



AIR and WATER Pollution Patrol

BROAD AXE, PA.

Aug. 16, 1984

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKETED
USNRC

'84 AGO 20 P12

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

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

Docket Nos. 50-352 *OL*
and 50-353 *OL*

Attached please find "AIR AND WATER POLLUTION PATROL (ROMANO)
ENTERS NEW INFORMATION CONTENTION RE HEALTH HAZZARD VIA POLY-
VINYL CHLORIDE "FILL" USED IN THE LIMERICK REACTOR COOLING
TOWERS".

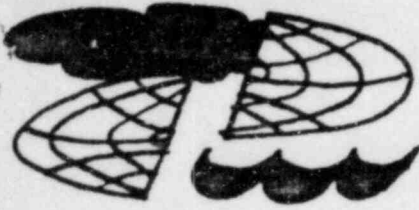
VERY TRULY YOURS,
AIR & WATER POLLUTION PATROL
Frank R. Romano
Frank R. Romano, Chairman

I certify the above has been served by first class mail on the
latest Service List as follows:

Lawrence Brenner. Esq., Chairman; Dr. Richard Cole; Dr. Peter
Morris; Troy B. Conner, Jr. Esq; Atomic Safety and Licensing
Board; Docketing and Service Section; Ann P. Hodgdon, Esq; and
Atomic Safety and Licensing Appeal Board Panel. Without attachemnts:
Limerick Ecology Action; Edward G. Buaer, Jr.; Marvin Lewis;
Joseph H. White III; Martha W. Bush, Esq.; Thomas Gerusky; Director
PEMA; Robert L. Anthony; Angus R. Love, Esq.; Charles W. Elliott;
David Wersan; Jay Gutierrez; Steven P. Hershey, Esq.; Zori Ferkin,
Esq.; Spence W. Perry, Esq.; Robert J. Sugarman, Esq.; James
Wiggins; Gregory Minor; and Timothy R.D. Campbell.

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AIR AND WATER POLLUTION PATROL (ROMANO), ENTERS NEW INFORMATION CONTENTION RE HEALTH HAZZARD VIA POLYVINYL CHLORIDE "FILL" USED IN THE LIMERICK REACTOR COOLING TOWERS

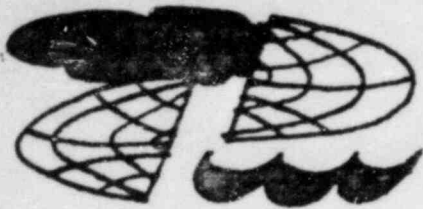
On February 15, 1984 a new information contention was filed in which Air and Water Pollution Patrol (Romano) contended that asbestos cement splash bars to be used inside the Limerick cooling towers would, due to heat and violent action of hot air and water, cause the splash bars to shed and discharge asbestos fibers into the air for miles, and into the Schuylkill River used for drinking in Montgomery County and Philadelphia.

Applicant and Staff objected to the admission of AWPP's contention mainly, first, on the basis that asbestos splash bars were replaced by polyvinyl chloride as per FSAR, page 9.5-17, and page 3.4-3 of EROL. And, secondly, that EPA had no regulation on asbestos in drinking water. EPA does have regulations on asbestos fibers in air as can come from asbestos cement drift eliminators in the cooling towers. However, AWPP's filing relating to discharge of asbestos fibers into the air has thus far been ignored.

I move at this time that the Board responds to the airborne asbestos aspect.

Now AWPP contends that neither the Staff nor Applicant considered the health effect of the contamination of air and water via fragmenting and volatilization of polyvinyl chloride and its plasticizers and stabilizers that will emanate from the polyvinyl fill now in the Limerick Cooling Towers.

Re timeliness criterion, this contention is late filed due



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Pollution Patrol

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(2)

AWPP New Information Contention re Polyvinyl Chloride contd:

to the fact that I recently read of adverse health effects caused by polyvinyl chloride and its plasticizers and stabilizers. Therefore, the substitution of tons and tons of polyvinyl chloride plastic fill for hazzardous asbestos splash bars require immediate attention.

Polyvinyl chloride and its plasticizers (phthalic anhydride) and stabilizers (organotins) readily enter the air and aqueous solutions, and have been known to cause "shock lung". This condition sometimes causing death was found to be caused by transfusion of blood stored in polyvinyl containers substituted for glass. Further, studies on chick embryos and rats show death caused by plasticizer and stabilizer leached from polyvinyl containers and polyvinyl hoses, into the culture medium. Phthalic anhydride and derivations used as plasticizers in polyvinyl chloride have been shown by test to cause congenital malformations through work done at Baylor University in Texas.

Further, I plan to contact as a prospective witness, Mr. Robert DeHaan who as early as 1970 recognized health problems associated with plasticizers used in polyvinyl chloride plastics. Another prospective witness would be Dr. R. J. Rubin of Johns Hopkins Hospital who found metabolic breakdown products of PVC in blood, urine and tissues of patients receiving blood that had been stored in PVC bags.

It is obvious, therefore, that polyvinyl chloride (PVC) will readily leach into aqueous solutions and air. The tons of PVC "fill" in the cooling towers, (aided by hot water and hot air action) will release large amounts of breakdown products of PVC, plasticizers, and its stabilizers into the air over Montgomery County, and into the Schuylkill River.

Re second criterion, I, as a Biochemist, see no other means



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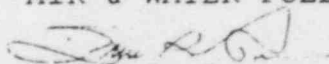
(3)

AWPP New Information Contention re Polyvinyl Chloride continued:

or party protecting AWPP's interest, since the Air and Water Pollution Patrol involves itself specifically with chemical, and biochemical environmental interests to which we now are alerted as described herein.

Re third criterion, AWPP's participation will assist in developing a sound record by injecting this issue of significant health effects not heretofore adequately considered by Applicant or Staff. Therefore, this contention must be considered now with the idea of preventing health effects caused by the environmentally and health affecting polyvinyl chloride present in the reactor towers. 4th: no one to any extent represents AWPP's interest.

Respectfully submitted,
AIR & WATER POLLUTION PATROL


Frank R. Romano, Chairman
61 Forest Ave.
Ambler, Pa. 19002

FRR/jch