

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '81 DEC -9 P2:23

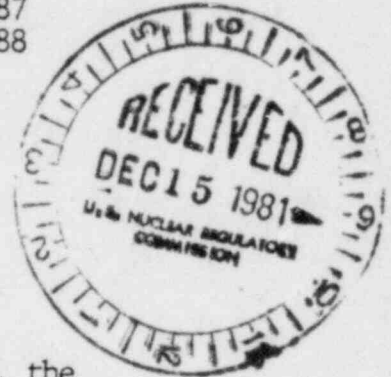
In the Matter of:

PENNSYLVANIA POWER & LIGHT CO. :  
and :  
ALLEGHENY ELECTRIC COOPERATIVE, :  
INC. (Susquehanna Steam Electric :  
Station, Units 1 and 2) :

Docket Nos. 50-387  
50-388

OFFICE OF SECRETARY  
ADMINISTRATIVE & SERVICE  
BRANCH

COMMONWEALTH OF PENNSYLVANIA'S  
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW



I. INTRODUCTION

In its proposed findings and conclusions set forth below, the Commonwealth takes advantage of its right to adopt positions and "advise the Commission" only on a number of discrete issues. 42 U.S.C. §2021(1); 10 C.F.R. §2.715(c). The Board should not infer from the Commonwealth's decision to propose findings and conclusions only on discrete issues that the Commonwealth has not reviewed the entire record. Rather, the Commonwealth simply elects to exercise its right to advise the Commission on specific emergency planning issues on which the Commonwealth perceives deficiencies that need to be remedied. The Commonwealth does not adopt specific findings and conclusions proposed by any other party. Moreover, the Commonwealth reserves its right to participate as a full party on all issues on appeal. Gulf State Utilities Co. (River Bend Station, Units 1 and 2) ALAB-317, March 4, 1976, 2 NUC. Reg. Rep. (CCH) ¶30,053.

DS33  
50/1

8112160 375

## II. PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW ON EMERGENCY PLANNING CONTENTIONS

### A. Evacuation Of Persons Without Transportation

1. The evacuation from the plume exposure pathway EPZ of persons who do not possess their own means of transportation obviously is one of the more difficult aspects of evacuation planning. Two major groups of people fall into this category: (1) school children; and (2) other members of the non-automobile-owning population. As the emergency planning contentions in this proceeding are written, this important issue cuts across a number of sections of contentions.\* However, due to the importance of this issue, and because the issue was the subject of a protracted oral debate during the hearing, the Board believes that it is important to treat it as a discrete issue.

2. The applicant employed a contractor, HMM Associates, Inc., to prepare the evacuation time estimates required by NUREG-0654, Planning Standard J, Criterion 10(1). Staff Ex. 7, at 63. See also id. App. 4. The evacuation time estimates in the HMM study include the time required to evacuate special facilities within the plume exposure pathway EPZ, including schools, hospitals and nursing homes. It is assumed that departures from schools, which comprise the bulk of this population, will begin 90 minutes after an order to evacuate is given. McCandless, ff. Tr. 2250, at 6-7.

---

\* Contention 20[7][a] deals, inter alia, with the evacuation of individuals without other means of transportation. As explained more fully below, the evidence indicates that this issue is intertwined with the issue of school evacuation. Contention 20[7][d] deals with the relocation of both school children and other individuals without transportation. Contention 20[7][f] deals with evacuation time estimates. The Applicant's time estimates include estimates for the evacuation of school children and other individuals without transportation. See ¶ 2, infra. Contention 6(a) also deals with evacuation time estimates. The Board has already ruled that the evacuation of persons without transportation is included in the scope of this contention. Tr. 2287 (Chairman Gleason).

3. Evacuation during the weekday, when schools are in session, was estimated by HMM to be more time consuming than a night or weekend evacuation. McCandless, ff. Tr. 2250, at 8. Therefore, evacuation of school children is an important consideration in determining the limiting evacuation scenario in terms of maximum expected evacuation time.

4. School students comprise a high percentage of the population to be evacuated from the plume exposure pathway EPZ for Susquehanna (during a weekday). Of the 71,511 persons in the EPZ, 15,587 are school students, comprising approximately 22 percent. McCandless, ff. Tr. 2250, at 5.

5. The non-auto-owning population within the plume exposure pathway EPZ for SSES constitutes approximately 13.5 percent of the population to be evacuated. There are 9,679 people who are members of non-auto-owning households, out of a total of 71,511 evacuees within the EPZ. McCandless, ff. Tr. 2250, at 5-6. When added to the school population, a total of 25,266 people, or over 35 percent of the population, will require bus transportation.

6. HMM assumed 40 students per bus in calculating the number of buses required to evacuate nearly 16,000 students. Tr. 2253 (McCandless). Therefore, approximately 400 buses will have to be mobilized to evacuate all students within the plume exposure pathway EPZ in a single run. Using the same assumption of 40 persons per bus, an additional 242 buses would be required to evacuate the estimated 9,679 non-auto-owning members of the EPZ population.

7. Mr. McCandless initially testified that the 90-minute assumed school departure time was concurred in by state and local officials. Tr. 2257 (McCandless). The witness could not recall, however, which

state official had agreed with this figure. Id. at 2258. The witness later amended his testimony, pointing out that the state was not explicitly asked to agree with the 90-minute assumption. Rather, the entire evacuation time estimate report was reviewed with PEMA staff, and no comment was made on the 90-minute assumption. The existing county plans do not rely on an assumed 90-minute departure time for school students. Tr. 2295 (McCandless).

8. The Board has serious problems with the HMM assumptions regarding the evacuation of school children, as well as other members of the non-auto-owning population, prior to the development of written school district plans. Most importantly, in developing time estimates for school children, HMM did not consider aspects of implementation of school evacuation. HMM did not consider whether the school plans exist or are necessary in order to assume that school populations can be evacuated within the estimated time frames. Tr. 2258-59 (McCandless).

9. HMM also did not specifically address the time required to initiate evacuation of the non-auto-owning population. Rather, they assumed that surplus buses will be available to evacuate the non-auto-owning population simultaneously with the school population. Tr. 2259 (McCandless). As with school evacuations, the HMM study merely assumes that plans to evacuate the non-auto-owning population will be implemented adequately. Id. at 2260. Essentially, to fill these voids in the analysis, HMM relied on assumptions made by other PP&L consultants as a basis for its time evacuation study. Tr. 2286 (McCandless). The applicant subsequently presented another witness to clarify the bases for the assumptions regarding school evacuations. This witness was Mr. Robert Carroll of Emergency Management Services, Inc. Tr. 2307. This witness, however, did not convince the Board that there is reasonable



assurance that schools can be evacuated within the times estimated by HMM, under all circumstances, absent the preparation of written school district plans.

10. Mr. Carroll testified that he had conversations with representatives of all of the affected school districts within the plume exposure pathway EPZ. During these discussions, Mr. Carroll received oral opinions that the 90-minute mobilization time for school evacuations was a reasonable assumption. These opinions were based on previous experiences with school bus mobilization during early school dismissals in cases of heavy snow. Tr. 2312-14 (Carroll). Mr. Carroll's efforts provide some assurance that school evacuation would proceed smoothly in the event of an accident at SSES. The Board does not believe, however, that "some assurance" is adequate. According to Mr. Carroll's own testimony, "the evacuation of school children is one of the primary concerns of any evacuation scheme ..." Tr. 2317. The Commission's emergency planning regulations require "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency." 10 C.F.R. §50.47(a)(1). To base such a finding on mere oral affirmations by the officials responsible for carrying out an evacuation would defeat the purpose of the emergency planning rule.

11. The fact that schools have successfully mobilized buses for early closings due to snow does not provide reasonable assurance that the same could be accomplished during a nuclear emergency. The Applicant's witness could not equate the two situations in terms of the availability of drivers during a nuclear emergency. Tr. 2320 (Carroll). Moreover, a large percentage of some schools is comprised of students who normally do not receive bus transportation. For example, in the

Berwick school district, only 23 buses are needed for students who normally receive bus transportation. Yet 76 buses are needed to transport the entire student population during a nuclear emergency. Tr. 2327 (Carroll). During a nuclear accident, even those students who normally walk to school will be evacuated to student pick-up points by bus. Under no circumstances will students be sent or taken home. Tr. 2333 (Carroll). Therefore, past mobilizations involving smaller numbers of buses than would be required to respond to a nuclear emergency may not necessarily be indicative of the problems that would occur during a nuclear accident.

12. Written school district plans would provide far greater assurance that school evacuation would proceed smoothly. There are currently no written school district plans in place to deal with a nuclear emergency at SSES. Tr. 2317 (Carroll); Henderson, ff. Tr. 2546, at 28. A number of uncertainties remain absent such plans:

(1) There are no written agreements between school districts and bus companies describing the responsibility to provide buses during a nuclear emergency. Tr. 2318 (Carroll).

(2) There are no written identifications of bus drivers responsible for responding during an emergency; nor is it clear whether there are any identifications of alternate drivers. Tr. 2318-19 (Carroll).

(3) Perhaps most importantly, there are no written routes to direct bus drivers to the pre-allocated student pickup points.\* Tr. 2319 (Carroll).

(4) One school district (Berwick) does not have sufficient buses under its own control to evacuate its entire school population. The Berwick school district intends to receive buses from surrounding districts to fill this deficiency. But there are no written agreements between the Berwick school district and the surrounding districts. Tr. 2312-13; 2320 (Carroll).

---

\* Parents of school children will be directed to these points to pick up their children during an emergency.

(5) According to the Applicant's witness, the 90 minutes assumed for mobilization of school buses includes the time for the school district official to contact the bus contractor, the time for the contractor to locate the bus, and the time to bring the bus to the school and load the children. Tr. 2314 (Carroll). Yet most of the drivers are employed in other jobs, and would first need to be contacted. Tr. 2325 (Carroll). Then the drivers would need to go home to get the buses. Tr. 2332 (Carroll). Applicant's contractor did not investigate the communications system to the drivers, whether alternate communications exist, or whether the buses have radios. Tr. 2325, 2332-33 (Carroll).

13. The Board attributes particular weight to the testimony of the Commonwealth's emergency planning witnesses. The PEMA panel testified repeatedly that there can be no reasonable assurance that school children will be evacuated in a timely fashion until school district plans have been prepared and coordinated with the county plans. In their written testimony, the witnesses stated:

(3) An adequate response to the issue as to whether all school children can be evacuated without buses making a return run can only be made after the school districts have developed their respective plans. There are obviously sufficient buses that could be moved in from areas surrounding the plume exposure pathway EPZ to effect the evacuation of school children by using only a single run. There is, however, the time factor that must be considered as well as the period needed to notify drivers and their availability whether within or outside the EPZ. This is an item that can only be resolved after school district superintendents complete their plans and coordinate them with the Luzerne County Civil Defense Agency. This should be accomplished prior to full operation of the Susquehanna Steam Electric Station.

Belser, et al., ff. Tr. 2586, at 25.

14. Mr. Belser further opined during oral testimony that the preparation of written school district plans prior to plant operation is the most important element of offsite emergency planning for SSES. Tr.

2607-08 (Belser). Mr. Belser elaborated by stating that there "is probably nothing of more concern to a parent than the welfare of the children." Id. at 2609. In addition, Mr. Belser pointed out that the requiring school districts to prepare plans is not an easy accomplishment. Although a letter from the Director of FEMA and the Secretary of Education was being prepared to encourage school districts to prepare emergency plans, this effort provides no absolute assurance that the plans will be developed prior to plant operation. Tr. 2609-10 (Belser).

15. Appendix 11 (Schools and Colleges Emergency Plans) to the Commonwealth's emergency plan clearly indicates that school district plans are necessary to ensure the safety of school children. The objective of Appendix 11 is to "specify responsibilities for developing plans needed for the safety of school children and college students during a nuclear facility incident ..." Commonwealth Ex. 7, at E-11-1 (emphasis added).

16. In fact, until the availability of buses is verified and until school district plans are completed, FEMA will not accept the current HMM evacuation time estimates. Instead, FEMA will accept for planning purposes a normal weekday estimate of evacuation time as 7 hours, 45 minutes. Belser, et al., ff. Tr. 2586, at 27. This is to account for the possible need for a double run of buses. Tr. 2604-05 (Hippert).

17. The FEMA panel reached similar conclusions regarding other members of the non-auto-owning populations:

The logistics of moving individuals without transportation have not been fully developed, nor can they be until school district plans are completed by the respective district superintendents. When schools are in session, first priority for buses is evacuation of school children.

Belser, et al., ff. Tr. 2586, at 24. See also Tr. 2612-13 (Hippert).



18. Witnesses for both the Applicant and the Staff agree that school district plans should be prepared prior to plant operation. Tr. 2317, 2328, 2335-36 (Carroll); Tr. 2675-76, 2685 (Swiren). In fact, Mr. Carroll stated that "the evacuation of school children is one of the primary concerns of any evacuation scheme that we have and certainly consideration of evacuating schools should enter into that." Tr. 2317. Yet the Applicant asks the Board to find that planning for the evacuation of school children and other members of the non-auto-owning population has been adequately addressed, on the assumption that written plans will be in effect at the time of plant operation. See Applicant's Proposed Finding 85. The Board rejects this approach. The emergency planning rule requires reasonable assurance that adequate protective measures can and will be taken. 10 C.F.R. §50.47(a)(1). The Applicant also argues that no school district plans have been prepared around the state. Applicant's Proposed Finding 85. The Board views this as irrelevant. This Licensing Board has the responsibility to adjudicate issues involving the safe operation of SSES. Its jurisdiction does not extend to other nuclear plants in Pennsylvania. Moreover, the Commonwealth's views regarding the need for school district plans for other nuclear plants in Pennsylvania are no different than for SSES. Tr. 2666 (Belser).

19. The Board concludes that there can be no reasonable assurance that adequate protective measures can and will be taken for school children and other members of the non-auto-owning population until the school district plans are developed. Therefore, SSES should not receive a full power license until this important development is demonstrated.

## B. Dosimetry

20. Two sections of Contention 20 allege deficiencies regarding dosimetry for emergency workers. Contention 20[5][b] alleges, in part, that no reference is made to required reserves of emergency equipment and instruments. As explained further below, dosimeters for emergency workers are included in this category. Contention 20[8][a] alleges that there are inadequate procedures to ensure that dosimeters are read at appropriate frequencies and that dose records are maintained for emergency workers as required by NUREG-0654. Staff Ex. 7, at 67. Obviously, this contention cannot possibly be met unless there are adequate supplies of dosimeters to distribute to emergency workers at the time of an emergency. The Board finds below that adequate supplies of dosimeters do not currently exist for SSES.

21. The function of dosimetry is to determine the radiological dose received by an individual. In the case of emergency workers, dosimetry is the method used to determine the amount of exposure he is receiving, specifically for purposes of advising the worker to leave the plume exposure pathway EPZ once the pre-determined level of exposure has been reached. Commonwealth Ex. 8, Appendix 16, Section V.B.

22. Emergency workers, as a category, are specifically referred to in the emergency planning rule and NUREG-0654. Planning Standard J of NUREG-0654<sup>\*</sup> requires that "[a] range of protective actions have been developed for emergency workers...". Staff Ex. 7, at 59. Planning Standard K of NUREG-0654<sup>\*\*</sup> requires that the "[m]eans for controlling

---

\* This is the same language as used in the emergency planning rule, 10 C.F.R. §50.47(b)(10).

\*\* This is the same language as used in the emergency planning rule, 10 C.F.R. §50.47(b)(11).

radiological exposures, in an emergency, are established for emergency workers." Staff Ex. 7, at 66. The specific evaluation criteria refer to dosimetry, both self-reading and permanent record devices, as the suggested means of controlling radiological exposures. Id. Criterion 3a, b. See also Tr. 2678 (Swiren).

23. The Commonwealth of Pennsylvania has incorporated both suggestions in its plans regarding emergency workers during a fixed nuclear facility incident. Commonwealth Ex. 8, Appendix 16, Section V. In fact, since evacuation and sheltering are almost by definition inappropriate for emergency workers, the Commonwealth relies on the use of dosimetry as the major protective measure to be taken for this group. The Commonwealth's plans regarding the use of dosimetry for emergency workers are consistent with federal guidance. Tr. 2700 (Swiren).

24. The state plan, as reflected in Commonwealth Exhibit 8, presently calls for distribution of dosimetry to the emergency workers at the time of an incident. Commonwealth Ex. 8, Appendix 16, Section V.B. When available, dosimetry for emergency workers responding to an accident at SSES will be predistributed by the state to the counties so that adequate supplies will be readily available at the time of an incident. The current state and county plans call for each emergency worker to receive three dosimeters: (1) a CDV-730 (self-reading with a range of 0-20 roentgens); (2) a CDV-742 (self-reading with a range of 0-200 roentgens); and a thermoluminescent dosimeter (TLD) for permanent record dosimetry. Belser, et al., ff. Tr. 2586, at 19; see also Henderson, ff. Tr. 2346, at 40. These plans are consistent with current federal guidance for required dosimetry. Tr. 2700 (Swiren).

25. The Applicant apparently agrees that emergency workers should receive self-reading dosimeters, as well as thermoluminescent dosimeters (TLD's) to establish an accurate permanent record of each individual's radiological exposure. Every emergency worker coming onsite from offsite response agencies will receive a TLD, Cantone, ff. Tr. 2383, at 6 (¶13). All emergency workers coming onsite from response agencies will also receive self-reading dosimeters. Tr. 2398-99 (Cantone). The importance of TLD's was explained by the Staff's witness. Tr. 2690-91 (Chestnut).

26. However, the State currently has a substantial shortage of dosimetry for offsite emergency workers. Until these deficiencies are remedied, plans to predistribute dosimeters cannot be fully implemented. The Commonwealth currently does not have a sufficient supply of CDV-730's to predistribute to emergency workers within the plume exposure pathway EPZ. More importantly, the Commonwealth has no available TLD's to predistribute to the counties. Belser, et al., ff. Tr. 2586, at 19. In the opinion of FEMA's Director of Plans and Preparedness, this deficiency must be addressed prior to the plant operation. Id.

27. Based on Mr. Swiren's testimony (Tr. 2678, 2698-2700), the Applicant has stated that "Federal Guidance, while calling for each emergency worker to have self-reading dosimetry, does not require two self-reading dosimeters for each emergency worker." Applicant's Proposed Finding 104. The State plan to provide two self-reading dosimeters is based on FEMA's "Guidance on Offsite Emergency Radiation Measurement Systems, Phase 1 - Airborne Release" (FEMA-REP-2, September 1980). Commonwealth Ex. 8, at 1. This publication has not been cancelled, and the State plan is currently consistent with FEMA guidance. Tr. 2700 (Swiren).



28. FEMA has forwarded a request to the Federal Emergency Management Agency (FEMA) in Washington to provide the necessary TLD's and CDV-730's to complete predistribution of adequate supplies of dosimeters. Belser, et al., ff. Tr. 2586, at 19. The Commonwealth has not received a response to this request. Tr. 2607 (Belser). The FEMA witness, however, indicated in oral testimony that this request will not be met by FEMA. Tr. 2672-73 (Swiren). Essentially, Mr. Swiren testified that, unless dosimeters are supplied by the state or the utility, they will not be available. Id. No such arrangement has been made to date. Tr. 2677 (Swiren).

29. The Board believes that a supply of both self-reading and permanent-record dosimetry, sufficient to equip each emergency worker according to the state plan, should be available. This is consistent with the emergency planning rule's requirement that adequate equipment to support the emergency response must be provided and maintained. 10 C.F.R. §50.47(b)(8); NUREG-0654, Planning Standard H<sup>\*</sup>. Therefore, it is directed that no full power license should be issued to the Applicant until this deficiency is addressed.

#### C. Public Information

30. The adequacy of plans to provide information to the public prior to and during a nuclear emergency at SSES was the subject of a number of portions of Contention 20. See Contention 20[1][a], [2][b], [4][a].

31. Witnesses from all three parties who testified on this issue agreed that the provisions for public information in the written emergency

---

\* The evaluation criteria for Planning Standard H indicate that this requirement is specifically intended to encompass radiological monitoring equipment, such as dosimetry. Staff Ex. 7, at 52-55 (Planning Standard H, Criteria 10 and 11).

plans are adequate. Henderson, ff. Tr. 2546, at 1-2, 7, 15-16 (Applicant); Belser, et al., ff. Tr. 2586, at 2, 6-7, 10-11, 17-18 (Commonwealth); Swiren, ff. Tr. 2671, at 4-5, 11, 21. See also Commonwealth Ex. 8, Appendix 15; Commonwealth Ex. 9, Annex (D).

32. The Board finds, therefore, that public information is adequately addressed in the written emergency plans of the Commonwealth and the counties. Written plans alone, however, will not ensure that members of the public will respond properly during an emergency.

33. The emergency planning rule sets forth a planning standard which requires that "[i]nformation [be] made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency ...". 10 C.F.R. §50.47(b)(7). The evaluation criteria of NUREG-0654 specify that such public information should include, at a minimum, general information on the effects of radiation, information on evacuation routes and protective measures available, and information for populations with special needs. Staff Ex. 7, at 49 (Planning Standard G, Criterion 1). Obviously, in order for members of the public to know how they will be notified, and what their initial actions should be, this public education program must be in place prior to the occurrence of an emergency.

34. The primary means of alerting the public during a radiological emergency at SSES will be through a siren system installed by the Applicant. The only purpose of sounding the sirens, however, is to alert the public to listen to the local Emergency Broadcast Station (EBS) on their radio or TV. Prepared messages will be broadcast over the EBS stations to advise the public of the appropriate protective actions to take. Belser, et al., ff. Tr. 2586, at 2. Obviously, this

system requires prior knowledge by the public that the sounding of the sirens simply means to tune to EBS, rather than, for example, to begin evacuation. (In fact, the complete opposite action, i.e., shelter, may be the appropriate protective action. E.g., Tr. 2507-08 (Reilly).

35. Public information regarding nuclear accidents, therefore, must be disseminated both prior to and during an emergency. According to the emergency plans, this public education effort consists of three parts:

- (1) general information regarding the nature of radiation, its hazards and effects, and the protective actions that can be taken to minimize these effects;

- (2) dissemination of pre-emergency information to inform the public of the plans and procedures that will be used during an emergency to notify the public and to implement protective actions; and

- (3) emergency information and instructions issued by the state at the time of an incident.

Belser, et al., ff. Tr. 2586, at 6, 17-18.

36. The need to disseminate written public information prior to plant emphasizes was emphasized during oral testimony by PEMA's public information officer, Mr. Comey. Tr. 2606 (Comey). Mr. Comey testified that pre-emergency distribution of information, to establish a firm basis of accurate public information and understanding, makes public information dissemination during an emergency much more effective. Tr. 2605 (Comey).

37. Pre-emergency dissemination of public information is also

important to ensure the smooth evacuation of transient populations, i.e. persons who do not reside in, but may be present in the plume exposure pathway EPZ at the time of an incident. These populations include persons at businesses, motels, hotels, senior citizens' health care facilities, etc. After the initial dissemination of public information brochures, managers of such facilities will receive a personal letter from the respective county with another copy of the brochures and other information necessary to provide transients with information at the time of an emergency. Tr. 2616-17 (Hippert). Without pre-emergency dissemination of this information, transients will have even less basis to know what procedures to follow during an emergency than the resident population.

38. The witness from FEMA categorically agreed that public information must be disseminated prior to plan operation. Tr. 2674 (Swiren).

39. The Board concludes that, in order to ensure that the public is adequately informed of the correct procedures to follow in the event of an accident at SSES, the public information program outlined in the state and county emergency plans must be implemented prior to plant operation. Absent pre-emergency dissemination of public information, there can be no finding of "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency." 10 C.F.R. §50.47(a)(1). The Board directs, therefore, that no full power license shall be issued to the Applicant until a showing has been made by the Applicant that public information brochures containing both general information on radiation exposure and specific instructions on actions to take in the event of an accident have been distributed to members of the public within the plume exposure pathway EPZ for SSES.



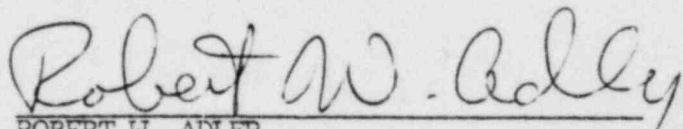
### III. ORDER

[The Commonwealth proposes that the following paragraph be inserted in the Board's order.]

Issuance of the aforementioned operating license shall be subject to the following condition. No full power operating license shall be issued until the Director of Nuclear Reactor Regulation, in consultation with the Federal Emergency Management Agency, finds that:

- (1) all school districts within the plume exposure pathway emergency planning zone for Susquehanna Steam Electric Station have completed adequate emergency plans to cope with a fixed nuclear facility accident;
- (2) adequate numbers of self-reading and permanent record (thermoluminescent) dosimeters, consistent with applicable federal guidance, are available for distribution to all offsite emergency workers identified in the state and county emergency plans as requiring dosimetry; and
- (3) the Applicant has distributed to members of the public within the plume exposure pathway emergency planning zone for Susquehanna Steam Electric Station, public information brochures containing general information on radiation exposure and specific instructions on actions to take in the event of a nuclear accident.

Respectfully submitted,

  
ROBERT W. ADLER  
Assistant Counsel  
Commonwealth of Pennsylvania