

RELATED COURT JURISDICTION

Subpoena requested: LEA-24

Norman Vutz

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 NOV -6 11:43

BEFORE THE  
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-352
PHILADELPHIA ELECTRIC COMPANY	)	November 2, 1984
(Limerick Generating Station	)	
Units 1 and 2)	)	

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MOTION ON BEHALF OF LIMERICK ECOLOGY ACTION REQUESTING THE ATOMIC SAFETY AND LICENSING BOARD TO ISSUE A SUBPOENA TO NORMAN VUTZ TO ATTEND AND GIVE TESTIMONY AT EVIDENTIARY HEARINGS ON OFF-SITE EMERGENCY PLANNING CONTENTIONS ON THE ISSUE OF TRAFFIC CONGESTION IN THE VICINITY OF VALLEY FORGE PARK  
(Contention LEA-24/FOE-1)

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Pursuant to 10. CFR §2.720, Limerick Ecology Action hereby respectfully requests the Atomic Safety and Licensing Board in the above captioned proceeding to issue a subpoena to:

Norman Vutz  
Country Club Road  
Phoenixville, Pa. 19460 (home phone 215-935-2894)

requesting Mr. Vutz to appear at the U.S. Customs House, Second and Chestnut Streets (Room 300) in Philadelphia, Pennsylvania on November 27th., 1984 at 9:00 a.m. and to be on 24 hour phone alert standby every day thereafter until called to testify on behalf of Limerick Ecology Action on the subject matter of contention LEA-24/FOE-1.

LEA OFFERING OF PROOF

Mr. Vutz is employed by Louis T. Klauder and Associates, Transportation and Mass Transit Consulting Engineers. He is the Emergency Management Coordinator and a township Supervisor in Schuylkill Township Chester County and holds a doctorate (Ph.D.) in nuclear science.

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Mr. Vutz's dual role as Emergency Management Coordinator and Township Supervisor gives him particular knowledge of the existing traffic conditions due to the limited roadways surrounding Valley Forge National Park. In addition, the Township has been involved in a long standing zoning dispute (Fernley, McNeil and McCracken vs. the Board of Supervisors) which involves these same traffic problems. His professional work in analyzing transportation and mass transit capacities has given him direct experience relevant to issues of traffic flow and capacity. His professional qualifications in nuclear science and transportation analysis make him uniquely qualified to assist in the development of a sound record on the subject matter of contention LEA-24.

LEA was unable to obtain written testimony from Mr. Vutz and believes that he would make a significant contribution to this proceeding if the Board grants LEA's request for a subpoena.

*David Stone*

David Stone  
LEA Representative LEA-24

Respectfully submitted,

*Phyllis Zitzer*  
Phyllis Zitzer, President

cc: Service List  
Subpoena Forms sent to Board only

LEA-24/FOE-1  
(Lead Intervenor: LEA)

There is no assurance that plans for evacuation of the ten mile radius will not be impeded by traffic congestion in the vicinity of Marsh Creek State Park, Exton area (involving Route 100) and Valley Forge Park, King of Prussia area.

These areas should either be included in the Emergency Planning Zone or adequate plans for traffic control and direction should be made to avoid adverse effects on EPZ evacuation.