



AIR and WATER Pollution Patrol

BROAD AXE, PA. June 8, 1984
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

DOCKETED
USNRC

JUN 11 P4:34

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Units 1 and 2)

Docket Nos. 50-352 OC
and 50-353 OC

AWPP moves the Board re-open the AWPP asbestos question and the use of
"judgement" by Mr. Boyer and Mr. Wetterhahn.

On Feb. 15, 1984, Air and Water Pollution Patrol (Romano) submitted a contention stating that asbestos in the cooling tower Splash Boards would contaminate the Schuylkill River and the air with asbestos fibers shed into the water and air out the cooling towers.

A discussion on March 6, 1984 before the Board in Philadelphia denied the contention on the basis that EPA had no ruling on asbestos in drinking water.

The Board did not address the question of asbestos in the air. The very voluminous publicity, and the EPA push to clean asbestos out of schools, etc. demonstrates their appreciation of the serious health effects of asbestos.

The EPA has just covered the asbestos dump in Ambler, Pa. because one or two asbestos fibers were found on a picnic table in the playground adjacent to the dump.

Therefore the shedding of asbestos from the drift eliminators (which Philadelphia Electric did not mention) can, by the force of the mechanical action of the water and air at the base area of the tower where the drift eliminators are, will force shed fibers out the tower and disperse it five to fifteen or more miles (based on water dropping that far from the towers as in transcript of AWPP Carburetor Ice Contention.

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

(2)

Motion to re-open Asbestos Contention and use of "judgement" continued:

Further at hearing re asbestos, in answer as to whether the Applicant knew of the presence of asbestos elsewhere in the Limerick construction, both Mr. Wetterhahn and Mr. Boyer answered that they did not know of any.

However, since both Mr. Wetterhahn and Mr. Boyer challenged my contention they should have known that as per par. 7, page 10 of IE Report 352/77-06, 353/77-07, dated 8/2/77, pipe spools with an outer covering of impregnated asbestos, some of which has been abraided thus exposing the asbestos as stated in page 10, is also a hazzard inside the plant.

In stating they did not know of any other asbestos present at Limerick, Mr. Wetterhahn and Mr. Boyer, again, subject themselves to a question of making mis-statements upon which they excuse themselves on the basis that it was their "judgement". By this repeated means they are able to, and have mislead the Board also on the AWPP VI-I Contention.

No where has the Applicant nor Staff considered the release of asbestos fibers from the Limerick towers. This known carcinogen causing such things as mesothelioma and other lung cancers requires re-study to protect myself, my family, and members of AWPP and the general public.

No other parties are discussing this point.

Respectfully submitted,
AIR & WATER POLLUTION PATROL


Frank R. Romano, Chairman

SEPTA: Asbestos tests find respiratory abnormalities

By Sara Kennedy
Inspector Staff Writer

Twenty-nine of 91 SEPTA employees tested during the last couple of weeks show respiratory abnormalities that could be related to exposure to asbestos in the work place, the transit agency said yesterday in announcing the results of preliminary testing by its medical director.

X-rays showed four workers with lung abnormalities and 25 workers with a thickening of the pleura, the lining between the chest wall and the lung, which could be caused by exposure to asbestos. Sixty-two workers tested showed no evidence of respiratory changes, according to a SEPTA statement.

The situation necessitates further investigation, said Dr. Wallace Davidson, SEPTA medical director. It is still too early to interpret what any of the physical changes in the 29

workers might mean, he emphasized. He said the workers would be referred to an expert on asbestosis, a disease of the lungs caused by inhalation of asbestos fibers.

SEPTA's largest union, Transport Workers Union Local 234, requested the testing last fall. Asbestos, a substance that does not transmit heat, has been linked to a wide variety of occupational illnesses, mainly lung diseases and various types of cancer.

But yesterday's findings do not mean that the workers will develop serious illnesses, Davidson said. "When you tell a person he has pleural thickening, you're not telling them there's anything wrong with their lungs or breathing," he said. "If you broke a window, that doesn't mean you've got a hole in your chimney."

Between 600 and 900 of the transit
(See ASBESTOS TESTS on 17-A)

Respiratory irregularities are found

ASBESTOS TESTS, from 1-A

agency's 9,000 employees probably will be tested, Davidson said. "Obviously, I'm going to look at anybody who has been exposed to asbestos or who might have been exposed," he said.

The testing began May 17, mostly with mechanics who work at SEPTA's Courtland shop, at Third and Courtland Streets. The workers may have been exposed to asbestos used as insulation in trolley cars, according to SEPTA spokesman Joaquin Bowman.

The Courtland shop probably has the worst problem of all SEPTA's repair facilities, said Roger Tauss, president of the union, which represents 5,600 SEPTA workers.

Until three months ago, Tauss said, workers there were cutting pressed asbestos boards in the shop, and breathing the dust; car-builders often pulled asbestos out of trolleys built in the 1940s with their bare hands. In other repair shops, asbestos is used in bus brake linings, he said. He estimated that as many as 2,000 workers may have been exposed.

However, Tauss said the union was satisfied with SEPTA's handling of the situation.

He said the transit agency lately had made efforts to clean up areas where workers were most likely to be exposed. He said SEPTA halted cutting of asbestos board in open areas, and that now it is done in segregated spaces with employees wearing protective clothing.

The union has been notified of SEPTA's findings, and has scheduled a meeting for today to present them to union members. "People are afraid, they're freaked out," Tauss said.