

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
Philadelphia Electric Company)
(Limerick Generating Station)
Units 1 and 2))

Docket Nos. 50-352
50-353

APPLICANT'S ANSWER TO LIMERICK ECOLOGY ACTION'S
FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE PHILADELPHIA ELECTRIC COMPANY
ON LIMERICK ECOLOGY ACTION'S
ADMITTED "OFF-SITE" EMERGENCY PLANNING CONTENTIONS

DISCOVERY 34
JULY 9, 1984

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PDR ADOCK 05000352
G PDR

Interrogatory No. 1

State whether PECO intends to present any expert witnesses on the subject matter issue in the contentions and issues sponsored by Limerick Ecology Action admitted by the Atomic Safety and Licensing Board in this April 20, 1984 on the issues of "off-site" emergency planning for the Plume Exposure EPZ for Limerick. If so, identify each expert witness and state (a) his professional qualifications; (b) the contention and subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; (d) the grounds for each opinion. Identify by court, agency or other body, each proceeding in which such individual rendered testimony on this subject.

Answer

Applicant intends to provide expert witnesses from the applicable offsite emergency management agencies as well as from the Applicant and its consultants. The names and qualifications of witnesses and the subject matter, substance, and grounds of their testimony will be provided at a later date.

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Interrogatory No. 2

State whether PECO intends to present any factual witnesses on the subject matters at issue in LEA's admitted contentions. If so, identify each such factual witness and further state (a) his professional qualifications; (b) the contention and subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

Answer

See answer to Interrogatory No. 1

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Interrogatory No. 3

Identify by title, author, publisher and date of issuance or publication, all documents that PECO relies upon as a basis for contentions or that PECO intends to use (by way of reference or evidentiary proffer) in presenting its direct case in cross-examining other witnesses on off-site emergency planning contentions, and all documents which PECO intends to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention.

Answer

Municipal, county and school district radiological emergency response plans have been provided previously to LEA's representative. These plans together with Annex E of the Pennsylvania Disaster Operations Plan are being made available for inspection and copying (Discovery 34) and are specifically identified as follows:

- | | |
|----------------------|--|
| Discovery 34, Item 1 | Berks County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, Berks County Emergency Management Agency, November, 1983 (Revised April, 1984) |
| Discovery 34, Item 2 | Chester County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, Chester County Department of Emergency Services June, 1984 |
| Discovery 34, Item 3 | Montgomery County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, Montgomery County Office of Emergency Preparedness April, 1984 |
| Discovery 34, Item 4 | Boyertown Area School District Berks County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by the Boyertown Area School District, November 1983 |

- Discovery 34, Item 5 Daniel Boone Area School District
Berks County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared
by Daniel Boone Area School District,
November, 1983
- Discovery 34, Item 6 Downingtown Area School District -
Chester County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared
by Downingtown Area School District,
November, 1983
- Discovery 34, Item 7 Great Valley School District -
Chester County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared
by Great Valley School District,
November, 1983
- Discovery 34, Item 8 Owen J. Roberts School District -
Chester County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared
for Owen J. Roberts School District
by Energy Consultants, Inc.
- Discovery 34, Item 9 Phoenixville Area School District -
Chester County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared
by Phoenixville Area School District,
November, 1983
- Discovery 34, Item 10 Methacton School District Montgomery
County Radiological Emergency Response
Plan for incidents at the Limerick
Generating Station, prepared by
Methacton School District,
November, 1983
- Discovery 34, Item 11 Perkiomen Valley School District -
Montgomery County Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station, prepared by
Perkiomen Valley School District,
November, 1983
- Discovery 34, Item 12 Pottsgrove School District - Montgomery
County Radiological Emergency Response
Plan for incidents at the Limerick
Generating Station, prepared by
Pottsgrove School District, November 1983

Discovery 34, Item 13	Pottstown School District - Montgomery County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Pottstown School District, November 1983
Discovery 34, Item 14	Souderton Area School District - Montgomery County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Souderton Area School District, November, 1983
Discovery 34, Item 15	Spring-Ford Area School District - Montgomery County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Spring-Ford Area School District, November, 1983
Discovery 34, Item 16	Upper Perkiomen School District - Montgomery County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Upper Perkiomen School District, November 1983
Discovery 34, Item 17	Ursinus College Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Ursinus College, February, 1984
Discovery 34, Item 18	Valley Forge Christian College Radiological Emergency Response Plan for incidents at the Limerick Generating Station, prepared by Valley Forge Christian College, June 1983
Discovery 34, Item 19	Commonwealth of Pennsylvania Disaster Operations Plan, Annex E, Fixed Nuclear Facility Incidents, November 1981, with changes
Discovery 34, Item 20	Evacuation Time Estimates for the Limerick Generating Station Plume Exposure Pathway Emergency Planning Zone, Final Draft, prepared for the Philadelphia Electric Company by HMM Associates Inc., May 1984
Discovery 34, Item 21	Berks County Transportation Coordinator Implementing Procedure, IP - 10

Discovery 34, Item 22	Montgomery County Transportation Group Implementing Procedure, TG - 10
Discovery 34, Item 23	Chester County Transportation Coordinator, Implementing Procedure IP-03
Discovery 34, Item 24	Berks County School Services Officer, Implementing Procedure
Discovery 34, Item 25	Chester County School Services Officer, Implementing Procedure, SS-1
Discovery 34, Item 26	Montgomery County School Services Officer, Implementing Procedure, SSP-IP
Discovery 34, Item 27	Offsite Training Program, Bus Driver Training (Lesson Plans), 1/25/84
Discovery 34, Item 28	Radiological Emergency Preparedness Training Module Audience: School Teachers and Staff, 11/83
Discovery 34, Item 29	Correspondence relating to bus companies
Discovery 34, Item 30	Correspondence relating to bus drivers
Discovery 34, Item 31	Correspondence relating to training of bus drivers and school staff.
Discovery 34, Item 32	[Model] Radiological Emergency Response Plan for (Day Care/Nursery Schools) for Incidents at the Limerick Generating Station, Pennsylvania Emergency Management Agency, undated.
Discovery 34, Item 33	Bright Spot Kindergarten Radiological Emergency Response Plan for Incidents at the Limerick Generating Station, prepared by Bright Spot Kindergarten, July 1983.
	Twin Acres Country Day School Radiological Emergency Response Plan for Incidents at the Limerick Generating Station prepared by Twin Acres Country Day School, July 1983.
	Children's House of Northern Chester County Radiological Emergency Response Plan for Incidents at the Limerick Generating Station prepared by Children's House of Northern Chester County, April 1984.

Discovery 34, Item 33 (con't)

Collegeville Montessori Academy
Radiological Emergency Response Plan for
Incidents at the Limerick Generating
Station prepared by Collegeville
Montessori Academy, June 1983.

Lincoln School Radiological Emergency
Response Plan for Incidents at the
Limerick Generating Station prepared by
Lincoln School, June 1983.

Montessori Academy of Pennsylvania
Radiological Emergency Response Plan for
Incidents at the Limerick Generating
Station prepared by Montessori Academy of
Pennsylvania, June 1983.

Discovery 34, Item 34

Section 6108 of the Pennsylvania Motor
Vehicle Code, 75 Pa. C.S.A. Sec. 6108

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Interrogatory No. 4

To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how the information provides a basis for your answer.

Answer

Documents used as a basis for answers to interrogatories are identified in each specific interrogatory answer.

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Interrogatory No. 5

To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results of such study, calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

Answer

Any study, calculation, research or analysis used as a basis for answers to interrogatories are identified in each specific interrogatory answer.

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Interrogatory No. 6

To the extent that your answer is based upon conversations, consultations or correspondence or other communications with one or more individuals or entities, please identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

Answer

Conversations, consultations, correspondence or other communications used as a basis for answers to interrogatories are identified in each specific interrogatory answer.

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Interrogatory No. 7

To the extent that PECO possesses information or documents expressing facts or opinions which are relevant to the specific interrogatories below, but which do not support Applicant's position or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

Answer

Applicant possesses no information or documents expressing facts or opinions which are relevant to the specific interrogatories, but do not support Applicant's position or which have not otherwise been fully provided in the answer thereto.

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Interrogatory No. 8

Supply any and all information currently available regarding the arrangements made for provisions of buses to evacuate school children in private and public schools in Chester and Montgomery Counties within the Limerick Plume EPZ.

Answer

School district and county radiological emergency response plans describe arrangements for school evacuation including the provision of buses. Information is available in Attachments 4, 5, and 6 of the Owen J. Roberts School District plan, Attachments 1, 2 and 3 of all other school district plans, in Annex I and N of the Berks, Chester, and Montgomery County Plans, and Annex E of the Disaster Operations Plan, Basic Plan, Section VII.A.22.e.

Based upon a conversation in this regard between applicant, the three risk county coordinators (Messrs. Robert L. Reiser, Timothy R. S. Campbell, and A. Lindley Bigelow) and representatives of PEMA (Messrs. John L. Patten, PEMA Director; Adolph Belser, Director of Plans and Preparedness; and Theodore Charney, Limerick Project Officer) during a planning coordination meeting on June 5, 1984, applicant is advised that any unmet transportation needs reported by the Counties will be addressed by PEMA through other state resources. This same mechanism for addressing unmet needs is utilized by local and county governments surrounding the four other fixed nuclear facility sites in Pennsylvania.

Copies of county, municipal and school district radiological emergency response plans have been provided previously to LEA's representative. These plans, together with Annex E of the Pennsylvania Disaster Operations Plan are being made available for inspection and copy as Discovery 34, Items 1 through 16 and 19.

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Interrogatory No. 9

Provide a list of the bus companies willing to make buses available for evacuation of Chester and Montgomery County public and private schools in the event of a radiological emergency at Limerick.

Answer

Annex I, Appendix I-2, Tab 3 of the Montgomery County Plan lists those companies. This information has been previously provided to LEA's representative and is being made available for inspection and copy as Discovery 34, Item 3.

As to Chester County, a list of bus companies is being developed and will be provided when available. Chester County has tentatively identified over 200 buses and drivers and is negotiating agreements. See Annex 1, Appendix 1 of Discovery 34, Item 2.

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Interrogatory No. 10

Have formal Letters of Agreement been completed for all us companies expected to provide buses for use in Chester and Montgomery Counties? If not, provide a list of the agreements still to be completed. If yes, provide a copy of all completed Letters of Agreement.

Answer

Fifteen agreements have been completed in Montgomery County, eight of which have been previously provided in Annex T of the county plan, and are being made available for inspection and copying in Discovery 34, Item 3. The remaining nine completed agreements will be available in the next plan draft.

The following eighteen Montgomery County bus companies and school districts have agreed in principle to provide bus transportation in the event of an emergency. Written agreements, as completed, will be made available.

1. Ashbourne Transportation Inc.
2. Carol Lines, Inc.
3. Huntington Valley Transportation
4. Levy School Bus Company
5. Lower Merion School District
6. Methacton School District
7. Norristown Area School District
8. North Penn School District
9. Perkiomen Valley Bus Company
10. Perkiomen Valley School District
11. Pottsgrove School District
12. Pottstown School District
13. Romano's School Bus Service
14. James O. Sacks Bus Company

15. SEPTA
16. Spring-Ford School District
17. Wissahicken School District
18. Upper Merion School District

A list of agreements to be completed for Chester County is being developed and will be provided when available.

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Interrogatory No.11

Indicate the number of buses available from each company (by company) that can be expected to be available in the event of a radiological emergency at Limerick.

Answer

The number of buses available in Chester County is stated in Attachments 1, 2, and 3 of the Phoenixville School District plan and in Attachments 4, 5, and 6 in the Owen J. Roberts School District Plan). These are resources owned or contracted for routine use by the school districts.

The number of buses available in Berks County is provided in Annex I, Appendices I-1 and I-5 of the County plan.

In Montgomery County, Annex I, Appendix I-2, Tab 3 of the County plan provides information on bus transportation. Copies of these documents have been previously provided to LEA's representative and are being made available for inspection and copying as Discovery 34, Items 1, 3, 8 and 9.

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Interrogatory No. 12

For each bus company expected to provide buses, please provide any information available to PECO or Energy Consultants, Inc., or any info they have knowledge thereof, regarding the length of time necessary to dispatch buses from the time it has been determined that they are needed until they reach the school to which they will be assigned.

Answer

No surveys have been conducted regarding the length of time necessary to dispatch buses from the time it has been determined that they are needed until they reach the school to which they will be assigned. Assignment of bus companies to specific schools by Montgomery County is based upon their proximity to those schools.

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Interrogatory No. 13

Who is responsible for contacting the bus companies during a radiological emergency at Limerick?

Answer

As provided for in the Concept of Operations section (School in Session) of each school district plan, School District Superintendents or their designees are responsible for contacting transportation resources owned or contracted by the district.

The county emergency management agencies are responsible for contacting transportation providers within their jurisdictions to fill unmet needs reported by the school districts. This is provided for in Annex I, Section V of the Berks, Chester and Montgomery County Plans and their respective transportation group implementing procedures.

Copies of these documents have been previously provided to LEA's representative and are being made available for inspection and copying as Discovery 34, Items 1 through 16 and 21 through 23.

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Interrogatory No. 14

How will each bus company be contacted in the event of a radiological emergency at Limerick? Be specific.

Answer

Each bus company in the school district plan will be contacted by the School District Superintendent or designee as referenced in Section V of each school district plan by means of commercial telephone. The Owen J. Roberts School District has the capability to contact its contracted bus provider by a private telephone line intercom (June 29, 1984 telephone conversation between John Cunnington of Energy Consultants and Betty Kersh, Owen J. Roberts School District Transportation Coordinator).

The Chester County Department of Emergency Services, Berks County Emergency Management Agency, and Montgomery County Office of Emergency Preparedness will also notify transportation providers via commercial telephones at the Alert, Site Emergency and General Emergency classifications as discussed in the Chester, Montgomery and Berks County Plans and their respective Transportation Group Implementing Procedures.

Copies of these documents have been previously provided to LEA's representative and copies are being made available for inspection and copying as Discovery 34, Items 1 through 16 and Items 21 through 23.

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Interrogatory No. 15

How will each individual bus driver be contacted during any period of time covering a 24 hour period? Be specific.

Answer

The notification of each individual bus driver is accomplished by the bus company, service or the school district that employs him/her. Notification to bus drivers is accomplished by commercial telephone, radio and/or pager, based on the normal operating procedures of the company, service, or school district.

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Interrogatory No. 16

Are each of the buses that will be used equipped with 2-way radio equipment? If PECO or ECI has knowledge of details about the kind of equipment involved, please provide any information either have knowledge thereof.

Answer

Each bus to be used is not equipped with 2-way radio equipment. Some buses are equipped with commercial grade FM radio transceivers and standard AM citizens' band equipment. All school plan procedures, however, call for the assignment of at least one radio-equipped vehicle with each caravan of buses from each school building, as discussed in the Concept of Operations section of each school district plan, Sections V.D.1.C and V.D.2.d.10.

In Montgomery County, six transportation providers have some or all of their vehicles radio-equipped as described in Annex I, Appendix I-2, Tab 3 of the county plan. Where there are no radio-equipped buses assigned to evacuate a school building by the school district, Montgomery County UEP will assign a RACES volunteer (mobile or portable equipment) to accompany each caravan from the risk to the host school (Annex N, VI. D.3) Montgomery County maintains a listing of RACES volunteers (Annex B, Appendix B-2) and activates the RACES network beginning at Alert (BASIC PLAN, VIII, D. 2.g). School Superintendents confirm this assignment of a RACES unit (if needed) at General Emergency and again upon recommendation to evacuate, as described in the Concept of Operations section of School District plans, specifically Sections V.D.1.c and V.D.2.d.10.

The number of radio-equipped buses in Chester County is unknown to Applicant. However, Applicant is aware that the Owen J. Roberts School District has radio communications between its' District Office and buses contracted to

the District by Gross Bus Company (June 29, 1984 conversation between John Cunnington, Energy Consultants and Betty Kersh, Owen J. Roberts School District Transportation Coordinator).

In Berks County, the Boyertown School District has at least forty-one 72-passenger buses which are radio-equipped, as described in the Berks County Plan, Annex N, Appendix N-2.

Copies of above referenced documents have been previously provided to LEA's representative and are being made available as Discovery 34, Items 1 through 16.

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Interrogatory No. 17

Are buses pre-assigned to specific schools? If not, how and when will those assignments be made in the event of a radiological emergency? How will this information be communicated? By whom? If assignments have been made, provide all details available.

Answer

Eight school districts have preassigned vehicles to specific schools-- Boyertown, Phoenixville, Daniel Boone, Methacton, Perkiomen Valley, Pottsgrove, Pottstown, and Spring-Ford. Attachment 3 of each of these school district plans describes these preassigned resources.

Three school districts make bus assignments at the time of an emergency (Owen J. Roberts, Upper Perkiomen and Souderton Area).

Procedures for making or adjusting assignments at the time of an emergency are outlined in the Concept of Operations section of school district plans, specifically Section, except Owen J. Roberts, see page 6114.4(K). The assignments are made by means of commercial telephones and are communicated between the school district and its transportation provider.

In Montgomery County, the Office of Emergency Preparedness (OEP) has assigned resources from outside the EPZ to those schools reporting unmet transportation needs. Those assignments are provided in Annex I, Appendix I-2, Tab 3 of the county plan. The Montgomery County Transportation Group Implementing Procedure states in Sections V.B.4 and V.B.7 that the Group Chief will obtain school district transportation needs and contact all Montgomery County transportation resources to determine the number of vehicles and drivers available. Assignment of transportation resources will be reviewed at Site

Emergency as provided in Section V.C.10. Communications between the county Transportation Group and transportation providers occurs via commercial telephone.

The Chester County Transportation Group Implementing Procedure calls for determination of school district transportation needs and contact of county transportation providers to determine the number of vehicles and drivers available at the Alert classification in sections IV.B.4 and IV.B.7. Communications between the county transportation group and transportation providers will be by commercial telephone.

Assignment of buses to Berks County schools is provided in Annex I, Appendix I-1 of the County plan and the Transportation Coordinator Implementing Procedure, Sections V.C.9 and V.D.C. Communications between the county transportation coordinator and transportation providers is by commercial telephone.

Copies of these documents have been previously provided to LEA's representative and are being made available for inspection and copying as Discovery 34, Items 1 through 16.

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Interrogatory No. 18

With regard to Contention LEA - 15, please provide answers to the following questions above as they would pertain to "bus drivers": 8,10,11,17, and 9 (For number 9, in the event that buses are available, but there are insufficient bus drivers, provide any information available about the source of other personnel or persons that would be used to drive buses in the event of a radiological emergency.)

Answer

What follows in restated interrogatories are the answers to LEA's Interrogatory No. 18 as they pertain to bus drivers. These have been renumbered by the Applicant as No. 18 and its subparts, 18.8, 18.9, 18.10, 18.11, and 18.17.

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Interrogatory No. 18.8

18.8 Supply any and all information currently available regarding the arrangements made for provisions of bus [drivers] to evacuate school children in private and public schools in Chester and Montgomery Counties within the Limerick Plume EPZ.

Answer

All information currently available regarding arrangements made for provision of bus drivers to evacuate school children is contained in Attachment 3 (Attachment 6 for Owen J. Roberts School District) of school district radiological emergency response plans.

Copies of these documents have been previously provided to LEA's representative and are being made available for inspection and copy as Discovery 34, Items 4 through 16.

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Interrogatory No. 18.9

Provide a list of the bus [drivers] willing to make themselves available for evacuation of Chester and Montgomery County public and private schools in the event of a radiological emergency at Limerick.

Answer

The Owen J. Roberts School District has obtained a list of bus drivers who have indicated a willingness to make themselves available for an evacuation in the event of a radiological emergency at Limerick. Applicant does not have a copy of this list.

Applicant is advised that Montgomery County intends to request PEMA to develop a back-up list of drivers available to respond to a radiological emergency at Limerick.

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Interrogatory No. 18.10

Have formal Letters of Agreement been completed for all bus [drivers] expected to provide assistance in Chester and Montgomery Counties? If not, provide a list of the agreements still to be completed. If yes, provide a copy of all completed Letters of Agreement.

Answer

No Letters of Agreement have been completed for bus drivers, nor are there any plans to obtain such agreements.

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Interrogatory No. 18.11

Indicate the number of [drivers] available from each company [by company] that can be expected to be available in the event of a radiological emergency at Limerick.

Answer

Bus drivers are supplied by bus companies. See answer to Interrogatory No. 11.

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Interrogatory No. 18.17

Are drivers pre-assigned to specific schools? If not, how and when will those assignments be made in the event of a radiological emergency? How will this information be communicated? By whom? If assignments have been made, provide all details available.

Answer

Bus drivers have been pre-assigned by the Boyertown, Phoenixville, Daniel Boone, Perkiomen Valley, Pottsgrove, and Pottstown School districts. This information is provided in Attachment 3 of those school district radiological emergency response plans.

All other assignment of drivers will be made by the company, service, or school district employing those individuals in accordance with company procedures.

Information on communications between the bus driver and his/her employer has been provided in the answer to Interrogatory No. 15.

Copies of the above referenced documents have been previously provided to LEA's representative and are being made available for inspection and copy as Discovery 34, Items 4, 5, 9, 11, 12, and 13.

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Interrogatory No. 19

Does PECO or ECI have any knowledge of whether companies have surveyed their drivers to determine the number that would participate during a radiological emergency? If yes, which companies have done so, when was the survey done, and what were the results? If no, what is the basis for the assumption that a sufficient number of bus drivers will be available?

Answer

No bus company, to Applicant's knowledge, has surveyed its drivers to determine the number that would participate during a radiological emergency, or any other emergency condition.

Each of the bus companies which has agreed to provide buses and bus drivers has or will contractually agree to do so.

There is no indication that these companies will be unable to fulfill their commitment.

Moreover, approximately half of the bus drivers who would be needed in Montgomery County to evacuate the EPZ will be furnished by companies located outside the EPZ. Based upon identified need, Montgomery County determined that it would require only about thirty percent of those companies' total driver force.

Further, the number of buses, and therefore drivers, needed has been conservatively estimated for the following reasons, (1) school is assumed to be in session, (2) students driving their own private vehicles to school are assumed to require bus transportation, (3) school children of parents without private transportation are double-counted as being in school and as members of the general public requiring transportation, and (4) actual daily school attendance is assumed to be 100% of the student census, which it is not.

Although not relied upon for planning purposes, Section 6108 of the Commonwealth of Pennsylvania Vehicle Code, a copy of which is being made available for inspection and copying as Discovery 34, Item 34, permits the Governor to modify provisions of the code in emergencies. Sections of the code pertaining to classification of licenses and qualifications for a school bus license could be modified to permit other than certified school bus drivers to operate school buses in the event of a declared emergency.

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Interrogatory No.20

Have all bus drivers expected to participate received "training" for a radiological emergency?

Answer

No specialized "training" for bus drivers is required. Applicant's consultant has nonetheless prepared a training program to orient bus drivers to overall planning concepts and to alleviate any concerns regarding radiation risks in the event of a radiological emergency at Limerick. Three of the thirteen school districts within the EPZ have accepted this program to date.

This program will be offered to all bus companies with support responsibilities.

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Interrogatory No.21

Please describe the training received. When, where, and by whom have the training sessions been conducted. Provide the dates of training sessions and the number of participants, identifying the bus company involved.

Answer

The bus driver program was designed to provide general information on nuclear technology/terminology, radiation measurement and effects, and emergency planning concepts.

Information is also provided on the specific actions required of bus drivers to respond to a radiological incident.

The program has been conducted thus far in three school districts in the Limerick plume exposure pathway emergency planning zone. Information regarding these sessions is as follows:

- Boyertown School District

Two classes were conducted on June 11, 1984, with a total of 46 participants. Those in attendance were either employed by the District or its contractor, Quigley Bus Service. The instructors for both classes were Rebecca Heizer and William Dunlap, who are both employees of Energy Consultants.

- Owen J. Roberts School District

One class was conducted on December 1, 1983, with a total of 43 participants. Those in attendance were employed by the District's Contractor, Gross Equipment Company. The instructors for this session were Robert Patterson and James Colson, both employees of Energy

Consultants.

.. Perkiomen Valley School District

One class was conducted on February 16, 1984, with a total of 38 participants. Those in attendance were employed by the District or one of the District's contractors, William Metz Bus Company and James U. Sackes Bus Company. The instructors for this session were James Colson and Rebecca Heizer, both employees of Energy Consultants.

A copy of this program material, previously provided to LEA's representative, is being made available for inspection and copying as Discovery 34, Item 27.

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Interrogatory No. 22

If any arrangements for buses are being made by anyone other than PECO or EC, please provide the basis for the company's position that unmet needs have been or will be satisfied. Answer the same question with regard to arrangements for bus drivers.

Answer

All such arrangements have been made exclusively by the school districts and county emergency management agencies involved.

See Answers to Interrogatories No. 8, No. 18 and No. 19.

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Interrogatory No. 23

Provide copies of all correspondence related to the involvement of bus drivers and buses in emergency response planning for a radiological emergency at Limerick. Provide any information available that outlines the responsibilities of the bus company or their drivers during a radiological emergency at Limerick. If none exists, please explain how this information has been discussed and agreed upon by the bus companies and their drivers. If someone other than PECO or ECI has made these arrangements (such as a County Office of Emergency Preparedness), please provide all information that will be relied upon by PECO to demonstrate that there are sufficient buses and drivers available to carry out the local, county and school district emergency response plans. If PECO is going to refer to any correspondence previously sent to LEA in this proceeding, please provide the date, author, and recipient of the letter/information, to avoid any possible confusion, unless copies are going to be included in PECO's response to this and other Discovery requests.

Answer

Copies of all correspondence related to the involvement of bus drivers and bus providers in emergency response planning at Limerick have been previously provided and are being made available for inspection as Discovery 34, Items 29 and 30.

The Bus Driver Lesson Plan developed by Energy Consultants discussed bus driver responsibilities in a radiological emergency. It has been previously provided to LEA's representative and is being made available for inspection and copying as Discovery 34, Item 27.

Applicant has not made any of the aforementioned arrangements for buses or bus drivers. See Answer to Interrogatories No. 8, 9, 10, 11, 17, 18, and 19.

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Interrogatory No. 24

Provide a summary of any "verbal understandings" that PECO has knowledge of, or will rely upon to provide assurance that individual bus drivers will respond when contacted in the event of a radiological emergency. Provide copies of any letters, contracts or written agreements to support PECO's position.

Answer

See Answers to Interrogatories 10, 18, and 19.

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Interrogatory No. 25

Have bus drivers, school staff, and other emergency workers been informed of the "risks" associated with remaining in or entering the EPZ during radiological emergencies requiring sheltering or evacuation as a protective measure? If not, why not? If yes, what information has been provided to them? How and when was this information presented?

Answer

For bus driver training, see Answer to Interrogatory No. 21.

The school staff training program provides information on nuclear technology/terminology, radiation measurements and effects, emergency planning concepts and specific actions of school staff during a radiological emergency. The program, developed by Energy Consultant's staff, was presented by a lecturer with a set of slides on the following dates:

SCHOOL DISTRICT TRAINING SCHEDULE

<u>Berks County</u>	<u>Admin.</u>	<u>Staff</u>	<u>Bus Drivers</u>
Boyertown	1/10/84	5/21/84; 5/22/84; 3/16/84	6/11/84
Daniel Boone	12/6/83	-----	-----
<u>Chester County</u>			
Owen J. Roberts	-----	11/28/83	12/1/83
Phoenixville	12/14/83	1/16/84	-----
Downingtown	1/3/84	-----	-----
<u>Montgomery County</u>			
Pottstown	-----	2/17/84	-----
Pottsgrove	5/14/84	2/17/84	-----
Mathaction	-----	-----	-----
Perkiomen Valley	2/16/84	2/17/84	2/16/84
Upper Perkiomen	-----	2/17/84	-----
Spring Ford	12/15/84		

PRIVATE AND PAROCHIAL SCHOOL TRAINING SCHEDULE

<u>Berks County</u>	<u>Admin.</u>	<u>Staff</u>
Montessori Academy of Pennsylvania		4/15/84
<u>Chester County</u>		
St. Ann	12/2/83	12/2/82
St. Mary of Assumption	12/2/83	12/2/83
Holy Trinity	12/2/83	12/2/83
St. Basil	12/2/83	12/2/83
Valley Forge Christian Academy		1/27/84
Kimberton Farm School		1/26/84
Liberty Forge School		2/1/84
Upattinas Open Community School		1/31/84
<u>Montgomery County</u>		
Sacred Heart		4/11/84
St. Aloysius		1/18/84
St. Eleanor		4/11/84
St. Mary's	3/15/84	4/11/84
Ursinus College	1/13-1/17	
The Hill School		2/7/84
Twin Acres County Day School		1/11/84
Western Montgomery Christian Academy		5/1/84

It should be noted that bus drivers and school staff are not considered emergency workers according to county plan definitions. Also, school bus drivers and school staff are not intended to reenter the EPZ in that school students are to be evacuated "in one lift" as stated in Section II.G.3.C. of school district plans provided in Discovery 34, Items 4 through 16.

Applicant objects to this Interrogatory insofar as it relates to unspecified "other emergency workers" as beyond the scope of Contention LEA-15.

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Interrogatory No. 26

Have any promises, inducements, incentives in writing (or otherwise) been made to bus companies or individual drivers or "volunteers" of any kind to obtain their services or upon which a commitment was made to provide such services or participation. (An example of this would be the offering of PECO to provide equipment necessary for the municipal EOC's.) If so, please specify. If not, please state whether PECO anticipates providing any communications equipment for any of the bus companies, their drivers, or any public or private schools. Please provide any written agreements or summaries of any verbal agreements which encompass these understandings.

Answer

Applicant has no knowledge of any promises, inducements, or incentives in writing or otherwise that have been made to any bus companies or individual drivers to obtain their services.

Applicant does not anticipate providing any communications equipment for any bus companies, drivers or public or private schools.

Applicant objects to this interrogatory insofar as it relates to unspecified "volunteers" as beyond the scope of Contention LEA-15.

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Interrogatory No. 27

Do any such agreements for bus services with individuals or companies contain penalty clauses for failure to comply? Do any such agreements contain incentive clauses for willingness to comply? Does PECO have any knowledge of whether or not such agreement provisions are part of general employment contracts for bus drivers?

Answer

The completed agreements for bus service in Annex T of the Montgomery County Plan do not contain either penalty clauses for failure to comply or incentive clauses for willingness to comply. See Discovery 34, Item 3.

In Berks County, no agreements contain either penalty clauses for failure to comply or incentive clauses for willingness to comply. Copies of agreements for bus services in Berks County are provided in Annex T of the Berks County Plan, Discovery 34, Item 1.

With regard to Chester County agreements, see the Answer to Interrogatory No. 10.

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Interrogatory No. 28

Does PECO have any knowledge of whether or not school staff is expected to remain on duty during a radiological emergency due to contractual agreement? If yes, please provide any information that will be used by PECO to support its position that there are sufficient school staff available and willing to remain with students during a radiological emergency. Provide specific information available for each school involved.

Answer

Applicant has no knowledge of contractual agreements between school staff and their employers.

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Interrogatory No. 29

What information is available to PECO to indicate the amount of response time involved before buses can be expected to arrive at their designated schools during a radiological emergency? Please indicate all information that will be relied upon by PECO, or that the company presently has knowledge of.

Answer

See Answer to Interrogatory No. 12.

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Interrogatory No. 30

Have bus companies been informed of any potential legal liability for inadequate response of its drivers during an emergency? How does a bus company guarantee the availability of drivers during a radiological emergency? Does PECO have any knowledge of verbal, contractual, or written agreements between drivers and bus companies?

Answer

Applicant is unaware of any information provided to bus companies regarding any potential legal liability for inadequate response of its drivers during an emergency.

Availability of drivers is discussed in Answer to Interrogatory No. 18.

The Applicant has no knowledge of verbal, contractual, or written agreements between drivers and bus companies. See Answers to Interrogatories 18, 10 and 27.

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Interrogatory No. 31

Do bus companies have commitments to provide services for more than 1 school district, municipality or other facility during an emergency? If so, please provide a listing of all commitments that PECO (or ECI) has knowledge of.

Answer

Some bus companies would provide transportation services to more than one school district, municipality, or other facilities during an emergency. This information is contained in Attachment 3 of the school district plans (Attachment 6 in the Owen J. Roberts plan), in Annex I, Appendix I-1 of the Berks County Plan, and Annex I, Appendix I-2, Tab 3 of the Montgomery County Plan. Copies of this information have been provided to LEA's representative and are being made available for inspection and copy as Discovery 34, Items 1, 3, and 4 through 16.

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Interrogatory No. 32

Have bus drivers and their companies been informed about the need for them to remain at host schools to subsequently provide transportation to mass care centers? Is this matter discussed in written or verbal agreement? Please provide any information that PECO is aware of.

Answer

Information relevant to this procedure is contained in Section V.D.1.i.3 of school district plans and in the Bus Driver Training Lesson Plan developed by Energy Consultants in Section VIII.D.4.e. Bus drivers who have received training have been informed of this procedure. See Discovery 34, Item 4 through 16 and 27.

Applicant has no knowledge of whether this matter is discussed in written or verbal agreements.

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Interrogatory No 33

Does PECO (or ECI) have any knowledge of bus drivers or companies unwilling or unable to provide bus drivers for transportation from host schools to mass care centers? If yes, what arrangements have or will be made to provide transportation from host schools to mass care centers?

Answer

Applicant has no knowledge of bus drivers or companies unwilling or unable to provide bus drivers for transportation from host schools to mass care centers.

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Interrogatory No. 34

What provisions have been made to provide transportation for pre-school and day care children out of the EPZ? Provide any information that will be relied upon by PECO to provide assurance that these transportation needs have been identified and will be met. (This refers to children within the EPZ at the time of an emergency).

Answer

Day care centers that happen to be located with kindergarten/nursery schools that receive public school transportation have been included in transportation needs of those kindergartens. This information is provided in Attachment 1 of the applicable private school plans previously provided to LEA's representative and being made available as Discovery 34, Item 33.

Based on a meeting with PEMA (Messrs. John L. Patton, Director of PEMA, Adolph L. Beiser, Director of Plans and Preparedness, and Theodore Charney, Limerick Project Officer) and the three risk county emergency management coordinators (Robert Reber, Timothy R. S. Campbell and A. Lindley Bigelow.) on June 18, 1984, day care centers licensed by Department of Public Welfare (DPW) and nursery schools licensed by the Department of Education (DOE) will be provided a model Radiological Emergency Response Plan by PEMA, DOE and DPW (Discovery 34, Item 32). The model plans will state that transportation required for evacuation is the responsibility of the facility (Section IV.F). In addition, these plans will state that, to avoid the need to evacuate facilities, facilities will be closed at Site and General Emergency, and that parents/guardians will be contacted and requested to pick up their children unless a decision to shelter has been made (Section IV.D and VI.C.4).

Preschoolers or children in unlicensed facilities are considered members of the general public.

In addition, a public needs survey was conducted of all residents and groups within the EPZ, one purpose of which was to determine transportation requirements. Unmet needs will be included in the transportation requirements addressed by each county. See Chester County Plan, Annex I, Appendix 2, Berks County Plan, Annex I, Appendix I-1, and Montgomery County Plan, Annex I, Appendix I-3, available for inspection and copy as Discovery 34, Items 1, 2, and 3.

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Interrogatory No. 35

If local municipalities are making these arrangements, provide all information that PECO has knowledge of regarding these arrangements. Have letters of agreement been developed to insure that adequate transportation will be available? Provide copies of any written agreements or summaries of any verbal agreements or understandings. (The same applies to any arrangements to be made by the county or state agencies involved.)

Answer

See Answer to Interrogatory No. 34.

Applicant has no knowledge of such letters of agreement.

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Interrogatory No. 36

What priority, if any, has been given to the transportation needs of pre-school/day care children among the "pool" of transportation needy people, which includes the elderly, handicapped, or those otherwise without transportation means to evacuate?

Answer

Sufficient transportation is being planned at county and state levels to move all persons requiring transportation assistance in one lift. Accordingly, it is unnecessary to give "priority" to the transportation needs of preschool/day care children.

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Interrogatory No. 37

Will buses or private emergency vehicles be used to evacuate the pre-school children? Have they been numbered and identified?

Answer

See Answer to Interrogatory No. 34.

Although buses or private emergency vehicles could be used, Applicant has no knowledge of any such arrangements.

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Interrogatory No. 38

How many buses or emergency vehicles will be used to evacuate pre-school/day care children? Have agreements been reached with bus drivers or "volunteer" drivers to evacuate these children? If yes, please provide a copy of any such agreements or understandings. If not, when are these arrangements anticipated to be completed? If they are not contemplated, please explain why.

Answer

See Answer to Interrogatories No. 34, 35 and No. 37.

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Interrogatory No. 39

Are pre-school/day care staff expected to remain with children until parents arrive? If yes, what is this assumption based on. If no, what arrangements have been made to supervise, transport and care for these children during a radiological emergency?

Answer

Model plans being prepared by the Pennsylvania Department of Education, Department of Public Welfare and PEMA provide that children will remain the responsibility of the director of the day care center or nursery school until the children are picked up by their parents or authorized persons, as described in Section IV.G. See Discovery 34, Item 32.

The expected conduct of reasonable adults with responsibility for the care of children in a state licensed facility assures that staff will remain with the children until picked up.

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Interrogatory No. 40

What effect will the use of volunteers have on the transportation of pre-school and day care children? Will parents be asked to approve release of their children to the care of unidentified, unnamed people in the event of a radiological emergency? What special training, if any, will such volunteers receive in dealing with pre-school evacuees?

Answer

The plans do not include the use of any volunteers for evacuating pre-school and day care children. Section IV.G of the model plan states that children will remain the responsibility of the day care/pre-school facility until picked up by parents or authorized persons. See Discovery 34, Item 32.

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Interrogatory No. 41

How will parents be notified of their child's whereabouts? Will parents be allowed to enter the EPZ to pick up their children during a radiological emergency? Will parents otherwise be permitted to pick up their children at school before they are evacuated out of the EPZ? Has this factor been considered in traffic congestion studies (especially for the larger day care centers)? For example, has the effect on road access been considered? Will additional traffic control points be necessary? Has the additional stress on existing traffic control points been considered?

Answer

The model plan to be distributed to day care centers and nursery schools by the Pennsylvania Department of Education, Department of Public Welfare, and PEMA states that if an incident reaches the level of Site Emergency, parents or contact persons will be telephoned to pick up their children in Section IV.D. Access control, when established, is to control access, not necessarily to prevent access. It is Applicant's understanding that during the early stages of an evacuation, State Police would permit access to residents. Thus, parents or authorized custodians will be permitted to reenter the EPZ to pick up their children. In addition, Appendix 2 of the proposed plan provides a letter to parents informing them of emergency procedures including the location of the host facilities. A copy of the model plan is being made available for inspection and copying as Discovery 34, Item 32.

Time required for notification, preparation, and mobilization of the entire resident population is considered in the "Evacuation Fire Estimates for the Limerick Generating Station Pulme Exposure Emergency Planning Zone", Final Draft, May 1984, HMM Associates, Section 5.3.

Traffic control points were designated by State and local police based upon their knowledge of the area.

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Interrogatory No. 42

Will pre-schoolers be evacuated as efficiently and effectively as other school district pupils? What is the status of developing emergency response plans for day care and pre-school children in Chester, Montgomery and Berks Counties? Please provide any information that PECO or ECI has knowledge of, or that will be relied upon in this proceeding.

Answer

Pre-schoolers will be evacuated as efficiently and effectively as school district pupils. As to the development of emergency response plans for day care and pre-school children, see Answers to Interrogatories No. 34 and No. 36.

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Interrogatory No. 43

What consideration has been given to the capability of day-care and pre-school buildings in the event that sheltering is the protective measure that is recommended? How will the adequacy of these buildings be determined?

Answer

The adequacy of buildings for sheltering according to the Department of Environmental Resources, Bureau of Radiation Protection (BRP) Plan for Nuclear Power Generating Station Incidents, April 1983, Section 10.2.2.2 is any building which is reasonably winter worthy with windows and doors tightly closed. The BRP plan is included as Appendix 12 of Discovery 34, Item 19. Applicant is unaware of special consideration that must be given to any day care and pre-school buildings for sheltering purposes.

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Interrogatory No. 44

What measures will be or have been taken to insure that such centers (day care & pre-school) have adequate radio/TV/phone communications for receiving information to determine appropriate response during a radiological emergency?

Answer

The planning assumptions for day care centers and pre-schools are the same as for other members of the general public, i.e., that telephone and AM/FM radio communications are available.

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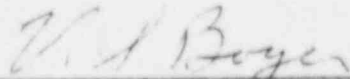
COMMONWEALTH OF PENNSYLVANIA :

SS.

COUNTY OF PHILADELPHIA :

V. S. Boyer, being first duly sworn, deposes and says:

That he is Senior Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Applicant's Answer to Limerick Ecology Action's First Set of Interrogatories and Request for Production of Documents to the Philadelphia Electric Company on LEA's Admitted "Off-Site" Emergency Planning Contentions and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Senior Vice President

Subscribed and sworn to
before me this 9th day
of July, 1984.



Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986

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July 10, 1984

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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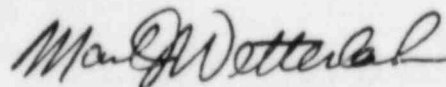
In the Matter of
Philadelphia Electric Company
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 50-353

Dear Mrs. Mulligan:

Enclosed is "Applicant's Answer to Limerick Ecology Action's First Set of Interrogatories and Request for Production of Documents to the Philadelphia Electric Company on Limerick Ecology Action's Admitted 'Off-Site' Emergency Planning Contentions." This request has been designated Discovery 34.

In accordance with past practice, the documentary material responsive to your request will be made available for your inspection during normal business days from 9:00 a.m. to 4:30 p.m. at a room near Philadelphia Electric Company's headquarters. Please call Edward Cullen, Esq. at 215/841-4273 to make specific arrangements at least one day in advance in order to gain access to the documents. Any copies that you wish made of this material as the result of your review should be marked and copies will be made at the commercial rate.

Sincerely,



Mark J. Wetterhahn
Counsel for the Applicant

MJW:sdd
Enclosure
cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED

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In the Matter of)
)
Philadelphia Electric Company) Docket Nos. 50-352
) 50-353
(Limerick Generating Station,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Answer to New Proposed Contention by Air & Water Pollution Patrol Relating to 'Gross Alpha,'" "Applicant's Answer to Motion by Citizen Action in the Northeast for Certification to the Commission of its Financial Qualifications Contention," "Applicant's Objections to LEA's First and Second Sets of Interrogatories on Offsite Emergency Planning Contentions," Applicant's Answer to Limerick Ecology Action's First Set of Interrogatories and Request for Production of Documents to the Philadelphia Electric Company on Limerick Ecology Action's Admitted 'Off-Site' Emergency Planning Contentions," and "Letter to Maureen Mulligan from Mark J. Wetterhahn" all dated July 10, 1984 in the captioned matter have been served upon the following by deposit in the United States mail this 10th day of July, 1984:

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