will acquisition of make-up water and activities such as "skimming" spring flows and inundation of stream and upland habitat have on fish and wildlife?
2. How will consumptive water use at Limerick affect water quality in the lower Schuylkill River during low flows? Will Limerick need to divert more water in the future from the Delaware River to compensate for water quality impacts downstream of the generating station?
3. How much water would be lost to groundwater in the East Branch of Perkiomen Creek and Perkiomen Creek between the Bradshaw Reservoir discharge point and the pumpout station for Limerick? Will greater flows than now estimated be required to compensate for losses to groundwater?

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4. How will changes in turbidity, water depths and water temperature impact the smallmouth bass fishery in the East Branch of Perkiomen Creek? How will flows in the East Branch be affected when water is needed for Limerick?
5. What will be the cumulative effects of depletive water use on water quality in the Delaware River estuary and salinity levels in the upper Delaware Bay? How will depletive water uses downstream from Trenton affect salinity levels in upper Delaware Bay?
6. In the event water in the Delaware River is not available due to extremely low flows (less than 3,000 to 2,600 cfs), how will flows in Perkiomen Creek be maintained until Limerick is completely shut down? How long will it take Limerick to shut down after the order is given by DRBC? Where will the 27 cfs continuous release come from after the order is given to shut down Limerick?

We would appreciate receiving your detailed responses to our questions and concerns by October 15, 1982.

Sincerely,



Charles J. Kulp
Field Supervisor

cc:

PFC, Bellefonte, PA - Jack Miller
PGC, Harrisburg, PA - Jacob Sitlinger
NRC, Washington, D.C.