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Delaware River Basin Commission
Box 7360. West Trenton, N.J. 08628

BUCKET # RELATED CORRESPONDENCE
50-352,353 Box 186 Meylan, Pa 19065
OL April 16, 1986

Re: No. D-69-210 CP (Final)
PECo Application - Use 1986

Dear Ladies and Gentlemen,

As a follow-up to my testimony before the Commission on 4/15/86 I ask permission to have the following supplemental testimony included in the record. It comes under the category of CONCLUSIONS AND RECOMMENDATIONS.

'86 APR 18 AM 11:31

1. The Commission should refuse the transfer of Titus and Cromby water for Limerick use because there is a financial loss to PECo customers as stated by Boyer, 3/4/86, V-5:

..releasing Titus and Cromby units from service and eliminating the approximate \$1 million/month fuel cost penalty incurred through these units not operating. (Emphasis added)

In addition taking Cromby water degrades and deprives the river reach from Limerick to Cromby (9 miles and water companies drawing there) with drastic effects on DO and temperature as shown below, (#11) 2 ppm DO on 8/19/86, PE Fig.1.

2. Require both DO limits and 59° temperature limit at all times since they are both essential to maintaining the river safety. (See 8 days "Low DO and Flow Greater than 680 cfs, PE Fig. 1, - 8 days, June to September 1986 .)

3. Never exempt the DO limits at any time, including flows when augmented by Titus quota, Cromby quota or any other upstream sources.

4. Maintain 530 cfs flow minimum at all times. Do not lower to 415 cfs.

5. Refuse to allow pumping from Beechwood Pit at any time.

6. Require an Environmental Report before any action is taken on diverting water from the Tamaqua reservoir since this is a \$ 95,000 project which comes also under the requirements of DRBC Admin. Manual Part II (c) 1. and 2.

7. Since DRBC is dependent on PECo for the readings from the river monitoring stations, DRBC as well as USGS have no immediate, independent means for checking the operation of, and readings on the river monitors. Hence DRBC and USGS are at a disadvantage in carrying out their responsibility to supervise PECo and the river conditions. DRBC must require that it and USGS be equipped with the means of contacting the monitoring stations directly with the ability to record directly at their offices.

8. We believe that ^{DRBC} may have exceeded the authority provided in the compact when it became the financial agent for PECo in dealing with USGS to install and supervise the monitors. In any case we ask for an accounting of the \$ 39,100 in the original 8/85 contract and any additional funds, to the public. We ask that we be provided a copy.

9. We register our objection to the action of DRBC on 4/1/86, granting an Emergency Certificate to PECo to operate under its approval to PECo of 5/29/85. We believe ^{DRBC} failed to act under the requirement of Sect. 2-3.9 (d) "to protect the public interest" since that interest in maintaining the biological health of the Schuylkill River outweighs the public interest in keeping Limerick operating. In fact it would serve the public interest to have the Limerick unit 1 shut down and never operate again if that would mean PECo ratepayers would be relieved of the 27% rate increase requested by PECo to pay for its argument, such as in Table 4, Boyer 3/4/86, PECo is misleading DRBC and the public with its category "Cost Penalty to Public" because PECo was buying power before Limerick started commercial operation at less cost than the price of producing it at Limerick. The public interest would be served best by no rate hike and no Limerick operation. There is no penalty to the public only benefit without it.

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10. The DO monitoring should include the low reading from the total 6 monitors, not 5 out of 6 as PECO requests. Consistently low readings at one or two stations should not be discounted but used as a warning. As an example we include here DO levels for the controlling minimums from a period in July 1985, taken from PECO's weekly reports. The 6 stations are indicated by the first letter of their names.

DATE	7/3	9	10	11	12	13	15	16	17	18	19	20	21
DO	3.8	4.7	3.5	4.4	3.7	4.1	4.1	3.4	3.6	3.5	3.8	4.9	4.1
STA.	FR	V	V	V	N	N	N	F	N	N	F	FR	F

SUMMARY

22	23	24	25	26	27	28	30	31	(F) Fairmount - 3
4.0	3.9	3.9	4.3	4.0	3.6	4.3	4.4	3.9	(FR) Flat Rock - 3
V	N	N	P	FR	V	V	V	V	(P) Plymouth - 1
									(N) Norristown - 7
									(BR) Black Rock - 0
									(V) Vincent - 8

It is important to note that the Vincent Pool has the greatest number of low readings. These figures were recorded before the operation of the Limerick reactor. It is obvious that the readings at Vincent, which is the closest monitor to the plant, however, could not be expected to improve with plant operation, and it is, therefore, essential that Vincent readings not be discounted by PECO's strategy to include only the 5 higher stations in the determination of DO.

11. To demonstrate PECO's disregard for the condition of the river we present the statistics below which show that PECO did not interrupt its operation during the depth of the drought, despite dangerously low DO content from early August until Hurricane Gloria on Sept. 27; and the highest temperature water levels of the summer, 84° F in August and 81° F in September.

The ofs and DO figures were read from the graphs of Figure 1, Boyer 3/4/86. The electric production figures are from the PECO Limerick monthly operating reports. PECO received a full power operating licence 8/8/85. Water augmentation from Blue Marsh took place 9/1-10 and 9/11-19.

8/1/85	380 cfs POTTSTOWN	3.8 DO	MWE LIMERICK ELEC. PRODUCTION
8	530	4.8	0
10	1000	3.6	0
13	600	3.2	0
14	530	3.4	100
19	370	2.	0
24	300	3.8	131
26	800	3.7	122
9/1	490	4.	159
12	350	3.5	0
19	450	5.8	114

DO levels are minimum instantaneous readings.

12. We remind DRBC of its obligation to respect the regulations of U.S. agencies; in this case the NRC. We filed a petition with NRC, 3/5/86, for immediate suspension of the operating license for Limerick under 10 CFR 50.100, based on PECO's violation of terms of the license, Appendix B. *NRC has not ruled on our petition. We believe DRBC is obligated to defer action on PECO's application until NRC rules on revoking the license. If it is revoked, there will be no basis for PECO's application or for DRBC to act on it.

cc: V.S. Boyer, v.p. PECO, NRC, Conner & Wetterhahn Respectfully submitted,
 * Schuylkill cooling water.

Robert L. Anthony