

RELATED CONFERENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC
'84 NOV -5 P2:14

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))	

TESTIMONY OF HENRY W. FARRELL AND FRED N. STARASINIC FOR
THE COMMONWEALTH OF PENNSYLVANIA ON
LIMERICK ECOLOGY ACTION CONTENTION
LEA-28(b)

Q.1. Mr. Farrell, what is your position?

A.1. I am a Civil Engineer, Pennsylvania Department of Transportation, Bureau of Maintenance and Operations. A statement of my professional qualifications is attached to this testimony.

Q.2. Mr. Starasinic, what is your position?

A.2. I am a Civil Engineer, Pennsylvania Department of Transportation, Bureau of Maintenance and Operations. A statement of my professional qualifications is attached to this testimony.

Q.3. What is the purpose of your testimony?

A.3. The purpose of this testimony is to respond to Limerick Ecology Action (LEA) contention LEA-28 concerning resources available to provide towing and snow removal on non-state roads.

Q.4. Mr. Farrell, please describe the Pennsylvania Department of Transportation's procedures for snow clearance of non-state roads in the Limerick area?

A.4. Depending on the severity of the situation several planned and established procedures could be quickly put into effect. These procedures range from sending locally based department equipment to clear the local roads all the way up to calling upon equipment from other districts outside of the Limerick Area but within a few hours response time.

Specific procedures are outlined for emergency situations, based on a theoretical worsening condition.

(1) Local Department Equipment: The Limerick Area falls within the jurisdiction of Department of Transportation District 6-0 Engineer. District 6-0 is comprised of Bucks, Chester, Delaware, Montgomery and Philadelphia Counties. The District Engineer on his authorization could direct any department equipment from this five county area to Limerick. There are no union contract problems with assigning equipment operators or support personnel to work on non-state highways.

(2) Privately Owned Snow Clearance Equipment: In order to provide adequate coverage for each county it is common practice to sign private contractors to snow clearance agreements. These agreements cover the services of equipment meeting department specifications, including the equipment operator, to work on snow clearance under the direction of department supervisors.

Two types of agreements are executed. The first type deals with equipment used on a regular basis, assigned definite sections or routes, that can be used any time the district engineer sees a need.

The second type is a standby emergency agreement. Equipment signed under this type of agreement is in most cases larger, specialty equipment, such as large front end loaders or bulldozers. Use of this type of equipment is approved only when the Department has declared that a snow emergency condition exists.

(3) Privately Owned Snow Clearance Equipment Not Under Agreement: In the event of a Department-declared snow emergency, the District Engineer may execute emergency agreements for specialty type equipment not under standby agreement.

The major difference between this type of emergency agreement and the standby agreement is that the standby agreement offers expedience since it is executed and placed on file prior to the winter season. The emergency agreement is negotiated at the time of the emergency.

(4) Mobile Emergency Teams: The Department has designated mobile emergency teams ("MET") in each district. These teams are composed of equipment operators, mechanics, and foremen, who are assigned to the team and are able to

leave their home districts to work in other areas of the state during emergency situations. Equipment is also designated as available for use by the emergency teams. District 5-0, headquartered in Allentown, and District 8-0, headquartered in Harrisburg, are close enough to Limerick to provide mobile emergency team support.

(5) Governor Declared Emergency: The final emergency procedure is a declaration of disaster emergency by the Governor. Under this type of condition the Department would have blanket authorization to secure needed manpower and equipment from any practical source to keep the road system open. Sources include the National Guard, local municipalities, contractors, equipment suppliers, and other state agencies.

Although some municipalities do not possess snow clearance equipment and capabilities, others do. We have on file over 700 agreements with municipalities to maintain sections of state road with municipal equipment for a fee. Limerick Township is one of the townships with snow equipment that has executed an agreement with the Department.

Q.5. Mr. Starasinic, what about procedures for road clearance?

A.5. As provided in Annex E to the Commonwealth's Disaster Operations Plan, the Pennsylvania Department of Transportation will aid in cleaning roads of stalled and

abandoned vehicles in the event of an emergency at the Limerick facility. A representative of the Department will be at the Pennsylvania Emergency Management Agency (PEMA) Emergency Operations Center (EOC). Should a call come in for road service, the Department official will notify PEMA's Eastern EOC of the nature and location of the need. The Eastern EOC will then call upon the respective county to provide needed equipment and manpower. At the same time the Department District Office will be notified of the extent of the problem. Should the county be unable to respond to the need for road clearance, the Department District Office will dispatch needed equipment and resources to ensure roads are cleared. "Mobile Emergency Teams" (MET), described in the attached December 27, 1983 memorandum from David C. Sims, P.E., Deputy Secretary for Highway Administration to Department District Engineers, provide District Engineers with personnel and equipment for efficient response to an emergency.

OS-735 (9-72)

COMMONWEALTH OF PENNSYLVANIA
 Department of Transportation
 Harrisburg



December 27, 1983

SUBJECT: MOBILE EMERGENCY TEAMS (MET)

TO:	District Engineer, Dist. 1-0	District Engineer, Dist. 8-0
	District Engineer, Dist. 2-0	District Engineer, Dist. 9-0
	District Engineer, Dist. 3-0	District Engineer, Dist. 10-0
	District Engineer, Dist. 4-0	District Engineer, Dist. 11-0
	District Engineer, Dist. 5-0	District Engineer, Dist. 12-0
	District Engineer, Dist. 6-0	

FROM: David C. Sims, P.E., Deputy Secretary
 for Highway Administration

David C. Sims

PURPOSE:

To establish pools of selected personnel and equipment from which Mobile Emergency Teams (MET) can be selected to aid other counties and/or districts in times of emergencies.

OBJECT:

To provide management with the means to respond quickly to emergency situations with efficient, highly qualified teams of personnel and equipment.

RESPONSIBILITIES:

The prime responsibility for activating the "MET" rests with the district engineer, with the assistant district engineer of maintenance being responsible for planning and coordinating the deployment of the "MET".

When it is determined by the district engineer that emergency circumstances have exceeded the capacity and/or the capability of available county forces, he should call upon the "MET" within the district to lend assistance sufficient to neutralize the emergency.

Should the magnitude of the emergency exceed the resource limits of an engineering district, that district engineer shall request the activation of the "MET" from another district that is able to support the request. Contact is to be made between the involved district engineers.

"MET" deployment actions are to be reported immediately to the Department Disaster Recovery Coordinator in the Bureau of Maintenance and Operations.

PERSONNEL:

Each county maintenance manager shall establish a "MET" list consisting of:

- 4 - Certified Equipment Operators
- 1 - Certified Fuel Truck Operator
- 1 - Mechanic
- 1 - Foreman
- 1 - Assistant County Maintenance Manager

Of course, the most desirable operators should be those who can operate several types of equipment with proficiency and that are agreeable to such an assignment.

These emergency crews may be expected to remain away from their home county for an extended period of time, but normally not more than 100 miles from their headquarters.

In addition to the above list, the county maintenance manager shall include a list of substitute personnel for those "MET" personnel who are not able to respond to a particular emergency.

EQUIPMENT:

The county maintenance manager shall select a list of dependable equipment which can be made available for immediate deployment with the "MET" personnel. This list shall contain, but is not limited to, the following equipment:

- *3 - Minimum 33,000 Lb. GVW dump trucks appropriately equipped according to the emergency
- 1 - All-wheel drive grader with plow
- 1 - Front end loader
- *1 - Tractor with 30 Ton bed trailer
- *1 - Pick-up truck with chain saw
- *1 - Fuel truck

Any truck, loader and grader mounted snow blowers (when used, additional operators may be required).

*Should be radio equipped.

Continued

TIME AND CHARGES:

Labor and equipment time, including transfer time, shall be charged to the maintenance district receiving the aid. Time worked by the "MET" shall be certified on form C-65I or C-65C by the maintenance manager of the county receiving the aid. These forms shall be returned to the home county in time for processing.

Overnight accommodations, if necessary, should be arranged by the receiving county or district. Cash advancements and reimbursements for individual expenses shall be made according to the Travel Expense Manual (Pub. 29).

REPORTS:

The engineering district shall report by county and district the personnel and equipment available to form the "MET". The resource reports will be made available to each district for their reference in requesting "MET" deployment.

The county report shall be made on Form M-622 and the district summary on Form M-623. Both shall be TYPEWRITTEN (see attached samples). Blank forms are available from Forms Management under the following commodity codes:

County (M-622)	0830-4600-1660
District (M-623)	0830-4600-1670

The district must insure that all reports have been filled out properly and distributed no later than January 15, 1984, thereafter to be forwarded in accordance with the dates established in Part 2 of the Emergency Management Manual, to be published in the near future.

In addition to the normal distribution throughout the district and the county, please provide a copy to the Department Disaster Recovery Coordinator within the Bureau of Maintenance and Operations.

IDENTIFICATION:

All "MET" equipment and regular personnel shall be identified by means of the "MET" emblem decals that can be obtained from the Equipment Division (see attached sample).

The seven (7") inch diameter decal shall be mounted on the left side of each piece of equipment and a two (2") inch decal on the left side of the hard hat of each member of the "MET".

Attachments

460/MM/shp

cc: Secretary's Reading File

David C. Sims, P.E., Deputy Secretary for Highway Administration

Quality Assurance Engineers: Neil Leitzel, Ron Hughmanick & Norm Cochrane

Philip W. Amos, P.E., Director Bureau of Maintenance & Operations

Department Disaster Recovery Coordinator



MOBILE EMERGENCY TEAMS - EQUIPMENT



County _____ Org. _____ Date _____

EQUIP. NO. WT. OR CAPACITY MFG. YEAR PLOW REMARKS

TRUCKS - FOUR WHEEL DRIVE

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

TRUCKS - CONVENTIONAL

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

GRADERS

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

FRONT END LOADERS

- 1.
- 2.
- 3.

SNOW BLOWERS

- 1.
- 2.
- 3.

TRUCK OR TRACTOR W/TRAILER

- 1.
- 2.

PICKUP TRUCK W/RADIO

- 1.
- 2.
- 3.
- 4.

PROFESSIONAL QUALIFICATIONS

Fred N. Starasinic

I am a Civil Engineer for the Pennsylvania Department of Transportation, Bureau of Maintenance and Operations. In this position, one of the duties I am responsible for is to assist the Pennsylvania Emergency Management Agency (PEMA) when the Emergency Operations Center or forward command posts are activated due to an emergency situation. This responsibility included actions as listed in Annex E ~~(attached)~~ of the Commonwealth's Disaster Operations Plan.

For the past five years, I have performed this responsibility for a number of exercises conducted by PEMA and for actual situations, as occurred in Bedford and Somerset Counties in August, 1984.

I have received a Bachelor's Degree in Civil Engineering from Catholic University in Washington, D.C. and a Master's Degree in Civil Engineering from Villanova University in Villanova, Pennsylvania.

I am a registered Professional Engineer in the Commonwealth of Pennsylvania.

I am a member of the Mid-Atlantic Section of the Institute of Transportation Engineers.

Prior positions included Urban Transportation Planning Management in the Department's former Bureau of Advance Planning and as a Civil Engineer in the Commonwealth's former Department of Property and Supplies.

PROFESSIONAL QUALIFICATIONS

HENRY W. FARRELL

I am employed as a Civil Engineer in the Bureau of Maintenance and Operations. One of my functions in this position is to develop policy and procedures for the statewide winter maintenance program. I have served in this capacity since 1973 and have been an employee of PennDOT since 1967. Other experience includes highway design and construction projects assignments at Engineering District 8-0 from 1967 to 1973.

Engineering education includes engineering and management studies at Penn State Extension, Harrisburg, Pennsylvania, from 1964 to 1970. I also completed the PennDOT Civil Engineering Intern Program from 1967 to 1969.

I am a Registered Professional Engineer in the state of Pennsylvania.