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Kimberton Farms School, Inc.

WEST SEVEN STARS ROAD KIMBERTON, PA 19442 (215) 933-3635

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Judge Cole
Atomic Safety and Licensing Board
50-352
U.S.N.R.C.
Washington, D. C. 20555

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Dear Judge Cole:

A Radiological Emergency Response Plan (RERP) has been submitted to the Chester County Department of Emergency Services (Chester County DES) by Energy Consultants, Inc. in the name of Kimberton Farms School. This document erroneously lists Kimberton Farms School as the preparer of the plan. In addition, it enumerates emergency procedures which are, in the view of the School Board, faculty and administration, neither adequate nor feasible in a worst case accident at the Limerick Generating Station. This plan was, in fact, not prepared by and cannot be agreed to by Kimberton Farms School. It was prepared from data supplied by the School to Energy Consultants, Inc.

Evacuation

The plan submitted by Energy Consultants gives specific requirements and guidelines for the evacuation by bus and private car of the School community in the event of an accident at the Limerick Generating Station. Not only are these specific needs unmet (as outlined below), but the overall feasibility of such evacuation has not been addressed. Some of the questions which remain unanswered are:

1. How long will a ground evacuation take under various traffic and weather conditions: rush hour, automobile accidents, fog, snow, sleet, etc.?
2. How will bus drivers and teachers/supervisors react in a real emergency when they have their own and their families' safety to consider?
3. Will there be a full scale drill of evacuation procedures during the school year to evaluate the effectiveness of the plans before they are approved? Otherwise, how can they be judged effective?
4. Who will bear the cost of such a drill?
5. Who is liable for the effectiveness of the evacuation plans?

A. Vehicles

Kimberton Farms School has a student enrollment of 260. The School owns three vehicles which would be available for use during an evacuation - two vans and one small bus. They have a total capacity of sixty-six (66) students. We would need, in addition, three (3), seventy-two passenger school buses to accommodate the entire school population. To date, no vehicles have been assigned to the school or designated for its use in a radiological emergency.

B. Bus Drivers

The School has no designated bus drivers either for its own vehicles

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or the additional vehicles needed in the case of a radiological emergency. Six (6) emergency bus drivers would therefore be needed for evacuation.

C. Teachers/Supervisors

We estimate the need in an evacuation situation for 16 teachers/supervisors to supervise the students. At present, it is not known whether any of the School faculty or staff would be available during a radiological emergency. We would all be forced, in that situation, to weigh our own and our families' needs with those of the School. Therefore, the School may need as many as 16 adult supervisory personnel.

D. Host Facility

As of this date, no host facility has been assigned or agreed to house our students in the case of evacuation.

E. Alternate Administrative Office

As of this date, no alternate administrative office outside the EPZ as outlined in the plan submitted by Energy Consultants, has been designated for use by the School.

Liability

In addition to the specific and general concerns with regard to the effectiveness of the proposed evacuation plan questions of financial responsibility must be resolved. Who will assume the financial liability for personal injury and property damage in the case of a nuclear accident? The liability of the owners and operators of the plant is limited to a small fraction of the estimated damages in a worst case accident by the Price Anderson Act of 1957. The School's insurance carriers will not cover such liability, as radiological damage caused by nuclear plant accidents is excluded from available policies. The School cannot and will not bear this burden. Who, then, will accept financial responsibility in the event of a nuclear accident?

Conclusion

Our concern is for the safety and welfare of the School and its students. The plan submitted by Energy Consultants for Kimberton Farms School is grossly inadequate; it does not insure the welfare of the School and the students, nor does it clearly delineate financial responsibility in the case of an accident. It will not be approved by the Board of Directors, faculty, or administration of the School as long as the above questions and inadequacies remain unresolved. Until that time, the operating license for the Limerick Generating Station must not be granted.

Sincerely,

Andrew Dill

Andrew Dill
Faculty Chairman

Nicholas Stanton

Nicholas Stanton
President, Board of Directors
Kimberton Farms School