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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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- USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 84 OCT 23 P2:36

In the Matter of	:	
	:	
Philadelphia Electric Company	:	Docket No. 50-352-OL
	:	50-353-OL
(Limerick Generating Station,	:	
Units I and II)	:	

OFFICE OF SECRETARY
DOCKETING & SERVICE

INTERVENOR DEL-AWARE UNLIMITED, INC.
LIMERICK REVISED CONTENTIONS

V-14 Contrary to the FES, The project will permanently destroy the ambiance and integrity of a eligible National Historic District (Point Pleasant), by causing a permanent loss of the natural hillside frame, by intrusions of cleared areas, parking lots, transformer pads and possible walls not disclosed to, or considered by, the Advisory Council and not considered by the Corps, including a major impact on the National Historic Landmark (Delaware Canal) included in the District. Locational and functional alternatives to avoid the harm exist.

Basis: Studies of the Bucks County Conservancy; Courtroom statement of U.S. Attorney in Del-AWARE v. Baldwin (neither the Corps nor the other parties to the Memorandum of Understanding considered or passed upon the hillside); actual scenery (which can be substantially restored if the project is dropped). Regarding alternatives; see V-16 and see PECO 1979 Assessment and other PECO documents.

V-16 The diversion will, contrary to the DRBC's contention adopted by the staff in the FES (Section 9 and Appendix O), adversely and unacceptably affect salinity levels and water quality (dissolved oxygen levels) in the Delaware

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River, and receiving waters, causing problems with fish, drinking water and other uses, and requiring major construction, and could be reduced or eliminated to avoid that impact. The FES inappropriately gave DRBC, not DOI or NRC, the "last word", and failed to reflect NRC's independent judgment.

Basis: FES Section 9; DOI letter, July 1983; Interstate Water Management Agreement of 1983 and DRBC staff review of its Recommendations, including the review and staff comment of the Basinwide Drought Management Plans, (April 1984), the New Jersey studies pursuant to the Agreement, (Draft, Summer 1984) and the plans to reactivate Tocks Island show that there is a significant present and projected salinity intrusion caused by low flow and diversions of which Limerick is a significant part. Oyster bed problems documented by DOI, use of DRBC contentions over DOI studies and conclusions not justified or qualified. Blue Marsh flows planned to prevent salinity (FES, D-3) will be less effective than Delaware River flows would be. (See Merrill Creek EIS). Tocks Island and Merrill Creek studies show the extent of construction needed. (See FES appendix O, showing DRBC reliance on future construction. Gky studies for Bucks County (April, June, 1984) show this can be avoided by eliminating or reducing Limerick, or taking water from the Schuylkill (with lesser impacts). Cancellation of Unit II is in the public interest, contrary to FES, in that only \$700 million spent, and no need for energy; cancellation will also reduce risks of accident. Re: receiving waters, see EHB Decision pp26-27, 100-02, (6/18/84) regarding impact on receiving waters.

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In the matter of)
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PHILADELPHIA ELECTRIC COMPANY) Docket Nos. 50-352
)
(Limerick Generating Station,)
Units 1 and 2))
)

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Intervenor Del-AWARE Unlmtied, Inc. Limerick Revised Contentions by mailing a copy of the same to the following persons this 19th day of October, 1984.

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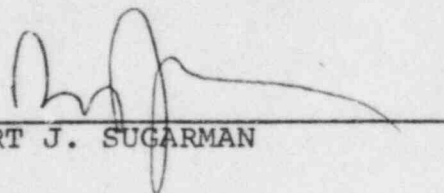
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