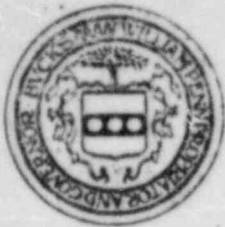


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COUNTY OF BUCKS

OFFICE OF THE COMMISSIONERS

Administration Building, Doylestown, Pa. 18901

215-348-2911

84 NOV 26 P1:28

County Commissioners
CARI F. FONASH, *Chairman*
LUCILLE M. TRENCH, *Vice-Chairman*
ANDREW L. WARREN

OFFICE OF THE COUNTY CLERK
DOCKETS & RECORDS
BRANCH

WILLIAM H. RIESER
County Administrator
JAMES M. McNAMARA
County Solicitor

November 16, 1984

Federal Emergency Management Agency
Federal Center Plaza
500 C Street S.W.
Washington, DC 20472

SERVED NOV 26 1984

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

ORDER NUMBER
PECO & UTIL FAC.

50-352/353.0L

Dear Sirs:

On behalf of the majority of Bucks County Commissioners, I wish to reassert, reaffirm, and clarify the status of Bucks County's activities in regard to the proposed Limerick Generating Station.

From public meetings with Bucks County citizens, it is apparent that many Bucks County residents, including those within the twenty-five mile radius of Limerick, and others within a fifty mile radius of Limerick, can be expected to evacuate the area. This expectation is further documented by such NRC publications as NUREG 0654.

Bucks County also anticipates considerable influx of evacuees from Philadelphia and Montgomery Counties, and is unable to make any reasonable or equitable basis for distinguishing among them.

In these circumstances, it is manifestly impossible for Bucks County to provide any basis or expectation for believing that facilities and personnel will be in place, or can be put in place, to accommodate twenty-five thousand shelter-seeking evacuees, either as to reception or support facilities, as contemplated in the draft plan which was prepared for the County's consideration by PECO consultants. In addition, some of our citizens have developed a list of well-founded concerns, which we believe are important as well. A copy is enclosed.

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November 16, 1984

The County cannot and will not be a party to a charade; approval or even further consideration of the proposed plan would be a charade, misleading the public.

None of the foregoing is inconsistent with Bucks County's appropriate discharge of its responsibilities under Act 1372, and under Senate Bill 987. Bucks County will make plans to provide realistic emergency assistance in appropriate cases. On the other hand, Bucks County will not permit its facilities to be utilized to create a misleading and dangerous trap.

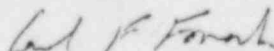
Within the above context, Bucks County will test its telecommunications interconnections and responses on November 20, with the expectation and foreknowledge that they will not constitute any evidence as to the appropriateness or feasibility of the draft plan, or its concepts; these we believe to be fatally flawed.

If either of your agencies can provide us with any basis for creating realistic plans, in light of the above and enclosed, we will consider such submissions.

In the meantime, we request that your agencies provide us with assistance in planning for the necessary evacuation of Bucks County residents.

This letter is consistent with the conversation which Commissioner Fonash and Mr. Patten held on November 8, 1984.

Sincerely,



Carl F. Fonash
Chairman,
Bucks County Commissioners

r12.rjsII/sp
Enclosures

cc: U.S. Nuclear Regulatory Commission
Philadelphia Electric Company
Charles McGill
Limerick Ecology Action-Intervenor

INADEQUACIES OF THE BUCKS COUNTY (ECI) FIXED NUCLEAR FACILITY INCIDENT SUPPORT
PLAN FOR INCIDENTS AT THE LIMERICK GENERATING STATION

1. Monitoring/Decontamination. The proposal to send evacuees on from reception centers to mass care centers (primarily schools) before monitoring/decontamination procedures has been strongly criticized by FEMA in its report on the drill of July 25, 1984. Revision would require massive changes in the central EPZ plan as well as in all support plans. These changes would necessitate widespread reallocation of fire department and other emergency personnel.
2. Plume/Ground Contamination. The Final Environmental Statement-Limerick (NRC Staff) states that in a number of accident/weather sequences, people as far as 25 miles from Limerick would be subjected to a 24-hour dose of ground radiation alone in excess of the total permitted (once only) for emergency workers. This dose would, of course, be in addition to that from the cloud passing overhead, and would remain as a continuing ground dose for a long period of time. Without being removed, residents would be subject to fatalities and severe health consequences.
3. Improper Center Siting. The plan designates two reception centers and a number of mass care centers in Central Bucks which lie within or just outside the 25-mile zone. These centers are inherently unsuitable, because Bucks County emergency services could face the double task of reevacuating the evacuees simultaneously with moving out their own Bucks County citizens.
4. Traffic/Meteorological Considerations. Like the EPZ plan, the support plan fails to take into account that both Philadelphia and Lower/Central Bucks lie statistically very significantly downwind from Limerick. The major evacuation route to and through Bucks is designated to be the Pennsylvania Turnpike, much of which lies along the single highest plume risk direction. Turning back westbound tractor-trailer traffic and disposing of it would create a problem compounded by the designation of the Philadelphia-Route 1 Interchange as exit point for the EPZ evacuees. One or two jack-knife accidents on the Turnpike east of that point would impede or halt the 25,000 evacuees projected to continue to unspecified points in New Jersey.
5. Logistics/Materiel. The support plan, as well as the EPZ plan, presupposes the dispatch of emergency supplies for mass care from the Red Cross warehouse in Northeast Philadelphia. Given the conditions of evacuation traffic at the Turnpike/U.S. 1 intersection and the possibility of attempted self-evacuation from Northeast Philadelphia through Bucks County, there is a clear risk of supplies not reaching their destination for many hours, even days. Furthermore, they might become contaminated en route.
6. Logistics/Distribution Center. The support plan designates the Bucks County Airport as a staging center for receipt of supplies. It lies on the periphery of the 25-mile zone. Not only is no fall-out-proof facility available for storage or loading, but emergency personnel as well as materiel could be unnecessarily subjected to serious contamination in some accident/weather sequences.
7. Transportation/Fuel. The only mode of emergency transport from risk areas is assumed to be by motor vehicle. Predictably, an evacuation from the EPZ into/through Bucks County would deplete stocks of gasoline and replacement tires. Given the NRC's assumed average evacuation speed of 2.5 mph, cars starting with less than full tanks would need refueling upon arrival in Bucks County. No study has been done nor have plans been made for the

fuel needs of Bucks residents if plume passage required them to move from the 25-mile zone or from contaminated areas contiguous to it. Especially, there are no emergency plans for the non-institutionalized disabled nor for people who may be temporarily or regularly without automobile transport.

8. Volunteers. The plan does not address the difference in volunteers' availability and willingness to serve under nuclear accident conditions, as distinguished from more limited and predictable disasters, such as Mississauga. Nor does the plan verify such volunteers' 24-hour, 365-day active status. The plan takes for granted the services of employees of bus and trucking companies, school districts, hospitals, etc. No individual letters of agreement are required; the arrangements presupposed are often at variance with other contractual obligations of the employer as well as lacking individual informed consent.
9. Sheltering. The plan lists Sheltering as a protective action. The PEMA Director, John Patten, however, acknowledged in a recent meeting in Bucks County what has also been pointed to in the G.A.O. Report on Further Actions Needed to Improve Emergency Preparedness Around Nuclear Powerplants: simply that sheltering is useless after two hours.
10. Public Information/Route Alerting. The plan makes no provision for notifying Bucks residents to prepare to move out from under a potential plume. Quite the contrary, the prepared radio announcement advises them that they are not affected. No route alerting whatsoever is planned within the 10- to 25-mile area in order to advise of any change in conditions that would warrant evacuation. Indeed, the personnel for such alerting would be unavailable because of being already assigned to support functions on behalf of the EPZ plan. There is no assessment of the number or location of the hearing disabled nor of those people living independently who are nevertheless incapable of appreciating and responding to such an emergency. Child care centers, prisons, hospitals, geriatric facilities, and other institutions would have to rely on their own general emergency plans, if any.
11. Schools. The support plan presupposes contradictory sequences of events if an accident should occur while schools are in session in Bucks County. The practice of school authorities is to hold students at school in the event of weather or other emergencies and to contact parents before sending them home. Contrary to that practice, the plan requires that students be dismissed immediately. Since most schools operate on a three-shift bus schedule, buses would not be instantaneously available as posited in the plan. Contaminated persons and vehicles might conceivably be mingled in the school buildings and parking areas with students retained at school pending contact with parents. (Handling of such a situation during the 7/25/84 drill in Montgomery County was alarmingly inept.)
12. Highways/Bridges. The inadequacy of roads to the north and of bridges to the east across the Delaware turn Bucks County into a bottleneck, which could on the one hand receive several hundreds of thousands of people from outside its border in addition to the several hundred thousand of its own population who would also seek to leave. Given fuel shortage and the absence of firm contingency planning, the result would be unacceptable disorder. Experts on plume characteristics and evacuation behavior affirm that appropriate plans well beyond the EPZ are necessary to mitigate the suffering and loss of life and property that would occur during an unplanned evacuation.

13. Other Jurisdictions. No formal plans have been entered into with New Jersey or other states, although PEMA is charged by law to develop such plans when appropriate.
14. Drills/Testing. The GAO has criticized as inadequate the procedures used for testing emergency/evacuation plans for commercial nuclear accidents. Not only are tests preannounced, known long in advance to state and local participants, but also the parameters set for accident simulation are limited to sequences resulting in a risk radius of no more than 10 miles from the plant. This practice is no doubt convenient for the licensee and the emergency "players" but of little use in demonstrating capability to protect the public in some of the more severe but credible accidents. Seldom have adverse weather conditions been incorporated into the tests, nor is participation required along the 25-mile potential plume radius. (By inadvertence, readings consistent with such a plume were once issued in a test; the emergency workers "evacuated" to the expected 10-mile distance and sat down to congratulate themselves on their performance, when in fact they would have been dead at the readings they had recorded and ignored.) Nothing in the EPZ plan or the support plan tests capacity to remove "promptly" (See Final Environmental Statement, Limerick, N-3) that part of Bucks Countians at risk, impacted as the area is by population and geographical location.

REFERENCES

1. Bucks Draft plan 5-a-1 paragraphs a & b; 5-e-1; FEMA, p.22
2. FES, N-3
3. Bucks Draft plan 4-c-1
4. FES 5-79
Bucks plan, page 12; 4-c-1; 3-a-1
5. Bucks plan 1-a-1
6. Bucks plan page 19
7. Bucks Plan 12-13; FES N-3
8. Bucks plan page 14, paragraph e; 14 paragraph f; 15 paragraph h; 6-a-1
9. GAO page 4; Bucks plan page 5, paragraph k-1
10. Bucks plan 7-c-1
11. Bucks plan 14 paragraph F
12. Dr. Jan Beyea.
13. 35 P.S.g 7703, pages 132,133
14. GAO chapter 3, pages 26-40