

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of	:	
	:	Docket Nos. 50-352 <sup>34</sup>
PHILADELPHIA ELECTRIC COMPANY	:	50-353
	:	
(Limerick Generating Station,	:	
Units 1 and 2)	:	

JUL 16 11:30

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RESPONSE OF PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
TO LIMERICK ECOLOGY ACTIONS'S FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS ON  
OFF-SITE EMERGENCY PLANNING CONTENTIONS

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INTERROGATORIES

1. State whether or not PEMA 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 proceeding by order of April 20, 1984 on the issues of "off-site" emergency planning for the Plume Exposure EPZ for Limerick. The contentions referred to are: LEA-11, LEA-12, LEA-13, LEA-14, LEA-15, LEA-22, LEA-26, LEA-27, LEA-28, and LEA-24 (includes FOE-1).  
Answer: PEMA has not yet thoroughly reviewed the named contentions, however, PEMA does indeed plan to present expert witnesses on some or all of these contentions. This would tentatively include:  
Adolph L. Belser, Director, Office of Plans and Preparedness;  
Ralph J. Hippert, Deputy Director, Office of Plans and Preparedness;  
and Kenneth R. Lamison, Director, Office of Response and Recovery.
2. State whether PEMA intends to present any factual witnesses on the subject matters at issue in LEA's admitted contentions (as listed above). If so, please identify each such factual witness and further state (a) his/her professional qualifications; (b) the contention and

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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: PEMA has not yet thoroughly analyzed the named contentions. PEMA, therefore, can not at this time identify factual witnesses on these contentions. PEMA intends, however, to seek witnesses from the three risk counties, as well as from various Commonwealth agencies, including the Departments of Environmental Resources, Agriculture, Education, Public Welfare, Transportation, Military Affairs, Health, and the Pennsylvania State Police. See also response to interrogatory 1.

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

Answer: (1) Commonwealth of Pennsylvania Disaster Operations Plan, Annex E, "Fixed Nuclear Facility Incidents," dated November 1981 with four changes; (2) Berks, Chester and Montgomery County Draft Radiological Emergency Response Plans current as of July 11, 1984; (3) Bucks and Lehigh County Draft Support Plans current as of July 11, 1984; (4) 43 municipal plans; (5) 13 school district plans; (6) Evacuation Time Estimates for the Limerick Generating Station Plume Exposure Emergency Planning Zone, Final Draft, dated May 1984;

(7) NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants; (8) FEMA-REP-2, "Guidance on Offsite Emergency Radiation Measurement Systems; (9) Limerick Generating Station Emergency Plan, Volumes 1 and 2 and their accompanying Implementing Procedures.

4. To the extent that PEMA's answer to any of the interrogatories is based upon one or more documents, (a) identify each such document on which the answer is based; (b) identify the specific information in such document upon which PEMA relies; (c) explain how the information provides a basis for PEMA's answer or position.

Answer: PEMA's answers to the interrogatories will be based upon Annex E, the three risk county plans and the 13 school district plans.

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, or 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 PEMA's answer.

Answer: Answers pertaining to evacuation routes were based upon analysis made by PennDOT. The analysis was made during the summer of 1982 by personnel in the Department of Transportation's District 6-0.

6. To the extent that your answer is based upon conversations, consultations, or correspondence or other communications with one or more individuals or entities, (a) 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: Our answers are based upon discussions with Timothy Campbell, Emergency Management Director for Chester County, and Lin Bigelow, Emergency Management Coordinator for Montgomery County. A representative from Energy Consultants, Inc. was, at the county request, also present during the discussion. Answers are also based upon a June 7, 1984 letter to Governor Thornburgh from Dr. Roy E. Claypool, Superintendent, Owen J. Roberts School District. The referenced letter was also sent by Dr. Claypool to Region III, FEMA, to which they responded June 25, 1984 in a letter signed by Mr. Giordano, Regional Director.

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

Answer: Documents identified in response to interrogatories #3 through #6.

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

Answer: The number of buses required to evacuate school children under the jurisdiction of the 13 school districts have been identified. The counties have subsequently identified sufficient resources to more than meet the requirement. All three counties are in the process of obtaining signed agreements with the bus companies so identified.

9. Provide a list of the bus companies willing to make buses available for evacuation of Chester, Berks and Montgomery County public and private schools in the event of a radiological emergency at Limerick. Provide addresses of each company and the location from where the buses will be dispatched.

Answer: Since the agreements are not completed, PEMA is unable at this time to provide a definitive list of bus companies involved. It is PEMA's understanding that when the agreements are completed they will be included in the finalized versions of the respective county plans submitted for formal review and approval.

10. Have formal letters of agreement been completed for all bus companies expected to provide buses for use in Chester, Berks and Montgomery Counties? If not, why not? Provide a list of the agreements still to be completed, and any information available to PEMA regarding when such agreements are expected to be completed. (Please include any information to support the basis for PEMA's answer.) If yes, provide a copy of all completed letters of agreement.

Answer: Formal letters of agreement have not been completed by the counties with all bus companies, but they are currently under development as previously indicated. These agreements will become part of the county plans when formally submitted for review and approval. There are, however, eight executed agreements in Draft 6, April 1984, Montgomery County Plan (copies attached).

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

Answer: The counties have identified the minimum and maximum number of buses that would be available from each bus company. It is PEMA's understanding that the minimum figures when added together exceed the bus requirements to evacuate school children under the jurisdiction of the 13 school districts. The precise number of buses available will be included in the finalized county plans.

12. Who is responsible at PEMA for evaluating the "risk" and "support" counties "unmet needs" regarding the sufficiency of buses and bus drivers? Please supply the name, title, and description of the designated person(s) position. Who in PEMA is responsible for securing the necessary buses and drivers in the event that any of the "risk" or "support" counties are unable to provide them?

Answer: If any unmet needs for buses or drivers are reported to PEMA by the risk or support counties they will be validated by Adolph L. Belser, Director, Office of Plans and Preparedness and Kenneth R. Lamison, Director, Office of Response and Recovery. The Department of Transportation maintains a current list of all commercial buses within the Commonwealth. In conjunction with this Department, PEMA would identify the feasible resources to fill the

unmet needs and the information would be included in appropriate plans. It should be recognized that the Deputy Secretary for Local and Area Transportation in the Department of Transportation has the authority to assign missions to commercial bus companies during emergencies.

13. For each bus company expected to provide buses, please provide any information available to PEMA, or any information that PEMA has knowledge thereof, regarding the time lapse from the notice of dispatch until buses and bus drivers reach their assigned destination.

Answer: The mobilization time for buses under control of the respective school districts should appear in the school district plans. PEMA's review to date of those plans discloses that this information is not included in all school district plans. It is PEMA's understanding that sections of Montgomery County's Draft 6 has been revised to list bus companies the county has contacted, together with information regarding mobilization times for arrival of drivers and buses at the county staging areas. In the HMM Evacuation Time Estimate Study the assumption was made that (page 5-5) "Up to one hour may be required to assemble buses, transport vehicles to schools, and to load students onto buses."

14. How many buses will be responding from within the 10 mile radius? How many buses and drivers will be responding from outside of the 10 mile radius (plume EPZ) to evacuate persons from within the plume EPZ? How far must these buses travel to reach their assigned school destinations?

Answer: The buses that will be available within the EPZ are identified in the respective school district plans. Montgomery County has identified 144 buses and Chester County 137 from outside the EPZ. Since bus resources are reportedly more than adequate to

meet the requirements, the distance that they must travel will depend upon which particular buses are available on the day of an incident.

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

Answer: During a radiological emergency the school districts will contact the buses under their control and the county emergency management agencies will contact the bus companies with whom they have agreements. If there is a need for still additional buses, contact will be made by the Department of Transportation.

16. What information is available to PEMA 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 PEMA, or that PEMA has knowledge of.

Answer: See response to interrogatory 13.

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

Answer: Bus companies will be contacted by commercial telephone.

18. How will each individual bus driver be contacted during any period of time covering a 24 hour period? What provisions are made for notification of drivers off-duty or enroute?

Answer: Drivers in buses with radios will be contacted by this means. Drivers in buses without radios will be contacted when they return to the bus terminal. Drivers at home will be contacted by normal bus company procedures.



19. Are each of the buses that will be used equipped with 2-way radio equipment? If PEMA has knowledge of details about the kind of equipment involved, please provide any kind of information that PEMA is aware of.

Answer: All of the buses are not equipped with 2-way radios. PEMA has no knowledge of details as to the type of radio equipment that will be used.

20. 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: If an evacuation is required, first priority on buses would go to the schools. School district plans should contain information as to where buses listed by them will report. PEMA's review of these plans to date discloses that this information does not yet appear in all school district plans. For Chester County, buses arrive at the staging area from outside of the plume exposure pathway EPZ will be assigned as they arrive to schools closest to the Limerick Generating Station. Montgomery County has made some tentative assignments of buses in revisions to Draft 6, Annex I, of its plan.

21. With regard to contention LEA-15, please provide answers to the following questions above as they would pertain to "bus drivers":

Answer: As requested the responses to the identified interrogatories pertaining to the availability of drivers are as follows:

8. With the exception of the 37 drivers identified by the Owen J. Roberts School District, it is PEMA's understanding, from consultation with the Chester and Montgomery Counties, that

reportedly there were no unmet bus needs for school district evacuation in those counties and that drivers are available.

9. This information is not currently available to PEMA.

10. Letters of Agreement between individual drivers and the counties have not and will not be obtained. There is no precedent for requiring that such letters be obtained in the context of emergency planning.

11. See response to interrogatory 11.

20. Drivers are not assigned to the schools but rather to buses.

22. Has PEMA collated any data, or does PEMA have in its possession any materials, surveys or lists regarding the number of bus drivers from each company that would participate during a radiological emergency? If yes, attach the materials, lists, data or surveys, by company, indicating the dates and results.

Answer: The only information PEMA has on this subject is what appears in the plans of the three risk counties plus the shortages identified in Dr. Claypool's June 7, 1984 letter to Governor Thornburgh.

23. If PEMA does not have the information referred to in interrogatory number 22 above, what is the basis for the assumption that a sufficient number of bus drivers will be available? How will PEMA respond to this "unmet" need?

Answer: The assumption that a sufficient number of bus drivers will be available is based upon agreements signed or under development with the bus companies involved and upon information provided by the school districts regarding any unmet driver need. As indicated previously the only district to report such a shortage is Owen J. Roberts School District. If drivers are not

available for school buses, PEMA through the Department of Transportation will arrange for commercial buses to report to the specific school districts for the evacuation of the students.

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

Answer: To date all bus drivers expected to participate in a radiological emergency have not received training.

25. Please describe the "training" received. Where, when, and by whom have the training sessions been conducted?

Answer: PEMA was involved in determining what the content of training given to bus drivers should be. The actual training, however, is being conducted by Energy Consultants, Inc. It is PEMA's understanding that to date this training has been conducted at only three of the thirteen school districts.

26. Provide the dates of training sessions and the number of participants, identifying the bus company involved.

Answer: The respective county emergency management coordinators are responsible for scheduling such training. PEMA does not have detailed information regarding dates and participants of training referenced in the response to interrogatory 25.

27. If any of the arrangements for buses are being made by anyone other than PECO or Energy Consultants, Inc., please provide the basis for the assumption that all unmet needs have been or will be satisfied. Answer the same question with regard to arrangements for bus drivers.

Answer: Arrangements for buses and drivers are not being made by either PECO or Energy Consultants, Inc. but rather by the emergency management agencies of the respective risk counties. Any requirements over and above those that the counties can meet will be handled by PEMA in conjunction with the Pennsylvania Department of Transportation.

28. Provide copies of correspondence relating to the securing and commitment of bus drivers and buses in emergency response planning for a radiological emergency at Limerick.

Answer: Attached please find correspondence between Timothy Campbell, Director, Chester County Department of Emergency Services and Adolph L. Belser, Director, Office of Plans and Preparedness for PEMA dated April 23, 1984 and May 9, 1984 respectively. Also enclosed is a copy of Dr. Roy Claypool's letter, Superintendent, Owen J. Roberts School District to Governor Thornburgh dated June 7, 1984. A copy of his letter was also sent to FEMA Region III by Dr. Claypool and a copy of FEMA's June 25, 1984 reply from Paul P. Giordano, Regional Director, is attached.

29. Provide any written or oral information available to PEMA that currently outlines the legal responsibilities of the bus companies and their bus drivers, to PECO, the "risk" and "support" counties, and to PEMA during a radiological emergency at Limerick. If none exist, please explain how PEMA has evaluated and discussed PECO's response to such an emergency and any agreement or plans for the provision of buses and drivers. If someone other than PECO or Energy Consultants, Inc. has made these arrangements (such as

a county office of emergency preparedness) please identify the parties to the arrangements as well as all data demonstrating that there are sufficient buses and bus drivers willing to respond to local, county, and school district emergency response plans.

Answer: PEMA is not certain of the meaning LEA attaches to the term "legal responsibilities." The bus companies and respective risk counties are in the process of entering into written agreements under which the companies will make buses available. Under those agreements the bus companies will be obligated to make buses available according to the particular terms of the agreement. PEMA has no such agreements with bus companies nor do we anticipate any need for such agreements. If it is determined that an agreement is required between the Commonwealth and any bus company such an agreement would be consummated by the Pennsylvania Department of Transportation.

30. Provide a summary of any "verbal understandings" that PEMA has knowledge of or will rely upon as 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 this.

Answer: PEMA has no knowledge of any such verbal understanding.

31. Have bus drivers, school staff, any other emergency workers been informed of the "risks" associated with remaining in or entering the Plume EPZ during a radiological emergency requiring sheltering or evacuation as a protective measure? If not, why not? If yes, provide details about the information that has been provided to

them. How and when was this information presented?

Answer: In response to this interrogatory it must first be recognized that bus drivers and school staff are not considered emergency workers as defined in state and county plans. Training conducted by Energy Consultants, Inc. for bus drivers and school staff does include information on the risk involved in the case of a radiological emergency. See responses to interrogatories 25 and 26.

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

Answer: PEMA has no knowledge of any promises, inducements or incentives to bus companies, individual bus drivers, or volunteers. PEMA is, however, aware that PECO has offered to fund the purchase of certain types of equipment for the county and municipal emergency management agencies for use in their emergency operations centers in the event of an emergency. PEMA will not provide any communications equipment for bus companies, drivers or schools.

33. Do any such written or oral 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 PEMA have any knowledge whether or not such agreement provisions are part of the general employment contracts for bus drivers?

Answer: Agreements with bus companies attached to this response do not contain penalty or incentive clauses. PEMA has no knowledge as to whether pending agreements with other bus companies contain either penalty or incentive clauses. PEMA also has no knowledge of the content of the general employment contract between any bus company and its drivers.

34. Has PEMA collated any data from any source on whether school staff will remain on duty during a radiological emergency? Supply the basis for this information, and its timeliness. Provide any information, contract terms, informal agreements or verbal understandings which support the position that sufficient school staff are available and willing to remain with students during a radiological emergency. Provide specific information available for each school involved.

Answer: The only information which PEMA has on this matter is the June 7, 1984 letter from Dr. Claypool.

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

Answer: In the eight agreements attached there are no provisions that address the liability of the bus companies in the event of failure to respond or of inadequate response. PEMA's understanding is that a bus company guarantees that drivers will be available during an emergency by its signing of an agreement to make buses available. PEMA has no knowledge of verbal, contractual or oral agreements between drivers and bus companies.

36. Do bus companies have commitments to provide services for more than one school district, municipality or other facility during a radiological emergency? If so, please provide a listing of all commitments that PEMA has knowledge of.

Answer: As plans have been currently developed, bus companies may be providing transportation services to more than one school district, municipality or other facility during an emergency providing sufficient buses are available for this service.

- 36\* Have bus drivers and their companies been informed about the need for buses and drivers to remain at host schools to subsequently provide transportation to mass care centers? If so, has the matter been arranged in written or verbal agreements? If not, why not? Please provide any information that PEMA is aware of.

Answer: Bus drivers and their companies have not as yet been informed about the need for buses and drivers to remain at host schools to provide transportation of children to mass care centers if necessary. This matter will be addressed in appropriate plans before they are finalized.



37. Does PEMA 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 been or will be made to provide transportation from host schools to mass care centers?

Answer: PEMA has no such knowledge but is addressing the subject. See response to interrogatory #36\*.

38. What provisions have been made to provide transportation for pre-school and day care children out of the EPZ? Provide any information that supports the position 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: PEMA, in conjunction with the three risk counties has developed a model radiological emergency response plan for the day care centers, homes or nursery schools for incidents at the Limerick Generating Station (copy attached). The Pennsylvania Departments of Education and Public Welfare are transmitting this model plan to all licensed facilities in this category with the request that plans be completed by mid-September 1984. Upon completion of its plan, a facility will make copies available to both the municipality and county in which the facility is located. As these plans are developed, transportation needs will be identified together with resources to meet the needs.

39. If local municipalities are making these arrangements, provide all information that PEMA has knowledge of regarding these arrangements. If PEMA or a county have made any such agreements attach all letters of agreement developed to insure that

adequate transportation will be available. Provide copies of any other written agreements or summaries of any verbal agreements which encompass same.

Answer: Transportation requirements for these licensed day care centers and nursery schools have not as yet been identified. No action can be taken on this matter until the plans referenced in response to interrogatory #38 are developed by the facilities in question.

40. What priority, if any, has been given to the transportation needs of re-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: In the view of the risk counties, once the referenced plans are completed for day care centers and nursery schools the children involved will have the same priority as that afforded to students under school district jurisdiction.

41. Will buses or private emergency vehicles be used to evacuate pre-school/day care children? Have they been numbered and identified? Have they been assigned? If so, please specify. If no, why not?

Answer: See response to interrogatory 39.

42. What information does PEMA have regarding the response time of bus drivers or other emergency volunteers to arrive at a designated day care center after notification has been made? How will drivers be dispatched?

Answer: See response to interrogatory 39.

43. How many buses or emergency vehicles will be needed to evacuate the identified pre-school/day care centers? Have agreements been reached with bus drivers or "volunteer" drivers to evacuate these children? If yes, please provide a copy of any such written agreement or a summary of any verbal understanding. If not, when are these arrangements expected to be completed. If such agreements are not contemplated, why not?

Answer: See response to interrogatory 39.

44. Are pre-school/day care staff expected to remain with children until parents arrive? If yes, upon what is this assumption based? If not, what arrangements have been made to supervise, transport and care for these children until their parents pick them up during a radiological emergency.

Answer: It is the intent of the model plan referenced in response to interrogatory #38 for the day care center and nursery school staff to remain with the children until they are picked up by their parents. It is PEMA's understanding that this expectation is consistent with, and within the scope of, the duties of the staff employed by these licensed facilities.

45. Has PEMA any information, data or studies on the effect that the use of "stranger" volunteers will have on the transportation of pre-school and day care children? Will parents be asked to authorize the release of their pre-school or day care children to the care of unidentified, unnamed people in the event of a radiological emergency? What special training, if any, will such volunteers or emergency workers receive in dealing with pre-school evacuees?

Answer: To PEMA's knowledge the only possibly relevant study of the effect of the use of such personnel is one by the Defense Civil Preparedness Agency dated December 1972, "A Perspective on Disaster Planning." PEMA has not reviewed the study.

As indicated in the model plan referenced in the response to interrogatory #38, nursery school or day care children will be released only to contact persons designated by their parents. As such "volunteers or emergency workers" will not be involved.

46. How will parents be notified of their children'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 from the EPZ? Has this factor been considered by PEMA 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: A proposed notification letter to be sent to parents is enclosed in the model plan referenced in response to interrogatory #38. Parents will be allowed to enter the plume exposure pathway EPZ to pick up their children at the schools at any time during a radiological emergency. PEMA will review the alleged impact on traffic of day care and nursery school parents entry into the EPZ with the Department of Transportation and will supplement its response to this interrogatory as appropriate.

As a general matter, two-way traffic will be maintained on main evacuation routes during an emergency.

47. Will pre-schoolers be evacuated as efficiently and effectively as other school district pupils? What is the status of emergency response planning for day care and pre-school children in Chester, Berks and Montgomery Counties? Please provide any information PEMA has on the current status of local and county plans for pre-school children, as well as any "unmet needs" that PEMA will be addressing in this regard.

Answer: It is the intent to have day care center and nursery school children evacuated as efficiently and effectively as students under school district jurisdiction. The status of emergency response plans for children in licensed day care and nursery school facilities in risk counties is addressed in response to interrogatories 38 to 46.

48. 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 for sheltering purposes be determined? What information is available to determine if sheltering is an acceptable protective measure in the event that there is not sufficient time to evacuate during a radiological emergency?

Answer: No particular consideration has been given to the capability of day care and pre-school buildings with regard to sheltering. None the less as discussed in Appendix 12 to Annex E, in Pennsylvania any building which is reasonably winter worthy will suffice for sheltering with windows and doors tightly closed. In the event evacuation is not possible, sheltering is the only available alternative protective action.

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

Answer: The availability of radios/TV/phone communications in day care and nursery school facilities will be addressed in the emergency plans under development.

50. Who is the designated official from PEMA that is responsible for reviewing "unmet needs" on the issue of emergency response planning for children in pre-school and day care programs?

Answer: It is the responsibility of the respective risk counties to review unmet needs for nursery school and day care facilities within the plume exposure pathway EPZ. PEMA will then review the unmet needs as presented by the counties. Within PEMA this is a joint responsibility of the Director of Plans and Preparedness and the Director of Response and Recovery.

51.1 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?

Answer: No part of Upper Merion Township is within the 10 mile zone of the Limerick Generating Station. It is PEMA's understanding from Montgomery County that Upper Merion was not offered an opportunity to be included in the emergency planning for either the township or county because it is outside the plume exposure pathway EPZ as defined.

51.2 If not, why not? Will Upper Merion be included in EM.PL now? How soon?

Answer: Since Upper Merion Township is outside the 10 mile zone,

as well as the EPZ as defined, an emergency plan was not developed for the township. Since consideration is not being given to extending the EPZ, there is no reason to anticipate that an emergency plan will be needed for Upper Merion. Upper Merion Township is, of course, within the 50 mile ingestion exposure pathway EPZ. Provisions for any response that may be required relative to ingestion exposure will be included in applicable sections of the state and Montgomery County plans.

51.3 Has there been contact with U.M.'s township Mgr.? The Emer. Planning officer?

Answer: PEMA does not understand the relevance of this question.

51.4 If there has not been contact, how soon will this be initiated?

Answer: PEMA does not understand the relevance of this question.

51.5 Has the present traffic study by U.M. been considered in evacuation plans?

Answer: PEMA has not seen, nor does PEMA have any knowledge of a traffic study conducted by Upper Merion Township.

51.6 How many vehicles daily travel into the King of Prussia area?

Answer: Response to this interrogatory will require consultation with the Pennsylvania Department of Transportation. PEMA will review this interrogatory with the Department of Transportation and provide a supplemental response based upon information obtained.

51.7 How many vehicles (and people) terminate there for work, school, etc.?

Answer: See response to interrogatory 51.1.

51.8 How many commuting vehicles travel through King of Prussia daily?

Answer: See response to interrogatory 51.1.

51.9 What are the peak travel hours? What are the times and peak number vehicles?

Answer: See response to interrogatory 51.1.

51.10 What are the peak shopping days and hours for King of Prussia? Number of vehicles, people?

Answer: See response to interrogatory 51.1.

51.11 What is the peak number of vehicles and people to be evacuated on maximum shopping/work days?

Answer: See response to interrogatory 51.1.

51.12 Since U.M. is partly in the 10 mile zone will Em. Pl. be made for these people?

Answer: See response to interrogatory 51.1.

51.13 Will Em. Pl. be made for all the residents of U.M.?

Answer: See responses to interrogatories 51.1 and 51.2.

51.14 Is the Schuylkill Expressway partly closed for repairs? For how many years?

Answer: It is PEMA's understanding that the Schuylkill Expressway is partly closed and will be for several years.

51.15 What is the record of blocked traffic on Schuylkill Expressway? Daily? How long? # of vehicles?

Answer: See response to interrogatory 51.6.

51.16 PEMA 6/83 Evac. Map shows no evacuation south on the Sch. Exp. Will it be blocked?



Answer: The Schuylkill Expressway will not be blocked during an evacuation.

51.17 Evac. Route south of #363 is routed to #202 and #76 onto the Turnpike (276) east. How will this traffic enter the Turnpike, through the toll booths? Or will all vehicles pick up cards? Will there be detours through and around the booths?

Answer: Evacuating vehicles will enter the Turnpike through the toll booths and will not detour around them. At present it is anticipated that the vehicles will pick up "cards." This matter will be clarified with the Pennsylvania Turnpike Commission.

51.18 Why no evacuation east of #202? Will it be blocked?

Answer: See response to interrogatory 51.6.

51.19 Why no evacuation west of PA Turnpike (76)? Will it be blocked?

Answer: See response to interrogatory 51.6.

51.20 How often are there blockages at Valley Forge exit of Turnpike?

Answer: See response to interrogatory 51.6.

51.21 How often are there commuter blockages on #202, #252? What are daily slow-down hours?

Answer: See response to interrogatory 51.6.

51.22 Evac. plans from Valley Forge Park on the map is via #252 and #202 to W. Goshen. How will parents of school children in the Park be notified of whereabouts?

Answer: There is no evacuation plan for Valley Forge Park per se. Evacuation from Schuylkill Township and Phoenixville Borough will be through the Park. Since the Park is not being evacuated, notification of parents regarding school children is not applicable.

51.23 Map shows 4,222 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 4,222 autos in (4) areas in evac.?

Answer: See response to interrogatory 51.6.

51.24 How does the estimate of 9,499 autos passing on #363 in (6) hours contrast with normal rate?

Answer: See response to interrogatory 51.6.

51.25 Is there an evacuation plan for Valley Forge Park?

Answer: See response to interrogatory 51.22.

51.26 Have Park Officials been consulted? If not, when will they be? If there is no present evac. plan for the Park, when will there be one?

Answer: Officials of the Valley Forge Park have been consulted by both Montgomery and Chester Counties. See also response to interrogatory 51.22.

51.27 Has a U.S. Department of Commerce Nov. 84 report, "Industrial impacts of Hypothetical Accidents at the Limerick Nuclear Reactor" been used in Emer. Plan.?

Answer: PEMA has no knowledge of a U.S. Department of Commerce report allegedly to be published on this subject in November 1984.

51.27\*Have industries in King of Prussia area been consulted on Emer. Planning? Industries in 10 mile zone?

Answer: Industries within the plume exposure pathway EPZ have been consulted in regard to emergency planning for Limerick. King of Prussia is not within the EPZ; therefore, industries located there have not been so consulted.

51.28 How will gasoline/diesel fuel supply be assured for evacuation.

Answer: The availability of gasoline and diesel fuel should be addressed in the municipal plans. In addition the Governor's Energy Council is responsible during a radiological emergency for emergency fuel allocation to assure adequate fuel availability to support an evacuation.

51.29 Will gas stations on evacuation routes be designated for evac. emergency?

Answer: The locations of gasoline supply within municipalities inside the EPZ will be shown in municipal plans. Gasoline and diesel fuel on main evacuation routes will be available from mobile sources provided by the Pennsylvania National Guard.

51.30 Have any shopping malls and centers in King of Prussia been consulted re evac. planning?

Answer: Montgomery County has consulted with the management of the King of Prussia Shopping Mall in regard to that county's plan to use the Mall as a staging area.

51.31 If not, when will they be?

Answer: See response to interrogatory 51.30.

July 11, 1984

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) )

AFFIDAVIT OF RALPH J. HIPPERT

I, Ralph J. Hippert, being duly sworn, state as follows:

1. At present I am the Deputy Director, Office of Plans and Preparedness, Pennsylvania Emergency Management Agency.
2. I contributed to and supervised the responses to Limerick Ecology Action's Interrogatories 1-51.
3. I hereby certify that the answers are true and correct to the best of my knowledge.



*Ralph J. Hippert*

Ralph J. Hippert, Deputy Director  
Office of Plans and Preparedness  
Pennsylvania Emergency Management  
Agency

Subscribed and Sworn to before me  
this 11th day of July 1984

*Carl C. Kuehn II*  
\_\_\_\_\_  
Notary Public

CARL C. KUEHN II, Notary Public  
Indiana, Indiana County, Pa.

My commission expires: My Commission Expires April 29, 1985

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) )

AFFIDAVIT OF KENNETH R. LAMMISON

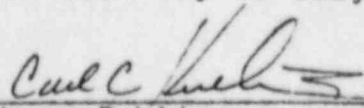
I, Kenneth R. Lammison, being duly sworn, state as follows:

1. At present I am the Director, Office of Response and Recovery, Pennsylvania Emergency Management Agency.
2. I contributed to the responses to Limerick Ecology Action's Interrogatories 12, 15, 16 and 50.
3. I hereby certify that the answers are true and correct to the best of my knowledge.



  
Kenneth R. Lammison, Director  
Office of Response and Recovery  
Pennsylvania Emergency Management  
Agency

Subscribed and Sworn to before me  
this 11th day of July 1984

  
\_\_\_\_\_  
Notary Public

My commission expires: My Commission Expires April 27, 1985

CARL C. KUEHN II, Notary Public  
Indiana, Indiana County, Pa.

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) )

AFFIDAVIT OF DONALD F. TAYLOR

I, Donald F. Taylor, being duly sworn, state as follows:

1. At present I am the Director, Office of Training and Education, Pennsylvania Emergency Management Agency.
2. I contributed to the responses to Limerick Ecology Action's Interrogatories 25, 26, 31.
3. I hereby certify that the answers are true and correct to the best of my knowledge.



*Donald F. Taylor*  
Donald F. Taylor, Director  
Office of Training and Education  
Pennsylvania Emergency Management  
Agency

Subscribed and Sworn to before me  
this 11th day of July 1984

*Carl C. Kuehn II*  
Notary Public

My commission expires: ~~My Commission Expires April 29, 1985~~  
CARL C. KUEHN II, Notary Public  
Indiana, Indiana County, Pa.

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) )

AFFIDAVIT OF MARGARET A. REILLY

I, Margaret A. Reilly, being duly sworn, state as follows:

1. At present I am Chief, Division of Environmental Radiation, Bureau of Radiation Protection, Pennsylvania Department of Environmental Resources.
2. I contributed to the response to Limerick Ecology Action's Interrogatory No. 48.
3. I hereby certify that the answers are true and correct to the best of my knowledge.

*Margaret A. Reilly*

Margaret A. Reilly, Chief  
Division of Environmental Radiation  
Bureau of Radiation Protection  
Pennsylvania Department of  
Environmental Resources

Subscribed and Sworn to before me  
this 11th day of July 1984

*Joyce Stare*  
Notary Public

My commission expires: \_\_\_\_\_

JOYCE STARE, Notary Public  
Harrisburg, Dauphin Co., Pa.  
My Commission Expires Nov. 13, 1984

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

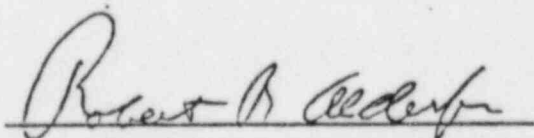
AND

ALDERFER TRANSPORTATION COMPANY

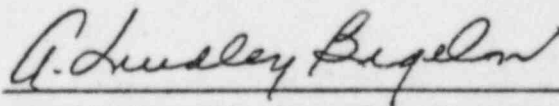
The Alderfer Transportation Company hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.



Alderfer Transportation Company



A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

10 April 84  
Date

4/4/84  
Date

Attachment: Contact List



LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

CMD SERVICES

The CMD Services hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Charles L. Robinson (Pres.)

CMD Services

A. Lindley Bigelow

A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

2-12-84

Date

4/4/84

Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

HAGEY'S BUS SERVICE

The Hagey's Bus Service hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Brian Hagey V.P.  
Hagey's Bus Service

A. Lindley Bigelow  
A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

4/9/84  
Date

n 4/4/84  
Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

HATBORO-HORSHAM SCHOOL DISTRICT

The Hatboro-Horsham School District hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Clifford Henderson  
Hatboro-Horsham School District

A. Lindley Bigelow  
A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

4/17/84  
Date

4/4/84  
Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

WILSON METZ BUS SERVICE

The Wilson Metz Bus Service hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Wilson Metz  
Wilson Metz Bus Service

A. Lindley Bigelow  
A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

April 9, 1984  
Date

4/4/84  
Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

POTTSTOWN TRANSIT

The Pottstown Transit hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

*Charles Lukassin*

Pottstown Transit

*A. Lindley Bigelow*

A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

4-12-84

Date

4/4/84

Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

SUPERIOR BUS SERVICE, INC.

The Superior Bus Service, Inc. hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Barry A. Ferla  
Superior Bus Service, Inc.

A. Lindley Bigelow  
A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

4/9/84  
Date

4/4/84  
Date

Attachment: Contact List

LETTER OF UNDERSTANDING

AGREEMENT

BETWEEN THE MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

AND

TRANSPORTATION SERVICES, INC.

The Transportation Services, Inc. hereby agrees to provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natural disasters, including an incident at the Limerick Generating Station.

The contact persons in the event of an emergency are identified on the attached list.

This agreement shall remain in effect until rescinded by either party in writing.

Donald Hazy, President  
Transportation Services, Inc.

A. Lindley Bigelow  
A. Lindley Bigelow, Coordinator  
Montgomery County Office of  
Emergency Preparedness

4/13/84  
Date

4/4/84  
Date

Attachment: Contact List



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
P.O. BOX 3321  
HARRISBURG, PENNSYLVANIA 17105



May 9, 1984

Mr. Timothy R. S. Campbell  
Director  
Chester County Department  
of Emergency Services  
Hazlett Building  
West Chester, Pennsylvania 19380

Dear Mr. Campbell:

This letter is in response to your letter of April 23, 1984, concerning Tredyffrin-Easttown School District's refusal to allow the use of their school buses in the event of an emergency at the Limerick Generating Station.

Under Section 7301 of Act 1978-323, P.L. 1332, the Governor has the power to commandeer or utilize any private property and all available resources of the Commonwealth Government and each political subdivision of the Commonwealth as reasonably necessary to cope with a disaster emergency. Such an extreme measure would be resorted to by the Governor only under very exceptional circumstances.

It is preferable to turn to other school districts and other sources of commercial buses and seek agreements for their use as needed subject to reasonable compensation subsequent to the emergency. There are precedents for this type of compensation for reasonable costs, and several risk counties have made these kinds of agreements part of their plan. For example, Lebanon County has agreements with A.P. Bucks Bus Company and the County of Lebanon Transit Company. Copies of these agreements are attached for your information.

After you have exhausted all possible bus resource entities in Chester County and still have a shortage of buses, then you should list the shortages in your plan for action by the state.

Sincerely,

Adolph L. Belser  
Director  
Office of Plans and Preparedness

ALB/TJC:jmb (Tel: 717-783-8150)  
Attachments





COLT

THE COUNTY OF LEBANON TRANSIT AUTHORITY

July 5, 1983

Clyde Miller, Director  
Lebanon County Emergency Management Agency  
Municipal Building  
Lebanon, PA 17042

RE: TMI Emergency Evacuation

Dear Mr. Miller:

Pursuant to your telephone inquiry, the Board of Directors of the County of Lebanon Transit Authority approved the use of COLT owned vehicles for use by your office during any emergency evacuation of Lebanon County citizens relating to any declared emergency incident at the Three Mile Island nuclear facility.

Such action was taken at the June meeting of the Board and is contingent upon operation of the vehicles by regularly assigned COLT drivers operating through COLT's purchase of service contractors namely Lebanon Coach Company and Super Cab Company.

The action is also contingent upon approval by COLT's insurance carrier who has indicated such approval will be granted.

The following vehicles are involved:

- 7 - 31 passenger Blue Bird diesel buses
- \*4 - 15 passenger Steyr diesel buses
- 3 - 45 passenger GMC diesel buses
- 3 - 12 passenger Chevrolet vans
- \*2 - 7 passenger Chevrolet vans
- \*1 - 18 passenger Chevrolet bus

\* - Handicap lift equipped.

The listed capacity of the 14 diesel buses involves seating capacity. In all cases these vehicles have a designed additional standing capacity of at least 50%.

Sincerely,

James G. Krause, Director  
County of Lebanon Transit Authority

CPHANGE 2  
AUGUST 1983

JGK/ksl

T-12-1

# A. P. Bucks & Sons, Inc.

Chartered Bus Service ♦ Coal

R. D. 2, BOX 439, PALMYRA, PA.

Phone 838-4611

AUGUST 5

19 83

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We A.P. Bucks & Sons, Inc. will supply necessary number of buses needed by South Londonderry Township in the event of emergency evacuation at ~~3-Mile~~ Island.

A.P. Bucks & Sons, Inc.

*Earl Bucks Jr.*

# COUNTY OF CHESTER

## COMMISSIONERS

Earl M. Baker, Chairman

Robert J. Thompson

Patricia Moran Baldwin

## DEPARTMENT OF EMERGENCY SERVICES

14 East Biddle Street, West Chester, PA 19380 (215) 431-6160

Timothy R. S. Campbell  
Director

April 23, 1984

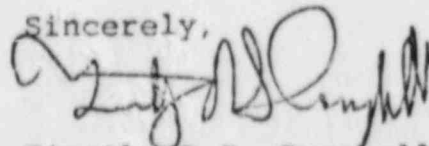
Mr. Otto Selser  
Director of Planning  
Pennsylvania Emergency  
Management Agency  
P.O. Box 3321  
Harrisburg, PA 17105

Dear Otto:

Attached is a letter from the Tredyffrin-Easttown School District outlining their reasons for refusing to agree to the use of Tredyffrin-Easttown school buses in the event of an emergency at the Limerick Power Plant. They make reference in their response to the ability of the Commonwealth to commandeer buses in the event of an emergency.

Does such an authority exist and in whom does it lie? What are the methods for activating such commandeering should the authority exist? If the authority does not exist, exactly what is the obligation of a non-risk zone school district to use its resources to assist a risk zone school district while the students who have been entrusted to its care by their parents are still on school property and under school authority? What methods or suggestions would you have to resolve this issue? I would appreciate hearing from you at your earliest convenience about this matter.

Sincerely,



Timothy R.S. Campbell  
Director of Emergency Services

Attachment

cc: John Shannon



Founded 1682





TREDYFFRIN/

SCHOOL DISTRICT

First & Bridge Avenues, Berwyn, Pennsylvania 19312 215 644-6600

OFFICE OF THE SUPERINTENDENT

March 5, 1984

Mr. Mark Force  
Emergency Services Department of  
Chester County  
14 East Biddle  
West Chester, PA 19380

Dear Mark:

I am responding to your request for Tredyffrin/Easttown's voluntary agreement for the Chester County Emergency Commission to use 35 T/E buses in the event of an emergency situation at the Limerick Power Plant. The request was limited to the hours of 9 a.m. to 2 p.m.

T/E is aware of the State's ability to commandeer our buses in the event of an emergency. We feel, however, that voluntarily agreeing to such use would put the welfare of students in other districts ahead of the welfare of T/E students and their parents in the event of an emergency. Without use of the buses, we would not be able to safely and expeditiously deliver students to their homes.

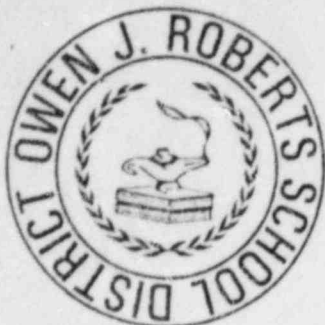
Therefore, Tredyffrin/Easttown School District is denying your request on this particular issue.

Sincerely,

Lynn Garrett  
Administrative Assistant

LG:bem

cc: Dr. George F. Garwood  
Superintendent of Schools



# Owen J. Roberts School District

Administration Building  
R.D. 1, Pottstown, Pennsylvania 19464  
Telephone (215) 469-6261

June 7, 1984

The Honorable Richard Thornburgh  
Governor of Pennsylvania  
Commonwealth of Pennsylvania  
333 Market Street  
P.O. Box 911  
Harrisburg, Pennsylvania 17108

Reference: Incomplete Inadequate Nuclear Evacuation Plan For The  
Owen J. Roberts School District Within The Limerick  
Nuclear Planning Area

Dear Governor Thornburgh:

Nineteen (19) months ago the Owen J. Roberts School District established a Citizens' Task Force for the purpose of the development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency at the Limerick nuclear facility.

This Citizens' Task Force is comprised of representatives from the seven (7) townships comprising the School District; township supervisors; NORCO Fire Company; Technical School; employee union representatives from custodial, secretarial, teachers, and cafeteria; parent representatives from all of our schools; and a number of concerned citizens. All of the task force meetings have been advertised in the local newspapers and open to the general public.

Last evening, the School Board held an open forum on the status of the nuclear evacuation plan. This meeting was widely advertised in the local media.

The Citizens' Task Force presented its status report which, in summary, states they have identified the human and other resources needed for an evacuation; the actual available resources on hand; the unmet needs; and the alarming fact that the County Department of Emergency Services has not been able to meet any of the identified unmet needs.

The Task Force made the following recommendation to the Board of School Directors. "We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency."

Citizens were then given an opportunity to comment on the status of the evacuation plan and to give additional input. Between two and one-half (2 1/2) and three (3) hours of testimony was received by the Board of School Directors. A summation of the input revealed unanimous agreement by all present to the following: the identified human and other resources needed for a nuclear evacuation as presented are real; the calculations and procedures identified by the task force over a nineteen (19) month period to identify unmet needs are valid; and, the School District must look beyond the county to both state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

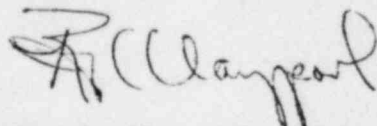
I am attaching a copy of the testimony presented by the Citizens' Task Force and also by my office.

We solicit your aid in notifying all governmental agencies of our unmet needs and the serious deficiencies in the overall master plan for a general nuclear evacuation for the citizens and children of this School District.

Both members of the Citizens' Task Force and I are prepared to give testimony on this most serious matter.

Your immediate attention and response will be appreciated.

Respectfully,



Roy C. Claypool, Ed.D.  
District Superintendent

Attachment  
/ho

OWEN J. ROBERTS SCHOOL DISTRICT  
R.D. #1, POTTSTOWN, PA. 19464

TO: Board of School Directors  
Owen J. Roberts School District

FROM: Citizens Task Force for Development of School  
Emergency Planning Guidelines

RE: Interim Progress Report on Development of  
Emergency Radiological Response Plan

DATE: June 5, 1984

This communication will inform you of the current status of the development of the Radiological Emergency Response Plan. As you know, the Citizens Task Force has worked seriously and conscientiously over the past nineteen (19) months in an honest effort to develop our District Emergency Plan. All activities of this Task Force have been completed within guidelines established by the Emergency Planning Act, the Pennsylvania Emergency Planning Agency, and the Department of Emergency Services.

As directed by these agencies, the primary objectives of the Task Force were to identify resources needed for student evacuation or sheltering; determine existing District resources; and then report all unmet resource needs to the Chester County Department of Emergency Services. The role of the Chester County Department of Emergency Services is to locate and identify additional resources required for a school district evacuation. These resources would then be appropriately documented and attached to our District and County Radiological Emergency Response Plans.

The following outline will summarize the results of the needs assessment completed by the Citizens Task Force and subsequent recommendations for Board consideration.

I. Findings of Fact

A. Resources Needed for Evacuation

1. Fifty five (55), seventy two (72) passenger buses
2. Fifty five (55) bus drivers
3. One hundred fifty six (156) student supervisory personnel
4. Twenty two (22) traffic coordinators
5. Establishment of an appropriate host school site

16

B. Current District Resources Determined After Extensive Study, Training, and Survey of District Personnel

1. Thirty (30), seventy two (72) passenger buses
2. Eighteen (18) bus drivers
3. Sixty five (65) student supervisory personnel
4. No available traffic coordinators
5. No agreement has been reached regarding the establishment of a host school site

C. Unmet Resource Needs Confirmed by the Citizens Task Force at a Meeting Held on June 4, 1984

1. Twenty five (25) additional school buses
2. Thirty seven (37) additional school bus drivers
3. Ninety one (91) additional student supervisory personnel
4. Twenty two (22) traffic controllers

D. Documentation of this Needs Assessment

1. Meeting on subject of District transportation needs and resources with representatives from the Chester County Department of Emergency Services - March 1983
2. Teacher survey - May 1983
3. Bus driver survey - May 1983
4. Joint sub-committee of Roberts Education Association and Citizens Task Force during the month of July 1983
5. Teacher and bus driver training program - November 1983
6. Teacher survey - November 1983
7. Bus driver survey - December 1983

E. Documentation of Communications Regarding Establishment of Unmet Resource Needs

1. Meeting with representatives of Department of Emergency Services - March 25, 1983
2. Letters to Chester County Department of Emergency Services dated July 20, 1983, March 13, 1984, and May 1, 1984
3. A representative of the Department of Emergency Services has attended all but two (2) regular meetings of the Citizens Task Force of the Owen J. Roberts School District and participated in all discussions of resources.



4. Letter from Department of Emergency Services informing our Task Force that additional resources have not been identified - May 25, 1984

#### F. Conclusions of Fact

1. As a result of thorough investigation and study of resources, the unmet resource needs of the Owen J. Roberts School District are real and valid.
2. None of our unmet resource needs have, as of this date, been identified and documented for us by the Chester County Department of Emergency Services.
3. Our emergency planning cannot move forward until all identified resource needs are provided by the Chester County Department of Emergency Services. Any statements regarding the location of these additional resources must be thoroughly documented in detail including letters of agreement with transportation providers, school bus drivers, supervisory personnel, traffic coordinators, host school arrangements, and all other needs established as real and valid by the Citizens Task Force.
3. If our responsibility is to provide for the safety and welfare of our students during a developing radiological emergency, it is also then our obligation to have assurance that all resources of additional equipment and personnel are of sufficient quality to evacuate our students within adequate parameters of time and safety.

#### II. Recommendations of the Citizens Task Force

- A. We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency.
- B. Since the Philadelphia Electric Corporation is scheduled to begin on-line operations of the Limerick Nuclear Power Generating Station in April of 1985, it is necessary to take an aggressive approach toward resolving the aforementioned emergency planning issues. We, therefore, recommend that communications be initiated with the Federal Emergency Planning Agency informing them of our detailed review of unmet resource needs and the lack of any response by the Chester County Department of Emergency Services.

- C. We also recommend that no Emergency Response Plan be submitted for Board approval without complete and thorough drill and exercise. If the unmet resource needs are eventually identified, we would ask that at least one planned drill be scheduled during the school day with movement of all internal and external resources to determine if emergency procedures and resources will adequately provide for student safety and welfare. In addition, we believe that at least one unscheduled drill be attempted to provide further assurance of the adequacy of the Emergency Plan.
- D. We also recommend that the Citizens Task Force for School Emergency Planning Guidelines continue to function until all emergency planning issues are resolved and the Emergency Response Plan is determined to be adequate to provide for the protection of the student enrollment of the Owen J. Roberts School District.

EXECUTIVE SUMMARY REPORT  
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Prepared and Presented By  
Dr. Roy C. Claypool,  
District Superintendent  
June 6, 1984

The statements contained within this Executive Summary Report have not been shared, in total, with anyone prior to their release tonight. They are my statements, and I stand accountable and ready to defend them as Superintendent of Schools.

In the Summer of 1982, the School District received a directive from the Department of Education establishing a need for a Radiological Emergency Response Plan for the Owen J. Roberts School District. Shortly thereafter, on August 31, 1982, the Chester County Department of Emergency Services sent a communication to the School District offering its services.

At the following September 20, 1982, School Board Meeting an open discussion took place on the need for the School District to develop such a plan. The Board sought input from citizens and at the next School Board Meeting October 18, 1982, the School Board established a Citizens' Task Force for the purpose of development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency. At the same meeting the School Board requested financial support from the Philadelphia Electric Company for the additional costs which would be incurred by the School District in the development of such a plan.

The Board also insisted that the task force meetings be open to the public and therefore, by resolution passed a motion advertising in the newspapers the first meeting of the task force would take place on November 30, 1982.

Representatives from the following agencies met on November 30, 1982. Department of Education, Harrisburg; PEMA; Chester County Department of Emergency Services; Emergency Coordinators from the seven (7) townships comprising the School District; NORCO Fire Company; Emergency Consultants, Inc.; Northern Chester County Tech School; Friends of the Arts; PTA and PTO's from all schools; employee union representatives from custodial, secretarial, teachers, and cafeteria; township supervisors; parents; and a number of concerned citizens.

During these nineteen (19) months this task force has been extremely active in attempting to accomplish their task. This task force has made a supreme effort to honestly appraise both human and other needs.

On July 20, 1983, seven (7) months into the planning process, this committee informed the Chester County Department of Emergency Services of the number of human resources and vehicles required for an evacuation plan.

From that point until March 13, 1984, sixteen (16) months into the plan, this committee attempted to realistically identify the number of employees who would participate and the actual number of vehicles which would be available during an emergency. This information was then sent to the Chester County Department of Emergency Services indicating unmet needs.

On May 1, 1984, I, as Superintendent of Schools, sent a communication to the Chester County Department of Emergency Services identifying additional unmet needs, and requested a detailed response by June 1st on how these needs would be met.

On May 25, 1984, the Chester County Department of Emergency Services informed the District that the identified needs have not been met at this point in time. On Monday, June 4th, I met with the Citizens' Task Force for a period of approximately two (2) hours for the purpose of reexamining the additional unmet needs as identified by my office on May 1, 1984. At the conclusion of that meeting all previously identified unmet needs were classified as real and valid.

As we have heard this evening, the task force is recommending that they continue their efforts.

The nuclear plant is tentatively scheduled to go on-line within the next ten (10) months. The agency responsible for meeting our unmet needs [the Chester County Department of Emergency Services] has been unable over the past four (4) months to meet any of our unmet needs. Can a limited operation such as the Chester County Department of Emergency Services [given even the most dedicated and competent staff] meet our unmet needs within the next ten (10) months??

Can they deliver the additional buses? Can they provide the additional human resources? Will they train these people for the specific functions needed such as bus drivers, traffic coordinators, and adult volunteers? Do they have sufficient funds to meet these unmet needs? Both my analytical mind and my intuition say no to all of the above.

These unmet needs have been public knowledge for at least five (5) weeks. To date not one governmental body, regulatory agency or individual has contacted my office to challenge the validity of these needs. I can only assume that there is either concurrence on these needs or a deliberate decision has been made to ignore these documented unmet needs.

I will not recommend any plan that first, does not meet these documented unmet needs; second, does not guarantee parents access to their children; third, does not address the resolution of the added expense to this School District; and fourth, does not answer the following additional questions.

Why are school age children not included in a selective evacuation along with preschool age children?

When an order to prepare for an evacuation occurs, our switchboard will be rendered useless in the first five minutes. We rely solely on telephones for both internal and external communications. Can the switchboard handle this overload and can the general telephone utility cover the overload?

Serious challenges to sheltering as a safety option have been raised with no satisfactory answers. If PEMA orders sheltering, how safe, how long before contamination and/or rays penetrate? Parents will surely converge on our schools to gain access to their children.

Is Twin Valley, our alleged host school, far enough away? Is it not in the ingestion exposure pathway?

What provisions are being planned by municipalities for alternative routing in the event of inclement weather such as ice, snow, etc. Routes 23 and 100 usually provides us with one or two accidents delaying our bus runs.

Whose time frames are we going to use to determine the absolute minimum time needed to properly evacuate students and employees?

Where in this country has a greater effort been made over a nineteen (19) month period to develop an adequate evacuation plan?

As the time draws nearer for the opening of the plant, parents are feeling and exhibiting increased stress over the health and safety of their children. We will not compromise either the health or safety of our children or employees in order to have an evacuation plan that is not adequate and implementable.

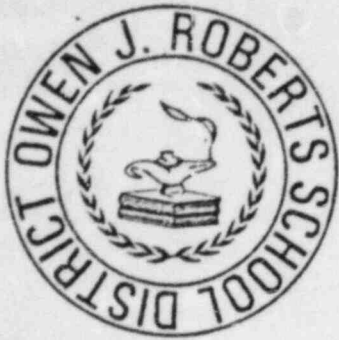
What are the legal liability exposures of the School District, the School Board, individual School Board members, District Superintendent, employees, and volunteers? If additional liability insurance is needed, who will pay for the insurance?

State and federal planners have been quick to identify, in detail, local responsibilities both financial and legal, but no visible effort to meet any of our unmet needs.

It is my opinion that we must look beyond Chester County to both the state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

Let us not spend these next few months debating how to rearrange the chairs on the deck of the Titanic. Instead, join forces with the task force in seeking a resolution to our unmet needs, as well as educating those in a decision making role the serious deficiencies in the existing planning structure, and the attitude that given an emergency of this magnitude citizens will rise up and solve the problem.

P. Claypool      6/6/84  
Signature                      Date



# Owen J. Roberts School District

Administration Building  
R. D. 1, Pottstown, Pennsylvania 19464  
Telephone (215) 469-6261

May 1, 1984

Mr. John McNamara  
Chester County Department of Emergency Services  
14 E. Biddle Street  
West Chester, PA 19380

RE: •Need for Detailed Response to Citizens Task Force Letter Dated  
March 13, 1984  
•Request to Respond to Additional Unmet Needs As Perceived By  
District Superintendent As Contained Within This Document

Dear Mr. McNamara:

Over the past couple of months, I have had extensive interaction with the Board of School Directors, individual Board members, and Joseph Clark, Administrative Representative to the Citizens' Task Force for School Emergency planning for the Owen J. Roberts School District. Last Friday, April 27, I spent three (3) hours with Mr. Clark reviewing in detail the status of Draft 7. During this session Mr. Clark informed me that he had telephoned your office to see if any response was forthcoming in reference to his letter of March 13, 1984.

Since my meeting with Mr. Clark I have spent an additional six (6) to eight (8) hours thoroughly reviewing Draft 7, and Mr. Clark's communication to you dated March 13, 1984.

I met with the Board of School Directors last evening, April 30<sup>th</sup>, to present my concerns which will be amplified in this communication. I, therefore, request that a detailed response be presented, in writing, to both the Citizens' Task Force letter of March 13<sup>th</sup>, as well as my additional concerns identified herein.

The Owen J. Roberts Citizens' Task Force has spent approximately a year and a half examining this most difficult concept. Prior to the end of this fiscal year I am requesting that the Board of School Directors meet with the Task Force for a thorough and complete update of the proposed Emergency Response Plan. Therefore, it is imperative that we receive from you a written communication no later than June 1, 1984.

Before presenting my concerns, I realize the difficult function you must perform, but I am also aware of Murphy's Law in an emergency situation.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

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In reference to Mr. Clark's letter of March 13, 1984, I believe the Citizens' Task Force identification of needs are minimal and reflect optimum conditions. That is to say, after thorough review and investigation I believe their needs are in some cases understated. In order to expedite your communication, I will restrict my identification of unmet needs to vehicles required for evacuation, bus drivers needed for evacuation, teachers and employees needed for evacuation, traffic coordinators, and last, but not least, the fact that Owen J. Roberts does not have a host center.

Until such time as these unmet needs identified herein are thoroughly delineated by your agency as being available under the most adverse conditions, no valid evacuation plan [in my opinion] could possibly be feasible. A general statement that these unmet needs will be resolved, or have been resolved without specific details involving how these needs have been met will be unacceptable due to the seriousness of the situation, and our complete reliance on outside resources to conduct an evacuation under the most optimum conditions.

SEVENTY-TWO (72) PASSENGER VEHICLES NEEDED FOR EVACUATION

ALL PERSONNEL AND STUDENTS

Total Vehicles Needed, Fifty-Five (55) Seventy-Two (72) Passenger Buses.

Vehicles available thirty (30). Please note this is smaller number than that identified by the consultant and the District Task Force. This figure is reduced by ten (10) vehicles for the following reason. A number of contracted drivers keep school buses at home. If this evacuation should take place between the period of 9:30 A.M. and 1:30 P.M., it is very likely that at least fifty percent (50%) of these buses will not be operating because the driver either cannot get back to the bus or has elected to take care of higher family needs. Therefore, I conclude the unmet vehicle needs amount to twenty-five (25) buses.

Please identify where these twenty-five (25) buses will be coming from, as well as, will the twenty-five (25) drivers bringing the buses into our District drive these buses during evacuation??

BUS DRIVERS

The initial survey indicated that twenty-five (25) of our District drivers will drive a school bus during a radiological emergency. However, many of these drivers did preface their statement stating that their families would come first, and they must be assured that their particular children had been taken care of. Knowing Murphy's Law in emergency situations, I believe that the twenty-five (25) figure more realistically would be a maximum of eighteen (18).

Therefore, I conclude that our unmet driver needs to be thirty-seven (37) drivers. If you are successful in acquiring twenty-five (25) buses and twenty-five (25) drivers from outside our area, there is still a need for twelve (12) additional drivers. Please identify where these drivers would be coming from.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

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### TEACHER NEEDS EVACUATION

As you are aware, the Task Force did survey our teachers at least twice. The second survey coming after an extensive inservice on the duties and responsibilities of teachers during an evacuation.

Our teachers were very open, and I believe honest, in their responses to this survey. Human nature is to first of all secure unmet family needs.

Sixty-six percent (66%) of our professional staff responded to this survey. This sixty-six percent (66%) response equates to one hundred thirty-seven (137) individuals. Please be advised, however, that only sixty percent (60%) of those responding signed the document. Therefore, a more realistic teacher need will be based on the number who signed the survey.

A summary of the survey is as follows:

QUESTION: Will you be willing to accompany students by bus to the host center or mass care center?

The number who signed the document equates to approximately thirty-eight (38) teachers.

QUESTION: Will you be willing to drive your own vehicle [without students] to the host school or mass care center to provide supervision for our students?

The number who signed the document equates to approximately fifty-six (56).

Teacher absences were not factored into the estimate. During November, for example, we had a daily absence of 13.5 teachers.

From the data available, I would conclude that, again giving Murphy's Law, human reaction to emergency situations and family needs, that internal staff resources accompanying students and attending to students at host centers will be more in the neighborhood of sixty (60) to sixty-five (65) teachers.

Our total teaching staff to date is two hundred eight (208) teachers to supervise our current enrollment. If we were to reduce our supervisor ratio by twenty-five percent (25%), we would still have a total need for approximately one hundred fifty-six (156) teachers. With only sixty-five (65) anticipated local teachers, there is a definite need for at least ninety-one (91) adult volunteers to assist students by bus or by car to the host school or mass care center. Who are these ninety-one (91) volunteers and where will they be coming from?

I have not attempted to address the issue of sheltering for I believe we need to have the resources determined for evacuation and if they be resolved, then sheltering would be resolved.



May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

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TRAFFIC COORDINATORS

As the time draws near for the opening of the plant, it is quite clear that our citizens have every intention of coming directly to our facilities in order to pick up their children in the event of an emergency. In no way will the School Administration prevent parents from picking up their children. Therefore traffic controllers will be an absolute must at each of our educational centers.

I predict the need for the following traffic controllers, in addition to school employees, at each of the following educational centers:

WARWICK ELEMENTARY CENTER	3 Traffic Controllers
FRENCH CREEK ELEMENTARY CENTER	3 Traffic Controllers
VINCENT ELEMENTARY CENTER	3 Traffic Controllers
EAST COVENTRY ELEMENTARY CENTER	3 Traffic Controllers
NORTH COVENTRY ELEMENTARY CENTER	4 Traffic Controllers
CENTRAL CAMPUS	a minimum of 6 Traffic Controllers
TOTAL	<u>22</u> Traffic Controllers

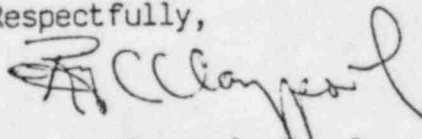
In addition to traffic controllers, I raise a serious question as to the traffic controlling activities that will take place at the intersection of Routes 23 and 100, Route 100 and Cadmus Road, and Route 23 and the exit from Owen J. Roberts. My personal interaction with a number of parents indicates that the first response will be to converge on our educational centers for the purpose of gaining access to their children. Unless this need is met, we will experience mass hysteria, confusion, and total blockage of any possible evacuation from our school facilities by school buses.

HOST SCHOOLS

As of this date we still do not have any agreement with another school district in the case of an evacuation.

I request your immediate attention to these most serious questions. Members of my staff and I would be more than happy to sit down with you, at your convenience, to discuss in detail our concerns as well as the content of this communication.

Respectfully,



Roy C. Claypool, Ed. D.  
District Superintendent



# Federal Emergency Management Agency

Region III 6th & Walnut Streets Philadelphia, Pennsylvania 19106

JUN 25 1984

Roy C. Claypool, Ed.D.  
District Superintendent  
Owen J. Roberts School District  
Administration Building  
R.D. 1  
Pottstown, PA 19464

Dear Dr. Claypool:

Thank you for your letter regarding the current status of the Owen J. Roberts School District's "Radiological Emergency Response Plan for Incidents at the Limerick Generating Station." As you note on page two of your letter, the School District is looking beyond Chester County to the State and Federal governments for immediate help in meeting your unmet needs and also to demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan.

As you are probably aware, the Federal Emergency Management Agency (FEMA) has been tasked with the responsibility of evaluating offsite emergency plans and preparedness for areas surrounding commercial nuclear power plants. This process includes reviewing plans, observing and evaluating joint exercises with the utility, and assuring that a public meeting is held to discuss the plans and the exercise.

The Pennsylvania Emergency Management Agency (PEMA) has submitted a complete set of draft plans for review by FEMA, Region III. The package included plans for the three risk Counties, forty-two risk municipalities, thirteen risk school districts and two support Counties. These plans underwent a thorough examination by this office as well as by the Regional Assistance Committee (an organization, chaired by FEMA, that is made up of eight other Federal agencies involved in preparedness for, and response to, an emergency at a commercial nuclear power plant). Upon completion of the review, our office forwarded detailed comments to PEMA for their use in revising and upgrading the various offsite emergency response plans. These comments have also been passed on, by PEMA, to the risk Counties.

Although FEMA is not a regulatory agency, such as the Nuclear Regulatory Commission (NRC), we have established a cooperative working relationship with the Commonwealth of Pennsylvania and with local governments in order to ensure that the best radiological emergency response effort possible is developed to protect citizens living within the vicinity of the Limerick Generating Station.

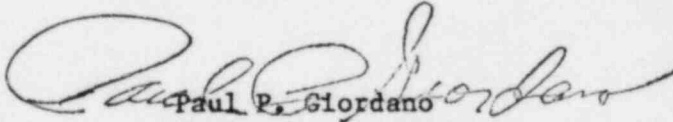
We share your concerns regarding the unmet needs identified by your School District. One of the major issues we highlighted in our report to PEMA, regarding the draft offsite plans, was the fact that it was evident that there were many unresolved items, from both a personnel and resource standpoint. However, we also acknowledged the considerable effort that had gone into the planning process.

In a conversation with an official from the Chester County Department of Emergency Services it is evident that the work continues in an attempt to resolve your unmet needs. PEMA has informed us that Chester County has not supplied them with a list of unmet needs as of this date. Until such time as PEMA formally requests assistance in providing otherwise unobtainable resources, FEMA, Region III will not interfere in the emergency preparedness process established by emergency management officials at the State and local level.

However, you can be assured that when the planning and preparedness process reaches a more conclusive stage, we will re-examine the plans once again. If any inadequacies still exist, they will be brought to the attention of the NRC for their utilization as part of the licensing process of the Limerick plant.

In the meantime, if we can be of further assistance in this matter, please do not hesitate to contact Mr. James R. Asher, Regional Assistance Committee Chairman at 597-8664.

Sincerely,

  
Paul P. Giordano  
Regional Director

cc: Ralph J. Hippert, PEMA ✓  
Timothy R. S. Campbell, Director  
Chester County Department of  
Emergency Services

RADIOLOGICAL EMERGENCY RESPONSE PLAN

FOR THE

(Name of Day Care Center, Home or Nursery School)

FOR INCIDENTS AT THE

LIMERICK GENERATING STATION

Adopted: \_\_\_\_\_  
(Date)

This plan has been prepared by the (director/owner) of the (name of day care center/home or nursery school) for response to an incident at the Limerick Generating Station. This plan is in consonance with the (name of municipality) Radiological Emergency Response Plan and is effective on this date.

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signed)

\_\_\_\_\_  
(Typed Name)

\_\_\_\_\_  
(Title)

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I. REFERENCES

- A. Pennsylvania Emergency Management Act of 1978, P.L. 1332.
- B. (Name of municipality) Radiological Emergency Response Plan.
- C. (Appropriate DPW or DOE Regulations.)

II. PURPOSE

The purpose of this plan is to be prepared for response to a serious incident at the Limerick Generating Station to ensure the safety of the children enrolled in the (name of day care center/home or nursery school).

III. DEFINITIONS

- A. Limerick Generating Station is referred to in this plan as LGS.
- B. Emergency Planning Zone (EPZ) - A generic area of approximately ten miles radius around a fixed nuclear facility. Inside the EPZ the populace must be prepared to take protective actions in response to a serious incident at the fixed nuclear facility to include sheltering and evacuation.
- C. Fixed Nuclear Facility Incident - An event or condition at a fixed nuclear facility which could result in impact on public health or safety. Four incident classifications have been identified from the least serious to the most serious.

Descriptions of the four emergency classifications are:

- 1. Unusual Event - Event(s) are in process which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring

off-site response or monitoring are expected unless further degradation of safety systems occur.

2. Alert - Event(s) are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any radioactive releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
  3. Site Emergency - Event(s) are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Any radioactive releases are not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.
  4. General Emergency - Event(s) are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protection Action Guideline exposure levels off-site for more than the immediate site area.
- D. Protection Action Guide (PAG) - A preestablished projected radiation dose to individuals which warrants protective action.
- E. Protective Action - An action taken to avoid or reduce a projected dose of radiation.
- F. Projected Dose - An estimate of the radiation dose which affected individuals could potentially receive if protective actions are not taken.



- G. Sheltering - Action taken to take advantage of the protection against radiation exposure affected by remaining indoors, away from doors and windows.

#### IV. POLICY GUIDELINES

- A. In the event a radiological emergency should occur during the time the (name of day care center/home or nursery school) is in session, the director or designated representative, will implement this plan and take such other actions as might be required for the safety of the children.
- B. This plan will be reviewed and updated annually.
- C. This plan will be used to orient the staff and faculty.
- D. If an incident reaches the level of Site Emergency, parents or contact persons will be called to pick up their children. When the (center, home or nursery school) is emptied of all children, it will be closed until the emergency is ended.
- E. Should an evacuation of any children be required, sufficient teachers, or support staff will accompany the children to provide adequate teacher-to-child ratios. Children will be evacuated to (name of host day care center or school and address) which is outside the emergency planning zone.
- F. Transportation required for evacuation is the responsibility of the (center, home or nursery school).
- G. Evacuated children will remain the responsibility of the (day care center, home, or nursery school) until the children are picked up by their parents or other authorized persons.

- H. Children will be tagged for identification purposes (see Appendix 1).
- I. Record of costs will be maintained and documented as a basis for claims.

V. NOTIFICATION PROCEDURES

- A. The (day care center, home or nursery school) director will receive emergency information from the (name of city, borough or township). The information will be logged, the staff will be informed, and the host facility will be notified.
- B. In the event of a Site Emergency or General Emergency, parents or emergency contact persons will be notified to pick up their children. At the option of the director, this action may be moved up to the Alert classification.
- C. The local Emergency Broadcast Station (EBS) will be monitored for additional information and instructions. The EBS station is (call letters and frequency).

VI. CONCEPT OF OPERATIONS

- A. Unusual Event. No action required, and no notification will be received.
- B. Alert.
  - 1. Alert all staff members.
  - 2. Notify host facility.
  - 3. Notify emergency contact persons and advise them of the situation. Alternatively, at the discretion of the director, the emergency contact persons may be notified to pick up their children.

4. Identify transportation needs.
5. Notify transportation resources.
6. Monitor EBS stations.

C. Site Emergency

1. Alert all staff members.
2. Notify host facility.
3. Notify emergency contact persons to pick up their children.
4. Transportation resources are assembled if needed.
5. Prepare to take shelter or evacuate, if necessary.  
Monitor EBS station.
6. After all children are picked up, close the school and report status to the (name of city, borough or township) at (telephone number).
7. Remain closed until notified that the incident is terminated.

D. General Emergency

1. Accomplish all of the actions shown above for Site Emergency.
2. Prepare to take shelter or evacuate, if necessary.

E. Take Shelter Actions

In the event that an order is received to take shelter, the following actions will be taken:

1. Notify all staff members.
2. Close all outside doors, windows and vents to heating or air conditioning systems.
3. Move children to the most interior part of the building, preferably in the basement.
4. Ensure the ready availability of drinking water, snacks, and first aid supplies.

#### F. Evacuation Actions

In the event that an order is received to evacuate, the following actions will be taken:

1. Notify all staff members.
2. Notify host facility.
3. Tag children and prepare them for movement.
4. Follow designated main evacuation routes out of the emergency planning zone, then proceed to host facility.  
See attached strip map, Appendix 2.
5. Monitor EBS station.
6. Report departure time to municipal emergency operations center. (Phone Number)
7. At the host facility, arrange for the safe transfer of the children to their parents or designated emergency contact persons.
8. When the facility is evacuated, post the location of the site to which children have been evacuated.

#### G. Children Pick Up

Parents or authorized persons must present identification (Social Security Card, Driver's License, etc.) to the staff personnel and sign a release form.

#### VII. COMMUNICATION WITH PARENTS

Parents of all children will be fully informed of this plan.

See Appendix 3.

#### VIII. DISTRIBUTION

This plan is distributed as follows:

1. Office of the Director
2. Each staff member
3. Department of Public Welfare Regional Office (or Department of Education in the case of nursery schools).
4. (Name of city, borough or township in which the center, home, or nursery school is located.)
5. (name of county in which the center, home or nursery school is located) Emergency Management Agency.
6. (Name of host facility.)

APPENDIX 1

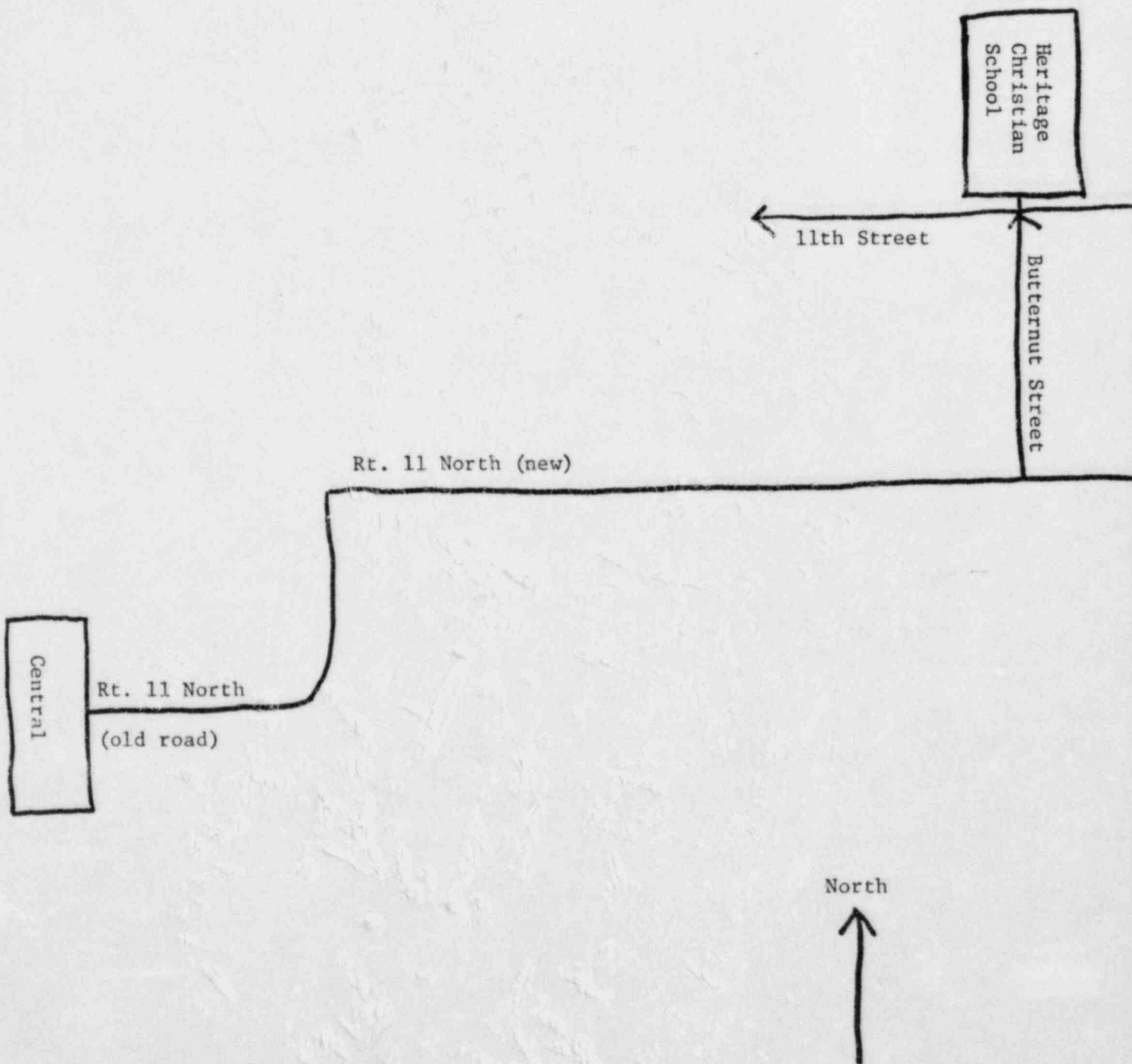
IDENTIFICATION TAG INFORMATION

To be developed.

APPENDIX 2

STRIP MAP

Note: This is an example of a strip map for purposes of illustration only.



APPENDIX 3

NAME OF DAY CARE CENTER OR NURSERY SCHOOL

Location

Dear Parent:

In the event of an incident at the Limerick Generating Station requiring response on the part of the population residing here, this (day care center or home or nursery school) has plans for the protection of your child.

The purpose of this letter is to inform you about the essential information contained in our plan.

There are four emergency classifications for incidents at the Limerick Generating Station. They are (1) Unusual Event, (2) Alert, (3) Site Emergency, and (4) General Emergency.

An Unusual Event poses no danger and requires no action to protect your child.

An Alert poses no danger off the site of the Limerick Generating Station, but the incident could become worse. During an Alert we shall begin our telephone calls to notify you or your designated emergency contact person and our prearranged host facility of the situation. Based upon information available at that time, we might decide to exercise an option to begin closing the (center, home or school). In that event, you or your designated contact person will be called and asked to pick up your child.



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A Site Emergency still poses no danger except possibly near the Limerick Generating Station site boundary, but the situation is worsening. Consequently, at Site Emergency we shall call you or your designated emergency contact person to pick up your child. When all children have been picked up the (center, home or school) will be closed until the emergency is over.

A General Emergency could lead to sheltering or evacuation of the population. If there are any children still here when an order to take shelter or to evacuate is received, we are prepared to comply. If an evacuation is necessary we shall evacuate the children to (name of center, home or school) and (complete address) where you can pick up your child. This host facility is located outside of the emergency planning zone, and it is a safe location for your child until you or your designated emergency contact person can arrive there. Once an evacuation order is made, please go to the host facility, instead of attempting to pick up your child here.

Parents or the designated emergency contact person will be required to provide proper identification at the time of pick up and to sign a release form.

Please be assured that in the event of an incident at the Limerick Generating Station we are prepared to protect your child.

As you know, in the event of an incident at the Limerick Generating Station you should stay tuned to our local EBS radio station

Page Three

for the latest information and instructions.

If you have any questions about our plan, please call us.

Cordially,

---

(Signed)

(Typed name)

(Title)

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  
 ) 50-353  
 )  
(Limerick Generating Station, )  
Units 1 and 2) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "Response of Pennsylvania Emergency Management Agency to Limerick Ecology Action's First Set of Interrogatories and Request for Production of Documents on Offsite Emergency Planning Contentions" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Commonwealth of Pennsylvania's internal mail system, this 11th day of July 1984:

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U. S. Nuclear Regulatory  
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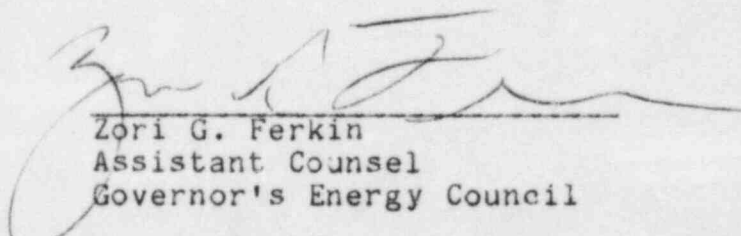
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Date: July 11, 1984