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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
Philadelphia Electric Company)	Docket Nos. 50-352,
(Limerick Generating Station,)	50-353
Units 1 and 2))	

COMMONWEALTH OF PENNSYLVANIA RESPONSE TO
FRIENDS OF THE EARTH DECEMBER 8, 1984 MOTION
REGARDING VALLEY FORGE PARK

By motion dated December 8, 1984, Friends of the Earth (FOE) asked this Board to "require PEMA to include Valley Forge Park in the EPZ and formulate an emergency evacuation plan for the Park." The merits of FOE's motion are properly considered after the close of the record on admitted contentions LEA-24 and FOE-1. In view, however, of the allegations by FOE that the Pennsylvania Emergency Management Agency (PEMA) "withheld" information from the Commission and parties regarding the Limerick plume exposure pathway emergency planning zone ("EPZ"), the Commonwealth wishes to respond to FOE at this time.

FOE asserts that the record at Tr. 14,655 shows that the Chief Ranger, Valley Forge National Historical Park "forwarded a map to PEMA in February 1984 of the Park . . .

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." Examination of that page of the transcript reveals that the only reference to a February 1984 date is Commonwealth counsel's statement that an error regarding the evacuation plan map for the Limerick station was made known to the Licensing Board and parties at that time. The basis for this error and its impact on the Limerick EPZ was explained in a letter dated February 24, 1984 from Adolph L. Belser, Director, Office of Plans and Preparedness, PEMA to this Board (Attachment). The evacuation plan map referred to in the attachment is the map dated June 1983 which is contained in the Commonwealth's Disaster Operations Plan, Annex E (marked for identification as Commonwealth Exhibit E-1). The June 1983 map has also been marked for identification as Limerick Ecology Action Exhibit E-16. The evacuation plan map that concerns FOE is a draft copy dated July 1984 of the Limerick Evacuation Plan Map, and has been marked for identification as Commonwealth Exhibit E-9.

FOE's motion also incorrectly describes the EPZ for the Limerick station depicted on the evacuation plan maps as a circle with a 10-mile radius. The EPZ is actually represented by the "white area" on the maps and generally exceeds the 10-mile circle.

The Limerick EPZ boundaries were determined early in 1982 jointly by PEMA and the three risk counties (Berks, Montgomery and Chester), and the counties with their townships and boroughs. The evacuation plan map published

in June 1983 depicts the EPZ boundaries developed in 1982 and adds main evacuation routes, reception centers and color illustration.

The EPZ on the June 1983 map includes, as it has since its development in 1982, that portion of Valley Forge National Park lying north and east of the Schuylkill River.

This segment of the Park is in Lower Providence Township. Lower Providence Township in its entirety has always been included in the EPZ as designated by PEMA and the risk counties.

As explained in the attached February 24, 1984 letter from Mr. Belser, subsequent to publication of the June 1983 map it was discovered that the circle depicting the 10-mile radius was approximately one quarter-mile too small. When this error was corrected, a very small segment of the Park fell within the 10-mile radius. The Park's status with regard to inclusion in the EPZ did not change, however. The July 1984 draft map identified as Commonwealth Exhibit E-9 depicts the 10-mile radius based on correction of the discovered error described in the February 24 letter. This map was prepared specifically for use in the July 25, 1984 exercise and furnished to the affected counties and municipalities for use in that effort.

As stated on the record (Tr. 14,655, 14,676-78), the Commonwealth will present competent evidence regarding factual representations made herein.

PEMA has not withheld any information from the Board

or parties regarding the 10-mile radius or the EPZ designated by the "white area" on the maps referenced herein. The Limerick offsite emergency response plans have been prepared to ensure the safety of the population within the designated EPZ and not merely within the 10-mile circle. Commonwealth Exhibit E-9 is in draft form and will not be finalized until definitive information is received from the affected counties regarding any further adjustments that may be necessary. PEMA has therefore not issued this map to all holders of Annex E. As noted previously, however, it was used during the July 25 exercise by the affected local governments and was available upon request to any individual or organization in need of the map. PEMA has not been a party to any alleged deception regarding what portion of the Valley Forge National Park is included within the designated Limerick EPZ.

Respectfully submitted,



Zori G. Ferkin
Assistant Counsel
Governor's Energy Council

Dated: December 17, 1984



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February 24, 1984

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In the Matter of
Philadelphia Electric Company
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352, 50-353

Dear Administrative Judges:

On December 6, 1983 we wrote to the Board, with copies to the service list, regarding our review of the draft off-site Radiological Emergency Response Plans for Limerick Generating Station and their subsequent distribution by Philadelphia Electric Company to the Board, the intervenors and the City of Philadelphia. In a continuing effort to keep the Board apprised regarding the status of these plans, PEMA wishes to inform you of a recently discovered error on the Evacuation Plan Map which we published in June 1983.

The map is a composite of the Berks, Chester and Montgomery County maps but the cartographers apparently neglected to compensate for this in developing the scale shown on the Evacuation Plan Map. The correct scale is one (1) mile equals .588 inches. Consequently, the circle depicting the ten-mile EPZ is approximately a quarter mile smaller than it should be. The EPZ, as determined by the municipalities, counties and PEMA, is shown as the white area on the map and follows political subdivision boundaries or recognizable landmarks. A review of the map indicates that our defined EPZ exceeds the ten-mile circle by considerably more than a quarter mile in Chester County and the error thus has no impact. This is not, however, true for Berks and Montgomery Counties since the additional quarter mile affects the EPZ boundaries now shown for several municipalities.

It is our intention to republish the maps and ensure that any necessary changes are made in the plans of the affected counties and municipalities. We will not know the extent of these changes until the EPZ can be redefined for Berks and Montgomery Counties. Philadelphia Electric Company's consulting firm, Energy Consultants Inc., is currently working with these counties and their involved municipalities to determine how the

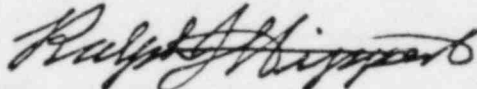
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EPZ boundaries should now be established to compensate for the quarter mile extension of the ten-mile circle that appears on the June 1983 maps.

Although it is indeed regrettable that the error occurred, it is, however, fortunate that it was discovered before the July 25, 1984 exercise and while the plans are still in draft form. We cannot at this time provide a date as to when the necessary changes will be completed, but please be assured that we will endeavor to republish the map and have necessary changes made in the plans as quickly as possible. Region III of the Federal Emergency Management Agency has also been informed of the error and the action being taken.

Sincerely,


for

Adolph L. Belser
Director
Office of Plans and Preparedness

ALB/RJH:jmb (Tel: 717-783-8150)

cc: Attached List

bcc: Roberta Kankus
James Asher