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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
UNITED STATES

'84 JUL -3 10:42

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

LIMERICK ECOLOGY ACTION'S SECOND 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 and Procedure of the Nuclear Regulatory Commission (NRC), 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 Philadelphia Electric Company 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 Philadelphia Electric Company (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.

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

WITH REGARD TO LEA-14: (AND LEA-12)

1. Please discuss "training" provided for school personnel. Has all school training been completed? If not, please provide a schedule indicating when outstanding training is to be completed.

Please clarify the role played in such "training" by representatives from PEMA, ECI, and the County Offices of Emergency Preparedness.

2. Does PECO or ECI have any information or knowledge about whether or not such training covers roles and responsibilities assigned to school personnel during a radiological emergency, especially in regards to sheltering and/or multiple trip evacuation scenarios?
3. Would adequate supplies of KI, dosimetry, and communications equipment be available during a sheltering and/or a multiple trip scenario? How and when would these be distributed?
4. Does PECO plan to present any witnesses regarding the willingness of teachers and school staff to perform their assigned roles in sheltering, evacuation or multiple trip evacuation scenarios? Does PECO have any information regarding the willingness of school staff to remain with school children while at a host school or mass care center?
5. How have teachers been informed of their responsibilities at school in the event of a radiological emergency? Provide the results of any surveys that PECO or ECI has knowledge of that indicate the number of school staff willing to participate and remain on duty in the event of a radiological emergency? What arrangements have been made for the families of teachers who are willing to remain on duty during a radiological emergency? If such arrangements have not been made, what assurance is there that teachers will remain on duty rather than leave to pick up their own children or family members?
6. Provide a list of teachers and school staff willing to remain on duty with children in the event of a radiological emergency. Provide a description of the information provided to these teachers

at the time the commitment was made to remain on duty during a radiological emergency.

7. What procedure is used if a teacher changes his/her mind about volunteering, or for some reason decides to leave the area? (and no longer work at the same school) Who do they notify if they no longer want to be considered a volunteer? Is the teacher or school staff member expected to find a replacement volunteer or does that slot remain open?
8. Describe the nature of the contact with the teacher/ staff person when asked to volunteer and the date of commitment. Did they have to give an answer "on the spot"?
9. What is the staff/student ratio considered to be adequate to remain with children in the event of a radiological emergency. Please differentiate between a sheltering and evacuation scenario.
10. Are teachers who are being asked to stay behind with the children being offered overtime pay, and if not, was this information provided to them at the time that they volunteered to participate?
11. Provide a list of the responsibilities the teachers/ staff who remain with the children take on if they volunteer. Are these same volunteers trained and expected to shelter children? What information is being used to train staff/teachers about what to do in a sheltering situation.
12. How will school districts determine which buildings are suitable for use sheltering students during a radiological emergency?
13. Discuss PECO or ECI's response to the concerns raised by Upper Perkiomen School District about whether or not "training" was adequate.

WITH REGARD TO LEA-27:

14. Please provide any information available to PECO or ECI about the status of emergency response planning for Spring Mountain House, Camp Hill Village School (West Vincent Twp.), and Camp Hill Special School (East Nantmeal Twp.). Are these facilities included in their respective municipal plans or are separate plans being developed for them? Please provide any information available about arrangements for:

- (a) training of personnel
- (b) transportation assistance in the event an evacuation is called for
- (c) suitability of these facilities for sheltering, including the length of time under various possible scenarios that sheltering would provide adequate protective action
- (d) arrangements for communications with these facilities during a radiological emergency (especially with the county and/or the municipality involved)

With regard to (b) above, please describe the number of vehicles necessary, where they will be dispatched from, how long it will take these vehicles to arrive at their designation, and who will provide drivers for these vehicles.

15. What are the reception centers and mass care center arrangements that have been made for these facilities? If none have been completed, who is responsible for seeing that these arrangements are completed?

16. What is the resident population that is being planned for at the facilities discussed in LEA-27? Provide any information about special transportation needs for the handicapped or those requiring ambulance assistance. If ambulances are involved, where will they be coming from? Who is responsible for assigning and dispatching ambulances for these facilities? Have letters of agreement been completed? If not, why not?

WITH REGARD TO LEA-28:

17. How many vehicles are available for use by the Pa. National Guard for providing fuel supplies and towing services in the Limerick Plume EPZ? Please provide a description of the type of vehicles

available for use by the National Guard, their approximate location, where they will be dispatched from, and any other information available to PECO or ECI. Have letters of agreement been provided for the use of these vehicles? Are letters of agreement necessary for the use of these vehicles? If not, why not. If yes (and they have not been completed) when will these letters of agreement be completed?

18. Please provide the same information about the availability of vehicles for provision of fuel supplies and towing services that would be applicable for use on non-state roads. (question 17 refers to state roads)

19. Provide a list by township or municipality of:

- (a) tow trucks that are available during a radiological emergency
- (b) locations of gasoline supplies, including a listing of gas stations that will remain open during a radiological emergency

20. Have letters of agreement been completed for the use of tow trucks and provision of gasoline supplies (as discussed in question 19) for (a) state roads
(b) non-state roads

If not, which ones are still outstanding? Please provide copies of all completed letters of agreement.

21. Who is responsible for snow removal on state roads during a radiological emergency? Provide any information that will be used by PECO to demonstrate that this responsibility has been assigned and will be carried out in the event of a radiological emergency. If state employees are involved, does their contract require them to carry out their regular work duties in the event of a radiological emergency? If yes, please be specific. If not, how can it be determined that there will be adequate personnel to assure that snow removal will not impede any evacuation.

22. Provide the same information requested in #21 above as it relates to arrangements for snow removal on non-state roads. Provide any letters of

agreements that have been completed to cover arrangements for snow removal. If none are required, please explain why.

23. When will training be offered to tow truck drivers, gas station attendants, and personnel involved in snow removal during a radiological emergency? If not, why won't it be? Are these personnel considered emergency workers? Is there any length of time that they would be expected to carry out their assigned duties during a radiological emergency? Have they been told this? When and by whom? (For example, if a gas station agrees to remain open to provide fuel supplies, how long do they have to remain in the EPZ before they can evacuate?)

24. If a gas station agrees to remain open but for some reason is not able to do so during a radiological emergency, are there any penalties or liabilities to the gas station owner or manager (or the person who made the written or verbal commitment to provide these services during a radiological emergency?)

25. For gas stations expected to remain open during a radiological emergency, provide any information available to PECC or ECI about the amount of gasoline available at each gas station at any given time? How will arrangements be made to insure that gas tanks are kept full at all times at these stations? Have these stations agreed to keep a certain reserve available at all times? If yes, what is it (by gas station)?

Provide any information available to indicate how much gasoline is to supply an evacuation of the Limerick EPZ? Have any studies been or surveys of any kind)

Insurance is there that employees at gas stations will remain during a radiological emergency? What happens if they don't?

Provide a description of the equipment available for use by the

ra. National Guard. Please be specific about the number and type of

vehicles available, their location, and any information available to PECO or ECI about the time necessary to dispatch and mobilize this equipment.

29. How many National Guard members can be mobilized by each of the Battalions assigned to cover the Limerick EPZ? In what length of time? Provide the basis for all information supplied. If additional personnel and/or equipment is needed, where will it come from? How much mobilization time is involved? Provide information specific to each Battalion that will be involved when answering the above.

30. Does PECO intend to provide any expert or factual witnesses on LEA-28? If not previously identified in response to LEA's first set of interrogatories, please identify PECO's witnesses, and provide answers to questions 1-7 as stated in LEA's First Set of Interrogatories.

31. Is there a direct telephone line between PEMA and the National Guard? Provide any information available to PECO or ECI about communications equipment and capabilities of the National Guard.

WITH REGARD TO LEA-26:

32. What is the basis for assigning fire company personnel to the task of "route alerting"? Have firemen been surveyed to determine how many are willing to participate during a radiological emergency?

33. If no survey has been done of the firemen (as discussed above) what is the basis for determining that there will be sufficient personnel available to carry out route alerting during a radiological emergency?

34. What other responsibilities have been assigned to firemen during a radiological emergency. Provide specifics by municipality, as well as for firemen coming in to assist from outside the EPZ. In the event a municipality finds that it does not have sufficient personnel for route alerting, how will additional assistance be provided? By whom?

35. What equipment is necessary to have available for "route alerting"? Be specific by providing resource listing by municipality.

36. Provide any information that will be relied upon by PECO to demonstrate the amount of time necessary to carry out route alerting as a notification procedure in the event of siren failure. Be specific as to whether the information refers to coverage of the entire EPZ (such as might occur in the event of a loss of power) or isolated siren failure.

37. Provide any information to document the extent of communications links to be tested during the July 25 'test drill'. Provide any written information that PECO has any knowledge of. Discuss the minimum standards that are required for each link to remain useful and viable during a radiological emergency with regard to notifications and communications with emergency workers, both within and outside of the Plume EPZ for Limerick. If PECO has no evaluation of what it considers the minimum standards needed to successfully be implemented during a radiological emergency, explain its basis for making a determination that communications capabilities with emergency workers are adequate.

38. Provide any additional information about arrangements for 24 hour EBS coverage to each "Risk" and Support County. Are letters of agreement necessary? Have they been completed? Is yes, please provide copies.

WITH REGARD TO LEA-24/FOE-1:

39. Provide any information that will be relied upon by PECO to demonstrate the impact of traffic congestion in the following areas:

- (a) Valley Forge National Park and King of Prussia area
- (b) Marsh Creek State Park
- (c) Route 100 South from Pottstown to Exton Mall

40. If PECO does not anticipate any traffic congestion in these areas, please provide all information to be relied upon as a basis for PECO's position. Be specific.

41. WITH REGARD TO CONTENTION LEA-24/FOE-1, PLEASE PROVIDE ANSWERS TO ANY OF THE FOLLOWING QUESTIONS THAT PECO HAS KNOWLEDGE OF:

1. A part of Upper Merion Township is within the 10 mile zone. Was Upper Merion offered an opportunity to be included in Emergency Planning for the township ?County?
2. If not, why not ? Will Upper Merion be included in EM.PL. now? How soon ?
3. Has there been contact with U.M.'s township Mgr. ? The Emerg.Planning officer ?
4. If there has not been contact, how soon will this be initiated.?
5. Has the present traffic study by U.M. been considered in evacuation plans ?
6. How many vehicles daily travel into the King of Prussia area.?
7. How many vehicles(& people) terminate there for work,school,etc.?
8. How many commuting vehicles travel through K.of P. daily ?
9. What are the peak travel hours ? What are the times and peak # vehicles ?
10. What are the peak shopping days and hours for K.of P.? # of vehicles,people ?
11. What is the peak # of vehicles and people to be evacuated on max.shopping/work day ?
12. Since U.M. is partly in the 10 mile zone will Em.Pl. be made for these people ?
13. Will Em.Pl. be made for all the residents of U.M. ?
14. Is the Schuylkill Expressway partly closed for repairs ? For how many years,
15. What is the record of blocked traffic on Sch.Exp.? Daily ? How long ? #vehicles ? months ?
16. PEMA 6/83 Evac.Map shows no evacuation south on the Sch.Exp. Will it be blocked ?
17. Evac. Route south on # 363 is routed to #202 and # 76 onto the TPK.(276) east. How will this traffic enter the TPK, through the toll booths? /or Will all vehicles pick up cards ? Will there be detours through and around booths
18. Why no evacuation east on #202.? Will it be blocked ?
19. Why no evacuation west on PA.TPK (76) ? Will it be blocked ?
20. How often are there blockages at Valley Forge exit of TPK ? For how long ?
21. How often are there commuter blockages on # 202, # 252 ? What are daily slow-down hours ?
22. Evac.plan from Valley Forge Park on the map is via#252 and # 202 to W.Goshen. How will parents of schoolchildren in the Park be notified of whereabouts. ?
23. Map shows 4222 autos in (4) hours passing a point on # 252. Is this auto total derived from PennDot average traffic counts ? Are these counts based on normal mph rate rather than the estimated passing of 4222 autos in (4) hours in evac. ?
24. How does the estimate of 9499 autos passing on # 363 in(6) hours contrast with normal rate ?
25. Is there an evacuation plan for Valley Forge Park ?
26. Have Park officials been consulted ? If not,when will they be ? If there is no present evac. pl. for the Park,when will there be one ?
27. Has a U.S. Dept. of Commerce Nov.'84 report " Industrial Impacts of Hypothetical Accidents at the Limerick Nuclear Reactor " been used in Emer.Pl. ?
27. Have industries in K.of P. area been consulted on Emer.Pl.? Industries in 10 mile zone ?
28. How will gasoline/diesel fuel supply be assured for evacuation ?
29. Will gas stations on evacuation routes be designated for evac. emergency ?
30. Have any shopping malls and centers in K.of P. been consulted re.evac.pl. ?
31. If not, when will they be ?

CERTIFICATE OF SERVICE

84 JUL -3 A10:42

I hereby certify that the following have been served by deposit by first class mail, postage prepaid, upon the service list below this 25th. day of June 1984:

LEA's Second Set of Interrogatories to Philadelphia Electric Co.
LEA's Second Set of Interrogatories to PEMA

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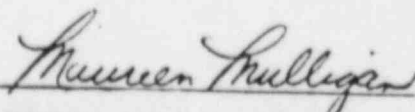
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June 25, 1984


MAUREEN MULLIGAN, LEA V. PRESIDENT