

# **limerick ecology action**

BOX 761

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(215) 326-9122

January 31, 1984

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Lawrence Brenner, Chair  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Richard F. Cole  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Peter A. Morris  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Limerick Generating Station, Units 1 and 2  
Philadelphia Electric Company  
Docket Nos. 50-352, 50-353

Gentlemen:

Enclosed please find off-site emergency planning contentions for Limerick Ecology Action and other coordinated intervenors, in response to the Board's Orders of May 16, 1983, Nov. 22, 1983, & Jan. 20, 1984. LEA, as lead intervenor for off-site emergency planning, received contentions from Robert Anthony (FOE), Marvin Lewis, and Joseph White, which have been incorporated into LEA's filing.

LEA also notes for the Board's consideration that LEA was put in the position of filing many off-site emergency planning contentions that allege a lack of information realizing that the Board would prefer not to have such contentions before it.

Due to the fact that draft Radiological Emergency Response Plans (RERP's) for Limerick are still under development, LEA does not wish to prejudice itself by failing to allege informational deficiencies that currently exist in the plans. We have done so, recognizing once again that such contentions may be denied without prejudice to a later filing, until such a time when additional information will hopefully be made available. Where our concerns apply to deficiencies or unmet needs that apply to all of the draft RERP's, we have provided sample critiques of each type of plan, as well as specific examples to demonstrate our concerns, without necessarily listing all 3 Risk County, 42 Municipality, 15 School District, 10 health care facility, and 2 Support County draft RERP's.

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a member of the environmental coalition on nuclear power

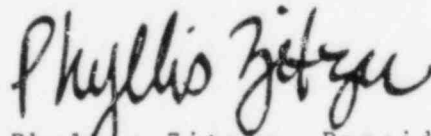
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LEA has been operating under a good-faith assumption that it has been receiving all available information on a timely basis, pertaining to Philadelphia Electric's consultants involvement in the development of draft local and county RERP's, according to the Board's Order of June 14, 1982. However, a recent meeting with the Applicant's Counsel to discuss the filing of these contentions resulted in the realization that in several instances this has not been the case.

A request for information regarding the schedule for the development of implementing procedures for local and county draft RERP's was made on January 26, 1984. Neither Mr. Conner nor Roberta Kenkus could provide any information; although we received copies of 40 municipal RERP implementing procedures via express mail on January 28, 1984 - 3 days before these contentions were due to be received in Washington. A conversation with the Union Township Emergency Management Director, Mary Catherine Lowery, revealed that this information had been sent by Philadelphia Electric's consultants (ECI) to her in early November, along with a copy of Union Township Draft 4, RERP. (November 10, 1983 letter attached). These draft municipal implementing procedures still fail to provide sufficient information to satisfy LEA's concerns as specified in the following contentions. The implementing procedures were reviewed over the weekend to determine if receipt of this information would necessitate any significant changes in the enclosed filing. This unexpected additional information to review before the filing deadline made it necessary for LEA to hand deliver the contentions to Washington on Jan. 31 to insure a timely filing.

LEA's areas of concern were discussed with other interested governmental participants in this proceeding. The City of Philadelphia is expected to file contentions on the Ingestion Exposure EPZ. PEMA is expected to raise concerns relating to the need for an updated evacuation time estimate study and the need for additional dosimetry materials. We have attempted to coordinate our concerns with these participants as requested by the Board's Orders.

Respectfully submitted,



Phyllis Zitzer, President  
Limerick Ecology Action



# ENERGY CONSULTANTS

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November 10, 1983

Ms. Mary Catherine Lowery  
Box 33, R. D. #1  
Douglassville, PA 19518

Dear Ms. Lowery:

I am forwarding herewith for your review three (3) copies of Draft 4 of the Union Township Radiological Emergency Response Plan for Incidents at the Limerick Generating Station.

As you know, Draft 3 was informally submitted to the Pennsylvania Emergency Management Agency (PEMA) for review and comment at the state level. In coordination with the Berks County Emergency Management Agency, the applicable comments have been incorporated in Draft 4. As we discussed during our telephone conversation of November 3, 1983, it is this document which will be forwarded to the Regional Assistance Committee (RAC) for review at the federal level. Once again, this is being accomplished with the understanding that your plan is in draft form, is subject to revision, and in no way reflects official policy of Union Township.

Thank you for your continued cooperation. If you have any questions or concerns, please feel free to contact me.

Sincerely,

R. L. Deck  
Planning Specialist

RLD/gmg

cc: Berks County EMA