

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 PHILADELPHIA ELECTRIC COMPANY )  
 (Limerick Generating Station, )  
 Units 1 and 2) )

Docket No. 50-352  
 50-353

DOCKETED  
 USNRC

84 NOV -6 AM 11:43

REQUEST OF LIMERICK ECOLOGY ACTION FOR ISSUANCE OF  
 SUBPOENAS TO OBTAIN TESTIMONY RELATING TO THE STATUS  
 OF RISK SCHOOL DISTRICT REDIODOLOGICAL EMERGENCY RESPONSE  
 PLANS COVERED BY LEA'S ADMITTED CONTENTIONS

Pursuant to 10 CFR § 2.720, Limerick Ecology Action respectfully requests the Atomic Safety and Licensing Board to issue the following subpoenas for the purpose of obtaining testimony from School District Superintendents within the Emergency Planning Zone for Limerick, with regard to LEA contentions LEA-11, LEA-12, LEA-14, and LEA-15.

LEA is making this request because we recently became aware that testimony would not be presented by the Montgomery County Office of Emergency Preparedness with regard to these matters. LEA desires to insure that a thorough record is developed in the upcoming hearings on these issues, and believes that the testimony of the responsible school officials involved would be of great assistance to the Board and the parties.

LEA has had continuing discussions with many of these individuals or their designated emergency planners, and is aware that the School District Superintendents have direct knowledge of the status of their RERP development, while at the same time being sensitive to the concerns of the school staff. LEA believes that without this information, that the record on these issues will be deficient, and therefore makes the following requests for witnesses to be subpoenaed to appear at hearings to be held by this Board at the United States Customs Court House, Second and Chestnut Streets, Philadelphia, Pa. according to the following schedule, with the understanding that School officials would be kept on telephone standby alert by LEA as the hearings progress, so as to minimize any inconvenience.

TIME  
 REQUESTED

TO  
 APPEAR: Dr. Roy C. Claypool, Superintendent  
 Owen J. Roberts School District  
 Administration Building  
 RD#1, Route 23  
 Pottstown, Pa. 19464 (215-469-6261)

11/26  
 9:00  
 am

Dr. Robert B. Murray, Superintendent  
 Phoenixville Area School District  
 1120 S. Gay Street  
 Phoenixville, Pa. 19460 (215-933-8861)

11/26  
 9:00  
 am

Dr. Laird P. Warner  
 Superintendent  
 Methacton School District  
 Kriebel Mill Road  
 Fairview Village, Pa. 19403  
 (215-489-5000)

11/28  
 9:00  
 am

Current information is attached as an exhibit to document the status of unmet needs relating to LEA's contentions

letter from Aug. 6, 1984 is provided, although another one was just written (11/1/84) which LEA has not received a copy of

Attached are copies of recent surveys sent out to school staff and bus drivers. LEA is not yet aware of the results.

DATE REQUESTED

TO  
APPEAR: Dr. William Wescott, Superintendent  
Perkiomen Valley School District  
Box 338

Some of the school staff  
have questioned the adequacy  
of training sessions.

11/26 Schwenksville, Pa. 19473  
9:00 (215-287-7862)  
am

11/28 Dr. Ray Feicht, Superintendent  
9:00 Pottstown School District  
am Beech and Penn Streets  
Pottstown, Pa. 19464  
(215-323-8200)

11/28 Dr. Royden S. Price, Superintendent  
9:00 Souderton Area School District  
am 139 Harleysville Pike  
Souderton, Pa. 18964  
(215-723-6061)

11/26 Dr. William Welliver, Superintendent  
9:00 Spring-Ford School District  
am 199 Bechtel Road  
Collegedale, Pa. 19426  
(215-489-1666)

11/28 Dr. Thomas Pershing, Superintendent  
9:00 Upper Perkiomen School District  
am Administration Building  
210 West Fifth Street  
East Greenville, Pa. 18041-1598  
(215-679-7961)

School officials have questioned  
the adequacy of training  
provided; there are many  
other concerns.

LEA is willing to provide more specific information to the Board before ruling on this request about the subject matter that LEA would seek to cover in cross-examination if subpoenas were granted. Generally, we are making this request to obtain factual information about the status of development of the plans and any information that the Superintendents might have knowledge of with regard to teacher, staff, and bus driver participation and involvement in the planning process.

Respectfully submitted,

*Phyllis Zitzer*

Phyllis Zitzer  
LEA President

Nov. 2, 1984

cc: Service List  
Subpoenas sent only  
to Board

OWEN J. ROBERTS SCHOOL DISTRICT  
R.D. 1, POTTSTOWN, PA 19464

DISCUSSION OF UNMET RESOURCE NEEDS  
EMERGENCY RADIOLOGICAL RESPONSE PLAN

August 1, 1984 - 1:00 P.M. Meeting  
Representatives From:  
Pennsylvania Emergency Managing Agency  
Chester County Department of Emergency Services  
Owen J. Roberts Citizens' Task Force  
School Administration

<u>Identified Basic Needs</u> <u>As Validated by Citizens' Task Force</u>	<u>Current Available</u> <u>Resources</u>	<u>Unmet Resource Needs</u> <u>as of June 5, 1984</u>
<u>EQUIPMENT</u>		
55 - 72 Passenger Buses	30	[25] 72 Passenger Buses
<u>PERSONNEL</u>		
55 Qualified Bus Drivers	18	[37] Qualified Bus Drivers
156 Responsible Student Supervisory Personnel	65	[91] Responsible Student Supervisory Personnel
22 On Site Traffic Coordinators	-0-	[22] On Site Traffic Coordinators
<u>OFF SITE LOCATION</u>		
An Appropriate Host School Site	None	An Appropriate Host School Site

ASSURANCE OF MEETING UNMET RESOURCE NEEDS - POSITION OF CITIZENS' TASK FORCE AND DISTRICT SUPERINTENDENT

1. Any statements regarding the location of these additional resources must be thoroughly documented in detail including letters of agreement with transportation providers, school bus drivers, supervisory personnel, traffic coordinators, host school arrangements, and all other needs established as real and valid by the Citizens' Task Force.
2. Assurance that all resources of additional equipment and personnel are of sufficient quality to evacuate our students and employees within adequate parameters of time and safety.

TESTING OF PLAN AFTER UNMET RESOURCE NEEDS HAVE BEEN IDENTIFIED AND VALIDATED BY CITIZENS' TASK FORCE

1. At least one (1) planned evacuation drill be scheduled during the school day with movement of all internal and external resources to determine if emergency procedures and resources will adequately provide for student safety and welfare.
2. We believe that at least one unscheduled evacuation drill be attempted to provide further assurance of the adequacy of the emergency plan.

LEA EXH. 6.7

Discussion of Unmet Resource Needs  
Emergency Radiological Response Plan

August 1, 1984  
Meeting with representatives from:  
Penna. Emergency Managing Agency  
Chester Co. Dept. of Emergency Svcs.  
Owen J. Roberts Citizens' Task Force  
School Administration

Equipment:

1. Statement of Unmet needs list not received by PEMA from county - cannot resolve.
2. Position of contractor will be determinant on availability of buses and drivers.

Response to survey will be different from emergency response based on experience. More people will respond than anticipated. Great faith that people will do what needs to be done in the event of an emergency.

Transportation Resources:

Campbell - Statement of Status:

PH & OJR need buses - only 1 verbal commitment for 29-164 buses from SEPTA; no buses committed as of this date.

15 municipalities to submit unmet needs.

Submit agreements and submit unmet needs to PEMA.

PEMA will make commitments to provide resources and from where buses are to come from. Response to be received in approximately 60 days from submission of unmet needs to PEMA.

Personnel:

PEMA rely on development of emergency incident over a period of days to enable staged response.

Rely on bus contractor for determination of number available drivers.

Will not communicate identity of drivers or buses. Only pool of drivers and buses will be developed within time parameters.

Key - communicate with Bill Gross.

Documentation - statement from PEMA - buses and drivers will be available within a period of time.

RCC need for documentation.

PEMA - host schools to provide supervision not previously discussed.  
Host schools to provide supervision until 8:00 PM and children not picked up will be transported to mass care centers. No practical solution to unmet needs for personnel in shelter needs.

School districts must provide for supervision in a consolidated area within the school buildings.

Traffic coordinators.

Host School:

Dr. Claypool to contact Twin Valley  
Include staff requirements  
Set-up meeting with Chester County

Summary:

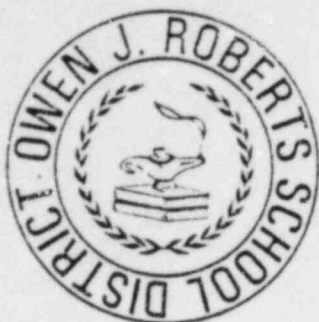
PEMA to respond to needs after receipt of unmet needs from Chester County EM Association.

Exercises:

Full exercise not possible due to limited resources

How big an exercise is required to demonstrate that the plan will work within resource constraints?

Limited exercise to validate problem.



## Owen J. Roberts School District

Administration Building  
R.D. 1, Pottstown, Pennsylvania 19464  
Telephone (215) 469-6261

June 27, 1984

'84 JUL -5 P2:15

COPIES  
EX-100

DOCKET NUMBER 50-352/353 06  
PROD. CONTROL FILE

SERVED JUL 5 1984

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Reference: Incomplete Inadequate Nuclear Evacuation Plan For The  
Owen J. Roberts School District Within The Limerick  
Nuclear Planning Area

Dear Sir:

Nineteen (19) months ago the Owen J. Roberts School District established a Citizens' Task Force for the purpose of the development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency at the Limerick nuclear facility.

This Citizens' Task Force is comprised of representatives from the seven (7) townships comprising the School District; township supervisors; NORCO Fire Company; Technical School; employee union representatives from custodial, secretarial, teachers, and cafeteria; parent representatives from all of our schools; and a number of concerned citizens. All of the task force meetings have been advertised in the local newspapers and open to the general public.

On June 6, 1984, the School Board held an open forum on the status of the nuclear evacuation plan. This meeting was widely advertised in the local media.

The Citizens' Task Force presented its status report which, in summary, states they have identified the human and other resources needed for an evacuation; the actual available resources on hand; the unmet needs; and the alarming fact that the County Department of Emergency Services has not been able to meet any of the identified unmet needs.

The Task Force made the following recommendation to the Board of School Directors. "We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency."

Page 2  
June 27, 1984

Citizens were then given an opportunity to comment on the status of the evacuation plan and to give additional input. Between two and one-half (2 1/2) and three (3) hours of testimony was received by the Board of School Directors. A summation of the input revealed unanimous agreement by all present to the following: the identified human and other resources needed for a nuclear evacuation as presented are real; the calculations and procedures identified by the task force over a nineteen (19) month period to identify unmet needs are valid; and, the School District must look beyond the county to both state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

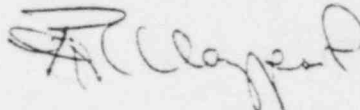
I am attaching a copy of the testimony presented by the Citizens' Task Force and also by my office.

We solicit your aid in notifying all governmental agencies of our unmet needs and the serious deficiencies in the overall master plan for a general nuclear evacuation for the citizens and children of this School District.

Both members of the Citizens' Task Force and I are prepared to give testimony on this most serious matter.

Your immediate attention and response will be appreciated.

Respectfully,



Roy C. Claypool, Ed.D.  
District Superintendent

Attachment  
/ho

OWEN J. ROBERTS SCHOOL DISTRICT  
R.D. 1, POTTSTOWN, PA 19464

TO: Members of the Board of School Directors, Administrators, and  
Members of the Emergency Planning Task Force

FROM: Dr. Roy C. Claypool, District Superintendent *R. Claypool*

SUBJ: • Testing of Existing Parent Call Chain in the Event of an  
Unexpected Emergency

• Communications to Elected Officials, Regulatory Agencies, and others  
Subject: Incomplete Inadequate Nuclear Evacuation Plan

DATE: June 12, 1984

As most of you are aware by now on Friday, without warning, I announced an early dismissal on the criteria of expected heat within classrooms to exceed 95 to 97 degrees.

The standard operating procedures were used in notifying each principal, radio stations, bus contractor, and parents.

The following is my evaluation of that activity for the purpose of demonstrating the problems we would face in the event of an alert related to nuclear or a chemical spill in our local area.

In order to ensure that the buses would be here by 11 a.m. it was necessary for me to notify the bus coordinator by 8:30 a.m. If I had not, according to the coordinator, it may take hours before we could round up the bus drivers.

The radio stations had little difficulty in receiving my communications because of the codes used for an emergency.

The parent chain calling system failed to operate adequately because many of the parents have allegedly thrown away their call systems lists because inclement weather is now over.

Conclusions:

Unless we notify bus drivers while they are physically in their buses [via two-way radio], we may face at least two (2) hours delay before having adequate number of buses available for an early dismissal.

It is quite apparent from the experience we had on Friday that the call system not only is inadequate, but that many parents do not recognize the need to maintain this call system other than for a major inclement weather situation. It is interesting to note that in a number of cases, unless these people were alerted to an emergency situation via the TV the night before, many have been unable to find their lists for the next morning.

(OVER PLEASE)



June 12, 1984

Page 2 .

Recommendations:

1. The bus transportation department must upgrade our communication contacts with bus drivers in order to decrease the time needed to notify bus drivers when they are not behind the wheel.
2. Our building principals and especially PTA/PTO's must structure chain call systems that can be implemented at any time during a twenty-four (24) hour period.
3. It is recommended that one of the first projects to be addressed by local PTA/PTO's in September would be the structuring and implementation of an emergency planning notification system.

Enclosed please find a communication sent to a number of elected officials, regulatory agencies and others on the subject of, "The Incomplete Inadequate Nuclear Evacuation Plan For The Owen J. Roberts School District Within The Limerick Nuclear Planning Area."

Enc.

cc: B. Kersch  
K. Rice

EXECUTIVE SUMMARY REPORT  
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Prepared and Presented By  
Dr. Roy C. Claypool,  
District Superintendent  
June 6, 1984

The statements contained within this Executive Summary Report have not been shared, in total, with anyone prior to their release tonight. They are my statements, and I stand accountable and ready to defend them as Superintendent of Schools.

In the Summer of 1982, the School District received a directive from the Department of Education establishing a need for a Radiological Emergency Response Plan for the Owen J. Roberts School District. Shortly thereafter, on August 31, 1982, the Chester County Department of Emergency Services sent a communication to the School District offering its services.

At the following September 20, 1982, School Board Meeting an open discussion took place on the need for the School District to develop such a plan. The Board sought input from citizens and at the next School Board Meeting October 18, 1982, the School Board established a Citizens' Task Force for the purpose of development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency. At the same meeting the School Board requested financial support from the Philadelphia Electric Company for the additional costs which would be incurred by the School District in the development of such a plan.

The Board also insisted that the task force meetings be open to the public and therefore, by resolution passed a motion advertising in the newspapers the first meeting of the task force would take place on November 30, 1982.

Representatives from the following agencies met on November 30, 1982. Department of Education, Harrisburg; PEMA; Chester County Department of Emergency Services; Emergency Coordinators from the seven (7) townships comprising the School District; NORCO Fire Company; Emergency Consultants, Inc.; Northern Chester County Tech School; Friends of the Arts; PTA and PTO's from all schools; employee union representatives from custodial, secretarial, teachers, and cafeteria; township supervisors; parents; and a number of concerned citizens.

During these nineteen (19) months this task force has been extremely active in attempting to accomplish their task. This task force has made a supreme effort to honestly appraise both human and other needs.

On July 20, 1983, seven (7) months into the planning process, this committee informed the Chester County Department of Emergency Services of the number of human resources and vehicles required for an evacuation plan.

From that point until March 13, 1984, sixteen (16) months into the plan, this committee attempted to realistically identify the number of employees who would participate and the actual number of vehicles which would be available during an emergency. This information was then sent to the Chester County Department of Emergency Services indicating unmet needs.

On May 1, 1984, I, as Superintendent of Schools, sent a communication to the Chester County Department of Emergency Services identifying additional unmet needs, and requested a detailed response by June 1st on how these needs would be met.

On May 25, 1984, the Chester County Department of Emergency Services informed the District that the identified needs have not been met at this point in time. On Monday, June 4th, I met with the Citizens' Task Force for a period of approximately two (2) hours for the purpose of reexamining the additional unmet needs as identified by my office on May 1, 1984. At the conclusion of that meeting all previously identified unmet needs were classified as real and valid.

As we have heard this evening, the task force is recommending that they continue their efforts.

The nuclear plant is tentatively scheduled to go on-line within the next ten (10) months. The agency responsible for meeting our unmet needs [the Chester County Department of Emergency Services] has been unable over the past four (4) months to meet any of our unmet needs. Can a limited operation such as the Chester County Department of Emergency Services [given even the most dedicated and competent staff] meet our unmet needs within the next ten (10) months??

Can they deliver the additional buses? Can they provide the additional human resources? Will they train these people for the specific functions needed such as bus drivers, traffic coordinators, and adult volunteers? Do they have sufficient funds to meet these unmet needs? Both my analytical mind and my intuition say no to all of the above.

These unmet needs have been public knowledge for at least five (5) weeks. To date not one governmental body, regulatory agency or individual has contacted my office to challenge the validity of these needs. I can only assume that there is either concurrence on these needs or a deliberate decision has been made to ignore these documented unmet needs.

I will not recommend any plan that first, does not meet these documented unmet needs; second, does not guarantee parents access to their children; third, does not address the resolution of the added expense to this School District; and fourth, does not answer the following additional questions.

Why are school age children not included in a selective evacuation along with preschool age children?

When an order to prepare for an evacuation occurs, our switchboard will be rendered useless in the first five minutes. We rely solely on telephones for both internal and external communications. Can the switchboard handle this overload and can the general telephone utility cover the overload?

Serious challenges to sheltering as a safety option have been raised with no satisfactory answers. If PEMA orders sheltering, how safe, how long before contamination and/or rays penetrate? Parents will surely converge on our schools to gain access to their children.

Is Twin Valley, our alleged host school, far enough away? Is it not in the ingestion exposure pathway?

What provisions are being planned by municipalities for alternative routing in the event of inclement weather such as ice, snow, etc. Routes 23 and 100 usually provides us with one or two accidents delaying our bus runs.

Whose time frames are we going to use to determine the absolute minimum time needed to properly evacuate students and employees?

Where in this country has a greater effort been made over a nineteen (19) month period to develop an adequate evacuation plan?

As the time draws nearer for the opening of the plant, parents are feeling and exhibiting increased stress over the health and safety of their children. We will not compromise either the health or safety of our children or employees in order to have an evacuation plan that is not adequate and implementable.

What are the legal liability exposures of the School District, the School Board, individual School Board members, District Superintendent, employees, and volunteers? If additional liability insurance is needed, who will pay for the insurance?

State and federal planners have been quick to identify, in detail, local responsibilities both financial and legal, but no visible effort to meet any of our unmet needs.

It is my opinion that we must look beyond Chester County to both the state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

Let us not spend these next few months debating how to rearrange the chairs on the deck of the Titanic. Instead, join forces with the task force in seeking a resolution to our unmet needs, as well as educating those in a decision making role the serious deficiencies in the existing planning structure, and the attitude that given an emergency of this magnitude citizens will rise up and solve the problem.

L. Clamond      6/6/84  
Signature                      Date

OWEN J. ROBERTS SCHOOL DISTRICT  
R.D. #1, POTTSTOWN, PA. 19464

TO: Board of School Directors  
Owen J. Roberts School District

FROM: Citizens Task Force for Development of School  
Emergency Planning Guidelines

RE: Interim Progress Report on Development of  
Emergency Radiological Response Plan

DATE: June 5, 1984

*Joseph Clark*

This communication will inform you of the current status of the development of the Radiological Emergency Response Plan. As you know, the Citizens Task Force has worked seriously and conscientiously over the past nineteen (19) months in an honest effort to develop our District Emergency Plan. All activities of this Task Force have been completed within guidelines established by the Emergency Planning Act, the Pennsylvania Emergency Planning Agency, and the Department of Emergency Services.

As directed by these agencies, the primary objectives of the Task Force were to identify resources needed for student evacuation or sheltering; determine existing District resources; and then report all unmet resource needs to the Chester County Department of Emergency Services. The role of the Chester County Department of Emergency Services is to locate and identify additional resources required for a school district evacuation. These resources would then be appropriately documented and attached to our District and County Radiological Emergency Response Plans.

The following outline will summarize the results of the needs assessment completed by the Citizens Task Force and subsequent recommendations for Board consideration.

I. Findings of Fact

A. Resources Needed for Evacuation

1. Fifty five (55), seventy two (72) passenger buses
2. Fifty five (55) bus drivers
3. One hundred fifty six (156) student supervisory personnel
4. Twenty two (22) traffic coordinators
5. Establishment of an appropriate host school site

B. Current District Resources Determined After Extensive Study, Training, and Survey of District Personnel

1. Thirty (30), seventy two (72) passenger buses
2. Eighteen (18) bus drivers
3. Sixty five (65) student supervisory personnel
4. No available traffic coordinators
5. No agreement has been reached regarding the establishment of a host school site

C. Unmet Resource Needs Confirmed by the Citizens Task Force at a Meeting Held on June 4, 1984

1. Twenty five (25) additional school buses
2. Thirty seven (37) additional school bus drivers
3. Ninety one (91) additional student supervisory personnel
4. Twenty two (22) traffic controllers

D. Documentation of this Needs Assessment

1. Meeting on subject of District transportation needs and resources with representatives from the Chester County Department of Emergency Services - March 1983
2. Teacher survey - May 1983
3. Bus driver survey - May 1983
4. Joint sub-committee of Roberts Education Association and Citizens Task Force during the month of July 1983
5. Teacher and bus driver training program - November 1983
6. Teacher survey - November 1983
7. Bus driver survey - December 1983

E. Documentation of Communications Regarding Establishment of Unmet Resource Needs

1. Meeting with representatives of Department of Emergency Services - March 25, 1983
2. Letters to Chester County Department of Emergency Services dated July 20, 1983, March 13, 1984, and May 1, 1984
3. A representative of the Department of Emergency Services has attended all but two (2) regular meetings of the Citizens Task Force of the Owen J. Roberts School District and participated in all discussions of resources.

4. Letter from Department of Emergency Services informing our Task Force that additional resources have not been identified - May 25, 1984

#### F. Conclusions of Fact

1. As a result of thorough investigation and study of resources, the unmet resource needs of the Owen J. Roberts School District are real and valid.
2. None of our unmet resource needs have, as of this date, been identified and documented for us by the Chester County Department of Emergency Services.
3. Our emergency planning cannot move forward until all identified resource needs are provided by the Chester County Department of Emergency Services. Any statements regarding the location of these additional resources must be thoroughly documented in detail including letters of agreement with transportation providers, school bus drivers, supervisory personnel, traffic coordinators, host school arrangements, and all other needs established as real and valid by the Citizens Task Force.
3. If our responsibility is to provide for the safety and welfare of our students during a developing radiological emergency, it is also then our obligation to have assurance that all resources of additional equipment and personnel are of sufficient quality to evacuate our students within adequate parameters of time and safety.

#### II. Recommendations of the Citizens Task Force

- A. We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency.
- B. Since the Philadelphia Electric Corporation is scheduled to begin on-line operations of the Limerick Nuclear Power Generating Station in April of 1985, it is necessary to take an aggressive approach toward resolving the aforementioned emergency planning issues. We, therefore, recommend that communications be initiated with the Federal Emergency Planning Agency informing them of our detailed review of unmet resource needs and the lack of any response by the Chester County Department of Emergency Services.

- C. We also recommend that no Emergency Response Plan be submitted for Board approval without complete and thorough drill and exercise. If the unmet resource needs are eventually identified, we would ask that at least one planned drill be scheduled during the school day with movement of all internal and external resources to determine if emergency procedures and resources will adequately provide for student safety and welfare. In addition, we believe that at least one unscheduled drill be attempted to provide further assurance of the adequacy of the Emergency Plan.
- D. We also recommend that the Citizens Task Force for School Emergency Planning Guidelines continue to function until all emergency planning issues are resolved and the Emergency Response Plan is determined to be adequate to provide for the protection of the student enrollment of the Owen J. Roberts School District.





## Owen J. Roberts School District

Administration Building  
R. D. 1, Pottstown, Pennsylvania 19464  
Telephone (215) 469-6261

May 1, 1984

Mr. John McNamara  
Chester County Department of Emergency Services  
14 E. Biddle Street  
West Chester, PA 19380

RE: •Need for Detailed Response to Citizens Task Force Letter Dated  
March 13, 1984  
•Request to Respond to Additional Unmet Needs As Perceived By  
District Superintendent As Contained Within This Document

Dear Mr. McNamara:

Over the past couple of months, I have had extensive interaction with the Board of School Directors, individual Board members, and Joseph Clark, Administrative Representative to the Citizens' Task Force for School Emergency planning for the Owen J. Roberts School District. Last Friday, April 27, I spent three (3) hours with Mr. Clark reviewing in detail the status of Draft 7. During this session Mr. Clark informed me that he had telephoned your office to see if any response was forthcoming in reference to his letter of March 13, 1984.

Since my meeting with Mr. Clark I have spent an additional six (6) to eight (8) hours thoroughly reviewing Draft 7, and Mr. Clark's communication to you dated March 13, 1984.

I met with the Board of School Directors last evening, April 30<sup>th</sup>, to present my concerns which will be amplified in this communication. I, therefore, request that a detailed response be presented, in writing, to both the Citizens' Task Force letter of March 13<sup>th</sup>, as well as my additional concerns identified herein.

The Owen J. Roberts Citizens' Task Force has spent approximately a year and a half examining this most difficult concept. Prior to the end of this fiscal year I am requesting that the Board of School Directors meet with the Task Force for a thorough and complete update of the proposed Emergency Response Plan. Therefore, it is imperative that we receive from you a written communication no later than June 1, 1984.

Before presenting my concerns, I realize the difficult function you must perform, but I am also aware of Murphy's Law in an emergency situation.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 2

In reference to Mr. Clark's letter of March 13, 1984, I believe the Citizens' Task Force identification of needs are minimal and reflect optimum conditions. That is to say, after thorough review and investigation I believe their needs are in some cases understated. In order to expedite your communication, I will restrict my identification of unmet needs to vehicles required for evacuation, bus drivers needed for evacuation, teachers and employees needed for evacuation, traffic coordinators, and last, but not least, the fact that Owen J. Roberts does not have a host center.

Until such time as these unmet needs identified herein are thoroughly delineated by your agency as being available under the most adverse conditions, no valid evacuation plan [in my opinion] could possibly be feasible. A general statement that these unmet needs will be resolved, or have been resolved without specific details involving how these needs have been met will be unacceptable due to the seriousness of the situation, and our complete reliance on outside resources to conduct an evacuation under the most optimum conditions.

#### SEVENTY-TWO (72) PASSENGER VEHICLES NEEDED FOR EVACUATION

##### ALL PERSONNEL AND STUDENTS

Total Vehicles Needed, Fifty-Five (55) Seventy-Two (72) Passenger Buses.

Vehicles available thirty (30). Please note this is smaller number than that identified by the consultant and the District Task Force. This figure is reduced by ten (10) vehicles for the following reason. A number of contracted drivers keep school buses at home. If this evacuation should take place between the period of 9:30 A.M. and 1:30 P.M., it is very likely that at least fifty percent (50%) of these buses will not be operating because the driver either cannot get back to the bus or has elected to take care of higher family needs. Therefore, I conclude the unmet vehicle needs amount to twenty-five (25) buses.

Please identify where these twenty-five (25) buses will be coming from, as well as, will the twenty-five (25) drivers bringing the buses into our District drive these buses during evacuation??

##### BUS DRIVERS

The initial survey indicated that twenty-five (25) of our District drivers will drive a school bus during a radiological emergency. However, many of these drivers did preface their statement stating that their families would come first, and they must be assured that their particular children had been taken care of. Knowing Murphy's Law in emergency situations, I believe that the twenty-five (25) figure more realistically would be a maximum of eighteen (18).

Therefore, I conclude that our unmet driver needs to be thirty-seven (37) drivers. If you are successful in acquiring twenty-five (25) buses and twenty-five (25) drivers from outside our area, there is still a need for twelve (12) additional drivers. Please identify where these drivers would be coming from.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 3

### TEACHER NEEDS EVACUATION

As you are aware, the Task Force did survey our teachers at least twice. The second survey coming after an extensive inservice on the duties and responsibilities of teachers during an evacuation.

Our teachers were very open, and I believe honest, in their responses to this survey. Human nature is to first of all secure urgent family needs.

Sixty-six percent (66%) of our professional staff responded to this survey. This sixty-six percent (66%) response equates to one hundred thirty-seven (137) individuals. Please be advised, however, that only sixty percent (60%) of those responding signed the document. Therefore, a more realistic teacher need will be based on the number who signed the survey.

A summary of the survey is as follows:

QUESTION: Will you be willing to accompany students by bus to the host center or mass care center?

The number who signed the document equates to approximately thirty-eight (38) teachers.

QUESTION: Will you be willing to drive your own vehicle [without students] to the host school or mass care center to provide supervision for our students?

The number who signed the document equates to approximately fifty-six (56).

Teacher absences were not factored into the estimate. During November, for example, we had a daily absence of 13.5 teachers.

From the data available, I would conclude that, again giving Murphy's Law, human reaction to emergency situations and family needs, that internal staff resources accompanying students and attending to students at host centers will be more in the neighborhood of sixty (60) to sixty-five (65) teachers.

Our total teaching staff to date is two hundred eight (208) teachers to supervise our current enrollment. If we were to reduce our supervisor ratio by twenty-five percent (25%), we would still have a total need for approximately one hundred fifty-six (156) teachers. With only sixty-five (65) anticipated local teachers, there is a definite need for at least ninety-one (91) adult volunteers to assist students by bus or by car to the host school or mass care center. Who are these ninety-one (91) volunteers and where will they be coming from?

I have not attempted to address the issue of sheltering for I believe we need to have the resources determined for evacuation and if they be resolved, then sheltering would be resolved.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 4

TRAFFIC COORDINATORS

As the time draws near for the opening of the plant, it is quite clear that our citizens have every intention of coming directly to our facilities in order to pick up their children in the event of an emergency. In no way will the School Administration prevent parents from picking up their children. Therefore traffic controllers will be an absolute must at each of our educational centers.

I predict the need for the following traffic controllers, in addition to school employees, at each of the following educational centers:

WARWICK ELEMENTARY CENTER	3 Traffic Controllers
FRENCH CREEK ELEMENTARY CENTER	3 Traffic Controllers
VINCENT ELEMENTARY CENTER	3 Traffic Controllers
EAST COVENTRY ELEMENTARY CENTER	3 Traffic Controllers
NORTH COVENTRY ELEMENTARY CENTER	4 Traffic Controllers
CENTRAL CAMPUS	a minimum of 6 Traffic Controllers
TOTAL	<u>22</u> Traffic Controllers

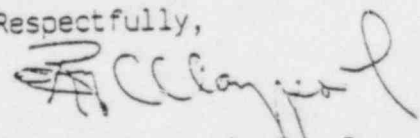
In addition to traffic controllers, I raise a serious question as to the traffic controlling activities that will take place at the intersection of Routes 23 and 100, Route 100 and Cadmus Road, and Route 23 and the exit from Owen J. Roberts. My personal interaction with a number of parents indicates that the first response will be to converge on our educational centers for the purpose of gaining access to their children. Unless this need is met, we will experience mass hysteria, confusion, and total blockage of any possible evacuation from our school facilities by school buses.

HOST SCHOOLS

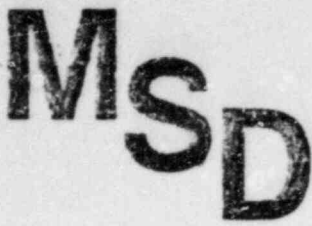
As of this date we still do not have any agreement with another school district in the case of an evacuation.

I request your immediate attention to these most serious questions. Members of my staff and I would be more than happy to sit down with you, at your convenience, to discuss in detail our concerns as well as the content of this communication.

Respectfully,



Roy C. Claypool, Ed. D.  
District Superintendent



## METHACTON SCHOOL DISTRICT

DR. LAIRD P. WARNER  
Superintendent

Fairview Village, PA 19403

### EMERGENCY EVACUATION PLANNING COMMITTEE SURVEY FOR BUS DRIVERS

TO: Methacton Bus Drivers  
FROM: Emergency Evacuation Planning Committee  
RE: Attached preliminary driver questionnaire  
DATE: October, 1984

A committee made up of representatives from the administration, teaching staff, bus drivers and community people is currently in the process of preparing a radiological emergency response plan for the Methacton School District. This plan is necessary because all three elementary and the Arcola School are within the ten-mile radius of the emergency planning zone (EPZ) of the Limerick Nuclear Power Plant. Procedures for evacuating and sheltering students are included in the plan.

Bus drivers of the district will be called upon to move students to a host school from each of these four areas in the event of an emergency situation. In addition, bus drivers may also be asked to in turn, transport students from the host school to a mass care feeding center at 8:00 pm.

In addition to the threat of a nuclear accident at Limerick, a good emergency plan will also be useful in the event of any other emergency that might occur at or near any of our schools. Such emergencies could occur at any time and we should be prepared.

It is vital to the committee that we have some idea of how many drivers would be willing to complete emergency driving assignments in any type of emergency. Therefore, we are asking you to complete the attached survey. This survey should be returned to Mr. McMenamin as soon as possible. If you have any questions about the survey, you may direct them to Mr. McMenamin or to Tyrone Johnson who serves as a member of the committee.

The committee is very grateful to you for spending a few minutes to complete this important survey.

METHACTON SCHOOL DISTRICT  
PRELIMINARY DRIVER QUESTIONNAIRE  
AVAILABILITY FOR EMERGENCY SITUATIONS

Please read each of the following questions carefully and answer with sincerity. We would welcome any comments you would have concerning any aspect of the topic of emergency preparedness.

1. In the event of an accident at the Limerick Power Generating station which require student evacuation to a host school during school hours:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with Emergency Response Plan of the Methacton School District.

B \_\_\_\_\_ I will not participate in the student evacuation.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. In the event of an accident at the Limerick Power Plant which requires student evacuation past regular school hours to a host school and/or a feeding center up until 8:00 pm:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with the Emergency Response Plan of the Methacton School District.

B \_\_\_\_\_ I will not participate in the student evacuation.

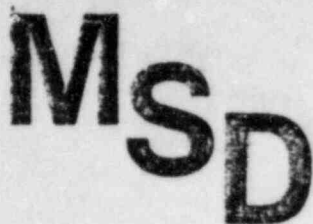
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. In the event of an emergency situation (other than nuclear accident), such as a toxic waste spill, flood, fire, etc., which requires student evacuation during school hours:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with the Emergency Response Plan of the Methacton School District.

B \_\_\_\_\_ I will not participate in the student evacuation.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



## METHACTON SCHOOL DISTRICT

DR. LAIRD P. WARNER  
Superintendent

Fairview Village, PA 19403

### EMERGENCY EVACUATION PLANNING COMMITTEE SURVEY FOR FOR STAFF MEMBERS

TO: All Methacton Staff Members (excluding bus drivers)

FROM: Emergency Evacuation Planning Committee

RE: Attached preliminary staff questionnaire

DATE: October, 1984

A committee has been formulated to develop a radiological emergency response plan for the Methacton School District. This plan is necessary because all three of our elementary and the Arcola school are in the ten-mile radius of the emergency planning zone (EPZ) of the Limerick Nuclear Power Plant. Procedures for evacuating and sheltering students are included in this plan.

Staff members of the school district will be asked to supervise students during emergency situations. This may require sheltering within a building or evacuating school students on buses to a host school outside the EPZ. An evacuation of school students will be followed by an order to evacuate the entire population from the ten-mile EPZ surrounding Limerick.

In addition to the threat of a nuclear accident at Limerick, a good emergency plan will also be useful in the event of any other emergency that might occur at or near any of our schools. Such emergencies could occur at any time and we should be prepared.

The committee is comprised of representatives from the administrative and teaching staff, parents, and interested community persons. This group has reviewed drafts of an emergency response plan, and will be making recommendations for improving the plan to the board of education. It is vital that the committee have information as to the availability of staff members for supervising students in an emergency situation. The Methacton bus drivers, also being surveyed, are using a separate instrument.

Your cooperation in taking a few minutes to complete the attached questionnaire is gratefully appreciated. Completed questionnaires should be returned to your building principal as soon as possible. If you have any questions relative to the contents of this questionnaire, please direct them to Mr. James P. Brown, Principal of Arrowhead School, who is serving as the chairperson for the committee. It is also important to note that the questionnaire is simply preliminary. It is possible a more specific survey will be devised later in the year.

METHACTON SCHOOL DISTRICT  
EMERGENCY EVACUATION COMMITTEE PRELIMINARY QUESTIONNAIRE

Please read each of the following questions carefully and answer with sincerity. We would welcome any comments you would have concerning any aspect of the topic of emergency preparedness.

\_\_\_\_\_  
Name of School In Which You Work

1. Would you be willing to remain at the school beyond regular hours with students until they are released to their parents or transported to a host school or mass care center in the event of an accident at the Limerick Power generating station?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

2. Would you be willing to accompany students by bus to the host school or mass care center?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

3. Would you be willing to drive your own vehicle (without students) and remain at the host school or mass care center to provide supervision for our students?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

4. Are you an emergency worker for any other agency?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, please list (e.g., ambulance crew, fire company, CB unit, National Guard) \_\_\_\_\_

5. Are you a resident of the Emergency Planning Zone (approx. 10-mile radius of Limerick)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, can your family be evacuated safely without your assistance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. General Comments: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_





# Evening phoenix

Wednesday, October 17, 1984

Phoenixville, Pa.

30¢

## In S-F district

# Evacuation plan going nowhere

By E.J. BROWN  
Staff Writer

ROYERSFORD — Despite low-power testing at the Limerick nuclear generating station being on the horizon, the Spring-Ford School Board is refusing to go to work on a district evacuation plan, since it feels it may be impossible to complete.

"We have not taken any steps to organize a committee," Superintendent Dr. William A. Welliver told a parent who questioned the status of the plan at the board meeting Monday night. He added that as far as he knows, only one school district actually has a plan at this point, and mentioned the frustration that has plagued the development of a plan in the Owen J. Roberts School District. Roberts was hampered by Chester County's inability to provide enough buses and drivers to support the evacuation.

School board members seemed to be of the same mind, and would not commit themselves to the formulation of such a plan in the near future.

Karen Kreider, of Mason Street in Royersford, who has been monitoring the progress of the district's response to nuclear emergency preparedness, was annoyed that nothing was being done.

"When my children are in school, I'm at work in Philadelphia," she said. "If there's an emergency, I can't leave and come back. You are responsible. I submitted my name in

(See PLAN, P2)

## • Plan

(Continued from Page 1)

May to be on a parent committee, and so far nothing has happened...I don't think we can just put this thing in mothballs and refuse to deal with it."

Welliver responded, "We would welcome a group that would like to develop a plan that is reasonable."

He said that he expected the district to have a plan by the time Limerick goes to full-power next spring. When asked when the process would begin, board President Dr. Bruce L. Burns told Kreider, "You will hear from us in the future."

The school district is protesting the use of its name on a preliminary draft plan made up by a consultant for Philadelphia Electric Co., that has been submitted to the Pennsylvania Emergency Management Agency as the district's plan. Welliver recently wrote a letter to both state and federal emergency management offices saying the plan in their hands was not from the district, and asking that it not be distributed to other agencies as such.

Federal officials assured him that

nothing in their hands was being considered as a final draft, and that copies of the consultant's plan would not be given out.

In a letter dated Oct. 10, however, John L. Patton, director of PEMA, told Welliver that his agency "understood" that the draft had been given to them through the Montgomery County Office of Emergency Preparedness "with the district's knowledge."

Last April, Robert Bradshaw, of Energy Consultants, a Harrisburg area company working for PE, said that he had already met with Welliver, although not with the school board, to discuss ideas for the plan. Patton said that PEMA has already been involved with reviewing the ongoing drafts of the Spring-Ford plan since last October. The agency has released copies of it to a "service list" designated by the NRC's licensing board.

When asked why the board was refusing to work on the plan, Burns shrugged, "No one has ever come to us and said we have to do it."

He said, however, that the board's lack of action is not an attempt to keep the Limerick facility from obtaining its license to operate.

# Town and Country

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2 Sections, 20 Pages

Serving The Upper Perkiomen Valley Since 1899

Wednesday, March 21, 1984

## School officials claim no training given for

## nuclear evacuation

By VIC ATTARDO  
Staff Writer

Upper Perkiomen school officials are disputing a statement issued by the Montgomery County Office of Emergency Preparedness (EOP) that school personnel have been trained for an emergency in the event of a nuclear accident at the Limerick power plant.

The statement, issued in a press release by EOP coordinator A. Lindley Bigelow, claims that "training has been completed for school administrators, teachers, school bus drivers and other school staff personnel from throughout the county."

But three Upper Perk administrators — Dr. George Bonekemper, assistant superintendent; Fred O. Dietzel, high school principal; and Anthony Fry, coordinator of nuclear emergency plans and assistant high school principal — say there has been no such training.

All three school officials disputed the EOP statement saying it was "erroneous" (Fry); "not correct" (Bonekemper); "not correct as far as I'm concerned" (Dietzel).

At issue in the dispute is whether Upper Perkiomen school officials, teachers and staff consider themselves to be trained well enough to handle problems that might arise during a nuclear accident. In addition,

Bigelow's statement comes on the heels of two other problems which the school district has faced regarding the emergency evacuation plans.

Last month superintendent Dr. Thomas E. Persing questioned the wording of a draft evacuation plan for the Upper Perk schools. On the cover of a plan was the claim: "Prepared by: Upper Perkiomen School District." When the wording was questioned, that the plan was "prepared by" the school district when in fact the district had had little to do with the draft document, it was generally agreed by the Upper Perkiomen school board that the plan should read, "prepared for." Persing contacted the authors of the draft plan, Energy Consultant Inc. of Harrisburg, who agreed to change the wording on future drafts.

The second problem arose with the correction of a map on which the draft plans were based. Until a few weeks ago, the so-called "circle of evacuation" did not include Upper Hanover Township. But an error of a quarter of a mile was found on the maps and suddenly a larger area of Upper Hanover Township was included in the emergency zone. The Upper Perkiomen High School is located in the borough of Red Hill, but a small area of the school district's land lies in adjacent Upper Hanover Township.

Rumor spread that the Upper Perkiomen High School would now be included in the list of schools to be evacuated in the event of a nuclear emergency.

While this contingency is not the case at the present time, there was confusion regarding the rumor. A Marlborough Township official went so far as to say at a public meeting that the high school was now included in the evacuation contingency.

The EOP press release published in *Town and Country* on March 7 stated that "training, based on emergency plans being prepared by county and local governmental units, consists of information relating to the effects and measurement of radiation as well as training in specific actions that might have to be undertaken."

According to the three district officials, school personnel were given a "presentation" on the plans and, in the words of Dr. Bonekemper, "we don't consider that training."

Bonekemper first commented about the EOP press release on Monday.

"Some of our people took some exception to that," he said. "They didn't think they were trained."

Bonekemper said that Emergency Consultant Inc. put on a program for the teaching staff during a February in-service day. Bonekemper said that the staff did not consider the program to be "a training session" adding, "How could we be trained when the final plan hasn't been accepted yet and we are still in a state of flux. Training is more than just giving information."

Dietzel said the Emergency Consultant program was a "presentation."

"I would not say that was training. I don't consider myself trained. 'Training' is not correct as far as I'm concerned."

Fry agreed with Bonekemper's and Dietzel's assertion, "That's erroneous," said Fry. "That's not true. They gave us some information."

At the Montgomery County EOP Bigelow and a assistant on a joint telephone hookup characterized the school program as an "overview of the evacuation plans ... as to what has to be planned for, who are the participants."

The EOP says it has begun radiological emergency response training to assist emergency organizations should an accident occur at the Limerick plant. Organizations scheduled to receive training include fire, police, rescue, emergency medical, public works personnel, county and municipal officials and staff, employees of health-care facilities, communication dispatches and those associated in the

(Continued on page 5)

# School has 'no training'

(Continued from page 1)

field of agriculture.

Bigelow and his assistant said that training differed with each group. They repeated that Upper Perk "has been trained."

"I can't say if they weren't in attendance," he added.

Beside the issue of what constitutes adequate training for a nuclear emergency, high school principal Fred Dietzel said the draft plan he heard reviewed during the presentation was "impossible."

"The plan did not make sense," he said. "It was so complicated I can't remember it. I told them it was impossible."

Dietzel said the plan called for someone to announce, through the high school intercom, that Limerick was having an emergency.

"Can you imagine the panic," he said. "If you have to think in a crisis situation it is not going to work."

Dietzel criticized the draft saying a more "practical" plan was needed. Liking the situation to a fire drill, Dietzel said school evacuations work because they are simple, practiced and an automatic response.

"They (the planners) have to develop a plan where you deal with people who might get emotional. The procedure they were outlining to me was completely impossible," he said.

Each school official interviewed emphasized that the plans are only in draft form and that no action can be taken until they are approved by the Upper Perkiomen School Board after a public meeting.

But many of basic possibilities that might occur in the event of a wide spread nuclear evacuation have not been agreed upon though the plan is in its third draft.

While it is generally agreed (at this time) that the Upper Perkiomen High School would not be evacuated in event of an emergency, there are still questions regarding Green Lane Elementary School and the use of the high school as a relocation center.

Bigelow said it is up to the school district to decide whether or not to evacuate Green Lane Elementary. He also said that there is a proposal for the high school to become a relocation center for emergency services.

Fry said the high school could be used as a host school for students from the Montgomery County Vo-Tech in Limerick. But legal agreements for the host school plan and a proposed mass care center have not been signed by the school district making neither final, Fry emphasized.

Fry said he will participate in the decision on whether or not Green Lane Elementary is to be evacuated in the event of a nuclear accident. Fry said his recommendation would be based on a decision by Marlborough Township officials whether or not the township will participate in drafting emergency plans. (Green Lane Elementary is located Marlborough.)

"They way they go would determine what we do," he said.

Fry said Limerick's evacuation plans are a long way from completion.

"We're dealing with a very complex problem. These are drafts and there will be mistakes made along the way," he said. "It's like war you have to adjust to the situation."