



AIR and WATER Pollution Patrol

BROAD AXE, PA. March 6, 1985
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL PANEL

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

Docket Nos. 50-352
50-353

Attn: Christine Kohl, Chairman; Garry J. Edles; Dr. Reginald L. Gotchy
Gentlemen:


Re the Nuclear Regulatory Commission's Benjamin Vogler's statement of "500 Feet below clouds", I think it is important for the record to indicate two fundamental points not brought up at the Appeal Hearing but which were already on the record. I bring these two points up because it is extremely important that they be reviewed.

1) Definition of a cloud:

The witnesses for the Applicant attached much of their testimony to rules which apply to clouds. They arbitrarily defined the plume as a cloud. They had no authority to define a plume as a cloud and, therefore, testimony that applied to clouds cannot be used for a plume as it relates to FAA distance from cloud rules.

2) Visible and invisible plumes:

The record in the Applicant's FSAR or equivalent states that invisible plumes can occur as much as 50% of the time. Mr. Vogler's reference to "500 feet below clouds" (referring to the plume as a cloud) is invalid not only because of improperly defining the plume as a cloud, but also because high moisture conditions which would affect carburetor ice could be present in an invisible plume. The invisible plume, thereby, could become a menace to unsuspecting pilots...inparticular the many student pilots in the unusually high number of airports surrounding Limerick.

Respectfully submitted,
AIR & WATER POLLUTION PATROL

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