

RE: Phila. Elec. Co. Limerick Gen.Sta.
Units 1 and 2

Docket No. 50-352,353

July 23, 1984

AMENDED ANSWERS BY ANTHONY/FOE TO PECC's FIRST SET OF INTERROGATORIES
RE. OFFSITE EMERGENCY PLANNING CONTENTION LEA/FOE 24.

28.(a) Valley Forge Park abuts the Penna.Turnpike on the south and the Schuylkill River on the east. King of Prussia lies adjacent to the park on the south and east. The park has steep hills; K.of P. is more rolling.

(b) We are still gathering these figures. (c) Same as b. (d) The congestion points would be Valley Forge Park (VFP) entrances, Schuylkill Expy. intersection with #202, Penna.TPK. toll booths, RTs # 23 and 252. Our analysis of the extent of the congestion and duration is still being compiled.

29. We do not agree with the HHM study on vehicle queuing but we have not completed our total figures.

30. The HHM study overlooks the traffic congestion and blockages on all the highways in the Valley Forge/King of Prussia area and especially at the intersections specified in (d) above. Additional access points would not solve this problem. The only possible answer would be:re-routing of all evacuation traffic completely away from the VFP/K.of P. area.

31. See # 30.

32. We disagree with HHM data, evacuation time estimates, and conclusions. The conclusion from our study is that there will be a panic situation in the VFP/KOP area in case of a nuclear alert and that the access to the Penna.TPK will be blocked for at least 3 hours and all the highways in the K.o P. area ,including the EPWY.and RT.202 will be similarly blocked.

33. All traffic from EPZ would have to move north, then east and west.

We expect to call the following witnesses:

ATTACHMENT #2

- Robert L.Rowland, District Engineer, PennDot.
- Valley Forge Nat.Park Manager. U.S. Nat Park Serv. Regional Director, Phila. Manager Penna.Turnpike, Valley Forge Div.
- Director Penna. State Police, Valley Forge Dist.
- Paul Bartle, Chairman, Montgomery County Commissioners.
- Upper Merion Twp.: Ralph Volpe, Chairman, Ronald Wegermann, Mgr., John R.Waters, Fire, Carl A.Mattia, Chairman, Advisory Board.
- Managers of King of Prussia Shopping Malls.
- Cc: Judges Brenner, Cole, Morris, FEMA, PEMA.
- NRC Counsel, PECC, Commwl., LEA, others on Serv.list

Respectfully submitted,
Robert Anthony
BOX 186, Moylan, Pa. 19064

8408090253 840806
PDR ADDCK 05000352
PDR

Please fill out and return to: Limerick Ecology Action
P.O. Box 761
Pottstown, PA 19464

Name of School: Spring-Ford Area School District

Contact person for evacuation planning: Dr. William A. Welliver

Mailing Address: 199 Bechtel Road, Collegeville, PA 19426

Phone: 489-1666

Has a first draft Radiological Emergency Response Plan for Limerick been completed? Yes

If not, what is the status of evacuation planning: Initial draft is being rewritten.

Is public input being incorporated into your plans? YES

If yes, how? A tentative draft of the plan will subsequently be available for public inspection, comment, and critical review prior to any formal action by the Board of School Directors.

ATTACHMENT #3



COUNTY OF MONTGOMERY

COMMISSIONERS
PAUL BAKER BARTLE
ALLAN C. MYERS
GIA C. BANNING

DEPARTMENT OF PUBLIC WORKS
A. W. MARTIN, P.E., DIRECTOR
DIVISION OF PUBLIC SAFETY
JOSEPH D. HAMILTON, DIRECTOR

OFFICE OF EMERGENCY PREPAREDNESS
100 WILSON BOULEVARD
EAGLEVILLE, PENNSYLVANIA 19403
(215) 531-5100
A. LINDLEY BIGELOW, COORDINATOR

July 10, 1984

Mr. John L. Patten, Director
Pennsylvania Emergency Management
Agency
P.O. Box 3321
Harrisburg, PA 17105

Dear John:

With the exercise of the Limerick RERP scheduled for July 25, 1984, only two weeks away, I have advised the County Commissioners of the status of our plan and my estimation of our ability to adequately implement it. In short, there is insufficient time remaining for many municipalities to receive the additional training needed to properly demonstrate implementation of the RERP.

Several local Emergency Management Coordinators are "going it alone"; they lack an EOC Staff of any kind. In other municipalities only minimal staff is on hand and a lack of alternates or depth at key positions is evident.

Locally, more training is still needed for Radiological Monitoring/Decontamination teams, Police Departments, Fire Companies, Ambulance Squads, and municipal EOC Staff.

In the area of facilities and equipment, there is still much to be done; ie., telephone equipment, signs, dosimetry, etc. I have concerns that the municipalities could demonstrate that these plans can be implemented, without having the physical resources in place and operable.

As I understand it, this exercise has a two-fold purpose: 1) to demonstrate an ability to implement emergency plans effectively to Federal authorities, and 2) to provide the participants with an opportunity to evaluate their emergency plans as they have been developed so far, in order to identify and make changes as applicable.

At this writing, I believe only five municipalities will be sufficiently staffed and trained to merit an evaluation by Federal observers. Perhaps another ten will be minimally staffed and would be willing to participate, but not to be graded.

ATTACHMENT #4



EDUCATION

Board won't sign evacuation pact

By Maura C. Ciccarelli
Special to The Inquirer

The Lower Merion school board has refused to sign an emergency-evacuation agreement with the Montgomery County Office of Emergency Preparedness but has agreed to let the county use its buses and drivers in the event of a natural disaster.

The rejected agreement was part of a Philadelphia Electric Co. evacuation plan in the event of an accident at the Limerick nuclear power plant in Montgomery County.

At Monday's meeting, board members Meridyth Senes and J. Roger Williams Jr. said that a letter from the board would offer the county use of buses and facilities in an emergency. But the board, Mrs. Senes said, would not be "meeting PE's needs" to get the Limerick plant approved.

Philadelphia Electric must have complete evacuation plans for the 10-mile radius around the plant to be certified by the Nuclear Regulatory Commission, said James B. Pugh, the school superintendent. Lower Merion is 27 miles from Limerick, but the Montgomery County office has asked for help from all school districts in the county, he said.

The company has been asking neighboring communities to help in the evacuation planning and has received a great deal of resistance from local authorities.

The requested agreement called for the school district to "provide buses and drivers to the maximum extent possible, for the use during an emergency, for transportation of individuals should an evacuation be required of Montgomery County residents affected by man-made or natu-

Lower Merion

ral disasters, including an incident at the Limerick Generating Station."

The board voted unanimously to send the letter in lieu of the signed agreement, deleting "an incident at the Limerick Generating Station" and keeping "man-made or natural disasters."

"Of course it would be our natural instinct to help" in the event of a disaster, Mrs. Senes said.

Williams said, "I would feel better just sending a letter, enclosing forms saying, 'This is what buses, facilities and equipment we have. It's here if you need it.' We would use our best efforts to help the evacuation plan."

Pugh said the board would review a final copy of the letter before sending it to the county agency.

In other business, the board approved an amendment to the attendance policy for students who live near Lower Merion High School. Students from the Welsh Valley Middle School will be affected by the change.

Most students go through the Penn Valley Elementary School and the middle school with the same group of classmates. When a class gets to high school, it is split up. Students who live within walking distance of Lower Merion go to that school and the rest go to Harrilton High School.

The amendment will permit students to choose which high school they want to attend if they live near Lower Merion. If students choose Harrilton, they will be bused from Lower Merion to Harrilton.

Hear Noise Complaints

(Continued from page one)

contact with the LCB in Harrisburg, and they had stated their office had been in touch with the Lower Salford Township police about their jurisdiction in the matter. Township Police Chief Terry Scholl said he had been contacted by the LCB which reiterated the fact that the township police have the jurisdiction over areas outside the tavern and the LCB has control over things inside the building. Scholl added, "It's not my responsibility for what goes on inside."

Supervisor Jay Moyer added, "We're doing everything within the law to control the problem. I'm very disappointed with the operation there." Moyer added that Simone had been called in to talk to the supervisors on two different occasions and he thought it was a waste of time to ask him to come in again.

Roth told the residents that the township would be in touch with John T. Hale, director of the Bureau of Enforcement of the LCB, to press him for a hearing date for the citations against the Lederach Station and "to see what kind of clamp we can put on it." Roth said the township would consider sending transcripts of the recent township meetings for evidence at the upcoming LCB hearings.

Garrity said they will inform the township residents when the hearing is scheduled and they would encourage concerned residents to attend.

The supervisors also reported they had received a copy of a letter from Rep. Raymond Bunt, Jr. (R-147th) which had been sent to Hale concerning the ongoing noise problem at the Lederach Station. Rep. Bunt again urged the LCB to expedite action against the nightclub and to set a hearing date.

William Franzen had also provided the supervisors with a copy of a letter dated July 6 from Hale outlining the pending citation action against the Lederach Station for: sales on Sunday after 2 a.m.; permitted entertainment when sale of alcoholic beverages is prohibited; sale of alcoholic beverages during prohibited hours and the use of loudspeakers whereby the sound of music could be heard outside.

A check with the LCB office in Harrisburg this week showed that the Lederach Station has already pleaded guilty to the charges listed above stemming from incidents in April and May of this year. Frank Friel, LCB assistant supervisor, said that the Lederach Station had waived the right of a hearing, and on July 13 the LCB imposed an \$850 fine. Friel said the establishment had 20 days in

which to pay the fine.

In addition Friel said a second set of charges is pending against the Lederach Station in connection with additional charges about noise and sales on Sunday in a citation dated June 18. He said a hearing date for the June 18 charges is pending, but, with the backlog of cases, it could take four to six weeks to set up a hearing in Philadelphia.

Friel explained that under the state Liquor code if an establishment has three separate citations within a four-year period, the LCB has the right to suspend or revoke the license of that establishment.

When the LCB was asked why the citation and hearing process for the Lederach Station has taken so many months, Bruce Bicken, assistant counsel for the LCB noted, "The citation process can take four to six months. Following an investigation, the LCB legal office may take up to 90 days to determine if there is sufficient information to proceed. The LCB will then decide if a hearing date should be set."

Joe Simone, who was contacted by phone this week said, "I've spoken to a lot of people living around me and they're not making a big deal about it. It's only these two couples. I'm trying to solve the problem. This is not like living next door to a home, this is a 250-seat club. I don't know if I can get to a point to satisfy them."

Simone said since receiving the complaints from the neighbors, he has covered over the bay window and the glass door in the foyer. He said he had also contacted Wargo Interior Systems of Hatfield, an acoustical contractor, to come out to the restaurant and make a proposal on what could be done to better sound-proof the building.

Paul Fetch, vice president of Wargo, said he had been out to the Lederach Station several weeks ago, and he is now in the process of getting a proposal together to "keep the sound down."

Simone added, "The residents make statements about turning the band down, but you have to have a certain volume to entertain. Obviously something has to be worked out. Any club which has music, you're going to hear it outside the building."

Simone said he felt he was trying to cooperate with the neighbors, adding that he had put a trash can out front, and he had an employee who daily went about the area with a trash bag. The club owner noted, "The residents should be a little more tolerant, they could be a lot worse off with something else there."

In another matter at last week's township meeting, resident Deborah Brown asked about the township's participation in this Wednesday's emergency response drill being coordinated by the Pennsylvania Emergency Management Agency. The drill is for a response plan in the event of an emergency at the Limerick nuclear power plant.

Mrs. Brown said, "The more I've read about the plan the more concerned I've become. A section of this township is in the 10-mile radius of the Limerick plant. I see problems with this plan even though it's just a paper drill."

Chief Scholl said, "We, like most townships, are just getting set up for an emergency response. We will be participating in a learning sense. Some of our personnel have gone to training sessions, but we are not ready at this point to implement a real mass evacuation." Chief Scholl said the township has asked that they be allowed to participate but not to be graded at this point.

Mrs. Brown said she was concerned that if this was the only drill conducted by the PEMA, the observers may conclude that Lower Salford is ready to respond in case of an emergency. However, both Supervisors Roth and Moyer said they did not think the drill was to see if the township was ready, but as a start for an emergency plan.

Chief Scholl added that the township was asked by the county to set up an active emergency management team, which the chief currently heads. Using a plan devised by a private contracting firm, Energy

Consultants of Harrisburg, Lower Salford has been given directions for its portion of the plan from the Montgomery County Emergency Management Agency.

Chief Scholl added that a siren has been set up in the area of Hoffman road, primarily as a warning device for an emergency at the Limerick plant. He said the Hoffman road area plus other sections of the township fall into the 10-mile EMZ (emergency management zone).

The chief also reported that the township police committee is looking into the wording of a new ordinance which would limit the use of firearms in the township. The chief said the purpose of the ordinance would be to limit rather than prohibit the use of firearms.

Chief Scholl said, "This is not a rural farming community anymore. I know residents like hunting, but this ordinance is now necessary."

ATTACHMENT #A
Souderton Independent 7/25/84

CERTIFICATE OF SERVICE

DOCKETED
USNRC

I, Maureen Mulligan, hereby certify that I have served the foregoing supplemental responses to interrogatories requested by Philadelphia Electric Company upon the following service by deposit in first class mail, postage prepaid, expect for those marked (*) who have been served by express mail, this 6th day of August 1984.

84-460-3140:21
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