

United States of America
Nuclear Regulatory Commission

BEFORE THE
ATOMIC SAFETY AND LICENSING BOARD

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

Motion on behalf of Limerick Ecology Action requesting the Atomic Safety and Licensing Board to issue a subpoena to Chief Ranger Thomas Fewlass (Valley Forge National Park) to attend and give testimony at evidentiary hearings on off-site emergency planning contentions on the issue of traffic congestion within and bordering Valley Forge National Park

(Contention LEA-24/FOE-1)

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:

Chief Ranger Thomas Fewlass
Valley Forge National Historical Park
P.O. Box 953
Valley Forge, Pa. 19481-0953
(215-783-7900 office)

requesting Chief Ranger Fewlass 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

Through conversations with FOE representative Bob Anthony, Chief Ranger Thomas Fewlass has shown a hands-on knowledge of existing traffic problems within the park, including the practical limitations of the roads.

Whereas the numerical data as to traffic flows can be extrapolated from reports and statistical data as suggested in the attached letter from Valley Forge National Park Superintendent Elms, the real consequences and frequency of heavy traffic flows can best be described by local experts with actual experience and knowledge of local conditions, such as Chief Ranger Fewlass. In order to properly evaluate the sufficiency of proposed evacuation routes through and bordering the park, existing conditions must be taken into consideration. Chief Ranger Fewlass' testimony will greatly contribute to the development of a sound record on this issue. Based on his experience with crowd management and large number of visitors in the park, Chief Ranger Fewlass can provide valuable information to the Board in this proceeding. LEA has been informed by Mr. Anthony that a subpoena would need to be issued to obtain this testimony. For the above reasons, LEA and Friends of the Earth request that the Atomic Safety and Licensing Board grant our request to issue a subpoena for the testimony of this witness on contention LEA-24/FOE-1.

David Stone

David Stone
LEA representative
for LEA-24/FOE-1

Sincerely

Phyllis Zitzer
Phyllis Zitzer
LEA 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.



United States Department of the Interior
NATIONAL PARK SERVICE

VALLEY FORGE NATIONAL HISTORICAL PARK
P. O. Box 953
VALLEY FORGE, PA 19481-0953

IN REPLY REFER TO:

N4615 VAFO(S)

October 31, 1984

Mr. Robert Anthony
Box 186
Meylan, Pennsylvania 19065

Dear Mr. Anthony:

We have reviewed your request for detailed information relating to the park's response to a potential emergency at the Limerick Nuclear Plant.

As you are probably aware, only the northwest tip of Valley Forge National Historical Park lies within ten miles of the Limerick Nuclear facility. The only visitor facility within the ten-mile circle is a small trailhead parking lot.

However the state and county emergency preparedness agencies have designed the state highways that pass through the park as evacuation routes for those persons residing within the ten-mile radius. Our planning efforts have been and will continue to be directed primarily toward assisting the counties in implementing their evacuation plans.

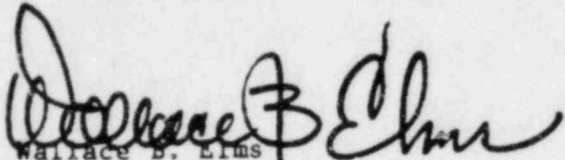
To this end we have met with emergency planning officials of both Chester County and Montgomery County to discuss, in general terms, the park's role in a general evacuation. Another meeting with officials of both counties is scheduled for November 7, 1984. We anticipate that more specific guidance will be obtained at that time.

Valley Forge National Historical Park does not have the staff expertise to determine the carrying capacities of the state highways that would be used should an evacuation be necessary.

You are welcome, however, to the statistical data we have in our files relative to counts of vehicles using park roads. Records are available, by date, for incoming traffic on each of the roads entering the park. Hourly counts are not available, however, visual observation confirms that travel is heaviest between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m. on weekdays.

To summarize, we will work with Montgomery and Chester counties and rely primarily on their plans for guidance in actions taken by the park in the event of a nuclear emergency at Limerick. We would also be glad to provide factual information from our files; however, we are unable to speculate about matters beyond our expertise.

Sincerely yours,


Wallace B. Lims
Superintendent

cc: Limerick Ecology Action