



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**OCT 14 2014**

Brian Wittick, Chief Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation  
U.S. NRC  
Washington, DC 20555-0001

Re: Generic Environmental Impact Statement for License Renewal of Nuclear Plants,  
Supplement 49, Regarding Limerick Generating Stations, Units 1 and 2, Final Report, Docket  
Nos. 50-352 and 50-353, CEQ #20140259

Dear Mr. Wittick:

In accordance with Section 102(2) (C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2) (C), Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, and the Council on Environmental Quality regulations, 40 CFR Parts 1500-1508, the United States Environmental Protection Agency (EPA), has reviewed the Final Environmental Impact Statement (EIS) for the above referenced project. The Final EIS is for the 20 year license renewal for the Limerick Generating Station (LGS), Units 1 and Unit 2. The LGS is located in Limerick Township, Pennsylvania.

On June 27, 2013, EPA provided comments on the Draft EIS. In that letter EPA identified deficient information in the EIS on the potential environmental impacts related to several things including: the on-site disposal spent fuel post decommissioning of Units 1 and 2, population growth rate evaluation for emergency notification/evacuation planning, cumulative effects, climate change, and stormwater management. The NRC response to comments have been incorporated into the Final EIS Appendices as well as a letter to the EPA dated September 5, 2014.

While the NRC has responded to EPA comments, we are requesting further clarification on the potential environmental impacts of climate change. EPA appreciates the climate change analysis that was incorporated into the EIS. In Section 4.12.1, Air Quality, the Final EIS provides an assessment of the climate change impacts based on the U.S. Global Climate Research Program. As stated in the assessment, between 1958 and 2010, the Northeast has experienced a 70% increase in heavy precipitation events, the largest increase in any region in the nation. The Northeast has also experienced a sea level rise of one foot since 1900, a rate that exceeds the global average of 8 inches. Further the assessment states that there is a predicted 3% average mean increase in precipitation and average mean temperature increase ranging 1.5 ° F to 3.5 ° F. It should be considered if these existing and predicted climatic changes have the potential to impact resiliency of the storage spent fuel, if the potential flooding may impact

emergency notification/evacuation planning and/or the cooling water withdrawals due to increase temperature. EPA is requesting further clarification how these climatic changes are being incorporated into the planning for the facility and assessed in the NEPA analysis.

Thank you for allowing EPA the opportunity to review and comment on the Final EIS. If you have questions regarding these comments, the contact for this project is Mr. Kevin Magerr; he can be reached at (215) 814-5724.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara Rudnick', written in a cursive style.

Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs