



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD PANEL  
WASHINGTON, D.C. 20555

July 20, 1984

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CENTRE

'84 JUL 23 P2:05

DOCKETING & SERVICE  
BRANCH

MEMORANDUM FOR: William L. Clements  
Docketing and Service Branch  
Office of the Secretary

SERIALIZED JUL 23 1984

FROM: Valarie M. Lane *V. M. Lane*  
Secretary to Judge Brenner  
ASLBP

SUBJECT: LIMITED APPEARANCE LETTER FOR LIMERICK  
GENERATING STATION -- DOCKET NOS. 50-352-353-0L

Please serve the attached letter to the parties in the Limerick proceeding.

Thank you for your attention to this matter.

Attachment

B407240174 B40720  
PDR ADOCK 05000352  
G PDR

D 503



# COUNTY OF BUCKS

## OFFICE OF THE COMMISSIONERS

Administration Building, Doytestown, Pa. 18901

215-348-2911 215-752-0281

'84 JUL 23 P2:05

*County Commissioners*  
CARL F. FONASH, *Chairman*  
LUCILLE M. TRENCH, *Vice-Chairman*  
ANDREW L. WARREN

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DOCUMENTS & SERVICES  
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WILLIAM H. RIESER  
*County Administrator*  
JAMES M. McNAMARA  
*County Solicitor*

July 17, 1984

SERVED JUL 23 1984

Mr. John Patton, Director  
Pennsylvania Emergency Management Agency  
P. O. Box 3321  
Harrisburg, PA 17120

Dear Mr. Patton:

The undersigned Bucks County Commissioners have been advised that your counsel, Mrs. Zori Ferkin, has indicated to the Nuclear Regulatory Commission that Bucks County has no reason not to approve the plan for evacuation relative to the Limerick Nuclear Generating Station. This assumption is erroneous. While we were willing to consider a neighborly undertaking with Montgomery County, we presumed that no inferences would be drawn relative to this consideration of the plan.

After initial review of the draft plan, the Commissioners are concerned about the lack of consideration for the residents of our county. In case of an accident at Limerick, there is considerable risk to Bucks County also and the obstacles to be overcome would be insurmountable.

Although we are very concerned for anyone who might be affected by an accident at Limerick, the Commissioners' responsibility under PL 1332 is to care for our own citizens who may seek to evacuate in large numbers. This would place a substantial burden on County resources. We cannot unknowingly assume responsibility for citizens of other counties and at the same time caring for our own citizens. In view of its statutory responsibility, as well as its common law fiduciary responsibility, Bucks County must deploy its resources to handle the evacuation of its own citizens.

We are requesting our Emergency Planning Director and PECO's employed consultant to determine the extent of potential evacuation from Bucks County, as well as those in transit through the County, and establish the direction of each evacuation, routes to be used, shelter requirements, and personnel and equipment required for management. With the results of such a study, Bucks County will be in a position to determine its ability to assist residents of other counties.

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July 17, 1984

We are also concerned about evacuees from Philadelphia compounding the burden we are being requested to assume from Montgomery County. We are apprehensive that our support system and highway system would be overwhelmed by an exodus from the Philadelphia area.

We anticipate substantial adverse public reaction to the plan which has been drafted because of the significant burden it would place on our residents. Under emergency conditions, this would not prevent the Commissioners from fulfilling our public responsibility. However, we believe the apparent obstacles would impede or deny opportunity to achieve reasonable success in the fulfillment of our responsibilities.

As a result of the foregoing concerns, the Bucks County Commissioners find it necessary to inform all agencies that Bucks County is not prepared at this time to participate further in the limited planning and testing process including the planned drill on July 25, 1984.

You are requested to acknowledge receipt of this letter, advise all concerned agencies of the contents hereof, and to advise Bucks County if there are any additional steps it needs to take in order to make its position clear.

Sincerely,

  
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Carl F. Fonash, Chairman  
Bucks County Commissioners

  
\_\_\_\_\_  
Lucille M. Trench, Vice Chairman  
Bucks County Commissioners

CFF:LMT:jtb

cc: Federal Emergency Management Agency  
Nuclear Regulatory Commission ✓ *document # 50-352*  
Montgomery County Commissioners