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PROCEEDINGS EVIDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

LIMERICK ECOLOGY ACTION'S 2nd. SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE PENNSYLVANIA EMERGENCY
MANAGEMENT AGENCY ON LEA'S ADMITTED "OFF-SITE" EMERGENCY PLANNING CONTENTIONS

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission (N.R.C.), 10 C.F.R. § 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 Pennsylvania Emergency Management Agency, ("PEMA"), 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 PEMA 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.
2. The following definitions shall apply:
 - a. "PEMA" shall refer to the Pennsylvania Emergency Management Agency, or any official, officer, member, employee, or consultant thereof and shall include

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any other related agencies of the Commonwealth, upon which PEPA will rely, particularly the Pa. Bureau of Radiation Protection in the Pa. Dept. of Environmental Resources, and the Governor's Energy Council representatives participating in this proceeding on behalf of PEPA.

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 PEPA, or which PEPA has knowledge thereof, and intends to rely upon in this proceeding.

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 an 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 PEPA's possession and/or knowledge and information in the possession of PEPA officials, officers, agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of PEMA'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. Provide a copy of all information relating to the Penn-DOT traffic analysis done for the Limerick Plume EPZ (cited by PEMA as the source for traffic flow estimates indicated on Limerick Plume EPZ maps). Provide all information that was used to determine the vehicle number and time estimates shown on these maps. (Provide a copy of the actual study)
2. Provide a map of the Limerick Plume EPZ that reflects any changes made after the EPZ was slightly extended in Feb. 1984. Please discuss how these changes were determined.
3. Provide all information relating to traffic flow and congestion in the following areas below. Please indicate what analysis has been made to consider these impacts during a radiological emergency.
 - (a) Valley Forge National Park and King of Prussia area (unless provided in answers to First Set of Interrogatories)
 - (b) Marsh Creek State Park and Hopewell Village area
 - (c) Route 100 South from Pottstown to Exton Mall
4. Has PEMA conducted any surveys or studies to determine the effect that spontaneous evacuation outside the Plume EPZ may have on traffic congestion backing up into the EPZ? Has this impact on evacuation times been considered? If yes, please provide any details available. If not, explain why this has not been considered by PEMA
5. Has PEMA completed its review of PECO's May 1984 Evacuation Time Estimate Study? Please provide any comments that PEMA has made about this study, including all correspondence exchanged during the development of the study.

WITH REGARD TO LEA-22:

6. Does PEMA have any information available to determine the number of farmers who would be eligible to be designated as emergency workers in the event of a radiological emergency at Limerick? Provide a status report on the progress made in training farmers who reside within the EPZ.
7. Does PEMA have any information relating to possible accident scenarios which could result in radiation releases that might prevent farmers from being designated as emergency workers, or any other circumstances that might limit farmer access to the EPZ?
8. Does PEMA intend to present any witnesses on LEA-22? If yes, please provide information about the subject matter to be covered in any such testimony, and any information about witness credentials currently known by PEMA.
9. Provide a detailed explanation of the training being offered to farmers within the EPZ. When and where have these sessions been held? Who has conducted them? How many farmers have participated? Specifically explain what farmers are being told about the 'risks' of exposure to radiation if they chose to remain in the EPZ during a radiological emergency. What role has PEMA played in determining the content of training sessions? Have PEMA representatives attended these training sessions? How is the effectiveness of such training evaluated?
10. In the event of a radiological emergency, where is a farmer supposed to obtain dosimetry and KI supplies? What arrangements have been made for decontamination of farmers? What about pets and livestock?