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License Renewal EIS
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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING TO DISCUSS THE DRAFT SUPPLEMENTAL
ENVIRONMENT IMPACT STATEMENT FOR THE LICENSE RENEWAL
OF LIMERICK GENERATING STATION

+ + + + +

EVENING SESSION

+ + + + +

THURSDAY

MAY 23, 2013

+ + + + +

The Meeting convened in the Sunnybrook Ballroom,
50 Sunnybrook Road, Pottstown, Pennsylvania, at 7:00
p.m., Richard Barkley, Facilitator, presiding.

PRESENT

RICHARD BARKLEY, Facilitator

LESLIE PERKINS, Environmental Project Manager

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P-R-O-C-E-E-D-I-N-G-S

7:04 p.m.

FACILITATOR BARKLEY: Thank you. My name is Richard Barkley. I'm the meeting facilitator for this evening. I was here this afternoon as well. We had a productive meeting, I thought, and we covered all the speakers that asked to sign up and I hope we'll repeat that this evening.

If you're interested in speaking this evening, please sign up at a yellow card at the back. I think I have 13 people signed up at this point which is actually just a couple less than this afternoon.

The purpose of this meeting again is to present the results of the review related to the environmental evaluation of the license renewal for Limerick Station. Again, we'll accept any comments you have. If you have some written remarks you may place them up here at the table. We will take that. There's also the opportunity to provide written comments submitted up until June 27th regarding this application.

Why don't we roll to the next page, please?

Again, as I mentioned I'll go over the ground rules for this meeting. If you do want to speak, please sign up on a speaker card. To be fair, I'd like to see you try to hold your remarks to five minutes. Most

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1 speakers went between three and seven minutes this
2 afternoon, so if we can do that we'll be fine with
3 covering everyone this evening.

4 I'll try to call the first three speakers
5 at a time so you know you're prepared for the next
6 speaker. That makes for a much smoother transition.
7 And I would ask that you silence your cell phone if you
8 have one on so we don't have disruptions during the
9 meeting. You'll see me working with my cell phone. I
10 use it as a timer during the meeting, but I won't be
11 accepting calls.

12 If we could go to the next slide. There you
13 go. We have two hand-held microphones, if you could hold
14 the microphone fairly close to your mouth that would be
15 great. The audience can hear you then as well as this
16 meeting is being transcribed and so it makes it much
17 easier for him to understand the transcription and
18 accurately record that.

19 I would ask that you do not interrupt the
20 speaker or speak when not at the microphone. The
21 audience this afternoon did that without problem and I
22 hope we repeat that this evening.

23 If you have any questions concerns
24 regarding the conduct of the meeting, please come see me.
25 I know I've talked to two different people that have

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1 schedule constraints tonight, so I'll try to put them
2 early in the order in which they're called.

3 So at this point, I'd like to thank you for
4 your cooperation and have Leslie get started with the
5 presentation.

6 MS. PERKINS: Thank you, Richard, and thank
7 you all for taking the time to come to this meeting. My
8 name is Leslie Perkins and I am the Project Manager for
9 the Environmental Review of Limerick Generating Station.

10 I hope the information we provide at this
11 presentation will help you to understand what we've done
12 so far and the role you can play in helping us make sure
13 that the Final Environmental Impact Statement is
14 accurate and complete. I would like to emphasize that
15 the Environmental Review is not yet complete.

16 Next slide.

17 I'd like to start off briefly by going over
18 the agenda for today's presentation. I will discuss the
19 NRC's regulatory role, the preliminary findings of our
20 Environmental Review which addresses the impacts
21 associated with extending the operating licenses of the
22 Limerick Generating Station for an additional 20 years.
23 I will present the current schedule for the remainder of
24 the Environmental Review and how you can submit comments
25 outside this meeting. And I will discuss how the waste

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1 confidence rulemaking and EIS impact the Environmental
2 Review for Limerick.

3 At the end of the presentation, there will
4 be time for questions and answers on the Environmental
5 Review process. And most importantly, time for you to
6 present your comments on the Draft Supplemental
7 Environmental Impact Statement.

8 Next slide.

9 NRC was established to regulate civilian
10 use of nuclear materials including facilities producing
11 electric power. NRC conducts license renewal reviews
12 for plants whose owners who wish to operate beyond their
13 initial license period. NRC license renewal reviews
14 address safety issues related to managing the effects of
15 aging and environmental issues related to an additional
16 20 years of operation. In all aspects of the NRC
17 regulations, our mission is three-fold: to ensure
18 adequate protection of public health and safety, to
19 promote common defense and security, and to protect the
20 environment.

21 Next slide.

22 We're here today to discuss the potential
23 site-specific impact of license renewal for Limerick
24 Generating Station. The Generic Environmental Impact
25 Statement, also known as the GEIS, examines the possible

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1 environmental impacts that could occur as a result of
2 renewing licenses of individual nuclear power plants
3 under 10 CFR Part 54.

4 The GEIS, to the extent possible,
5 establishes the bounds and significance of these
6 potential impacts. The analyses in the GEIS encompass
7 all operating light-water power reactors. For each type
8 of environmental impact, the GEIS establishes generic
9 findings covering as many plants as possible. For some
10 environmental issues, the GEIS found that a generic
11 evaluation was not sufficient and that plant-specific
12 analysis was required.

13 The site-specific findings for Limerick are
14 contained in the Draft Supplemental Environmental Impact
15 Statement, also known as the Draft SEIS, which was
16 published April 30th of this year. This document
17 contains analyses of all applicable site-specific issues
18 as well as a review of issues covered by the GEIS to
19 determine whether the conclusions in the GEIS are valid
20 for Limerick. In this process, the staff also reviews
21 the environmental impacts of power generation
22 alternatives to license renewal to determine whether the
23 impacts expected for license renewal are unreasonable.

24 For each environmental issue identified an
25 impact level is assigned. The NRC standards of

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1 significance for impact was established using the White
2 House Council of Environmental Quality terminology for
3 significance. The NRC established three levels of
4 significance for potential impact: small, moderate,
5 and large as defined on the slide.

6 This slide lists the site-specific issues
7 NRC staff reviewed for the continued operation of
8 Limerick during the proposed license renewal period.
9 Overall, the direct and indirect impacts for license
10 renewal on all these issues were found to be small which
11 means that the effects are not detectable or are so minor
12 that they neither destabilize nor noticeably alter any
13 important attribute of the resource.

14 Next slide.

15 This slides provides a summary of our
16 findings with respect to cumulative impact associated
17 with Limerick. Cumulative impacts include the effects
18 on the environment from other past, present, or
19 reasonably foreseeable future human actions. These
20 effects not only include the operation of Limerick, but
21 also the impacts of activities unrelated to Limerick such
22 as future urbanization, other energy-producing
23 facilities in the area, and climate change. Past
24 actions are those related to the resources at the time
25 of the power plant licensing and construction. Present

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1 actions are those related to the resources at the time
2 of the current operation of the power plant. And future
3 actions are considered to be those that are reasonably
4 foreseeable through the end of the plant operation,
5 including the period of extended operation.

6 Therefore, the analysis considers
7 potential impacts of the end of the current license term
8 as well as the 20-year renewal license term. While the
9 level of impact due to direct and indirect impacts of
10 Limerick on aquatic and terrestrial resources were
11 small, the cumulative impacts, when combined with other
12 resources, such as increased urbanization and climate
13 change will be small to moderate for aquatic resources
14 and moderate for terrestrial resources. In
15 other areas considered, the staff preliminarily
16 concluded the cumulative impacts are small.

17 Next slide.

18 The National Environmental Policy Act, also
19 known as NEPA, mandates that each Environmental Impact
20 Statement consider alternatives to any proposed major
21 federal action. A major step in determining whether
22 license renewal is reasonable or not, is comparing the
23 likely impact of continued operation of the nuclear power
24 plant with the likely impact of alternative means of
25 power generation. Alternatives must provide an option

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1 that allows for power generation capability beyond the
2 term of the current nuclear plant operating license to
3 meet future systems generation needs.

4 In the Draft Supplement, NRC staff
5 initially considered 18 different alternatives. After
6 this initial consideration, the staff then chose the most
7 likely and analyzed these in depth.

8 Finally, NRC considered what would happen
9 if no action is taken. And Limerick shuts down at the
10 end of its current license without a specific replacement
11 alternative. This alternative will not provide power
12 generation capacity nor would it meet the needs currently
13 met by Limerick.

14 The NRC's preliminary conclusion is that
15 the environmental impact for license renewal for
16 Limerick would be smaller than those feasible and
17 commercially viable alternatives.

18 The no action alternative will have small environmental
19 impact in most areas with the exception of the social
20 economic impacts which would be small to moderate.
21 Continued operation would have a small environmental
22 impact in all areas. The staff concluded that continual
23 operation of the existing Limerick is the
24 environmentally preferred alternative.

25 Next slide.

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1 Based on a review of the likely
2 environmental impacts for license renewal, as well as
3 potential environmental impacts on alternatives to
4 license renewal, the NRC staff's preliminary
5 recommendation in the Draft SEIS is that the adverse
6 environmental impacts to license renewal for Limerick
7 are not great enough to deny the option of license renewal
8 for energy planning decision makers.

9 Next slide.

10 For the term beyond the 20-year period of
11 extended operations, the NRC addresses the management of
12 spent nuclear fuel and the Waste Confidence Decision and
13 Rule. Previous license renewal Supplemental EISs noted
14 that the environmental impact of temporary storage of
15 nuclear fuel for the period following the reactor
16 operating license term were addressed by this rule. The
17 Draft Supplemental EIS does not discuss potential
18 environmental impact of storing spent fuel for an
19 extended period after the plant shuts down. That issue
20 will be addressed in the NRC's Waste Confidence
21 Environmental Impact Statement and Rule. The Draft Rule
22 and the EIS is expected to be issued in fall of 2013 and
23 the public will have an opportunity to provide comments.

24 The Final Rule and EIS is expected to be
25 issued in September of 2014.

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1 Additional information on the Waste
2 Confidence Rulemaking and EIS can be found at the NRC
3 public website at the link listed on the slide.

4 In August 2012, the Commission decided that
5 the Agency would not issue licenses dependent upon the
6 Waste Confidence Decision until the Waste Confidence
7 Rule is completed. However, the Commission directed the
8 staff to proceed with licensing reviews and proceedings.
9 If the results of the Waste Confidence EIS and Rule
10 identifies information that impacts the analysis in the
11 final SEIS for Limerick, the NRC staff will perform any
12 appropriate review for those issues and may supplement
13 the Final SEIS before the NRC makes a final licensing
14 decision as to whether or not to renew Limerick's
15 licenses. If no changes are required, the NRC staff
16 would base its decision on the Final Supplemental EIS for
17 Limerick, the Waste Confidence EIS and Rule, as well as
18 the Safety Evaluation Report.

19 Next slide.

20 I'd like to reemphasize that the
21 Environmental Review is not yet complete. Your comments
22 today and all the written comments we receive by the end
23 of the comment period on June 27th will be considered by
24 the NRC staff as we develop the Final SEIS which is
25 currently planned to be issued in November 2013. Those

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1 comments that are within the scope of the Environmental
2 Review and provide new and significant information can
3 help change the staff's findings. The Final SEIS will
4 contain the staff's final recommendation on the
5 acceptability of license renewal based on work we've
6 already done and any new and significant information we
7 receive in the form of comments during the comment
8 period.

9 Next slide.

10 As many of you know, I am the primary contact
11 for the Environmental Review. Rick Plasse is the
12 primary contact for the Safety Review. Copies of the
13 Draft SEIS are available on CD as well as hard copies on
14 the table in the back of the room. In addition, the
15 Pottstown Regional Public Library and the Royersford
16 Free Public Library have agreed to make hard copies
17 available for review. You can also find electronic
18 copies of Draft SEIS along with other information about
19 the Limerick license renewal review online.

20 Next slide.

21 The NRC staff will address written comment
22 in the same way we address spoken comments received
23 today. You can submit written comments either online or
24 via conventional mail.

25 To submit written comments online visit the

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1 website regulations.gov and search for the docket ID
2 listed on the slide. If you have any written comments
3 today, you may give them to any NRC staff. This
4 concludes our presentation and I'll turn the meeting back
5 over to Richard.

6 FACILITATOR BARKLEY: Okay, thank you,
7 Leslie. Are there any questions regarding the
8 presentation? If not, I'll move right into the comment
9 period.

10 Again, typically, we call elected or
11 appointed officials first. And Michael Moyer is the
12 first one who signed up. Are there any other elected or
13 appointed officials who would like to speak this evening
14 as well? If not, Michael, you're first.

15 MR. MOYER: Thank you for the opportunity
16 to make my comments and I promise that I will keep them
17 brief.

18 The NRC is guilty of regulatory capture in
19 my opinion. Regulatory capture occurs when a regulatory
20 agency created to act in the public interests instead
21 serves to advance and to promote the agenda of the very
22 industry it is charged with regulating.

23 Let me give you a very specific example. On
24 September 14, 2012, I wrote the NRC to request a delay
25 of final public hearing on the Environmental Impact

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1 Statement of relicensing the Limerick Generating Station
2 until the NRC's U.S. court-ordered spent fuel study was
3 complete. I never received a response. Not a phone
4 call. Not a letter. Not an email. No response.

5 Recently, I called Congressman Jim
6 Gerlach's office and I also called Senator Bob Casey's
7 office for help in getting a response to my letter. I'd
8 like to publicly thank Greg Francis from the
9 Congressman's office and Kurt Imhof from the Senator's
10 office for personally contacting the NRC on my behalf.
11 Even after those efforts, and now some eight months after
12 I had written that letter, I still haven't heard back from
13 the NRC. And I suspect I never will.

14 This helps to illustrate a real-life
15 example of how regulatory capture works. In this case,
16 the regulatory agency in question seems to be more
17 concerned, in my opinion, with keeping Exelon's
18 relicensing of the Limerick Generating Station on track
19 than they are with responding to the concerns to protect
20 the public interest.

21 How is it in the public interest, for
22 example, to attempt to assess the environmental impact
23 of relicensing Limerick Generating Station when we don't
24 know the results of the spent fuel study? And we won't
25 know the results until some time in 2014. How can the

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1 NRC properly assess the environmental impact of
2 relicensing Limerick Generating Station until the
3 earthquake mitigation plans have been completed? And we
4 won't know the results until some time in 2017. Why does
5 the NRC seem to be in such a mad rush to relicense a
6 nuclear facility when its license doesn't even expire
7 until 2024? Why? Why? Why?

8 The answer is simple: regulatory capture.
9 The Nuclear Regulatory Commission or better yet, the
10 Nuclear Rubberstamp Committee, which is precisely what
11 it appears to be in my opinion, is far more concerned with
12 being directed by Exelon and Exelon's schedule than it
13 is with responding to the health and safety concerns of
14 the public. That's why today I am formally calling for
15 a congressional investigation of the NRC's practices
16 based on regulatory capture, regulatory malpractice, and
17 willful abandonment of its charge to act in the public
18 interest.

19 Further, as an elected official
20 representing over 6,000 residents across the Schuylkill
21 River in East Coventry Township, I am formally calling
22 for a final public hearing here in Pottstown before the
23 NRC grants any license renewals to Exelon for its
24 Limerick Generating Station. Thank you. Thank you for
25 your time and consideration.

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1 (Applause.)

2 FACILITATOR BARKLEY: Okay, thank you, Mr.
3 Moyer. Our next several speakers will be Mark Pavelich,
4 followed by Dr. Ann Baly.

5 MR. PAVELICH: Good evening. My name is
6 Mark Pavelich. I own a business called Organics and I
7 operate it and live in Dowington. I'm extremely
8 passionate about issues that relate to the environment
9 as my company develops, manufactures and deploys
10 materials in organic horticulture.

11 Thus, I'm in the forefront of environmental
12 issues daily. And I do support the relicensing of
13 Limerick Generating Station. Thank you.

14 (Applause.)

15 FACILITATOR BARKLEY: Okay, thank you,
16 Mark. Dr. Baly.

17 DR. BALY: I'm Anita or Ann Baly. I'm
18 mostly retired, former Lutheran pastor and professor of
19 theology. I'd like to comment on one specific
20 environmental issue and one more fundamental question.
21 And first, I just want to publicly thank the Pottstown
22 Mercury and Evan Grant, in particular, for the continued
23 and on-going and careful reporting that has been done on
24 this whole Limerick nuclear plant issue in our community.
25 Otherwise, most of us would know very little about it.

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1 Environmentally, I am concerned about
2 evacuation. Now I just learned tonight that evacuation,
3 alas, falls into another unit of the NRC's portfolio.
4 But since the professed number one mission of the NRC is
5 to protect the public health and safety and because I
6 don't know whether that other unit will ever invite
7 public comment, I would like to speak briefly to
8 evacuation tonight.

9 I am in my mid-60s. I am healthy, mobile,
10 resourceful, informed, and well educated. I believe my
11 chances of successfully evacuating in the event of a
12 nuclear disaster are slim to none. I live a mile from
13 the plant at the Sanatoga Ridge Retirement Community. I
14 believe the chances of my neighbors evacuating
15 successfully, most of my neighbors are in their 80s or
16 90s, I think their chances could be described as simply
17 not having a prayer.

18 To pretend otherwise seems like a cruel
19 hoax. Any previous hopes that people would be
20 evacuating only in a ten-mile area, it seems to me, have
21 been definitively answered and dashed by the actual human
22 behavior we saw at Fukushima during their nuclear
23 disaster. People evacuated within a 50-mile area and
24 they had to.

25 When nuclear disaster strikes at Limerick,

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1 people will be evacuating all over the greater
2 Philadelphia area and into New Jersey. Millions of
3 people, all competing in a panic mode for the same roads
4 that serve us so poorly around here during an ordinary
5 rush hour. And it can only get worse because daily the
6 population increases.

7 But environmental impacts, crucial as they
8 are, are secondary questions. I really wish someone
9 would address why this licensing procedure is happening
10 so early. Unit 2's present license, as Mr. Moyer
11 explained, isn't even up for 16 years. Only God knows
12 what will happen tomorrow, let alone 16 years from now.
13 We will be learning that only as we go along.

14 Think back just 12 years ago. Remember
15 those days, the spring of 2001? I still enjoyed flying
16 in airplanes. I had no sense that the United States in
17 the contiguous 48 states could be attacked by anyone.
18 Our economy was robust, employment was full, interest
19 rates were high. I hadn't even heard of email. Our
20 general feeling in America was that of happiness and
21 safety. Well, all that has changed.

22 Much will happen in the next 12 years that
23 no one can foresee. To proceeding with licensing now
24 makes no sense. It almost seems as though the NRC is
25 saying to us our mind is made up. Do not confuse us with

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1 any present or future facts, circumstances, insights,
2 developments, or technologies.

3 Someone must be profiting by this reckless
4 rush to relicense, but the public is being harmed by the
5 haste. You, Nuclear Regulatory Commission, have the
6 power to change this. Please, slow the process down.
7 Thank you.

8 (Applause.)

9 FACILITATOR BARKLEY: Thank you, Ann. Our
10 next speaker is Gail Brown, followed by Donna Cuthbert,
11 and then Leanne Birkmire.

12 MS. BROWN: My name is Gail Brown. And my
13 neighbor is the Limerick Generating Station. I live a
14 short distance from Frick's Lock National Registered
15 Historic District. About two thirds of this district is
16 within the exclusionary boundary, right on the cusp of
17 the Limerick Generating Station, therefore,
18 uninhabited.

19 Greatly due to increasing vandalism and a
20 fire at the Lock Tender's House in February 2008, the
21 Frick's Lock stakeholders were formed to negotiate a
22 satisfactory resolution towards the preservation of
23 Frick's Lock. The stakeholders were represented by
24 members from Exelon, the Schuylkill River Heritage Area,
25 East Coventry Township, Chester County, Senator Breneman

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1 and Preservation Pennsylvania, and the Pennsylvania
2 Historic and Museum Commission.

3 On February 14, 2011, Valentine's Day, an
4 agreement between Exelon and East Coventry Township was
5 accepted to rehabilitate Frick's Lock. Construction
6 began and was completed the following year 2012. The
7 first public tour of Frick's Lock Historic District is
8 scheduled for June 8, 2013.

9 I believe this is the first time a major
10 utility has rehabilitated a National Historic District
11 in negotiated terms to allow a local historical
12 commission limited access to conduct guided tours within
13 the EAB. Not only did this project enrich the history
14 and heritage of our community, but Frick's Lock also lies
15 adjacent to the proposed Schuylkill River Trail and as
16 a trail head will be a tourist destination and a boost
17 to our local economy.

18 As a member of the Frick's Lock
19 stakeholders, I am still amazed at what can be
20 accomplished when a large corporation, Exelon, is
21 willing to come to the table and work with individuals
22 and a community to contribute to and enhance our
23 resources. Thank you, Exelon, and I look forward to a
24 continued participation within the Frick's Lock
25 stakeholders.

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1 (Applause.)

2 FACILITATOR BARKLEY: Here you go, Donna.

3 MS. CUTHBERT: For an agency mandated to
4 protect public health from Limerick nuclear plant
5 operations, NRC's mindset and insistence on repeatedly
6 denying reality is intolerable. NRC's denial protects
7 Exelon's profits and NRC jobs, but they allow more people
8 to become tragic victims of Limerick nuclear plant's
9 radiation and other toxic releases.

10 Sadly, NRC is infested with conflicts of
11 interest which are leading to lies that will further
12 jeopardize everyone in our region.

13 NRC obviously ignored documented evidence
14 of environmental and health harm, compiled and submitted
15 to NRC for this EIS in 2011 by ACE. This evidence should
16 have been alarming even to NRC.

17 NRC did no monitoring or testing. In
18 reality, NRC has no idea how much radiation is released
19 from Limerick. Based on flawed and outdated theoretical
20 models for radiation exposure which only measure
21 external doses and ignore internal doses, NRC
22 shamefully, shamefully continues to absurdly claim
23 Limerick radiation releases are safe. Permissible does
24 not mean safe.

25 In 2005, the National Academy of Sciences,

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1 BEIR VII Report said there is no safe level. Dr. John
2 Gofman, once head of AEC's labs raised dire warnings
3 about permitted releases from nuclear plants. He
4 published research warning about permitted releases from
5 nuclear plants. He estimated 32,000 Americans would die
6 each year from fatal cancers induced by allowable
7 radiation releases. Gofman said the entire nuclear
8 power program is based on a fraud that there is a
9 permissible dose that wouldn't hurt anyone. And
10 frankly, we're tired of hearing NRC people say that.

11 We provided NRC with evidence showing
12 communities around Limerick already exacted a high
13 public health toll since Limerick started operating. A
14 cancer crisis has been documented by Pennsylvania cancer
15 registry statistics and CDC data. Cancer rates
16 skyrocketed far above the national average after 1985
17 when Limerick started releasing radiation into our air,
18 water, soil, and people. Links to Limerick are clear.
19 Limerick routinely releases radiation. Radiation
20 causes cancer. We have a cancer crisis and one of the
21 largest relays for life anywhere.

22 The upward trend in childhood cancer rates
23 provides the most tragic link. By the late 1980s,
24 childhood cancer rates climbed to 30 percent higher than
25 the national average; higher by 60 percent in the early

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1 1990s and a shock 92.5 percent higher than the national
2 average in the late 1990s. Infant and neonatal
3 mortality rates are far higher than the state average and
4 even higher than Philadelphia and Redding. Studies
5 provide a link.

6 When nuclear plants open, infant mortality
7 rates go up. When they close, rates go down. Autism
8 rose a whopping 310 percent from 1990 to 2000. Learning
9 disabilities increased by 94 percent, a rate double the
10 state increase. Strontium-90 radiation is an
11 undeniable link. Limerick releases strontium-90.
12 It's in our air, water, and soil. Strontium-90 is also
13 documented in the babies' teeth of our children at some
14 of the highest levels in the nation. NRC still
15 shamefully tries to blame decades old bomb testing far
16 from our region. It's ridiculous.

17 Many cancers rose dramatically by the late
18 1990s. Examples include thyroid cancer, 128 percent
19 increase; multiple myeloma, 91 percent increase; breast
20 cancer, 61 percent increase, higher than the national
21 average in every age group and it is 51 percent higher
22 in women 30 to 44. There's a 48 percent increase in
23 leukemia, almost double the state average.

24 Limerick nuclear plant is clearly a major
25 factor in the tragic and costly health crisis around it

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1 with children the most profoundly impacted victims.
2 Exposure to Limerick's radiation is an unavoidable and
3 intolerable injustice. We can't see it, smell, taste,
4 or feel it, but it's everywhere. We can't avoid it.

5 As long as Limerick nuclear plant continues
6 to operate, radiation and other dangerous toxics will be
7 released into our air and water and more people will
8 suffer needlessly. We have lost patience with NRC's
9 lies, coverups and negligence. NRC should close
10 Limerick now to protect public health. It's time to stop
11 unnecessary exposures and associated suffering and
12 healthcare costs due to Limerick's operations.

13 (Applause.)

14 FACILITATOR BARKLEY: Thank you, Donna.
15 Leanne. And Tina Daly is next.

16 MS. BIRKMIRE: Good evening. My name is
17 Leanne Birkmire. I live in Jeffersonville,
18 Pennsylvania. I'm a chemical engineer by trade and I've
19 worked for Exelon for nine years. The past four have
20 been at Limerick Generating Station. My group is
21 responsible for monitoring of the air, water, land,
22 waste, chemicals, tanks, and wildlife in accordance with
23 state, local, and federal regulation.

24 I'm also the lead of the Environmental
25 Stewardship Committee at Limerick Generating Station, a

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1 group of approximately 30 volunteer employees who
2 participate in conservation efforts both at the station
3 and in their communities.

4 I believe that Limerick is safe both in its
5 design and in that the employees come to work every day
6 recognizing that nuclear technology is special and
7 unique. I believe that Limerick is operated in a manner
8 that protects the environment and that conservative
9 decisionmaking is used at the station to ensure that we
10 protect the plant, we protect the workers, we protect the
11 public, and we protect the environment for future
12 generations.

13 I support the approval of the Draft
14 Environmental Impact Statement for renewal of Limerick's
15 operating license. Thank you for your time.

16 (Applause.)

17 FACILITATOR BARKLEY: Tina's next.
18 Followed by Charlie Shank.

19 MS. DALY: My name is Tina Daly. I live
20 within ten miles of Limerick. I have been following the
21 process since the days of the Limerick Ecology Action.
22 I was one of two citizens who commented on the latest air
23 permit, so I won't get into that tonight, and one of the
24 very few who commented on the NPDES permit, also I won't
25 get into that.

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1 I also spent years worrying over the DRBC
2 water augmentation request that dedicates the Schuylkill
3 River to the production of nuclear power. I am opposed
4 to the relicensing and I believe this plant should be
5 safely decommissioned as soon as possible and with full
6 on-the-record public participation at every step.

7 The DSEIS is completely self serving and
8 shows how far NRC is in bed with Exelon. Nuclear
9 regulatory means regulate. NRC is paid for by all of us
10 and should be fair and impartial. It is strange that the
11 NRC wrote the DEIS. The NRC set up the interior rules,
12 including small, moderate, and large -- what a brilliant
13 idea -- and whether something is new or old. And the NRC
14 will decide whether or not to relicense. What a farce.
15 This is not the way to make decisions.

16 The public notice was not informative in the
17 least. Obviously, NRC is not interested in public
18 input. The notice appeared on 5/9/13 and today is two
19 weeks later. I, for one, cannot adequately review this
20 document in that time frame. However, I do thank the NRC
21 for making the paper copies available on request.

22 This is a meeting that's being transcribed.
23 Are we on the record as we would be at a hearing? Is NRC
24 on the record? I agree with Mr. Moyer, the supervisor,
25 that there should be an on the record public hearing.

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1 NEPA Section 1502.2(f) says agencies shall not commit
2 resources prejudging selections of alternatives before
3 making a final decision.

4 On page 123 of this document it says "the
5 USNRC preliminary recommendation is that the adverse
6 environmental impacts of license renewal for LGS are not
7 great enough to deny the option of license renewal for
8 energy planning decision makers." I think the NRC is not
9 in compliance with NEPA and I think this needs to be
10 looked into. I think the law is being broken.

11 Throughout the supplemental, we are told
12 that there is no new information to change the past EIS
13 and decisions. The fact is there are lots of new pieces
14 of information. One of the new pieces Donna mentioned
15 is the National Academy's National Research Council BEIR
16 VII No. 2 Report which says there's no safe level of
17 exposure to radiation. This is new since LGS
18 started up. It is not considered here. I couldn't find
19 anything about it in the document that I was given. It
20 must be considered because of all of the reasons Donna
21 said.

22 Most of the maps are no good. Quickly, show
23 me the star on page 2-3. Show me the township names.
24 What is the location of the business shown on page 217,
25 etcetera. Some of the maps have circles around the plant

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1 at varying distances, so of course, you can't compare
2 them.

3 I looked at all the references they used.
4 The references include work by private firms for
5 corporations as far as I can see. Who paid for these
6 studies? Where did the money come from? It seems that
7 NRC did not use work done by such organizations as the
8 Union of Concerned Scientists, Beyond Nuclear, or ACE.
9 This is an example of how NRC is in bed with one side.

10 New also is the above-ground storage of
11 spent nuclear fuel. That certainly wasn't here before
12 and that certainly presents a huge danger to us all. And
13 I might add the public hearing on that was held in the
14 context of whether they could put cement pads in a certain
15 zoning district.

16 New rules about spent fuel may be released
17 in 2014, so this relicensing is obviously premature.

18 The whole document is full of things like
19 the term "permanent disposal." There is no such thing
20 as permanent disposal. Also, there's a reference to
21 corporate wildlife habitat certification. It's just
22 one of the references on one of the lines. This
23 certainly throws all those references about wildlife
24 into question to say the least.

25 Historic resources, Frick's Lock aside,

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1 don't include some of the places that I know are on the
2 Historic District and it also said that there were no
3 federal lands owned in the 50-mile radius except Valley
4 Forge. Maybe the Independence National Park isn't
5 nationally owned. I don't know. Hopewell Furnace, the
6 Heinz National Wildlife Refuge, I question that.

7 Also federal money is being spent on the
8 Highlands. NRC is a lackey to the nuclear industry and
9 NRC should not consider this premature license
10 application and its circular arguments. NRC should be
11 reorganized into a non-biased, regulatory commission
12 prior to any further decision making. I plan to extend
13 these remarks before the deadline is over.

14 (Applause.)

15 FACILITATOR BARKLEY: Thank you, Tina.
16 Charlie. Then Paul Gunter is up.

17 MR. SHANK: Before I start, I just want to
18 thank again Mr. Moyer for coming over and making his
19 comments. He seems to be the only one who is aware of
20 the potential dangers over there in East Coventry
21 accepting that land. Recently, the Limerick
22 nuclear plant refueled Reactor 1. It also uprated the
23 plant to produce more energy. To do this they have mixed
24 in a more powerful fuel, GNF2, and changed the shape of
25 the fuel bundles. These changes make more power, more

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1 radiation, more heat, and more stress on the aging
2 equipment. Exelon is now close to the maximum output for
3 the Limerick reactors. To add more power, expensive
4 changes would be necessary to handle even greater
5 stresses and greater radiation.

6 Every day, 14.2 million gallons of very hot
7 water leave the cooling towers loaded with dissolved
8 solids and radiation. This hot brew goes down Pipe 001
9 to the diffuser and into the Schuylkill River. It enters
10 the river at 110 degrees Fahrenheit a much higher
11 temperature than the Schuylkill River limit of 87 degrees
12 Fahrenheit. Over the course next 30 years, that will
13 amount to about 150 billion gallons of polluted water
14 going into the river.

15 When water is hotter than 95 degrees
16 Fahrenheit it fosters the growth of thermophilic
17 microbial organisms. These organisms include
18 legionella, yes, legionella, and salmonella among
19 others. These pathogens thrive in warm water. They can
20 also cause fatal infections and pneumonia in compromised
21 individuals and the elderly. This hot water needs to be
22 cooled down more than it can be at the present time.

23 Exelon asked the Pennsylvania Department of
24 Environmental Protection to provide comments about these
25 pathogenic organisms in the river. Exelon wanted the PA

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1 DEP to confirm Exelon's conclusions that no harm would
2 come from the pathogens during an extended period of
3 operation with these higher temperatures. The
4 Pennsylvania DEP, to its credit, said it had no data on
5 these organisms in the river to support Exelon's claim.
6 The PA DEP was unable to reach any conclusions as to the
7 possible health effects, thus, not supporting Exelon's
8 contentions.

9 I think it would be better to have more
10 independent study done now than solve any unknowns before
11 racing to relicense Limerick. We have 11 years
12 remaining in the present license period to properly work
13 out these problems. We should not just skip over them
14 or wait until a serious accident happens. The job of the
15 NRC is to promote public safety, not the nuclear
16 industry. The way the NRC has been acting lately, makes
17 the IRS look good.

18 I support ACE's recommendations about the
19 Senate investigation of the NRC and about having a public
20 hearing here for relicensing back in Pottstown.

21 Lastly, I want to mention how Exelon and the
22 agencies like the NRC are destroying public trust. This
23 isn't something that just happened over night. It's
24 been coming on for many, many years. For one thing, they
25 eliminate. They eliminate proper temperature controls

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1 and heat standards for the Schuylkill. They allow dirty
2 Wadesville water into the Schuylkill. They grant
3 radiation exemptions. They grant total dissolved solid
4 exemptions. They ignore Clean Air and Clear Water Act.
5 They delay timely notification of the public about
6 accidents and spills. They alter the river flow rate
7 measurements for convenience. They allow 20 time
8 increase in pipe leakage rates for Limerick so it can pass
9 a test. They stall fuel pool liner repairs. They stall
10 protective vent installation. They fail to require
11 filters for the vents. They misled Limerick
12 construction costs. Deceived. The NRC inspectors had
13 been instructed not to write things down on paper so they
14 won't show up in FOIA requests.

15 Secrets. They withhold Exelon information
16 from the public concerning foreign ownership or
17 investors. My favorite, the evacuation plan. The NRC
18 requires this plant for relicensing, they pay for it,
19 Exelon does, and then everybody ignores it.

20 Among some of us, we think of this plant as
21 a dinosaur. To me, the industry is dying, but they just
22 don't want to admit it. We call it nukesaurus. Our
23 country is smarter than this. Because of corporate
24 greed and control, they have taken over this business and
25 this relicensing. We should start over with a fresh

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1 sheet of paper. The rest of the world is moving ahead
2 while we tread water. We can do better than this. We
3 can certainly do better than what we're doing now. Thank
4 you very much.

5 (Applause.)

6 FACILITATOR BARKLEY: Paul, after you will
7 be Zach Chizar.

8 MR. GUNTER: Thank you. My name is Paul
9 Gunter. I'm Director of the Reactor Oversight Project
10 at Beyond Nuclear in Takoma Park, Maryland. And I drove
11 up here tonight basically with the message that the
12 relicensing of the Limerick plant is more than just a
13 local issue.

14 The concerns here are far reaching and I
15 think that the story that I wanted to bring to start off
16 with was the concern is how can you do an accurate
17 Environmental Impact Statement if in the midst of trying
18 to figure out just how far the reach of the Fukushima
19 Daiichi nuclear accident really is and in terms of its
20 impact on land contamination, air, water, and marine
21 environment contamination by radioactivity from this
22 accident?

23 And so it's our recommendation, our
24 request, that this relicensing be suspended until
25 there's a more reliable reviewable Environmental Impact

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1 Statement that tells us what's the results from Fukushima
2 Daiichi and the nuclear catastrophe that happened at the
3 GE boiling water reactors there similar to those here.

4 At Fukushima Daiichi, it was General
5 Electric Mark I boiling water reactor for Units 1 through
6 5 and Unit 6 is a Mark II, like Fukushima Daiichi. And
7 I'm going to recall a story. On March 11, 2011, I was
8 called into CNN in Washington, D.C. to comment on the
9 accident that was emerging at the Fukushima Daiichi
10 facility and I was asked by correspondent Jean Mazur to
11 just briefly say what is your concern as simply as you
12 can put it. And what I said and what was on The Situation
13 Room report for that evening was our concern is that this
14 reactor could literally blow its roof off.

15 And that remark was contrasted by Tony
16 Pietrangelo with the Nuclear Energy Institute that said
17 there's no evidence that there's any threat to
18 containment. What proved out the next day was the
19 explosions that then repeated themselves. And it wasn't
20 a prediction on our part. It was never a prediction, but
21 it was the fact that we've known, I've known for decades,
22 that these GE boiling water reactors are unreliable in
23 terms of their primary component for protecting the
24 public in the event of a severe accident, that being the
25 containment structure.

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1 The Atomic Energy Commission which is the
2 predecessor of the Nuclear Regulatory Commission, its
3 chief safety officer in 1972 said that plant should never
4 be built. And that the reliance on other GE Mark I
5 reactors should be suspended. That was ignored. And in
6 fact, the concerns have only grown since then to the point
7 that on the eve of the explosions at Fukushima this was
8 what carried our concern.

9 But first and foremost, this relicensing
10 should not be going forward because the Nuclear
11 Regulatory Commission's own requirements for the
12 licensing agreement for Limerick have been violated or
13 are in violation. And to extend the operating license
14 is to extend that violation.

15 And I want to read into the record NRC
16 general design criteria which states "the principle
17 design criteria established the necessary design,
18 fabrication, construction, testing, and performance
19 requirements for structures, systems, components,
20 important to safety. That is, structures, systems and
21 components that provide reasonable assurance that the
22 facility can be operated without undue risk to public
23 health and safety."

24 It then goes on to identify general design
25 criterion 16 which is the containment design and states,

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1 "requires reactor containment and associated systems
2 shall be provided to establish an essentially leak-tight
3 barrier
4 against the uncontrolled release of radioactivity to the
5 environment and to assure that the containment design
6 conditions important to safety are not exceeded as long
7 as postulated accident conditions require. Essentially
8 leak-tight barrier against uncontrolled release of
9 radioactivity."

10 This is a violation of the licensing
11 agreement as currently operated by Exelon at Limerick
12 facility. But it doesn't stop there. The NRC staff by
13 their own document, SECY-2012-0157, has stated that
14 given a severe accident involving core damage, there's
15 only roughly a 50-50 chance of recovering from the
16 nuclear accident within the pressure vessel and no
17 significant radioactive release from containment.
18 That's a 50-50 chance that it will occur with a
19 significant release from the containment to the
20 environment.

21 The document also reads "if the vessel
22 fails, there is only a 25 percent chance that the
23 operators might cool the molten core inside the
24 containment with no significant release to the
25 environment." In other words, by NRC staff's own

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1 judgment, that's a 75 percent chance of a core melt
2 exiting containment. That said, NRC states that there
3 is an 11.8 percent chance that a severe core damage
4 sequence would lead to early overpressure containment
5 failure where there is a 90 percent chance that the molten
6 core bypasses the suppression pool, being a primary
7 component of the containment for the Mark II because of
8 drain line failure or a rupture in the drywell, another
9 component.

10 Essentially, this paints a picture for you
11 for us of a very large radioactive release to the
12 environment because of this unreliable containment.
13 Again, which is in violation of Exelon's licensing
14 agreement.

15 The licensing renewal process -- basically,
16 the NRC has never rejected a license renewal application.
17 There have been 75 plants that have received their
18 license extension and the NRC has never really in our
19 experience and we've participated in a number of these
20 interventions, the NRC is always an adversary to
21 questions, concerns, contentions, that would raise the
22 safety bar or question the extension of these operating
23 licenses. So the NRC in these proceedings stands for
24 Nuclear Regulatory Conveyor that is intent upon speeding
25 up the process, granting early application, and it's our

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1 contention that if you're wondering why Exelon is making
2 its application so early, it's one of our contentions
3 that the industry and the agency have colluded to avoid
4 answering questions about the lesser environmental
5 impact from the on-coming renewable energy renaissance,
6 revolution that is happening, that is attracting
7 investment and is growing by leaps and bounds. The NRC
8 doesn't want to make that kind of information in its
9 Environmental Impact Statement. That's why -- that's
10 precisely why Exelon or any of these other utilities can
11 make application as early as 20 years. That's the rule.

12 I mean what kind of Environmental Impact
13 Statement is worth anything if it's fixed 20 years before
14 the federal action is even required? This gives you the
15 basic plan and blueprint for a bias that this Agency and
16 this industry have concocted to expedite these license
17 extensions prior to what they view as a lot of unwelcome
18 and unnecessary questions about renewable wind, solar,
19 energy efficiency, and whole host of 21st century energy
20 policy chances that are going to happen, that are
21 happening. Thank you.

22 (Applause.)

23 FACILITATOR BARKLEY: Thank you, Paul. Is
24 it Chizar?

25 MR. CHIZAR: Chizar.

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1 FACILITATOR BARKLEY: I butchered it
2 really bad. Dr. Cuthbert, you'll be up next.

3 MR. CHIZAR: Hi. My name is Zach Chizar
4 and I'm an administrator with the Pennsylvania Energy
5 Alliance. Day in and day out, we educate Pennsylvanians
6 about nuclear power as a clean, safe, and reliable source
7 of energy for the future. One of the most rewarding
8 parts of working with this coalition is getting out into
9 the community to meet different people, so many of whom
10 already support nuclear energy.

11 In early April, we were in this very room
12 for Representative Mark Painter's Live Well Expo. Many
13 attendees came by our table to learn about us and some
14 even shared stories about Limerick Generating Station
15 dating back to its origination when it was first opened.

16 Over the last six months, we've had two
17 groups of fourth grade students from Brooke Elementary
18 and Limerick Elementary nearby visit Limerick Generating
19 Station. Nuclear energy is part of their current
20 curriculum in school and the visit served as a perfect
21 wrap up for the unit. The students were actively engaged
22 and many asked great questions about the facility some
23 of which were even interested in how to work there when
24 they were older.

25 In addition, we were also present at the

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1 community information night that was held last week at
2 Limerick Generating Station. Community events such as
3 this continue to show that results from our March 2012
4 poll still hold true that the public opinion of nuclear
5 power is still very strong and positive near our State's
6 five power plants.

7 As the need for energy continually
8 increases, nuclear power proves to be the most reliable
9 and environmentally friendly solution. Thank you.

10 (Applause.)

11 FACILITATOR BARKLEY: Thank you, Zach.
12 After Dr. Cuthbert, will be Betty Shank and then finally
13 Lorraine.

14 DR. CUTHBERT: Thank you, Rich.
15 Throughout this Environmental Impact Statement that has
16 been drafted and presented by the NRC, the Agency has
17 persistently and continuously understated, minimized,
18 or denied the documented evidence of harms from Limerick
19 nuclear plant.

20 Your pro-nuclear industry bias is well
21 established, but it's also shameful at the same time. We
22 reviewed the document in its entirety and I will refer
23 to just a few items that illustrate the points that we
24 make on behalf of protecting the public.

25 In Section 9.3.1 of your EIS you admit that

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1 "during nuclear power plant operations, workers and
2 members of the public would face unavoidable exposure to
3 radiation and hazardous toxic chemicals." Despite this
4 fact, NRC has actually suggested in this repugnant EIS
5 that all of the environmental harms from Limerick are
6 small. I'm going to repeat, all of the environmental
7 harms from Limerick are small and have no measurable
8 impacts.

9 Nuclear power plants are the only
10 facilities on the planet with the capability of rendering
11 entire regions uninhabitable for decades, if not
12 centuries, in the event of a radiation disaster. For NRC
13 to claim that all power generating facilities generate
14 similar wastes is another lie. You stated "the
15 generation of spent fuel and waste material including
16 low-level radioactive waste, hazardous waste, and
17 nonhazardous waste would also be generated at
18 non-nuclear power generating facilities." Really?

19 NRC staff also concluded that cumulative
20 impacts from Limerick's license renewal would be small
21 in all areas except aquatic ecology and terrestrial
22 ecology. That conclusion is patently absurd. You
23 arrogantly and irresponsibly dismiss the harms, risks,
24 and threats from Limerick as callously as you consider
25 the members of our community to be merely acceptable

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1 collateral damage. You should be ashamed.

2 Even more astonishing than that, NRC staff
3 concluded that continued operation of Limerick nuclear
4 plant would have less environmental impacts than either
5 solar or wind alternatives on air quality, groundwater,
6 surface water, human health and aesthetics. Such
7 conclusions are beyond untenable and unscientific.
8 They bring new meaning to the term hubris. These
9 ludicrous conclusions by NRC are laughable. And yet,
10 they may not be sufficient to reject the Limerick EIS as
11 having zero credibility.

12 In Section 9.3.2 of your EIS Exelon claims
13 "after decommissioning these facilities, and restoring
14 the area, the land could be available for other
15 productive uses." This is a delusional conclusion,
16 worthy of no less than four Pinocchios. This is the same
17 land that Exelon claimed was worth zero when it fought
18 to avoid paying its fair share of property taxes for
19 years.

20 Consider this alternative. The only
21 acceptable use of this site after decommissioning to
22 members of our community would be as a regional NRC
23 office. NRC has utilized their checklist mentality,
24 referred to earlier, through other testimonies.

25 As an approach throughout this EIS,

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1 Limerick's evacuation plan is a perfect example of the
2 checklist mentality. Exelon was required to have an
3 update to its plan on file with NRC no later than 2011.
4 The document was finally submitted to NRC in December
5 2012. Analysis of that document, Exelon's evacuation
6 time estimate, ETE, for Limerick nuclear plant's plume
7 exposure pathway reveals that that update is based on
8 unrealistic, unworkable suppositions, assumptions,
9 inconsistencies, inaccuracies which we have enumerated,
10 and illogical conclusions. NRC refused repeated
11 requests to meet to review our detailed analysis of
12 Exelon's fatally-flawed report.

13 Even more shocking than that, was the
14 admission by NRC officials that they had no need or
15 intention to review, evaluate, or approve Exelon's ETE.
16 The report was turned in, checked, good enough.

17 Well, not for us.

18 Every elected official in this region
19 should be outraged. Exelon's ETE should be summarily
20 rejected by elected officials and the NRC for that
21 matter. This EIS for Limerick nuclear plant is nothing
22 less than an insult to our community. Unsupported
23 conclusions appear to fit your predetermined decision to
24 use your infamous rubber stamp and approve an EIS that
25 will facilitate relicensing of Limerick.

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1 The narrative simply does not comport with
2 reality or documented facts in many areas. This biased
3 EIS is invalid, detached from reality, and unacceptable.
4 You can do much better. NRC has now lost all credibility
5 in the eyes of this community. It is painfully evident
6 that NRC is becoming a cowardly agency, unwilling to
7 implement or enforce minimal protection of the public,
8 despite readily available scientific evidence and
9 well-documented harms.

10 Sadly, you choose to be a subservient lapdog
11 to the nuclear industry and their lobbyists rather than
12 a vigilant watchdog protecting public interest. Only
13 willful blindness could explain this EIS for Limerick
14 nuclear plant which is nothing less than a white wash of
15 epic proportion.

16 It is our conclusion and recommendation
17 that the United States Senate should investigate the NRC
18 for wilful blindness and regulatory malpractice and
19 disallow or forbid all permitting decisions for Limerick
20 nuclear plant until all unresolved findings, legal
21 issues and recommendations from NRC's own staff are
22 finalized and implemented.

23 And finally, ACE is again formally
24 requesting that NRC hold a public hearing in Pottstown
25 to address all of the relicensing issues for Limerick

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1 nuclear plant not specifically or adequately addressed
2 in the environmental impacts. Our community deserves
3 nothing less.

4 (Applause.)

5 FACILITATOR BARKLEY: Thank you. Betty?
6 And finally, Lorraine after her.

7 MS. SHANK: I have read NRC's safety
8 evaluation reviews of Limerick and inspections and
9 notices of violations. NRC inspectors, to their credit,
10 do a good job identifying problems and citing violations,
11 but somehow they get whitewashed by the time violations
12 are issued.

13 Maybe what the public needs is what is done
14 for Exelon. A cost-benefit analysis. If it got one,
15 the result would show how indefensible Limerick license
16 renewal is. NRC's job is to protect the public. But it
17 has never acknowledged the astronomical costs and the
18 lack of benefits for the public that results from
19 Limerick nuclear operations.

20 As taxpayers and ratepayers, the public
21 does not benefit from Limerick nuclear energy because
22 Exelon makes its enormous profits while the public pays
23 the lion's share of its business costs in one of the
24 biggest corporate welfare schemes ever.

25 Public costs include construction costs,

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1 the enormous costs skyrocketed and were attached to
2 electric rates that climbed to a whopping 55 percent
3 above the national average.

4 Property and school taxes, Exelon refused
5 to pay its fair share for years. Eventually, a
6 settlement was reached and Exelon now pays around \$3
7 million a year. But that's a pittance compared to the
8 \$17 million it should have been paying each year all
9 along.

10 Avoidable diseases, cancers and other
11 illnesses in this region are much higher than the
12 national average and are linked to Limerick's radiation.
13 The cost for one six-month-old child treated for just two
14 years who has cancer is over \$2 million.

15 Water contamination. Limerick's toxic and
16 radioactive waste water discharges cost water companies
17 and their customers more money. Exelon should filter to
18 protect public health and protect the water companies and
19 the people who use their water downstream

20 High-level radioactive waste storage.
21 Tons are produced at Limerick every year, remaining
22 deadly virtually forever. The public cost is in higher
23 taxes. And we are charged for it to be stored at
24 Limerick.

25 Decommissioning. That's funded through

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1 hidden charges in our electric bills and through
2 miscalculations, deliberate or not, on Exelon's part,
3 \$100 million will be needed for Limerick which Exelon
4 wants ratepayers to fund. Exelon makes mistakes, but we
5 pay for them.

6 Exelon hands out donations like candy with
7 one hand and picks our pockets to do it with the other.
8 Its contributions to this community are paid for by us.
9 It's pennies on the dollar for Exelon and the cost to the
10 public are incalculable.

11 I do not support NRC's decision to relicense
12 Limerick or understand why it is rushing to do so. And
13 I fully support the Cuthbert's recommendations that come
14 from ACE and that are calling for a renewed look at this
15 problem. Thank you.

16 (Applause.)

17 FACILITATOR BARKLEY: Lorraine and if
18 there's anyone else that would like to speak, please come
19 see me.

20 MS. RUPPE: Hi, my name is Lorraine Ruppe
21 and I live in Pottstown. How can NRC believe Exelon's
22 outlandish claims that they are stewards of the
23 environment when, in fact, evidence shows Exelon is
24 damaging the environment every day Limerick operates.

25 Common sense tells us nothing in the world

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1 threatens our environment and our health more than
2 Limerick nuclear plant operations. We shouldn't have to
3 live with radiation, other toxics poisoning our water and
4 bombarding our children because of Limerick nuclear
5 plant operations. We shouldn't be faced with the
6 depleting water supply because of Limerick's cooling
7 towers or risk having no water if Limerick has an accident
8 or a meltdown. Our drinking water could dry
9 up or become so radioactive we can't use it.

10 Exelon pumps toxic minewater into the river
11 up to 80 times safe drinking water standards. The toxics
12 don't magically disappear. They end up in our drinking
13 water. And manganese, one of the toxics can lead to
14 permanent brain damage from showering.

15 NRC dismissed serious threats to public
16 drinking water from Limerick nuclear plant. NRC met
17 with DEP and DRBC, but they just gave Limerick five-year
18 permits to use and pollute our drinking water with
19 dangerous loopholes and exemptions because Limerick
20 can't meet safe drinking water standards or other
21 protected limits. That didn't reduce our risks.

22 Exelon should have been required to filter
23 Limerick discharges and those from the minewater to
24 protect our drinking water and public health. Limerick
25 causes irreparable and irreversible damage to the river

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1 and then donates to a fund deceptively claiming they
2 protect the river. Not one dime of that fund was ever
3 spent to reduce Limerick's radioactive or other toxic
4 discharges.

5 Exelon's donations are a drop in the bucket
6 compared to their profits and tax avoidances. Sadly,
7 organizations hoping to get funding from Exelon ignore
8 Limerick's poisoning of our water and children.

9 How can we take care of our health when we
10 are forced to drink, bathe in, and breathe in toxic
11 chemicals from Limerick operations every day? Too many
12 people are really sick, have thyroid problems and are
13 dying of dreaded disease like cancer.

14 Look at the huge cancer rallies in our
15 community. Why should we risk our lives and fear
16 meltdown, more sickness, cancer from Limerick's
17 electricity when safer energy is available. The problem
18 is NRC appears to be more of a salesman than a policeman.

19 Nuclear power already destroyed parts of
20 the world. This dangerous dinosaur technology must make
21 way for safe, clean energy alternatives that won't
22 destroy our water supplies and our health. Thank you.

23 (Applause.)

24 FACILITATOR BARKLEY: Thank you, Lorraine.

25 Okay, at this point we have a little more

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1 time left. If there's anyone else that wanted to make
2 any additional remarks I can have them up and if not I
3 will at this point wrap up this meeting.

4 I was very pleased with the comments
5 provided and the way you handled yourselves during this
6 meeting. I very much appreciated your respect for each
7 and every one of the people in the audience. At this
8 point again, we had mentioned you can submit written
9 comments regarding the EIS up until June 27th, so I
10 encourage you to do that and at this point I'd like to
11 wrap up this meeting. Thanks very much.

12 (Whereupon, at 8:25 p.m., the public
13 meeting was concluded.)
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