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September 10, 1984

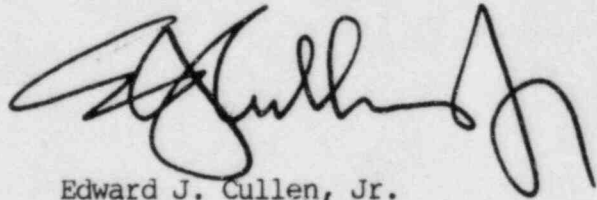
Ms. Maureen Mulligan  
Limerick Ecology Action  
762 Queen Street  
Pottstown, PA 19464

Re: Limerick Generating Station, Units 1 and 2  
Docket Nos. 50-352 & 50-353 *OL*

Dear Ms. Mulligan:

In accordance with the Board's Order of June 1, 1982, I am forwarding to you copies of correspondence and documents regarding emergency planning among Applicant, NRC Staff, the Commonwealth of Pennsylvania and other responsible governmental agencies.

Very truly yours,



Edward J. Cullen, Jr.

EJC, JR./pkc  
encs.  
cc: See Attached Service List  
0000q/0006q

8409130330 840910  
PDR ADDCK 05000352  
PDR

DS07  
*[Handwritten initials]*

cc: Judge Lawrence Brenner (w/o enclosure)  
Judge Peter A. Morris (w/o enclosure)  
Judge Richard F. Cole (w/o enclosure)  
Judge Christine N. Kohl (w/o enclosure)  
Judge Gary J. Edles (w/o enclosure)  
Judge Reginald L. Gotchy (w/o enclosure)  
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Ann P. Hodgdon, Esq. (w/enclosure)  
Mr. Frank R. Romano (w/o enclosure)  
Mr. Robert L. Anthony (w/o enclosure)  
Zori G. Ferkin, Esq. (w/enclosure)  
Mr. Thomas Gerusky (w/o enclosure)  
Director, Pennsylvania Emergency (w/o enclosure)  
Management Agency  
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Angus Love, Esq. (w/o enclosure)  
David Wersan, Esq. (w/o enclosure)  
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Martha W. Bush, Esq. (w/o enclosure)  
Spence W. Perry, Esq. (w/o enclosure)  
Jay M. Gutierrez, Esq. (w/o enclosure)  
Atomic Safety & Licensing (w/o enclosure)  
Appeal Board  
Atomic Safety & Licensing (w/o enclosure)  
Board Panel  
Docket & Service Section (w/enclosure - 3 copies)  
James Wiggins (w/o enclosure)  
Timothy R. S. Campbell (w/o enclosure)



# ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110  
(717) 236-0031

'84 SEP 12 A11:19

August 22, 1984

OFFICE OF SECRETARY  
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Dr. John Kiss  
Special Education Director  
Berks County Intermediate Unit  
2900 St. Lawrence Avenue  
Reading, PA 19606

Dear Dr. Kiss:

As I discussed with Dr. Deitrich, I am working with the Owen J. Roberts School District to develop a radiological emergency response plan for incidents at the Limerick Generating Station. Part of that planning process is to develop an agreement with the Twin Valley School District to act as a "host school" district, in the event of an evacuation of Owen J. Roberts students during school hours. A "host school" is where students who are evacuated remain until they are picked up by their parent or guardian. Owen J. Roberts special education students would also be evacuated to Twin Valley School District (High School and/or Twin Valley Elementary Center).

It would be helpful to the planning process if you would discuss with the special education staff working in the Twin Valley area, the possibility of voluntarily remaining, after Twin Valley dismissal, to assist Owen J. Roberts special education staff to supervise special education students until parents or guardians arrive to pick up the students.

I will await your response. If you need additional information or assistance, give me a call or you can contact Ms. Nancy Krauss, Business Manager, Twin Valley School District, who is coordinating development of the host school agreement.

Thank you for your consideration.

Sincerely,

John H. Cunnington  
Associate Senior Planner

JHC:jr

cc. Nancy Krauss, Twin Valley School District  
Joseph Clark, Owen J. Roberts School District  
Timothy Campbell, Chester County DES  
Robert Reber, Berks County EMA  
Francis Deitrich, Berks County IU

**ENERGY CONSULTANTS**Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110  
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August 24, 1984OFFICE OF SECRETARY  
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BRANCH

Mrs. Patricia Carson  
Twin Acres CountryDay School  
105 Cherry Avenue  
Trappe, PA 19426

Dear Mrs. Carson:

Thank you for meeting with me August 22, 1984 with regard to the radiological emergency response plan for incidents at the Limerick Generating Station.

As discussed, I will incorporate the information gained during our meeting into the next document. The next document will be Revision 0 rather than a new draft. In this format you may review the material and authorize or accept it.

If you have any questions or desire any further information, please contact me.

Sincerely,

*Henry C. Tamanini*  
Henry C. Tamanini

HCT:jr  
cc. Montgomery County OEP



# ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110  
(717) 236-0031

August 24, 1984

Mr. Walter A. Hessinger  
Superintendent  
Downingtown Area School District  
122 Wallace Avenue  
Downingtown, PA 19335

Dear Mr. Hessinger:

Thank you for the opportunity to meet with you and Rita Jones on August 23, 1984.

As discussed, the next step in the planning process for the Downingtown Area School District is the generation of Revision 0 of the radiological emergency response plan for incidents at the Limerick Generating Station. The new document will be developed based on the information in the updated Attachments.

Following our meeting, I discussed your request for information regarding upcoming municipal meetings within the district. Any subsequent municipal meetings pertaining to the radiological emergency response planning process for incidents at the Limerick Generating Station should be communicated to you.

Thank you again for your time and consideration. Please contact me if you have any questions regarding the next document.

Sincerely,

*Henry C. Tamanini*  
Henry C. Tamanini

HCT:jr  
cc. Chester County DES



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REC'D

AUG 31 1984

DOCKETED  
R. A. KANKUS

August 29, 1984<sup>84</sup> SEP 12 AM 12:22

Mr. Richard T. Brown, Chairman  
Board of Supervisors  
Lower Providence Township  
180 Park Lane Drive  
Eagleville, PA 19403

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Mr. Brown:

This correspondence is in response to the transcript of the public hearing held on April 25, 1984, concerning Draft 5 of the Lower Providence Township Radiological Emergency Response Plan for Incidents at the Limerick Generating Station. The transcript, which was first received by me on August 21, 1984, presents five questions which could not be answered during the hearing.

The following is a summary of each question, a source reference, and a response:

Question #1, page 6, line 16: At any given time, how many people would possibly be on site at Limerick?

Response: According to Philadelphia Electric Company, there will be a maximum of approximately 175 personnel on site at any given time once the plant is operational. This is exclusive of any construction personnel that may be present.

Question #2, page 45, line 3: What is the target date for commercial operation?

Response: Spring 1985.

Question #3, page 49, line 14: What are the relocation sites for Eagleville Hospital?

Response: The most current draft of the Eagleville Hospital Plan indicates that the detoxification patients are to be relocated to Warminster General Hospital. The remainder of the patients will be relocated to a mass care facility operated by the Red Cross.

Question #4, page 80, line 10: What is the time factor from the time that the alert went out until the evacuation should begin?

Response: According to the final draft of the Evacuation Time Estimate, which was prepared by HMM Associates, Inc., it is assumed

Mr. Richard T. Brown

(2)

August 29, 1984

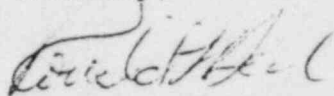
that no vehicles will begin to evacuate during the 15-minute initial notification period. It is also assumed that there would be a minimum preparation/mobilization time of 15 minutes for all population sectors. Accordingly, no vehicles will begin to evacuate until 30 minutes following the initial notification. Additionally, permanent residents with access to automobiles will take varying amounts of time to begin evacuating. Some persons will leave as quickly as possible; most will take some time to prepare, pack valuables and clothes and then depart; and some will take added time to secure property before departing. Based upon a review of site-specific characteristics of the Limerick EPZ, as well as through discussions with emergency preparedness officials, it was assumed that there would be a two-hour period over which permanent residents would begin to evacuate.

Question #5, page 82, line 4: Does the public information brochure have shutdown procedures for each homeowner?

Response: The draft version of the Limerick Generating Station Public Information Brochure states: "When instructed to leave, secure your home as you would for a three-day trip."

Hopefully, you will find the above responses satisfactory. If you require any additional information, please feel free to contact me.

Sincerely,



Ronald L. Deck

RLD:jr



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RECEIVED

AUG 31 1984

R. A. KANKUS

August 29, 1984

Mr. Robert Miller  
Administrator  
Frederick Mennonite Home  
Route 73  
Frederick, PA 19435

Dear Mr. Miller:

Enclosed please find ten (10) copies of Revision 0 of the Frederick Mennonite Home Radiological Emergency Response Plan for incidents at the Limerick Generating Station.

I will forward four (4) copies, numbers one (1) through four (4), to Montgomery County Office of Emergency Preparedness and copy number five (5) to the Upper Frederick Township Emergency Management Coordinator for you as per our phone conversation. Copies number six (6) through fifteen (15) are the Frederick Mennonite Home copies.

Please send a letter to the Montgomery County Office of Emergency Preparedness formally submitting the Frederick Mennonite Home's Radiological Emergency Response Plan.

I would like to thank you and your staff for your assistance in the preparation of the Emergency Response Plan. Please call me with any questions. Again, thank you.

Sincerely,

David L. Dunn

DLD/dlt

Enclosures

cc: Montgomery County OEP



FREDERICK MENNONITE HOME PLAN  
FOR INCIDENTS AT THE  
LIMERICK GENERATING STATION

Frederick Mennonite Home  
Route 73  
Frederick, PA 19435

August 1984

Copy Number \_\_\_\_\_

Revision 0

RECORD OF CHANGES

CHANGE NUMBER	DATE OF CHANGE	DATE ENTERED	CHANGE MADE BY (SIGNATURE)

RADIOLOGICAL EMERGENCY RESPONSE PLAN  
FREDERICK MENNONITE HOME

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# RADIOLOGICAL EMERGENCY RESPONSE PLAN

## FREDERICK MENNONITE HOME

### I. INTRODUCTION

#### A. Purpose

The following Radiological Emergency Response Plan (RERP) is designed to prepare Frederick Mennonite Home personnel to respond appropriately to emergencies or potential emergency situations in the event of an incident at the Limerick Generating Station.

The objective of this plan is to identify each necessary function, determine who will be responsible for it, assign authority within that function, and illustrate how that function will relate to others.

This Radiological Emergency Response Plan is a working document, action-oriented and designed as a guide for the time of stress. It is intended to be flexible and quickly adaptable to produce a safe environment for both residents and staff.

This document is intended to conform to all appropriate Federal, State, County and Municipal statutes and accrediting/licensing agency regulations for the safety and care of residents and employees during a radiological incident.

Orientation of new personnel should include issuance of appropriate sections of this Plan and instruction in the duties assigned therein.

#### B. Authority

The authority for the preparation of this Plan is provided by P. L. 1332, the Pennsylvania Emergency Management Services Act of 1978.

#### C. References

- Public Law 1332, "The Pennsylvania Emergency Management Services Act of 1978."
- Commonwealth of Pennsylvania Disaster Operations Plan, Annex E - Fixed Nuclear Facility Incidents.
- Pennsylvania Department of Health Disaster Preparedness and Recovery Plan.
- Joint Commission on Accreditation of Hospitals, "Accreditation Manual for Long Term Care Facilities," 1980.
- United States Nuclear Regulatory Commission and Federal Emergency Management Agency, "Criteria for Preparation and

Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG 0654, FEMA REP-1, November 1980.

- Montgomery County Radiological Emergency Response Plan, Annex G; Health and Medical Services.

#### D. Definitions

The following definitions refer to terms mentioned within the text of this plan or commonly used in reference to long-term care/nursing facilities.

1. Dosimeters - Device for measuring and recording exposure to radioactive emanations.
2. Emergency Broadcast System (EBS) Announcements - Official announcements made at the county level for the specific purpose of providing instructions or directions from the County Commissioners, or their designated official representative, to the residents of the County. Announcements are made over the legally designated alerting and warning (EBS) network.
3. Emergency Management - The judicious planning, assignment and coordination of all available resources in an integrated program of prevention, mitigation, preparedness, response and recovery for emergencies of any kind, whether from enemy attack, man-made or natural sources.
4. Emergency Operations Center (EOC) - A specific location within the nursing home complex designated for use by the Emergency Management Team to direct operations in the event of an emergency condition.
5. Emergency Planning Zone (EPZ) - A generic area defined about a nuclear facility to facilitate offsite emergency planning and develop a significant response base. It is defined for the plume and ingestion exposure pathways.
6. Fixed Nuclear Facility Incident (hereinafter called an "incident") - An incident is an event or condition at a fixed nuclear facility which could result in a negative impact on public health and safety. Four incident classifications have been identified; from the least serious to the most serious they are: Unusual Event, Alert, Site Emergency and General Emergency. (Note: Site or General Emergency classifications are not to be confused with a "Declaration of Disaster Emergency" made by the Governor.) Descriptions of the four incident classifications are as follows:
  - a. Unusual Event - Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

- b. Alert - Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
  - c. Site Emergency - Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Any releases are not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.
  - d. General Emergency - Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
- 7. Host Facility - A nursing home or other facility located outside the Plume Exposure Pathway EPZ with which a formal written agreement has been made for the hosting of evacuated residents.
  - 8. Plume Exposure Pathway EPZ - The area surrounding a fixed nuclear facility which potentially is subject to radiation exposure as a result of an incident involving radioactive material emanating from the facility. Such potential exposure could involve: (a) whole body external exposure to gamma radiation from the plume and from deposited materials, and (b) inhalation exposure from the passing radioactive plume. The EPZ for this pathway consists of an area of approximately ten miles in radius around the fixed nuclear facility. (The exact size and configuration of the plume exposure pathway EPZ for the Limerick Generating Station was determined in relation to local emergency response needs and capabilities as they are affected by conditions such as demography, topography, access routes, and jurisdictional boundaries.)
  - 9. Protective Action Guide (PAG) - Projected dose to individuals in the general population which warrants protective action.
  - 10. Protective Actions - An action taken to avoid or reduce a projected dose of radiation. (Sometimes referred to as protective measures.)
  - 11. Public Information Statements - Public announcements made by Pennsylvania Emergency Management Agency or County spokespersons via newspaper, radio or television to explain government actions being taken to protect the public in event of any public emergency. The purpose of the announcement is to provide accurate information, prevent panic and counteract misinformation and rumors. Reference to the emergency situation itself will be made only in the context of the reasons for governmental actions, and not to provide detailed information about it.

12. Radio Amateur Civil Emergency Services (RACES) - Licensed volunteer radio amateur (HAM) Communications, personnel, equipped and affiliated with the County UEP.
13. Radiological Emergency Response Plans (RERP) - Detailed incident response plans developed by the State and its agencies, County and Municipal emergency management agencies and special facilities in coordination with the Pennsylvania Emergency Management Agency and the Limerick Generating Station.
14. Radioprotective Drugs - A medication (generally Potassium Iodide) which blocks the absorption of radioactive Iodine-131 by the thyroid gland, which will be issued to individuals required to stay within the Plume Exposure Pathway EPZ.
15. Sheltering - Action by the public to take advantage of the protection against radiation exposure afforded by remaining indoors, away from doors and windows, during and following the passage of the radioactive plume.
16. State of Disaster Emergency - A state of disaster emergency exists whenever the Governor issues a declaration of disaster emergency. A disaster emergency shall be declared by executive order or proclamation of the Governor at any time upon finding that a disaster has occurred or that the occurrence or the threat of a disaster is imminent. The state of disaster emergency continues until the Governor finds that the threat or danger has passed and terminates it by executive order or proclamation, but no state of disaster emergency may continue for longer than 90 days unless renewed by the Governor. The term, state of disaster emergency, is not to be confused with the incident classification terms called Site Emergency and General Emergency.
17. Transportation Resources - Modes of transportation for evacuation of nursing home residents; generally includes ambulances, buses and trucks.
18. Unmet Needs - Capabilities and/or resources required to support emergency operations but neither available nor provided for at the respective levels of emergency response.

#### E. Responsibilities

##### 1. Emergency Management Team

The implementation of this Radiological Emergency Response Plan is the responsibility of the Emergency Management Team. This team is comprised of the following individuals, with their stated responsibilities:

- a. Administrator - The overall authority for the implementation and direction of this Radiological Emergency Response Plan rests with the Administrator or his designated alternate. Specific responsibilities include:



- (1) Coordinate the emergency management response to all radiological incidents.
  - (2) Set up the Emergency Operations Center (EOC) in the Administrator's Office.
  - (3) Establish and maintain communications with the Montgomery County Office of Emergency Preparedness and provide for internal facility communications via telephone intercom, paging or messenger.
  - (4) Coordinate staff scheduling with the Emergency Management Team to ensure adequate 24-hour staffing for emergency conditions.
  - (5) Coordinate the facility's emergency management response with the medical group/coordinator of the Montgomery County Office of Emergency Preparedness, designated host facilities and outside agencies.
  - (6) Respond to all internal requests for personnel and equipment support.
  - (7) Receive and maintain current resident census/transportation requirements and staffing needs, reporting unmet needs to the Montgomery County Office of Emergency Preparedness.
  - (8) Terminate the emergency condition and deactivate the emergency response plan when conditions stabilize, allowing a return to normal operations.
  - (9) Document the emergency management effort when normal operations are restored (it is advisable to maintain a date-time log of events during the incident).
- b. Director of Nursing - The Director of Nursing is responsible for the assignment of all nursing service personnel and any volunteers needed to supplement staffing requirements. In the absence of the Administrator, or his designate, the Director of Nursing shall assume control of the response. In addition, the Director of Nursing is responsible for overseeing the preparation of resident census reports, the classification of residents for transport, and the coordination of the efforts of the resident care, clinical care and support departments.
- c. Charge Nurse on Duty - The Charge Nurse on duty is responsible for carrying out responsibilities assigned by the Director of Nursing. In the absence of the Director of Nursing, the Charge Nurse shall be responsible for the assignment of all nursing service personnel. In the absence of the Administrator and the Director of Nursing, the Charge Nurse shall assume control of the initial response.

- d. Medical Director - The primary responsibility of the Medical Director is ensuring adequate medical care for Frederick Mennonite Home residents. The Medical Director shall prescribe appropriate precautionary measures so as to alleviate suffering and loss of life. The Medical Director shall also review and identify residents eligible for discharge during census reduction efforts.
- e. Maintenance Supervisor - The Maintenance Supervisor is responsible for maintaining all electrical and mechanical functions necessary to ensure a safe facility environment. The Maintenance Supervisor shall assign appropriate personnel to answer emergency calls for service from all areas of the Frederick Mennonite Home.

## 2. Other Agencies

There are a number of external agencies with specific responsibilities in the event of an incident at the Limerick Generating Station. These include:

### a. Montgomery County Office of Emergency Preparedness.

Those responsibilities of the Montgomery County Office of Emergency Preparedness which are specifically related to this Radiological Emergency Response Plan include:

- (1) Implementation of protective action recommendations.
- (2) Coordination of emergency medical services to include maintenance of routine coverage. In the event of an evacuation, provision of assistance to homebound invalids, hospitals and nursing homes.
- (3) Personnel decontamination monitoring for the general population and decontamination of individuals as necessary.
- (4) Provision for medical support to mass care centers.
- (5) Provision for the health protection of emergency workers by implementing plans for protective actions including protective clothing, dosimeters, radioprotective drugs, personnel decontamination monitoring, and related training.
- (6) Utilization of the Department of Health's hospital list (those capable of treating contaminated and irradiated individuals) to designate the local and backup hospitals that will support fixed nuclear facility incidents.

- (7) Identification of hospitals, nursing homes, prisons, and other institutions located within the plume exposure pathway EPZ.
- (8) Provide backup communications via RACES in the event of primary communication failure.

d. Pennsylvania Department of Health (PaDOH)

The Pennsylvania Department of Health, under the direction of the Secretary of Health, has the following related responsibilities:

- (1) Development and maintenance of a comprehensive State emergency medical plan for response to radiological incidents.
- (2) Coordination with Federal health authorities, the Pennsylvania Emergency Management Agency (PEMA), the Bureau of Radiation Protection (BRP), and the Department of Agriculture to assess any radiation hazard to the public and develop corresponding health related guidance for incident response.
- (3) Support of counties and municipalities with technical advice, identification and coordination of medical resources in the event of an incident.
- (4) In coordination with PEMA and the risk counties, development of procedures for stockpiling, distributing and administering radioprotective drugs.
- (5) Maintenance of a current inventory, with a copy to PEMA, of Statewide medical facilities with the capability of treating radiation exposure victims.
- (6) Maintenance of current site-specific lists of local and backup medical facilities having the capability of evaluating, handling and treating contaminated and irradiated individuals.
- (7) Compilation and maintenance of a current listing of Statewide ambulance resources that could be made available for use in evacuating hospitals, nursing homes and invalids living at home.
- (8) Provision of technical advice and assistance to hospitals and nursing homes within the plume exposure pathway EPZ as well as hospitals in general support and advice to them regarding their respective emergency response plans, with information to the respective county EMA's, through PEMA, regarding all emergency related messages, information, and assistance between the Department and individual institutions.

- (9) Cooperation with State Hospital Associations and other medical organizations in developing plans for preventing adverse effects that may result from radiation exposure.
- (10) Development and implementation of a uniform Statewide system for recording the contamination data and treatment of radiologically exposed individuals to include:
  - (a) Location at time of incident
  - (b) Radiation exposure date
  - (c) Contamination status
  - (d) Treatment status
  - (e) Release status
- (11) In coordination with PEMA and BRP:
  - (a) Issuance of guidelines for radiation detection and measurement systems used by ambulance services and hospital emergency departments.
  - (b) Issuance of guidance concerning the levels of radiation exposure related to the health and safety of ambulance services, hospitals and other health care personnel.
  - (c) Development of emergency medical support and response training programs.
  - (d) Development of public education material to explain to the populace the health hazards of radiation exposure and what can be done medically to eliminate or lessen the hazards and treat individuals exposed to them.
- (12) Coordination of the medical response to incidents with any affected contiguous states.

c. Pennsylvania Emergency Management Agency (PEMA)

The Pennsylvania Emergency Management Agency has the following related responsibilities in the event of an incident at the Limerick Generating Station:

- (1) Responsibility as the lead State agency for emergency management and coordination of response activities.
- (2) In cooperation with applicable State agencies and the American Red Cross, coordination of the resource management (including delivery to central resource

receiving points) of available State equipment and supplies to satisfy unmet needs of risk and support Counties.

- (3) Establishment and maintenance of agreements with supporting Federal agencies, adjacent States, volunteer organizations and fixed nuclear facilities to provide for coordination and integration of emergency response planning and operations.
- (4) Operation of an annual exercise to evaluate Radiological Emergency Response Plans and capabilities.

#### F. Situation

An incident at the Limerick Generating Station having the potential for release of radioactive materials may require that the residents and staff of the Frederick Mennonite Home take some type of protective action. These actions may include:

1. Sheltering
2. Evacuation

Appropriate responses may include some combination of these protective actions. Technical assistance concerning responses to a particular incident will be made available by the Department of Health, the Bureau of Radiation Protection, and Pennsylvania Emergency Management Agency through the Montgomery County Office of Emergency Preparedness.

## II. NOTIFICATION

### A. Initial Notification

Upon receiving information from the Montgomery County Office of Emergency Preparedness that a radiological incident at the Limerick Generating Station has been classified as an Alert, Site Emergency or General Emergency, the telephone/paging operator shall immediately notify the highest ranking staff person available within the facility.

A confirmatory telephone call, verifying the initial notification, should be anticipated from Upper Frederick Township.

### B. Implementation

The individual so notified shall implement this Radiological Emergency Response Plan, as appropriate (reference Section III - Concept of Operations)

### C. Emergency Management Team Notification

Upon implementation of the Radiological Emergency Response Plan, the telephone/paging operator shall immediately notify all members of

the emergency management team (reference Attachment A). The ranking staff person on duty shall assume the role of directing the radiological emergency response until such time as a higher ranking staff person arrives.

D. Un-Duty Personnel

Un-duty personnel will be notified of the situation by the facility's public address system or telephone.

Un-duty personnel will remain at their assigned stations unless directed elsewhere by a member of the Emergency Management Team. Members of the Emergency Management Team should report to the Emergency Operations Center in the Administrator's Office.

E. Off-Duty Personnel

Off-duty personnel will be contacted by the appropriate member of the Emergency Management Team or their department supervisor. Immediately upon notification, off-duty personnel should proceed to the nursing home and report to the appropriate department head or, in the case of those assigned to the Emergency Management Team, to the Emergency Operations Center in the Administrator's Office.

Off-duty personnel, upon learning of a Site Emergency or General Emergency through the mass media or Emergency Broadcast System, should not wait for notification but should proceed directly to the nursing home and report to their appropriate department head, or in the case of Emergency Management Team members, to the Emergency Operations Center in the Administrator's Office.

III. CONCEPT OF OPERATIONS

Specific emergency management responses are dependent upon the "Incident Classification" declared at the Limerick Generating Station. Notification of the incident classification, and of any changes in that classification, will be received from the Montgomery County Office of Emergency Preparedness.

Please note that procedures for all classifications are cumulative; that is, procedures for each incident classification include those procedures established for all lower classifications.

A. UNUSUAL EVENT

No formal notification will be received from the Montgomery County Office of Emergency Preparedness at this classification. No action is required.

B. ALERT

1. Assemble Emergency Management Team

2. Establish Emergency Operations Center (EOC) in the Administrator's Office.
3. Perform immediate update of resident census (reference Attachment C, Tab I) classifying residents according to the following transport status:
  - a. Ambulance (litter patients)
  - b. Bus/Van (ambulatory and most wheelchair patients)
4. Code resident chart in accordance with transport status, coding as follows:
  - a. A - ambulance
  - b. B - bus/van
5. Notify designated host facilities (reference Attachment B, Tab I) of incident, requesting bed availability and reservation of available beds for resident evacuees.
6. Determine on-duty staff census.
7. Determine emergency staff needs for (a) shelter and (b) evacuation.
8. Identify residents whose medical status would permit temporary discharge to family custody (excluding those requiring ambulance transportation).
9. Inventory supply needs for a 5-day period.
10. Provide an immediate report of the following (reference Attachment C, Tab I) to the Montgomery County Medical Coordinator at \_\_\_\_\_:
  - a. Resident census and transportation requirements.
  - b. Host facility bed availability.
  - c. Un-duty staff census.
  - d. Any unmet needs.
11. Test emergency generator.
12. Stock kitchen with a 5-day supply of canned foods, fruits and juices, containers of potable water, disposable plates, cups and utensils.
13. Inventory and replenish medications, IV fluids and oxygen supplies for a minimum five (5) day period.
14. Inventory and prepare dosimeters and radioprotective drugs (KI).

C. SITE EMERGENCY

1. Prerequisite - Perform all appropriate actions outlined under ALERT.
2. Terminate admissions.
3. Terminate visiting hours for the duration of the incident.
4. Recall required off-duty personnel.
5. Prepare abbreviated resident transfer forms providing personal data, diagnosis, medications, etc.
6. Place identification bracelets, or identification/disaster tags on all residents.
7. Time permitting, contact families of residents identified as being appropriate for discharge, and discharge residents to family care wherever possible.
8. Consolidate nursing units to reduce staffing requirements, as necessary.
9. Place minimum five-day requirement of residents' medication in individual bags stapled to resident transfer forms.
10. Assemble all required special care resident transportation needs (e.g., portable oxygen apparatus, patient restraints, etc.) at the appropriate nursing stations.
11. Contact host facilities (reference Attachment B, Tab I) confirming bed availability and reservation of available beds for resident evacuees. Request additional beds through the Montgomery County Medical Coordinator at [REDACTED], if required.
12. Confirm transportation resources through the Montgomery County Medical Coordinator at [REDACTED], and assure that transportation providers have been readied for dispatch.
13. Instruct staff in the procedures for distribution and use of radiation dosimeters and administration of radioprotective drugs (sufficient quantities of dosimeters and radioprotective drugs will be maintained on hand in the nursing home, dosimeters will be provided for 50% of total staff (emergency staffing levels) and potassium iodide will be provided for 50% of staff and 100% of patients.
14. Notify families of possible resident evacuation and name/location of host facility as time permits.



D. GENERAL EMERGENCY

1. Prerequisite - Perform all appropriate actions outlined under ALERT and SITE EMERGENCY.
2. Await Protective Action Guidelines from the Montgomery County Office of Emergency Preparedness. Such guidelines should consist of either:
  - a. Sheltering (reference Section IV), or
  - b. Evacuation, if evacuation can be safely completed prior to the release of significant radiation to the Plume Exposure Pathway EPZ (reference Section V.)

IV. SHELTERING PROCEDURES

- A. Remain indoors with all doors and windows closed.
- B. Adjust heating/ventilation/air conditioning systems to eliminate or minimize the intake of outside air.
- C. If possible, evacuate exterior rooms with windows and/or doors in favor of interior rooms.
- D. Distribute dosimeters to designated emergency staff.
- E. Upon the direction of the Secretary of Health, distribute radioprotective drugs, instruct staff to administer them to themselves and patients (if so ordered by the attending physician) in accordance with the instructions received with said drugs.

V. EVACUATION PROCEDURES

A. Authority

The Governor has the sole authority and responsibility for directing and compelling an evacuation. The Governor or the highest ranking elected County or Municipal official in authority may recommend an evacuation for their respective jurisdictions. Evacuation of the Frederick Mennonite Home may be ordered by the Administrator.

B. Required Coordination

Any evacuation outside the Frederick Mennonite Home complex must be coordinated with the Montgomery County Office of Emergency Preparedness and the Emergency Response Team of the Pennsylvania Department of Health through the Montgomery County Medical Coordinator at [REDACTED].

C. General Procedures

1. Notify host facilities (reference Attachment B, Tab 1) of incident, requesting bed availability, commissioning available beds for resident evacuees and determining requirements for

- accommodating transfer of staff, reporting any unmet needs to the Montgomery County Medical Coordinator at [REDACTED].
2. Confirm dispatch/positioning of required transport vehicles from the Montgomery County Medical Coordinator at [REDACTED].
  3. Prepare a roster of residents, their destinations and mode of transportation. Provide copies of roster for host facilities and the Montgomery County Medical Coordinator.
  4. Assemble residents, together with resident charts, transfer forms, medication and other necessary medical support equipment at departure areas according to assigned transport status.
    - a. Ambulance cases will be assembled in the Nursing Entrance Lobby.
    - b. Bus/van cases will be assembled in the Residential Main Entrance.
  5. Assign staff to provide external traffic direction for departure areas.
  6. Assign medical/nursing staff to multiple-resident transport vehicles as deemed appropriate.
  7. Distribute evacuation route maps (reference Attachment B, Tab II) to drivers unfamiliar with the route of travel or final destination.
  8. Assist residents into appropriate transportation vehicles.
  9. Dispatch selected staff to establish temporary administrative headquarters at one of the host facilities.
  10. Secure the facility via the shutdown of all mechanical, electrical and physical plant systems, with the exception of sprinkler and alarm systems.
  11. Secure records by locking all file cabinets and/or fire files, locking important records in fire files.
  12. Secure resident's personal valuables and lock the safe, depositing an inventory list in a separate locked file.
  13. Secure drugs/medications not being transported by triple locking all medication cabinets.
  14. Notify the Montgomery County Medical Coordinator at [REDACTED], of the relocation site selected as the temporary administrative headquarters, indicating that evacuation is complete and depart with the facility locked and secured.

VI. DE-ESCALATION OF INCIDENT

Upon notification from the Montgomery County Office of Emergency Preparedness that the Incident Classification for the Limerick Generating Station has been de-escalated, the Frederick Mennonite Home Administrator should oversee the orderly return of the facility to the level of preparation indicated by the new classification. The specific steps to be taken and the sequence in which they are taken shall be determined by the Administrator.

VII. REENTRY

Safety inspection of the physical plant and surrounding areas shall be performed by the Administrator and Maintenance Supervisor. Upon the determination that reoccupation of the nursing home is considered safe, department managers and the emergency management team shall ensure that the facility is fully prepared to resume normal operations prior to reoccupation. When the facility is fully prepared, the emergency operations center will be re-established in the Administrator's Office and the Administrator will coordinate transportation and reoccupation through the Montgomery County Office of Emergency Preparedness.

VIII. PLAN MAINTENANCE AND DISTRIBUTION

A. Maintenance

1. The Administrator is responsible for ensuring the currency of the Nursing Home RERP, including the development and distribution of all changes, as well as accomplishing an annual review.
2. All changes to the Frederick Mennonite Home RERP shall be coordinated through the Montgomery County Office of Emergency Preparedness.
3. The current date shall be placed on any page that is changed.

B. Distribution

1. Montgomery County EOC (copies to accommodate distribution to PEMA and Philadelphia Electric Company)  
Copy Numbers 1-4 4 copies
2. Upper Frederick Township Emergency Management Coordinator  
Copy Number 5 1 copy
3. Frederick Mennonite Home Staff  
Copy Numbers 6-15 10 copies

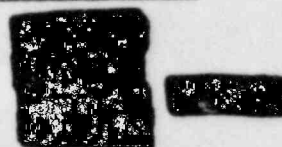
ATTACHMENT A  
NOTIFICATION ROSTER

I. Emergency Management Team

Administrator  
Director of Nursing  
Medical Director  
Maintenance Supervisor

Robert Miller  
Ruth Bechtel, R.N.  
Edwin Anderson, M.D.  
Levi Beiler

Home Telephone



II. Department Supervisors

Director of Nursing  
Maintenance Supervisor  
Dietary  
Housekeeping/Laundry  
Social Service

Ruth Bechtel, R.N.  
Levi Beiler  
Christine Rhoads  
Bessie Phillips  
Feg Hasson



ATTACHMENT B  
EVACUATION SUPPORT

Tab I: Host Facilities

Tab II: Evacuation Route Maps

Tab III: Letters of Agreement

TAB 1 to ATTACHMENT B

HOST FACILITIES

\*Facility: Rockhill Mennonite Community  
Route 152, Box 21  
Sellersville, PA 18960

Telephone: (215)257-2751

Contact Person: Mr. Randy Shelly


\*Facility: Eastern Mennonite Home  
207 West Summit Street  
Souderton, PA 18964

Telephone: (215)723-9881

Contact Person: Mr. Paul Moyer

\*Facility: Dock Terrace  
Detwiler Road  
Lansdale, PA 19446

Telephone: (215)362-5757

Contact Person: Mrs. Lina Hughes or Mr. David Derstine 

\* Should pre-arranged host facilities be unable to provide full evacuation support, the Montgomery County Medical Group/Coordinator will assist in the identification of alternate host facilities.

TAB II to ATTACHMENT B  
EVACUATION ROUTE MAP



HOST FACILITY  
EASTERN MENNONITE HOME  
207 WEST SUMMIT STREET  
SOUDERTON, PA 18964  
723-9881





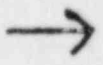
HOST FACILITY  
DOCK TERRACE  
DETWILER ROAD  
LANSDALE, PA 19446  
362-5757

UPPER  
GWYNEDD

LANSDALE

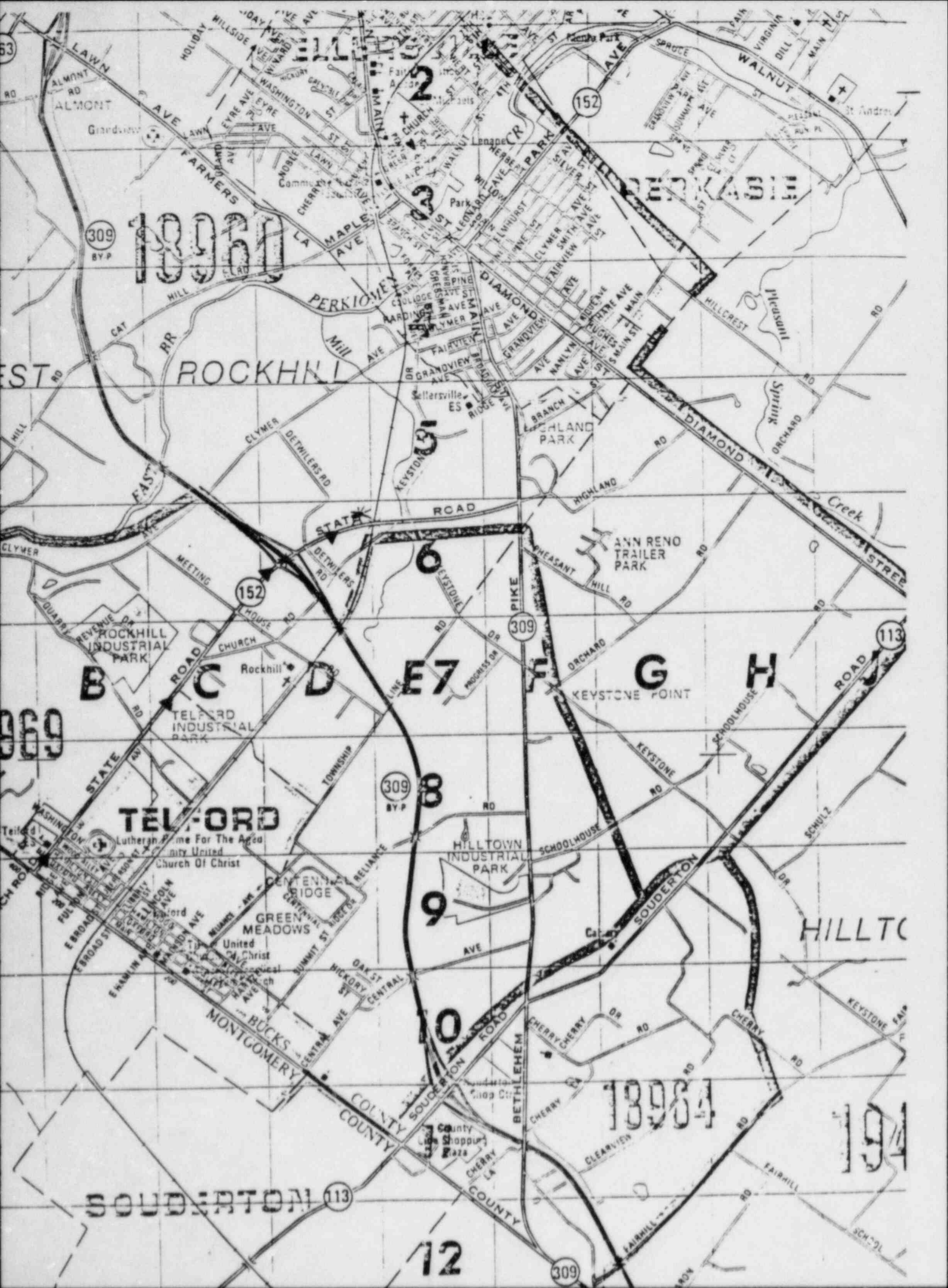


See next page



HOST FACILITIES  
ROCKHILL MENNONITE COMMUNITY  
ROUTE 152  
SELLERSVILLE, PA 18960  
257-2751





18961

ROCKHILL

TELFORD

Lutheran Home For The Aged  
Community United  
Church Of Christ

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TAB III to ATTACHMENT B  
LETTERS OF AGREEMENT

# Eastern Mennonite Home

207 WEST SUMMIT STREET SOUDERTON, PA 18964-2093 (215) 723-9881

July 1, 1983

Robert Miller, Administrator  
Frederick Mennonite Home  
Route 73  
Frederick, PA 19435

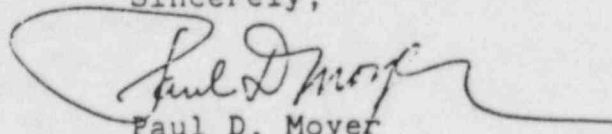
Dear Mr. Miller:

This letter will serve to indicate the willingness of the Eastern Mennonite Home to accept patient evacuees, to the maximum extent possible, from the Frederick Mennonite Home in the event of an evacuation due to a radiological emergency at the Limerick Generating Station.

It is our understanding that you will contact this facility at the earliest possible stages of any incident. Detailed information regarding the actual number of evacuees to be hosted, the transfer of Frederick Mennonite staff, and any other concerns, will be addressed at that time.

Your contact person in the event of an emergency is Paul D. Moyer, Administrator.

Sincerely,

  
Paul D. Moyer  
Administrator

djr



# DOCK WOODS COMMUNITY, INC.

---

---

DOCK TERRACE  
Dobson Road, Landolt, PA 17046

June 27, 1983

Mr. Robert Miller  
Administrator  
Frederick Mennonite Home  
Route 73  
Frederick, Pa. 19435

Dear Mr. Miller:

This letter will serve to indicate the willingness of Dock Terrace to accept patient evacuees, to the maximum extent possible, from the Frederick Mennonite Home in the event of evacuation due to a radiological emergency at the Limerick Generating Station.

It is our understanding that you will contact this facility at the earliest possible time. Detailed information regarding the number of evacuees, the transfer of Frederick Mennonite staff, and other concerns, will be addressed at that time.

In the event of an emergency, you would contact me at Dock Terrace, phone number 362-5757 or at my home, phone number 723-4575.

Sincerely,

*Lina S. Hughes RN, NHA*

Lina S. Hughes, RN, NHA  
Administrator

LH/cd'a

CC: John Long, Jr. ✓  
Energy Consultants, Inc.



# ROCKHILL MENNONITE COMMUNITY

Box 21, Route 152, Sellersville, Pennsylvania 18960 • 215-257-2751

March 14, 1984

Mr. Robert Miller, Administrator  
Frederick Mennonite Home  
Route 73  
Frederick, PA 19435

Dear Mr. Miller:

This letter will serve to indicate the willingness of the ROCKHILL MENNONITE COMMUNITY to accept patient evacuees, to the maximum extent possible, from the Frederick Mennonite Home in the event of an evacuation due to a radiological emergency at the Limerick Generating Station.

It is our understanding that you will contact this facility at the earliest possible stages of any incident. Detailed information regarding the actual number of evacuees to be hosted, the transfer of Frederick Mennonite staff, and any other concern, will be addressed at that time.

Your contact person in the event of an emergency is Randy L. Shelly, Administrator.

Sincerely,

Randy L. Shelly,  
Administrator

RLS:cm



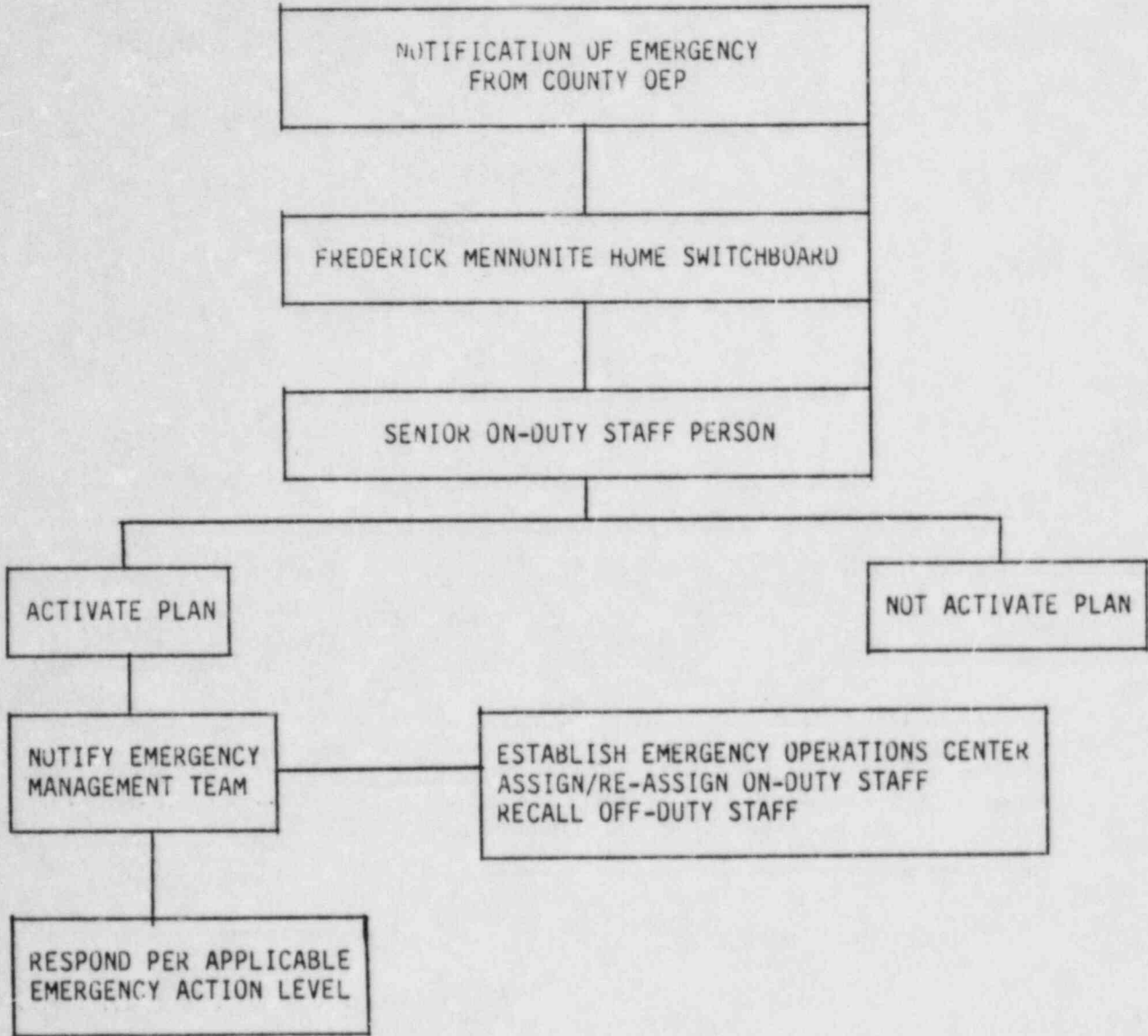


ATTACHMENT D

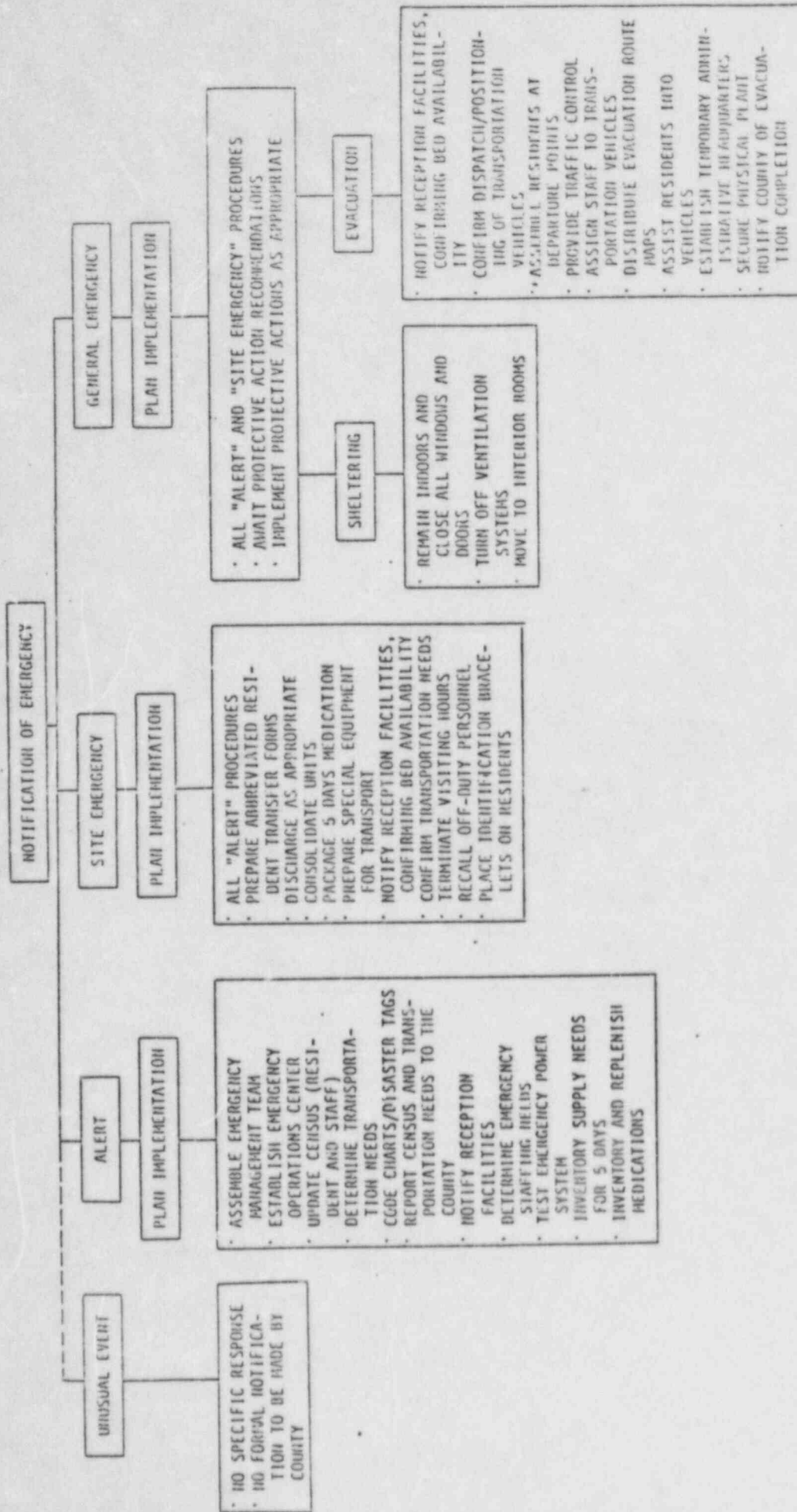
Tab I: Plan Activation Sequence

Tab II: Operations Sequence

TAB I to ATTACHMENT U  
RADIOLOGICAL EMERGENCY RESPONSE PLAN  
ACTIVATION SEQUENCE



**TAB II to ATTACHMENT D**  
**RADIOLOGICAL EMERGENCY RESPONSE PLAN OPERATIONS SEQUENCE**



ATTACHMENT E

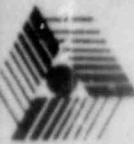
EVACUATION VEHICLE ESTIMATES

It is estimated that, on average, the following number and type of vehicles will be necessary to totally evacuate the Frederick Mennonite Home. The actual number and type of vehicles will be determined at the time of an actual incident.

14 Ambulances\*  
3 Buses\*\*

\*Assuming 2 persons/ambulance

\*\*Assuming 40 persons/bus



# ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110  
(717) 236-0031

RECEIVED  
AUG 31 1984  
R. A. KANKUS

August 29, 1984

Ms. Nancy Thaler  
Administrator  
River Crest Center  
Route 29  
Mont Clare, PA 19435

Dear Ms. Thaler:

Enclosed please find six (6) copies of Revision 0 of the River Crest Center Radiological Emergency Response Plan for incidents at the Limerick Generating Station.

I will forward four (4) copies, numbers one (1) through four (4), to Montgomery County Office of Emergency Preparedness and copy number five (5) to the Upper Providence Township Emergency Management Coordinator for you as per our phone conversation. Copies number six (6) through eleven (11) are the River Crest Center copies.

Please send a letter to the Montgomery County Office of Emergency Preparedness formally submitting the River Crest Center's Radiological Emergency Response Plan.

I would like to thank you and your staff for your assistance in the preparation of the Emergency Response Plan. Please call me with any questions. Again, thank you.

Sincerely,

David L. Dunn

DLD/dlt

Enclosures

cc: Montgomery County OEP

RIVER CREST CENTER  
RADIOLOGICAL EMERGENCY RESPONSE PLAN  
FOR INCIDENTS AT THE  
LIMERICK GENERATING STATION

River Crest Center  
Route 29  
Mont Clare, PA 19453

August 1984

Copy Number \_\_\_\_\_

Revision U



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# RADIOLOGICAL EMERGENCY RESPONSE PLAN

## RIVER CREST CENTER

### I. INTRODUCTION

#### A. Purpose

The following Radiological Emergency Response Plan (RERP) is designed to prepare River Crest Center personnel to respond appropriately to emergencies or potential emergency situations in the event of an incident at the Limerick Generating Station.

This plan covers the nine houses located at the Mont Clare Campus and the one house on High Street in Pottstown.

The objective of this plan is to identify each necessary function, determine who will be responsible for it, assign authority within that function, and illustrate how that function will relate to others.

This Radiological Emergency Response Plan is a working document, action-oriented and designed as a guide for the time of stress. It is intended to be flexible and quickly adaptable to produce a safe environment for both residents and staff.

This document is intended to conform to all appropriate federal, state, county and municipal statutes and accrediting/licensing agency regulations for the safety and care of residents and employees during a radiological emergency.

Orientation of new personnel should include issuance of appropriate sections of this plan and instruction in the duties assigned therein.

#### B. Authority

The authority for the preparation of this plan is provided by P. L. 1332, the Pennsylvania Emergency Management Services Act of 1978.

#### C. References

- Public Law 1332, "The Pennsylvania Emergency Management Services Act of 1978."
- Commonwealth of Pennsylvania Disaster Operations Plan, Annex E - Fixed Nuclear Facility Incidents.
- Pennsylvania Department of Health Disaster Preparedness and Recovery Plan.
- Joint Commission on Accreditation of Hospitals, "Accreditation Manual for Long Term Care Facilities," 1980.

- United States Nuclear Regulatory Commission and Federal Emergency Management Agency, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG U654, FEMA REP-1, November 1980.
- Montgomery County Radiological Emergency Response Plan, Annex G; Health and Medical Services.

#### D. Definitions

The following definitions refer to terms mentioned within the text of this plan or commonly used in reference to long-term care/nursing facilities.

1. Emergency Broadcast System (EBS) Announcements - Official announcements made at the county level for the specific purpose of providing instructions or directions from the County Commissioners, or their designated official representative, to the residents of the county. Announcements are made over the legally designated alerting and warning (EBS) network.
2. Emergency Management - The judicious planning, assignment and coordination of all available resources in an integrated program of prevention, mitigation, preparedness, response and recovery for emergencies of any kind, whether from enemy attack, man-made or natural sources.
3. Emergency Planning Zone (EPZ) - A generic area defined about a nuclear facility to facilitate offsite emergency planning and develop a significant response base. It is defined for the plume and ingestion exposure pathways.
4. Fixed Nuclear Facility Incident (hereinafter called an "incident") - An incident is an event or condition at a fixed nuclear facility which could result in a negative impact on public health and safety. Four incident classifications have been identified; from the least serious to the most serious they are: Unusual Event, Alert, Site Emergency and General Emergency. (Note: Site or General Emergency classifications are not to be confused with a "Declaration of Disaster Emergency" made by the Governor.) Descriptions of the four incident classifications are as follows:
  - a. Unusual Event - Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.
  - b. Alert - Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

- c. Site Emergency - Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Any releases are not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.
- d. General Emergency - Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
5. Host Facility - A facility located outside the Plume Exposure Pathway EPZ with which a formal written agreement has been made for the hosting of evacuated residents.
6. Plume Exposure Pathway EPZ - The area surrounding a fixed nuclear facility which potentially is subject to radiation exposure as a result of an incident involving radioactive material emanating from the facility. Such potential exposure could involve: (a) whole body external exposure to gamma radiation from the plume and from deposited materials, and (b) inhalation exposure from the passing radioactive plume. The EPZ for this pathway consists of an area of approximately ten miles in radius around the fixed nuclear facility. (The exact size and configuration of the plume exposure pathway EPZ for the Limerick Generating Station was determined in relation to local emergency response needs and capabilities as they are affected by conditions such as demography, topography, access routes, and jurisdictional boundaries.
7. Protective Action Guide (PAG) - Projected dose to individuals in the general population which warrants protective action.
8. Protective Actions - An action taken to avoid or reduce a projected dose of radiation. (Sometimes referred to as protective measures.)
9. Public Information Statements - Public announcements made by Pennsylvania Emergency Management Agency or county official spokespersons via newspaper, radio or television to explain government actions being taken to protect the public in event of any public emergency. The purpose of the announcement is to provide accurate information, prevent panic and counteract misinformation and rumors. Reference to the emergency situation itself will be made only in the context of the reasons for governmental actions, and not to provide detailed information about it.
10. Radio Amateur Civil Emergency Services (RACES) - Licensed volunteer radio amateur (HAM) communications personnel, equipped and affiliated with the County OEP.

11. Radiological Emergency Response Plans (RERP) - Detailed incident response plans developed by the State and its agencies, county and municipal emergency management agencies and special facilities in coordination with the Pennsylvania Emergency Management Agency and the fixed nuclear facility.
12. Sheltering - Action by the public to take advantage of the protection against radiation exposure afforded by remaining indoors, away from doors and windows, during and following the passage of the radioactive plume.
13. State of Disaster Emergency - A state of disaster emergency exists whenever the Governor issues a declaration of disaster emergency. A disaster emergency shall be declared by executive order or proclamation of the Governor at any time upon finding that a disaster has occurred or that the occurrence or the threat of a disaster is imminent. The state of disaster emergency continues until the Governor finds that the threat or danger has passed and terminates it by executive order or proclamation, but no state of disaster emergency may continue for longer than 90 days unless renewed by the Governor. The term, state of disaster emergency, is not to be confused with the incident classification terms called Site Emergency and General Emergency.
14. Transportation Resources - Modes of transportation for evacuation of residents; generally includes ambulances, buses, vans and automobiles.
15. Unmet Needs - Capabilities and/or resources required to support emergency operations but neither available nor provided for at the respective levels of emergency response.

#### E. Responsibilities

##### 1. River Crest Center Director

The overall authority for the implementation and direction of this Radiological Emergency Response Plan rests with the Director or her designated alternate. Specific responsibilities include:

- a. Coordinate the emergency management response to all radiological emergency conditions.
- b. Establish and maintain communications with the Montgomery County Office of Emergency Preparedness and provide for internal communications via telephone, paging or messenger.
- c. Coordinate scheduling to ensure adequate 24-hour staffing for emergency conditions.

- d. Coordinate the center's emergency management response with the medical group/coordinator of the Montgomery County Office of Emergency Preparedness, the designated host facility and outside agencies.
- e. Respond to all internal requests for personnel and equipment support.
- f. Receive and maintain current resident census/transportation requirements and staffing needs, reporting unmet needs to the Montgomery County Office of Emergency Preparedness.
- g. Terminate the emergency condition and deactivate the emergency response plan when conditions stabilize, allowing a return to normal operations.
- h. Document the emergency management effort when normal operations are restored (it is advisable to maintain a date-time log of events during the emergency conditions).

## 2. Other Agencies

There are a number of external agencies with specific responsibilities in the event of an incident at the Limerick Generating Station. These include:

- a. Montgomery County Office of Emergency Preparedness. Those responsibilities of the Montgomery County UEP which are specifically related to this Radiological Emergency Response Plan include:
  - (1) Implementation of protective action recommendations.
  - (2) Coordination of emergency medical services to include maintenance of routine coverage. In the event of an evacuation, provision of assistance to homebound invalids, hospitals and nursing homes.
  - (3) Personnel decontamination monitoring for the general population and decontamination of individuals as necessary.
  - (4) Provision for medical support to mass care centers.
  - (5) Provision for the health protection of emergency workers by implementing plans for protective actions including protective clothing, dosimetry, radioprotective drugs, personnel decontamination monitoring, and related training.
  - (6) Utilization of the Department of Health's hospital list (those capable of treating contaminated and irradiated individuals) designate the local and backup hospitals that will support fixed nuclear facility incidents.

- (7) Identification of hospitals, nursing homes, prisons, and other institutions located within the plume exposure pathway EPZ.
- (8) Provide backup communications via RACES in the event of primary communication failure.

b. Pennsylvania Department of Health (PDH)

The Department of Health, under the direction of the Secretary of Health, has the following related responsibilities:

- (1) Development and maintenance of a comprehensive State emergency medical plan for response to radiological incidents.
- (2) Coordination with Federal health authorities, the Pennsylvania Emergency Management Agency (PEMA), the Bureau of Radiation Protection (BRP), and the Department of Agriculture to assess any radiation hazard to the public and develop corresponding health related guidance for incident response.
- (3) Support of counties and municipalities with technical advice, identification and coordination of medical resources in the event of an incident.
- (4) In coordination with PEMA and the risk counties, development of procedures for stockpiling, distributing and administering radioprotective drugs.
- (5) Maintenance of a current inventory, with a copy to PEMA, of Statewide medical facilities with the capability of treating radiation exposure victims.
- (6) Maintenance of current site-specific lists of local and backup medical facilities having the capability of evaluating, handling and treating contaminated and irradiated individuals.
- (7) Compilation and maintenance of a current listing of Statewide ambulance resources that could be made available for use in evacuating hospitals, nursing homes and invalids living at home.
- (8) Provision of technical advice and assistance to hospitals and nursing homes within the plume exposure pathway EPZ as well as hospitals in general support and advise to them regarding their respective emergency response plans, with information to the respective county EMA's, through PEMA, regarding all emergency related messages, information, and assistance between the Department and individual institutions.

- (9) Cooperation with State Hospital Associations and other medical organizations in developing plans for preventing adverse effects that may result from radiation exposure.
- (10) Development and implementation of a uniform Statewide system for recording the contamination data and treatment of radiologically exposed individuals to include:
  - (a) Location at time of incident
  - (b) Radiation exposure date
  - (c) Contamination status
  - (d) Treatment status
  - (e) Release status
- (11) In coordination with PEMA and BRP:
  - (a) Issuance of guidelines for radiation detection and measurement systems used by ambulance services and hospital emergency departments.
  - (b) Issuance of guidance concerning the levels of radiation exposure related to the health and safety of ambulance services, hospitals and other health care personnel.
  - (c) Development of emergency medical support and response training programs.
  - (d) Development of public education material to explain to the populace the health hazards of radiation exposure and what can be done medically to eliminate or lessen the hazards and treat individuals exposed to them.
- (12) Coordination of the medical response to incidents with any affected contiguous states.

c. Pennsylvania Emergency Management Agency (PEMA)

The Pennsylvania Emergency Management Agency has the following related responsibilities in the event of an incident at the Limerick Generating Station:

- (1) Responsibility as the lead State agency for emergency management and the coordination of response activities.
- (2) In cooperation with applicable State agencies and the American Red Cross, coordination of the resource management (including delivery to central resource

receiving points) of available State equipment and supplies to satisfy unmet needs of risk and support counties.

- (3) Establishment and maintenance of agreements with supporting Federal agencies, adjacent States, volunteer organizations and fixed nuclear facilities to provide for coordination and integration of emergency response planning and operations.
- (4) Operation of an annual exercise to evaluate radiological emergency response plans and capabilities.

#### F. Situation

An incident at the Limerick Generating Station having the potential for release of radioactive materials may require that the residents and staff of River Crest Center take some type of protective action. These actions may include:

1. Sheltering
2. Evacuation

Appropriate responses may include some combination of these protective actions. Technical assistance concerning responses to a particular incident will be made available by the Department of Health, the Bureau of Radiation Protection and the Pennsylvania Emergency Management Agency through the Montgomery County Office of Emergency Preparedness.

## II. NOTIFICATION

#### A. Initial Notification

Upon receiving information from the Montgomery County Office of Emergency Preparedness that a radiological incident at the Limerick Generating Station has been classified as an Alert, Site Emergency or General Emergency, the River Crest Center telephone operator or answering service shall immediately notify the highest ranking staff person available within the center or the person on call if after hours.

A confirmatory telephone call, verifying the initial notification, should be anticipated from Upper Providence Township.

#### B. Implementation

The individual so notified shall implement this Radiological Emergency Response Plan, as appropriate (reference Section III - Concept of Operations) The ranking staff person on duty shall assume the role of directing the radiological emergency response until such time as a higher ranking staff person arrives at the center.



C. On-Duty Personnel

On-duty personnel will be notified of the situation by telephone. On-duty personnel will remain at their assigned stations unless directed elsewhere by the Director or her designate.

D. Off-Duty Personnel

Off-duty personnel will be contacted by the Director or her designate. Immediately upon notification, off-duty personnel should proceed to the center and report to their appropriate department head.

Off-duty personnel, upon learning of a Site Emergency or General Emergency through the mass media or Emergency Broadcast System, should not wait for notification but should proceed directly to the center and report to their appropriate department head.

III. CONCEPT OF OPERATIONS

Specific emergency management responses are dependent upon the "Incident Classification" declared at the Limerick Generating Station. Notification of the incident classification, and of any changes in that classification, will be received from the Montgomery County Office of Emergency Preparedness.

Please note that procedures for all classifications are cumulative; that is, procedures for each incident classification include those procedures established for all lower classifications.

A. UNUSUAL EVENT

No formal notification will be received from the Montgomery County Office of Emergency Preparedness at this classification. No action is required.

B. ALERT

1. Notify center staff as deemed appropriate.
2. Perform an immediate update of resident census.
3. Notify High Street facility.
4. Notify designated host facility (reference attachment B, Tab 1) of incident, requesting availability and reservation for resident evacuees.
5. Determine the on-duty staff census.
6. Determine emergency staff needs for:
  - a. Sheltering.

b. Evacuation.

7. Inventory supply needs for a 5-day period.
8. Check vans and cars for fuel and operability.
9. Provide an immediate report of the following to the Montgomery County Medical Coordinator at [REDACTED]:
  - a. Resident census.
  - b. Host facility availability.
  - c. Un-duty staff census.
  - d. Unmet needs.
10. Inventory and replenish medications and supplies for a minimum five (5) day period.
11. Time permitting, contact families of residents, notifying them of the incident and determining their ability to accept residents should the incident escalate.

C. SITE EMERGENCY

1. Prerequisite - Perform all appropriate actions outlined under ALERT.
2. Recall required off-duty personnel.
3. Prepare resident records providing personal data, medications, etc.
4. Contact families of residents by telephone and discharge residents to family care wherever possible.
5. Consolidate group homes to reduce staffing requirements, as necessary.
6. If notification is received before school hours, suspend regular daily release of residents to schools and vocational centers.
7. If notification is received during school hours, pick-up residents at Vocational Schools located in the Emergency Planning Zone (EPZ).
8. Place minimum five-day requirement of residents' medication in individual bags and attach to resident records.
9. Contact host facility (reference Attachment B, Tab I) confirming availability and reservation for resident evacuees. Request additional space through the Montgomery County Medical Coordinator at [REDACTED], if required.

10. Monitor alert/warning Emergency Broadcast Station KYW 1060 AM.
11. Stock the kitchen with a 5-day supply of canned foods, fruits and juices, disposable plates, cups and utensils.

D. GENERAL EMERGENCY

1. Prerequisite - Perform all appropriate actions outlined under ALERT and SITE EMERGENCY.
2. Await Protective Action Guidelines from the Montgomery County Office of Emergency Preparedness. Such guidelines will consist of either:
  - a. Sheltering (reference Section IV), or
  - b. Evacuation, if evacuation can be safely completed prior to the release of significant radiation to the Plume Exposure Pathway EPZ (reference Section V.)

NOTE: DURING SCHOOL HOURS, RESIDENT STUDENTS ARE CONSIDERED TO BE WITHIN THE JURISDICTION OF THE RESPECTIVE SCHOOL DISTRICT AND, AS SUCH, WILL BE SUBJECT TO THE PROVISIONS OF THE SCHOOL DISTRICT RADIOLOGICAL EMERGENCY RESPONSE PLAN. PLEASE REFERENCE EMERGENCY INFORMATION PROVIDED BY THE INDIVIDUAL DISTRICTS.

IV. SHELTERING PROCEDURES

- A. Remain indoors with all doors and windows closed.
- B. Adjust heating/ventilation/air conditioning systems to eliminate or minimize the intake of outside air.
- C. In the event of a contaminating incident, Montgomery County will provide potable water upon request.

V. EVACUATION PROCEDURES

A. Authority

The Governor has the sole authority and responsibility for directing and compelling an evacuation. The Governor or the highest ranking elected county or municipal official in authority may recommend an evacuation for their respective jurisdictions. The Director may order the evacuation of the River Crest campus.

B. Required Coordination

Any evacuation outside the River Crest Center complex must be coordinated with the Montgomery County Office of Emergency Preparedness.

### C. General Procedures

1. Notify the host facility (reference Attachment B, Tab I) of the incident, requesting availability for resident evacuees and staff, reporting any unmet needs to the Montgomery County Medical Coordinator at [REDACTED].
2. Assemble residents, together with resident records, medication and other necessary supplies at departure areas. The departure area will be at the front door of each house.
3. Assign staff to multiple-resident transport vehicles as deemed appropriate.
4. Distribute evacuation route maps (reference Attachment B, Tab II) to any drivers unfamiliar with the route of travel/final destination.
5. Assist residents into appropriate transportation vehicles.
6. Dispatch selected staff to establish a temporary administrative headquarters at the host facility.
7. Secure the evacuated center via the shutdown of all mechanical, electrical and physical plant systems.
8. Secure records by locking all file cabinets and/or fire files.
9. Secure resident's personal valuables, depositing an inventory list in a separate locked file.
10. Secure medications not being transported by locking all medication cabinets.
11. If an evacuation occurs during school hours, residents attending school within the EPZ will be evacuated with their schools to host schools. Residents attending school outside the EPZ will be held at those schools. Residents will have to be picked up at the appropriate schools (reference Attachment C).
12. Notify the Montgomery County Medical Coordinator at [REDACTED] of the relocation site selected as the temporary administrative headquarters, indicating that evacuation is complete and depart with the center buildings locked and secured.

### VI. DE-ESCALATION OF INCIDENT

Upon notification from the Montgomery County Office of Emergency Preparedness that the Incident Classification for the Limerick Generating Station has been de-escalated, the River Crest Center Director should oversee the orderly return of the center to the level of preparation indicated by the new incident classification. The specific steps to be taken and the sequence in which they are taken shall be determined by the Director.

VII. REENTRY

Safety inspection of the physical plant and surrounding areas shall be performed by the Director. Upon the determination that reoccupation of the center is considered safe, appropriate staff shall ensure that the center is fully prepared to resume normal operations prior to reoccupation. When the center is fully prepared, the Director will coordinate transportation and reoccupation through the Montgomery County Office of Emergency Preparedness.

VIII. PLAN MAINTENANCE AND DISTRIBUTION

A. Maintenance

1. The Director is responsible for ensuring the currency of the RERP, including the development and distribution of all changes, as well as accomplishing an annual review.
2. All changes to the River Crest Center RERP shall be coordinated through the Montgomery County Office of Emergency Preparedness.
3. The current date shall be placed on any page that is changed.

B. Distribution

1. Montgomery County EUC (copies to accommodate distribution to PEMA and Philadelphia Electric Company)  
Copy Numbers 1-4 4 copies
2. Upper Providence Township Emergency Management Coordinator  
Copy Number 5 1 copy
3. River Crest Center Staff  
Copy Numbers 6-11 6 copies

ATTACHMENT A  
NOTIFICATION ROSTER

Emergency Numbers

Director.....Nancy Thaler..... [REDACTED]

Director of,  
Residential Services.....Beth Hopkins..... [REDACTED]

Project Directors.....Gale Leonard..... [REDACTED]

Joanne Cunfer..... [REDACTED]

Jim Dunne..... [REDACTED]

Jean Merkl..... [REDACTED]

Answering Service and Emergency Beeper..... [REDACTED]

ATTACHMENT B  
EVACUATION SUPPORT

Tab I: Host Facilities

Tab II: Evacuation Route Maps

TAB 1 to ATTACHMENT B

HOST FACILITIES


\*Facility: Montgomery County School/Center for Developmental Education

Address: 1605 - B West Main Street  
Norristown, PA 19403

Telephone: (215) 539-8550

Contact Person: Robert H. Leiss, Ed. D.

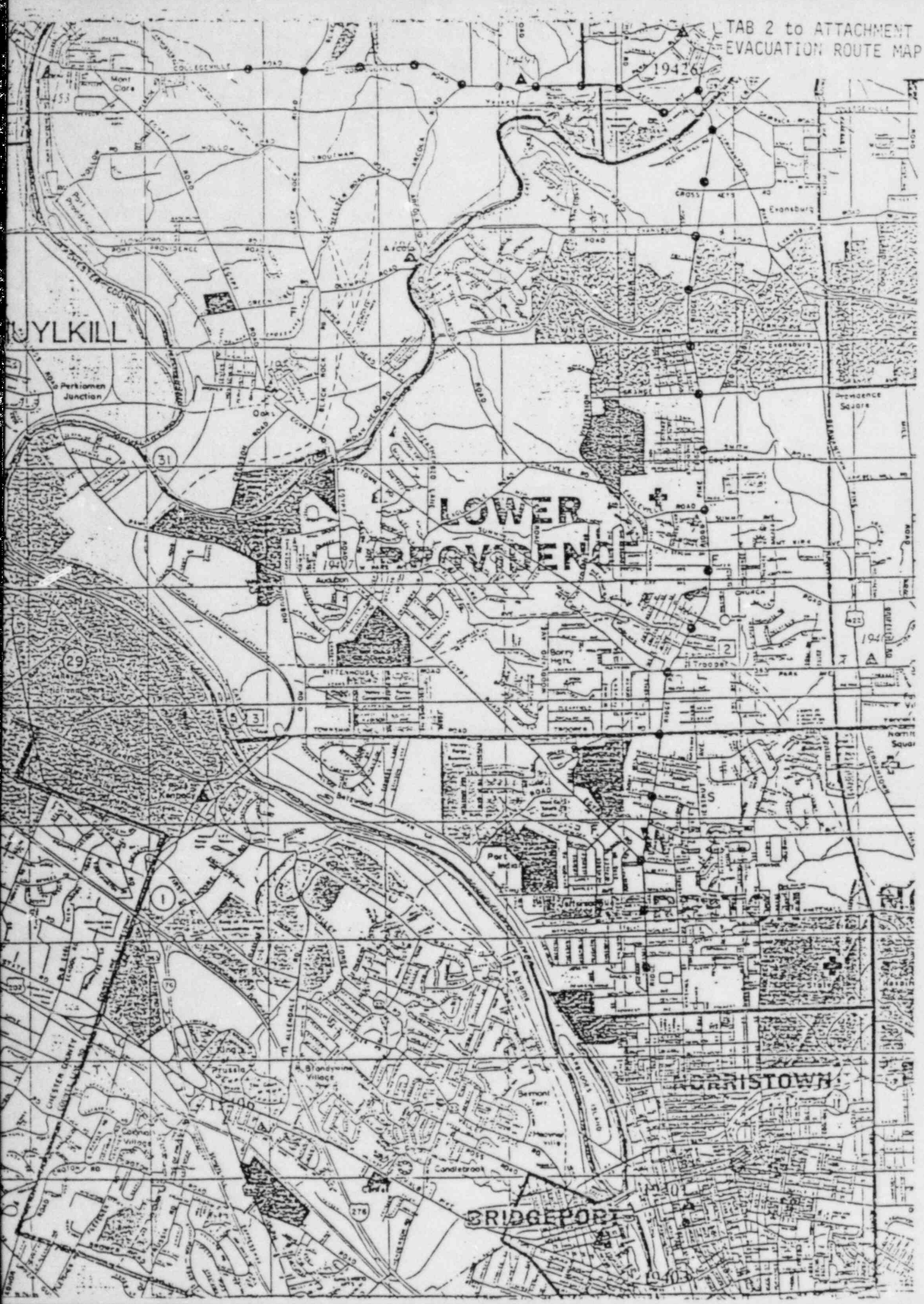
Night or Weekend Contact: Joe Chell

Telephone: 

\* Should pre-arranged host facility be unable to provide full evacuation support, the Montgomery County Medical Coordinator will assist in the identification of alternate host facilities.



19476



TAB 3 to ATTACHMENT B

LETTER OF AGREEMENT



MONTGOMERY  
COUNTY SPECIAL EDUCATION CENTER • 1605-B WEST MAIN ST. • NORRISTOWN, PA. 19403 • 215-534-8550  
INTERMEDIATE  
UNIT

May 3, 1983

Mr. David Dunn  
Planning Specialist  
Operations Service Division  
Energy Consultants, Inc.  
Riverside Office Center #3  
2101 North Front Street  
Harrisburg, PA 17110

Dear Mr. Dunn,

This is in response to your request to utilize the Montgomery County School and the Center for Developmental Education to house children from Rivercrest in the event of an emergency situation at the Limerick Power Station. Based on my discussion with Mr. Guthridge, Executive Director of the Child Development Center, these facilities will be available to you for the situation described above.

We are pleased to be of service to you. Should you have any questions please contact me.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'R. Leiss'.

Robert H. Leiss, Ed.D.  
Assistant Director of Special Education

/mrt

cc: J. Steven Banks  
Frank Guthridge  
Jacob Dailey

ATTACHMENT C

DAYTIME LOCATIONS OF RIVER CREST RESIDENTS  
AND THEIR EVACUATION HOST FACILITIES

Schools

Perkiomen Valley High

Upper Merion Junior High

Physically Handicapped School

West End Elementary

Eisenhower Junior High

Center for Developmental Education

Lower Merion Vocational Training Center

Host Facilities

North Penn Senior High  
Lansdale, PA

Upper Merion Junior High

Physically Handicapped School

Emmaus Jr. & Sr. High Schools

Eisenhower Junior High

Center for Developmental Education

Lower Merion Vocational Training  
Center

# COUNTY OF CHESTER

## COMMISSIONERS

Earl M. Baker, Chairman

Robert J. Thompson

Patricia Moran Baldwin

## DEPARTMENT OF EMERGENCY SERVICES

14 East Biddle Street, West Chester, PA 19380 (215) 431-6160

Timothy R. S. Campbell  
Director

August 17, 1984

RECEIVED  
AUG 27 1984  
R. A. KANKUS

Mr. Vincent S. Boyer  
Senior Vice President-Nuclear Power  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, PA 19101

Dear Vince:

In reviewing with the local emergency management coordinators and members of the County emergency operations staff, the drill of July 25, 1984, one theme becomes very apparent very quickly. That is the role that training played in the preparedness of the municipal EOC teams and the role that it played in the preparedness of the local emergency service organizations.

Essentially those organizations which participated the most in training were the most ready and those that had not were the least. The training given by Energy Consultants on behalf of the Philadelphia Electric Company recognized this need and addressed it. However, it is also very clear that many of the agencies felt that the training they had already received was but a first step in a series of different training environments that they felt had to occur before they reached the point of maximum preparedness. As you know, Chester County Emergency Services and Energy Consultants cooperated to present a series of table-top exercises in the weeks immediately prior to the drill. From all reports from local directors, these proved to be the most helpful of the training sessions that they were exposed to.

In many cases, the local directors have indicated that they wish to consider this series of table-top exercises and to expand them into the non-nuclear arena. As you know, one of the constant themes of the preparedness effort in Northern Chester County has been that the improvements in preparedness will result in the readiness for non-nuclear plant emergencies as well as for RERP. There are a number of exercises that are available from the Federal Emergency Management Agency through PEMA which will continue the process of education on the part of local emergency staff personnel. However, a commitment in time and personnel



Founded 1682



Mr. Vincent S. Boyer  
August 17, 1984  
-2-

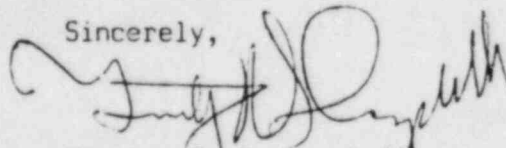
must be made so that the municipalities in the Limerick EPZ can receive further training and further exercising.

I have already had one meeting with Mr. Robert Patterson of Energy Consultants concerning this area and feel, based on my conversation with him, my own staff and the local directors, the following things need to be done:

- 1) Additional training in the basic emergency worker program must continue for all agencies which may become involved in a RERP response.
- 2) A special program must be presented for the amateur radio operators. As you know, there are usually people from outside the municipality who travel into the local EOC's to set up communications links. Because of their location, they have not been able to participate in the local EOC training in Northern Chester County but need the education as far as EOC procedures and the use of dosimetry, KI and other protective measures.
- 3) A follow-up course should be developed for emergency workers and EOC staff which is of a more practical nature concerning the duties of each individual staff member in an EOC or each individual member of a route alerting team.
- 4) A continuing series of table-top exercises must be developed and presented on a regular basis including non-nuclear power plant as well as nuclear power plant themes.
- 5) Those agencies which have assignments requiring the use of skills not normally exercised by routine emergency response should receive practical, hands-on training and practical hands-on exercising on a regular schedule.

I believe that all of these points are readily achievable and within the capability of the training group of Energy Consultants. I also feel that all of them are necessary to maintain the interest and commitment by the emergency workers both at the EOC and emergency service organization level in the Limerick EPZ. I would be more than happy to meet with you and/or members of your staff to discuss this in further detail at any time.

Sincerely,



Timothy R. S. Campbell  
Director  
Department of Emergency Services

TRSC/esb  
cc: Roberta Kankus  
Wayne Rothermel

# COUNTY OF CHESTER

RECEIVED

AUG 24 1984

## COMMISSIONERS

R. A. KANKUS

Earl M. Baker, Chairman

Robert J. Thompson

Patricia Moran Baldwin

## DEPARTMENT OF EMERGENCY SERVICES

14 East Biddle Street, West Chester, PA 19380 (215) 431-6160

Timothy R. S. Campbell  
Director

August 16, 1984

Ms. Roberta Kankus  
Director  
Emergency Preparedness  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, PA 19101

Dear Robbi,

In reviewing the results of the exercise on July 25, 1984 one point became very clear. As you know, the siren system installed by the Philadelphia Electric Company in the three counties is designed to operate on one of two bases. First is the activation of a single siren requiring sixty-seven activations to set off all the sirens in Chester County and the other is the activation of all sixty-seven sirens simultaneously.

In view of the fact that we have told the municipalities that the knowledge, information, materials, skills that they have gained from participating in the Radiological Emergency Response Planning for the Limerick Generating Station would also enhance their ability to respond to all other man-made and natural disasters, it would be a great benefit if we could activate sirens by township as well. This would allow activation of the sirens system for a particular township in the event of a local emergency and also it would allow for activation of the Emergency Broadcast Network for the northern part of the County at the same time. I think that this would be of great benefit not only to the Department of Emergency Services and the local municipalities but also would prevent any problems in the event of non-Limerick disasters since we would not have to set off all sixty-seven sirens at once.

I would appreciate your looking into this issue. I believe it is a small change in the software program to allow this. As you know, the drill has revealed the necessity for some software program changes anyway and I feel that this can be accomplished at the same time. I feel that this issue would be a

continued. . . . .



Founded 1682

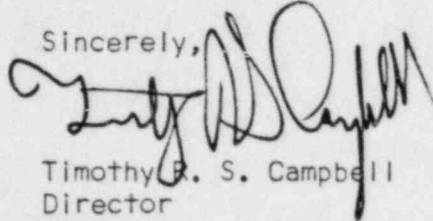


Page 2

Ms. Roberta Kankus letter (cont'd)

good agenda matter for the siren discussion to be held at Montgomery County on the afternoon of the 21st. I feel this would be a great benefit not only to Chester County but also to Berks and Montgomery and feel that this is the way to go.

Sincerely,



Timothy R. S. Campbell  
Director  
Department of Emergency Services

TRSC/mla

cc: A. Linley Bigalow,  
Montgomery OEP  
Robert Reber,  
Berks County EMA  
Wayne Rothermel

ALD W. BAGENSTOSE  
HONY J. CARABELLO  
NON K. SHAFFER  
Commissioners



ROBERT L. REBER  
DIRECTOR

BERKS COUNTY EMERGENCY MANAGEMENT AGENCY

BERN TWP. AGRICULTURAL CENTER, R.D. 1, LEESPORT, PA 19533 (215) 374-4800

RECEIVED

AUG 27 1984

R. A. KANKUS

August 22, 1984

Ms. Roberta Kankus  
Director - Emergency Preparedness Section  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Robbie:

At our meeting on August 21 with Paul Locke and as a result of our discussion about the siren system and its controls, it was felt by all three counties that there would be distinct advantages to having a program that permitted the selection and activation of sirens in "municipality" groups; i.e. all the sirens in one township or one borough at one time. Presently, we'd have to activate the sirens one at a time to get the same effect and that takes considerably longer to do. We asked Paul to investigate the possibility of doing this and he promised to check, but said it would be helpful if he had your blessing. Will you bless?

Sincerely,

A handwritten signature in cursive script that reads "Bob Reber".

Robert L. Reber  
Director

RLF/jam



# PHILADELPHIA ELECTRIC COMPANY

680 RIDGE PIKE

PLYMOUTH MEETING, PA 19462

B. R. STOWELL  
DIVISION MANAGER

August 16, 1984

All Fire and Ambulance Companies  
of Berks, Chester and Montgomery Counties  
located within the Limerick Generating Station  
Emergency Planning Zone

Gentlemen:

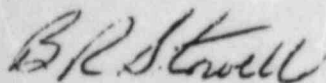
The first annual Limerick emergency drill is now behind us and most of you have participated in the implementation of the Radiological Emergency Response Plan in your respective municipalities. We at Philadelphia Electric Company appreciate your cooperation. You have again demonstrated the important contribution volunteer organizations make to the safety and welfare of the communities they serve.

In June and July representatives of all Fire and Ambulance Companies in the EPZ were invited by the Emergency Management Directors of Berks, Chester and Montgomery Counties to attend meetings with PECO representatives in their respective counties. Those that were able to attend, heard W. J. McCormick or myself, express PECO's willingness to provide certain items of equipment that the participating Companies would need to fulfill their responsibilities in the Emergency Response Plan.

Over the next several weeks each individual Company will be contacted by PECO to arrange a meeting with appropriate representatives of each Company to discuss their needs. In preparation for this meeting, you are encouraged to consider your needs recognizing that PECO can provide only that equipment which is presently unavailable and required to fulfill your responsibilities as designated by the Emergency Response Plan for your municipality.

Your past and future cooperation is deeply appreciated.

Very truly yours,



Division Manager

GAS AND ELECTRIC SERVICE