

SEP 28 1984

Docket Nos. 50-352/353

Mr. Edward G. Bauer, Jr.
Vice President & General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: PROPOSED RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR SKIPPACK TOWNSHIP
FOR INCIDENTS AT LIMERICK

The enclosed letter to Alan E. Boroff, solicitor for the Skippack Township Board of Supervisors, from the Pennsylvania Emergency Management Agency dated August 16, 1984, responds to the concerns of the Township regarding the proposed radiological emergency response plans for Skippack Township for incidents at the Limerick Generating Station. The Pennsylvania Emergency Management Agency response addresses the specific concerns of the Township and suggests further coordination between the Township and Montgomery County as well as with the State to completely resolve the concerns raised by the Skippack Township Board of Supervisors.

The enclosed letter is forwarded to you with our request that you continue to coordinate the emergency planning efforts with those of the State and local planning authorities to ensure that the concerns of the Skippack Township Board of Supervisors are addressed in a timely manner.

Sincerely,

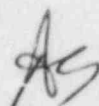
A. Schwencer, Chief
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Division of Licensing

Enclosure: As stated

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PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY

P.O. BOX 3321

HARRISBURG, PENNSYLVANIA 17105



August 16, 1984

Mr. Alan E. Boroff
Boroff, Harris & Heller
650 Blue Bell West - Suite 320
Blue Bell, Pennsylvania 19422

Dear Mr. Boroff:

In response to your June 22, 1984 letter regarding the proposed radiological emergency response plan submitted to Skippack Township by Energy Consultants, I first wish to assure you that the delay in acknowledging the letter has not been due to a lack of concern for the issues that have been raised.

The concerns you have expressed on behalf of the Board of Supervisors about Draft 5 of the proposed plan are certainly real and indeed should be resolved before the plan is adopted by Skippack Township. The real issue, however, is how this can best be accomplished. It obviously will require coordination between the Township and Montgomery County, as well as with the Commonwealth. Perhaps the following discussion of the specific concerns will be helpful.

1. Personnel staffing to provide a 24-hour response is a problem that every municipality must face at the local level if it is to meet any emergency that might arise, and not only in the event of an accident at the Limerick Generating Station. Few, if any, municipalities have a paid staff large enough to provide such personnel and they must rely upon volunteers for augmentation. A determination needs to be made by the Township as to how many individuals are really needed to man an emergency operations center for a municipality the size of Skippack. Using 12 rather than 8-hour shifts can often ease the problem. The fact that Skippack does not have a police force is indeed a problem but can it perhaps be solved by an agreement with whomever is charged with providing such service under normal conditions? If this is not possible, is it feasible to utilize some type of auxiliary police? The unwillingness of the volunteer Skippack Fire Company to participate in the event of a radiological emergency is unusual and a position not previously encountered as plans were developed by municipalities around the other four nuclear power plants within the Commonwealth. Aside from their normal functions, the additional task usually assigned to a fire company during a radiological emergency is to

Mr. Alan E. Boroff
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provide route alerting in the event the sirens should fail, or in areas where they cannot be heard. If the fire company is adamant in its refusal to participate perhaps an agreement could be reached with a neighboring company. What has been presented here are but possibilities or suggestions since the concerns expressed regarding the availability of personnel can only be solved at the local level in consultation with the county emergency management agency.

2. Transit-dependent individuals would be alerted and notified through sounding of the sirens and county announcements over the Emergency Broadcast System. Since the Township does not have the transportation assets needed for evacuation of these individuals, Montgomery County should be advised in writing of the number of buses, and ambulances if necessary, that would be required. If the County cannot arrange for the needed transportation then the shortages are reported by the County to the Pennsylvania Emergency Management Agency (PEMA) and arrangements would be made with the Pennsylvania Department of Transportation to obtain the buses.
3. The exact nature of the concern regarding evacuation routes through Skippack and the relationship of the Township to other municipalities that would be evacuating through Skippack is not clear. The concern as to the impact the evacuation of the State Correctional Institution Graterford would have on Skippack is certainly valid. We are still working on resolution of the problem and expect to be able to provide definitive information to the Skippack Board of Supervisors the first part of September. As I am sure you will understand, identification of the evacuation routes for Graterford is a sensitive subject and not one that can, or should be, discussed in open forum.
4. Some of the dosimetry required by Skippack has already been issued from PEMA's stock to Montgomery County. PEMA has recently signed an agreement with Philadelphia Electric Company whereby the latter will fund our purchase of additional dosimetry for county and municipal emergency workers that would be involved in the event of an accident at the plant. The dosimetry will be ordered as soon as the required legal and bidding procedures have been completed. It is difficult to respond to the Township's lack of means to obtain other equipment without knowing specifically what is involved. As mentioned previously, essential equipment shortfalls should be reported in writing to Montgomery

Mr. Alan E. Boroff

August 16, 1984

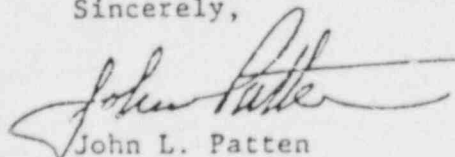
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County. If the County cannot fill the requirements then they are reported as unmet needs to PEMA and we will take whatever action is necessary. Neither Montgomery County nor PEMA can do anything without a specific list of essential equipment needed to respond effectively to an accident.

5. Here again it is difficult to determine what matters the Skippack Board of Supervisors believe need more coordination. The capacity of roads in the area was determined by traffic engineers from the Pennsylvania Department of Transportation and from this the main evacuation routes were determined in consultation with the counties. Since the counties and municipalities are more keenly aware of their own circumstances, designation of secondary routes leading to the main evacuation routes was left to them. PEMA stands ready to provide specific coordination whenever it is needed and requested. To be effective, however, it should progress from Skippack Township to Montgomery County and then to the Commonwealth, if necessary.
6. While an ongoing training program is indeed essential, the framework for one is already in existence and needs only to be utilized. Energy Consultants, under contract with Philadelphia Electric Company, has developed training courses covering the various types of offsite response that would be required should an accident occur at the power plant. The municipalities need only request this training through their county emergency management agency. All training for municipal emergency personnel is to be coordinated through the county. If there is a void somewhere in the training, please let the Montgomery County Emergency Management Coordinator know and he in turn will discuss it with us.

I hope that with this rather lengthy letter I have been able to clarify some of the concerns that have rightfully been troubling the Skippack Board of Supervisors. If not, perhaps you would like to arrange a meeting through Montgomery County to discuss the matter further with the Skippack Board of Supervisors.

Sincerely,



John L. Patten
Director

JLP/RJH:jmb (Tel: 717-783-8150)

cc: George Hugenin, Skippack Township Emergency Management Coordinator
Edward L. Jordan, Nuclear Regulatory Commission
Federal Emergency Management Agency, Region III
A. Lindley Bigelow, Montgomery County Office of Emergency Preparedness
Mrs. Mary Wills, Skippack Township Secretary