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RELATED CORRESPONDENCE

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 JUN 25 12:02

Before the Atomic Safety and Licensing Board

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

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

Pursuant to the Rules of Practice of the Nuclear
Regulatory Commission ("NRC"), 10 C.R.F. § 2.740 (b), and
the Orders of the Atomic Safety and Licensing Board in this
proceeding, Limerick Ecology Action hereby propounds the
following interrogatories to the Philadelphia Electric
Company (PECO), to be answered fully in writing, under oath,
in accordance with the definitions and instructions set
forth below. Additionally, pursuant to 10 C.F.R. § 2.741
Limerick Ecology Action requests that PECO produce copies of
those documents designated by it in its respective answers
below.

Definitions and Instructions

1. For each interrogatory, please state the full
name, work address, and title or position of each person
providing information for the answer to the interrogatory.

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2. The following definitions shall apply:

a. "PECO" shall refer to the Philadelphia Electric Company, or any official, officer, member, employee, or consultant thereof, including Energy Consultants, Inc.

b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, computer tapes or other electronically stored or generated material, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of PECO, or its officials, employees, or consultants; it shall also mean all copies or drafts of documents by whatsoever means made.

c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).

d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.

e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number, relevant date, and any

other descriptive information appropriate to the request.

f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and, if a corporation or other entity, its principal place of business or, if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in PECO's possession and/or knowledge and information in the possession of PECO officials, officers, agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of PECO's assertion, contention, view or opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

Interrogatories

1. State whether PECO intends to present any expert witnesses on the subject matter at 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.

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).

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.

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.

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.

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.

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.

WITH REGARD TO LEA-11:

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.

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.

10. Have formal Letters of Agreement been completed for all bus 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.

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.

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.

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

FOR THE FOLLOWING, PROVIDE ANY INFORMATION AVAILABLE TO PECO, ENERGY CONSULTANTS, INC., OR WHICH EITHER PRESENTLY HAS ANY KNOWLEDGE THEREOF:

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

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

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.

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.

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.)

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?

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

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.

22. If any of the arrangements for buses are being made by anyone other than PECO or ECI, 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.

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 procee-

ding, 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.

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.

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?

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.

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 pro-

visions are part of general employment contracts for bus drivers?

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.

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.

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?

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.

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 agreements? Please provide any info that PECO is aware of.

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?

WITH REGARD TO LEA-13:

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

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?

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?

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 PECC or ECI has knowledge of, or that will be relied upon in this proceeding.

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?

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?

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket Nos. 50-352
(Limerick Generating Station, : 50-353
Units 1 and 2) :

NOTICE OF APPEARANCE

Notice is hereby given that Maureen Mulligan has been authorized by the Board of Directors of Limerick Ecology Action to enter an appearance in the above-captioned matter. I will be representing Limerick Ecology Action with regard to "off-site" emergency planning issues in this proceeding.

In accordance with 10 C.F.R. §2.713(a), the following information is provided:

Name: Maureen Mulligan

Title: Vice President, Limerick Ecology Action

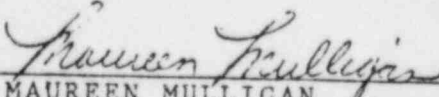
Address: Maureen Mulligan
Limerick Ecology Action
P.O. Box 761
Pottstown, Pa. 19464

(* for Federal Express use:
762 Queen Street
Pottstown, Pa. 19464

Phone: (215) 458-5683 or (215) 326-9122

Name of Party: Limerick Ecology Action

Please note: This information was previously provided verbally to all parties actively involved in "off-site" emergency planning issues. This Notice of Appearance is being distributed to the entire service list for this proceeding.


MAUREEN MULLIGAN
Vice President LEA

SWORN AND SUBSCRIBED TO ME
THIS 20th DAY OF June, 1984


(Notary Public)

FRANKLIN MANN 3rd, Notary Public
Pottstown Boro. Montgomery Co., Pa.
My Commission Expires February 4, 1989

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CERTIFICATE OF SERVICE

I hereby certify that the following information was served upon the following parties by first class mail, postage prepaid, with hand delivery, on June 21, 1984, to those on the service list beside whose name appears an asterick (*):

LEA Findings of Fact and Conclusions of Law on LEA I-42;

LEA Findings of Fact and Conclusions of Law on On-site

Emergency Planning Contentions; (mailed under separate cover)

LEA's First Set of Interrogatories on "Off-site Emergency Planning"

- (*) Lawrence Brenner, Chairman (2)
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
- Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, DC 20555
- Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555
- Atomic Safety and
Licensing Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555
- (*) Ann P. Hodgdon, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555
- (*) Benjamin Vogler, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555
- (*) Troy B. Conner, Jr., Esq.
Conner and Wetterhahn
1747 Pennsylvania Ave., NW
Washington, DC 20006
- (*) Philadelphia Electric Company
Attn: Edward G. Bauer, Jr.
VP and General Counsel
2301 Market St.
Phila., PA 19101
- Thomas Gerusky, Director
Bureau of Radiation Protection, DER
5th fl, Fulton Bank Bldg.
Third and Locust Sts.
Harrisburg, PA 17120
- Spence W. Perry, Esq.
Associate General Counsel
FEMA
Room 840
500 C St., SW
Washington, DC 20472
- Zori Ferkin, Esq.
Governor's Energy Council
P.O. Box 8010
1625 Front St.
Harrisburg, PA 17105

Jay M. Gutierrez, Esq.
U.S. Nuclear Regulatory Commission
Region 1
631 Park Ave.
King of Prussia, PA 19406

Director, PEMA
Basement, Transportation
and Safety Building
Harrisburg, PA 17120

Angus Love, Esq. / Montg. Co. (Legal Aid)
107 East Main St.
Norristown, PA 19401

Robert Anthony
103 Vernon Lane
Moylan, PA 19065

Martha W. Bush, Esq.
Kathryn S. Lewis, Esq.
Solicitor's Office
City of Philadelphia
Municipal Services Building
Phila., PA 19107

Steven Hershey, Esq.
community Legal Services
5219 Chestnut St.
Phila., PA 19139

Marvin I. Lewis
6504 Bradford Terrace
Phila., PA 19149

Frank Romano
61 Forest Ave.
Ambler, PA 19002

Joseph H. White, III
15 Ardmore Ave.
Ardmore, PA 19003

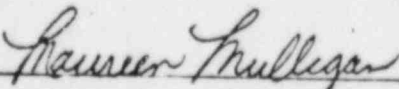
Robert Sugarman, Esq.
Sugarman and Denworth
Suite 510
North American Building
121 S. Broad St.
Phila., PA 19107

David Wersan, Esq.
Assistant Consumer Advocate
Office of the Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Gregory C. Minor
MHB Technical Associates
1723 Hamilton Ave.
San Jose, CA. 95125

Timothy Campbell
Chester County Dept.
of Emergency Services
14 East Biddle Street
West Chester, Pa. 19380

June 21, 1984


MAUREEN MULLIGAN, LEA V. PRESIDENT