

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PHILADELPHIA ELECTRIC COMPANY) Docket No. 50-352
(Limerick Generating Station) 50-253
Units 1 and 2)

Request of Limerick Ecology Action for the issuance of
a subpoena to obtain the testimony of Mr. Donald Young,
President of the Perkiomen Valley Education Association,
relating to off-site emergency planning contentions

Pursuant to 10. CFR § 2.720, Limerick Ecology Action hereby requests the Atomic Safety and Licensing Board to issue a subpoena to Dr. Donald Young, President of the Perkiomen Valley Education Association so that he can provide testimony in this proceeding on the matters he has presented in the attached letter which was sent to Limerick Ecology Action in response to inquiries about the concerns that the teachers have about the Perkiomen Valley School District Radiological Emergency Response Plan.

Mr. Young's address is:

Mr. Donald Young
682 Church Lane
Graterford, Pa. 19426
(215-489-9691)

LEA attempted to obtain a written statement from Mr. Young to document the concerns of the teachers in the Perkiomen Valley School District. He does not consider his letter to be "testimony" that he intends to present as a witness on behalf of Limerick Ecology Action, but would be prepared to provide factual information as to the specific concerns expressed in his letter to assist in the development of a thorough record in this proceeding, if subpoenaed by the Board. Therefore, LEA respectfully requests that Mr. Young be requested to appear at the United States Customs Court House, Second and Chestnut Streets (Room 300) in Philadelphia on November 26th., 1984 at 9:00 a.m. to testify on behalf of Limerick Ecology Action, and that he be placed on 24 hour phone alert every day thereafter until called to testify on matters relating to radiological emergency planning for the Perkiomen Valley School District.

cc: Service List
Subpoenas sent only to Board

Sincerely,

Phyllis Zitzer
Phyllis Zitzer
LEA President

PERKIOMEN VALLEY EDUCATION ASSOCIATION
BOX 235
SCHWENKSVILLE, PENNSYLVANIA 19473

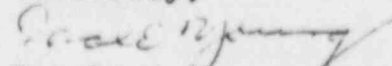
Limerick Ecology Action
P.O. Box 761
Pottstown, Pa. 19464

Sirs:

What follows are our responses to the five questions you intend to address at the November 19, 1984 hearings with the Nuclear Regulatory Commission.

1. It was not until a month ago that we realized that our members had been officially trained in the evacuation procedure. It had been our impression that the February meeting with the representatives of ECI was only for informational purposes. At no time was it said that that was our official training.
 2. To the best of our knowledge, there has not been produced any written guarantee that a sufficient number of outside buses will come in to our district to supplement our regular carriers.
 3. The evacuation plan was approved without any input from the Perkiomen Valley teaching staff.
 4. As of October 30, 1984 there has been no official notice of our participation in the November 20 drill.
 5. The evacuation plan for our school district was clearly written by E.C.I. and then approved by our board of education.
- I hope this information proves helpful in your testimony.

Sincerely,


Donald Young, President