

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

'84 NOV -5 P2:14

In the Matter of)
Philadelphia Electric Company)
(Limerick Generating Station,)
Units 1 and 2)

Docket Nos. 50-352
50-353

OFFICE OF SECRETARY
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BRANCH

TESTIMONY OF ROBERT C. FURRER FOR
THE COMMONWEALTH OF PENNSYLVANIA
REGARDING LIMERICK ECOLOGY ACTION
OFFSITE EMERGENCY PLANNING
CONTENTION LEA-22

Q.1. What is your name and position?

A.1. My name is Robert C. Furrer. I am a Management Analyst with the Pennsylvania Department of Agriculture. I serve as Emergency Management Coordinator for the Department. A statement of my professional qualifications is attached to this testimony.

Q.2. What is the purpose of your testimony?

A.2. The purpose of my testimony is to respond to Limerick Ecology Action (LEA) Contention LEA-22.

Q.3. What does LEA-22 state?

A.3. LEA-22 states:

The State, County, and Municipal RERP's are inadequate because farmers who may be designated as emergency workers in order to tend to livestock in the event of a radiological emergency have not been provided adequate training and dosimetry.

Q.4. What is your response to LEA-22?

A.4. The Pennsylvania Department of Agriculture does not have on hand data regarding actual numbers of farmers in the Limerick plume EPZ who may require dosimetry and KI. Such information is developed at the county level. The state emergency plan's use of the terms "livestock" and "farmer" is no more restrictive than the commonly accepted dictionary definitions. Webster's Seventh New Collegiate Dictionary defines "livestock" as "animals kept or raised for use or pleasure; esp: farm animals kept for use and profit." "Farmer" means "a person who cultivates land or crops or raises livestock." The Department has no data as to the question of whether so-called "USDA" lists would be used to limit registration of farmers.

Q.5. What about information and training for farmers?

A.5. A farmer information brochure was developed and distributed by the licensee to farmers in the vicinity of Three Mile Island. The Department of Agriculture supports the use of a brochure.

Training is best handled by a particular licensee and local government with the assistance of the USDA County Extension Service. The Department supports such training, and suggests any training offered pre-emergency be repeated before any individual is permitted to re-enter the plume EPZ.

PROFESSIONAL QUALIFICATIONS

Robert C. Furrer

As a Management Analyst and the Emergency Management Coordinator for the Pennsylvania Department of Agriculture, I have been responsible for emergency response planning in the Department since 1976. Within this responsibility, I am involved in the revision of Annex E, Fixed Nuclear Facility Incidents of the Commonwealth Disaster Operations Plan in Agriculture Department areas of interest.

I am a graduate of the University of Maryland and have a Masters in Personnel Administration from George Washington University.

From 1974 until now, I have worked as a Management Analyst for the Pennsylvania Department of Agriculture.

Prior to 1974, I was a professional soldier for 30 years.