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, 50-353
	)	
(Limerick Generating Station, Units 1 and 2)	)	

TESTIMONY OF RALPH J. HIPPERT
FOR THE COMMONWEALTH OF PENNSYLVANIA
ON LIMERICK ECOLOGY ACTION
DEFERRED AND RESPECIFIED OFFSITE EMERGENCY PLANNING CONTENTIONS
LEA-1, LEA-3

LEA-1

The Risk Counties, Municipalities, School Districts, and Institutions haven't promulgated or adopted final radiological emergency response plans, nor have they approved and adopted plans drawn up for them by Energy Consultants, Inc., a Harrisburg firm hired by Philadelphia Electric Company. There is no reasonable assurance that the present state of planning is predictive of final approval, or that the plans are capable of being implemented.

1. During the period September through November, 1983, the Pennsylvania Emergency Management Agency (PEMA) reviewed draft radiological emergency response plans submitted by the three Limerick EPZ risk counties (Berks, Chester and Montgomery) as well as draft municipal and school district plans provided through the respective risk counties. In connection with this review, PEMA provided written comments and recommendations to each of the risk counties regarding changes, corrections or additions to bring the plans into consonance with the state plan and to ensure their adequacy and implementability. Comments with regard to municipal and school district plans were provided through the respective counties.

TR-01/1

PLEASE INSERT IN LIMERICK TRANSCRIPT
AFTER PAGE 19,498 DATED 1/22/35

Add 5 copies to ASLBP, LW-439

2. Subsequent to PEMA's initial review and comments, revised drafts were prepared by the counties, municipalities and school districts with assistance from Energy Consultants, Inc., the firm funded by Philadelphia Electric Company for this purpose.

3. In accordance with this Board's Order dated May 16, 1983, copies of the revised draft plans were distributed to the intervenors. Given the timetable imposed by the Board for the distribution of draft plans, PEMA was unable to review the revised drafts prior to their transmission to the intervenors. In view of this distribution, PEMA opted to submit the same drafts to the Federal Emergency Management Agency (FEMA), Region III for informal review pursuant to 44 C.F.R. Part 350.

4. As a result of this informal review of the plans provided to it by PEMA, FEMA Region III issued its interim findings in April 1984. FEMA indicated that, "[a]t this point in the planning process, the local offsite emergency response plans developed for incidents at the Limerick Generating Station are inadequate and are not capable of being implemented."

5. If the most recent drafts of the county, municipal and school district plans reflect the changes, corrections and additions recommended by PEMA in the fall of 1983 and the April 1984 recommendations of FEMA, the plans should be adequate and capable of being implemented.

6. With the exception of Draft 6 for Berks County (received by PEMA October 6, 1984) and Draft 7 for Montgomery County (received October 23,

1984) PEMA has not received any county, municipal or school district draft plans for review since the fall of 1983. PEMA is currently in the process of reviewing these latest drafts of the Berks and Montgomery County plans, but is not prepared at this time to make a definitive assessment of their adequacy and implementability.

7. As to the current status on adoption of municipal and school district plans by the governing bodies of these entities, it is reiterated that no municipal or school district plans have been submitted by the respective counties to PEMA for review since the fall of 1983. Based upon the draft plans submitted to PEMA at that time, none have been accepted, approved or adopted at the local level. Any updated report on the adoption status of these plans must come from the risk counties in their role as coordinator and initial reviewer of the respective municipal and school district plans prior to transmittal by the counties to PEMA.

8. With regard to county plans, none of the three risk or two support (Bucks and Lehigh) county plans has been formally accepted by its respective Board of Commissioners.

9. In connection with its application to FEMA for formal review and approval of the Limerick offsite radiological emergency response plans, the Commonwealth is required under Section 350.7(d) of 44 C.F.R. Part 350 to certify that the plans are, in its opinion, "adequate to protect the public health and safety of its citizens living within the emergency planning zone[] . . . ." The Commonwealth, through PEMA, will not make a

statement evaluating the adequacy and implementability of the county, municipal and school district radiological emergency response plans prepared in connection with the Limerick Generating Station, or submit these plans to FEMA for formal review and approval, until:

(a) A joint exercise acceptable to FEMA has been conducted. This exercise was held July 25, 1984 and a supplemental exercise, required by FEMA, ~~is scheduled for~~ was conducted November 20, 1984.

(b) A public meeting has been conducted in accordance with 44 C.F.R. Section 350.10. As a prerequisite, PEMA must ensure that the State and local plans are available in local libraries for review by the general public at least two weeks prior to the meeting. The local plans should obviously be available for review by PEMA before they are put into the public libraries. A date has not yet been established for this meeting.

(c) The finalized risk municipal and school district plans are:

(1) Reviewed by the respective county to ensure consonancy with its own plan; and

(2) Submitted by the county to PEMA together with the county plan, and with each containing a promulgation page indicating whether the plan has been accepted or rejected by the respective Board of Supervisors, School Board or Board of Commissioners.

LEA-3

The Montgomery County RERP fails to provide reasonable assurance that the public will be adequately protected in that the Bucks County Support Plan, which is essential to the workability of the MontCo RERP, may not be approved. The present Board of Commissioners have [sic] little knowledge of the contents and implications of the Bucks County Support Plan. There is no assurance that the County will assume the responsibilities assigned to it in the Support Plan, rather than use County resources to help Bucks County people first. The Montgomery County Plan relies on the Support Plan in at least these ways:

1. facilities for relocation and mass care of evacuees
2. augmentation of emergency workers, including use of county resources, on a continuous 24-hour basis
3. See attachment "Excerpts and comments on the Bucks County Draft Evacuation Plan" for additional areas of support and interface.

It is contended that without the approval of the Bucks County Support Plan, the MontCo RERP is unworkable as it now stands.

10. This contention appears to be based upon the erroneous assumption by LEA that Bucks County has inexplicably decided not to accept the plan developed by Energy Consultants for support of approximately 24,400 evacuees from Montgomery County. The Bucks County Board of Commissioners has raised some legitimate questions regarding the impact of such an evacuation upon the safety and well-being of its residents and PEMA has acknowledged the Board's concerns. Based upon a recent meeting with the Commissioners, PEMA does not believe that Bucks County would refuse to cooperate in the event of an accident at Limerick. Rather, the County is asking that provisions be made in the plans to ensure that its populace would not be adversely affected by the evacuation from Montgomery County, or by a spontaneous evacuation from Philadelphia.

11. Senate Bill 987, which upon the Governor's signature became Act 1984-147, the Radiation Protection Act, provides for the establishment of a Radiation Emergency Response Fund from fees levied upon the nuclear power plants within Pennsylvania. This fund is to be used to defray expenses incurred by risk and support counties in developing their plans and preparedness for response to a nuclear power plant accident. Bucks County has indicated its desire to be a participant in this fund and as such must continue to be a support county. The issue is thus one of assuaging the County's present concerns by developing more explicit procedures and safeguards before the current draft plans are finalized. PEMA intends to work with Bucks County towards this objective.

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
	)	50-353
(Limerick Generating Station, Units 1 and 2)	)	

TESTIMONY OF RALPH J. HIPPERT AND DONALD F. TAYLOR FOR THE COMMONWEALTH OF PENNSYLVANIA REGARDING LIMERICK ECOLOGY ACTION ADMITTED OFFSITE EMERGENCY PLANNING CONTENTIONS LEA-11, 12, 13, 14(a), 14(b), 15, 22, 26

Introduction

The purpose of this testimony is to respond to certain contentions raised by Limerick Ecology Action (LEA) concerning offsite emergency planning for the Limerick Generating Station. Ralph J. Hippert and Donald F. Taylor are officials of the Pennsylvania Emergency Management Agency (PEMA). Their professional qualifications are attached to this testimony.

LEA-11

> The draft Chester and Montgomery County and School District RERP's are deficient in that there is insufficient information available to reasonably assure that there will be enough buses to evacuate the schools, both public and private, in one lift.

This contention is structured around the basic question: Have arrangements been made to ensure that sufficient buses will be readily available to evacuate the schools within the EPZ? Ancillary questions are then posed as follows:

1. What assurance is there that designated bus companies will actually provide the buses needed?

2. Are letters of agreement with bus companies definitive in setting forth the obligations of each party and can the agreements be enforced?

3. Do the plans have to include preassignment of buses to specific schools?

4. Will the normal or emergency-related bus requirements of school districts outside the EPZ impede the availability of buses needed for evacuation?

5. What procedures are, or should be, in place to ensure that designated buses from outside the area of normal school bus resources can be timely and effectively utilized?

6. Does Chester County have written agreements with bus companies to provide buses needed for evacuation of school children?

1. It is PEMA's position that should an evacuation become necessary arrangements must be in place to ensure the action can be accomplished in a timely manner by using one lift rather than multiple bus trips. This requires a coordinated effort by many parties. The first step is for each risk school district to determine how many buses it will require and the number that are readily available. If the buses are not owned by the school district then consideration must be given to the impact of prior scheduling by the supplier on the prompt availability of the buses needed. After this determination has been made the school districts then notify their respective county as to the number of buses available to them and the shortages, if any, that must be met to effect a one-lift evacuation. Each risk county emergency management agency then tries to arrange to meet these shortages from resources within the county. If this cannot be done the county reports its total school bus shortage as an "unmet need" to PEMA. It now becomes PEMA's responsibility, in coordination with the Pennsylvania Department of Transportation, to fill these unmet needs by arranging to utilize bus resources from counties outside the Plume EPZ. If this cannot be done the ultimate recourse is for PEMA to ask FEMA for assistance from adjoining states. This is, and has been, the concept to fill unmet needs for response to any emergency within the Commonwealth of Pennsylvania. In short, the procedure that is in effect to satisfy resource shortages is for the township or borough to go to its county and the county to

PEMA rather than for direct negotiations--township to borough or county to county. (R. Hippert)

2. In accordance with the Pennsylvania Emergency Management Services Code, P.L. 1332, No. 323, ~~Section 1,~~ codified in 35 Pa. C.S.A., Section 7101 et seq.) PEMA, in developing plans for emergency response, is charged with the duty and power "<t>o plan and make arrangements for the availability and use of any private facilities, services and property and, if necessary, and if in fact used, provide for payment for use under terms and conditions agreed upon." 35 Pa. C.S.A. Sectin 7313(10). Given this defined responsibility and authority it is incumbent upon PEMA, acting on behalf of the Commonwealth and in coordination with the Pennsylvania Department of Transportation, to make feasible and effective arrangements to ensure that any school bus shortage reported to it by the risk counties will indeed be filled if an evacuation becomes necessary. The need for these arrangements is further emphasized in 35 Pa. C.S.A. Section 7301(f)(4), which empowers the Governor, "<s>ubject to any applicable requirements for compensation under Section 7313(10) ... <to> commandeer or utilize any private property if necessary to cope with the disaster emergency." (R. Hippert)

3. On September 10, 1984, PEMA received notification from the Chester County Department of Emergency Services by letter dated September 4, 1984 that the county had an unmet need for 134 buses. Subsequent contact with the county

revealed that this shortage consisted of 80 buses to evacuate school children and 54 for the evacuation of persons without transportation, the handicapped and others not able to leave by private automobiles. Although PEMA was advised by Chester County that these figures should be considered subject to change, ~~no revisions have been received.~~ and in fact it is now PEMA's understand that Chester County is in the process of obtaining approximately 100 buses which will reduce its unmet need to 34. (R. Hippert)

4. On October 23, 1984, the Montgomery County Office of Emergency Preparedness transmitted to PEMA two copies of its Draft 7, dated October 1984, Radiological Emergency Response Plan for Incidents at the Limerick Generation Station. Upon checking Appendix Q-1, Annex Q of this plan, PEMA learned that Montgomery County needed 387 buses and had that quantity available from within the county, and thus was reporting no unmet bus needs for the evacuation of schools. This was the first formal indication that PEMA had from Montgomery County regarding adequacy of buses. While Montgomery County did report a shortage of seven "coach buses," PEMA subsequently learned that these were not required for school evacuation. ~~PEMA is not aware of the status of agreements regarding these 387 buses since there are no agreements included in Annex T, Agreements and Statements of Understanding, of the referenced Draft 7. Annex T indicates that many agreements are under development.~~ (R. Hippert) Although there are no copies of agreements in Annex T, Agreements and Statements of Understanding in the referenced Draft 7, PEMA is now aware, from testimony by Mr. Bige and Energy Consultants during these hearings, that a form of written Agreement does exist with most of the bus providers and that the balance are under development.

5. The Southeastern Pennsylvania Transportation Authority (SEPTA) maintains a large fleet of buses to serve its five

county area, Bucks, Chester, Delaware, Montgomery, and Philadelphia. SEPTA is therefore the logical source for filling the unmet bus needs of Chester County. While the Governor has authority to commandeer the needed buses, it— agreements and/or implementing procedures should be in place to ensure that the buses are and will be available to meet the shortage in Chester County. While PEMA is responsible for making these arrangements, the Department of Transportation has the expertise to provide the technical information regarding assemblage of buses, estimated travel times to transportation staging areas, fair compensation for use of buses and similar procedures or conditions that should be addressed. PEMA and the Department of Transportation, together with their legal counsels are developing a proposed agreement that could provide for filling the unmet needs without the need to commandeer buses. If this effort fails, the ~~agreed-upon~~ being developed by PEMA and the Department of Transportation procedures will be invoked in support of the Governor's commandeering of buses. When the proposed agreement is completed, PEMA and the Department of Transportation, in conjunction with Chester County, intend to meet with SEPTA and/or other bus companies that may be able and willing to agree in advance to meet the bus shortages needed to effect a one-lift evacuation of school children. At present it appears that such an agreement should be between the county involved and the bus company, with the Commonwealth serving as the catalyst for its consummation. The Board will be

kept advised as to the ongoing status and progress being made by PEMA to resolve the unmet bus needs of Chester County. (R. Hippert)

LEA-12

> The draft Montgomery, Chester, and Berks County RERP's and the School District RERP's are not capable of being implemented because there is not reasonable assurance that there will be sufficient numbers of teachers and staff required to stay at school during a radiological emergency if sheltering is recommended as a protective measure, or that there will be sufficient numbers of school staff available to evacuate with children in the event of a radiological emergency. Therefore, children are not adequately protected by the draft RERP's.

The thrust of this contention is based upon the question: Will there be sufficient teachers and school staff available to ensure the safety of school children in the event sheltering or evacuation should be required? Supporting questions are:

1. What basis is there for presuming that teachers or school staff will stay on duty during a radiological emergency? How will collective bargaining agreements impact upon this presumption?

2. What is the basis for the apparent assumption in the plans that school buildings are adequate for sheltering as a protective action?

3. Are ongoing training programs an effective means of informing teachers and staff concerning the nature and scope of a potential radiological emergency?

4. Can the capability to implement school district plans only be demonstrated by conducting unannounced evacuation and sheltering drills?

6. The availability of teachers and school staff in the event of an accident at Limerick is a question that must be resolved at the school district level, and is one that must be confronted by school officials in planning to meet any major disaster, whether man-caused or natural. If either sheltering or evacuation should become necessary, classes could be combined and thereby the normal students-to-teacher ratio could be reduced. It is not, however, a feasible solution to report an alleged lack of teachers or staff as an unmet need and expect it to be filled by personnel from outside the EPZ. The time element and problems involved in relying on such an alternative would indeed hinder, and in all likelihood preclude, a prompt and safe evacuation of the school children. (R. Hippert)

7. At present, school district plans are written so that the risk school teachers are not only to accompany the children to the host school but are also to remain with them until they are picked up by their parents or other

authorized individuals. Although not the procedure preferred by PEMA, it is permissible if acceptable to and desired by the school districts. The course of action preferred by PEMA is for the risk teachers to accompany the children to the host school, teachers and officials. This permits the risk teachers to be released to care for or rejoin their own families who may also be involved in the evacuation. While this could pose some problems at the host school, they are more of an administrative nature and do not have the impact of those confronting risk teachers concerned with the safety of their own families as well as that of the children under their charge. An agreement between the host and risk school districts should resolve any supposed administrative roadblocks preventing use of this alternate procedure. This alternative might assist a risk school district to ensure that more of ~~their~~ teachers would be available to supervise the children during the evacuation phase only. (R. Hippert)

8. In response to the question raised about the suitability of school buildings for sheltering, the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection states in paragraph 10.2.2.2, Appendix 12, Annex E to the Commonwealth's Disaster Operations Plan that, "in the general climate of the Commonwealth, any building which is reasonably winter worthy will suffice, with windows and doors tightly closed." Sheltering as a protective action is a topic

to the best of my knowled

addressed in the training that is available, and has been presented to teachers and school staffs participating in this training. (R. Hippert)

LEA-13

There must be specific and adequate plans for children in day care, nursery and pre-school programs in order to provide reasonable assurance that this particularly sensitive segment of the population is adequately protected.

The contention is centered around the basic question: Has adequate and specific planning been accomplished to ensure the safety and protection of children in day care, nursery and preschool facilities? Additional questions are:

1. Have the transportation needs to evacuate day care, nursery and preschool facilities been determined and can they be met?

2. Do municipal and county plans identify all licensed, as well as unlicensed day care, nursery and preschool facilities within the EPZ?

3. Have arrangements been made for preassignment of the transportation resources needed to evacuate these facilities?

4. What will be the basis for a decision to implement sheltering at these facilities?

9. A model plan for use by day care, nursery and preschool facilities has been developed by PEMA in coordination with the Pennsylvania Departments of Education and Public Welfare. These two departments subsequently sent copies of the model plan to their licensed day care, nursery and preschool facilities within the Limerick Plume EPZ and advised them of the necessity of preparing a plan for response to an accident at Limerick. Unlicensed facilities have subsequently been identified and have been advised through the risk counties of the need for a plan and how to obtain help in developing one. (R. Hippert)

The model plan provides policy guidelines, recommended procedures for notifying parents in the event of an accident and a detailed listing of actions to be taken under each emergency classification. A sample letter to parents is included in the model plan with explicit reference as to the action that would be taken by the facility. (R. Hippert)

10. Although provisions have been made in the model plan for parents to be notified to pick up their children at a Site or General Emergency, the facility director also has the option of arranging for this action at the Alert stage. It is the responsibility of the facility director to determine a location to host the children in the event evacuation is necessary. Reference to the designated host site is to be included in the letter to parents, and they

are expressly advised to pick up their children at this location if an evacuation takes place. (R. Hippert)

11. While the model plan indicates that transportation required for evacuation is the responsibility of the facility, it also advises the facility to contact its municipal emergency management coordinator or the county emergency management agency, if necessary, for assistance in developing a plan. The facility plan must be coordinated with the municipal plan and prudent and responsible action by the two parties should result in resolution of any transportation difficulties. If not, referral to the county would be the common sense approach to meeting the need. (R. Hippert)

12. A listing of day care, nursery and preschool facilities should appear in the respective municipal plans and corresponding county plans. In view of the effort recently expanded to identify both the licensed and unlicensed facilities, there is no viable reason why this cannot be done. (R. Hippert)

LEA-14(a)

The School District RERP's and the Chester, Berks, and Montgomery County RERP's are deficient because there are inadequate provisions of units of dosimetry-KI for school bus drivers, teachers, or school staff who may be required to remain in the EPZ for prolonged periods of time or who may be required to make multiple trips into the EPZ in the event of a radiological emergency due to shortages of equipment and personnel.

This contention raises the specific question: Why do not school districts and Berks, Chester, and Montgomery County plans include provisions for issuing dosimetry and KI to school bus drivers, teachers, and school staff. Accompanying questions are:

1. Will all school buses be required to pass through the transportation staging area before reporting to schools being evacuated? If not, how will the drivers obtain dosimetry and KI?

2. How many units of dosimetry/KI will be available at the transportation staging areas for Berks, Chester, and Montgomery Counties and what was the basis for determining that this amount would be adequate?

3. Since sheltering could be recommended shouldn't teachers and school staff be issued dosimetry and trained in its use?

13. As explained in response to LEA-11 it is PEMA's position that evacuation of the school children be accomplished in a one-lift bus move, and PEMA has no reason to doubt that this can be accomplished. As previously indicated, definitive action is being taken to ensure that reported unmet bus needs can be filled. This will therefore preclude the necessity for multiple trips and accordingly there is no need to have dosimetry or KI

available for bus drivers, teachers or school staff. Once the evacuation of the school children is effectively underway and all buses are enroute to host schools, there is no requirement for teachers or staff to remain at the risk school district or within the EPZ, and thus no need for them to be issued either dosimetry or KI. Dosimetry and KI are issued only to emergency workers, and school bus drivers, teachers and school staff are not considered in this category for the reasons indicated above. (R. Hippert)

14. The one-lift concept pertains not only to the evacuation of school children but also to all persons to be evacuated by bus. This in principle would eliminate the necessity for having any dosimetry or KI available at the transportation staging areas. As a contingency there is certainly nothing wrong in maintaining a limited supply of dosimetry and KI at the staging area for potential use in meeting an unforeseen development. The maintenance of a supply for routine issue of drivers of vehicles is, however, not necessary in view of the one-lift concept. (R. Hippert)

15. As stated earlier, school staffs are not considered emergency workers and therefore will not be issued dosimetry and need not be trained in its use. If sheltering becomes necessary the decision will be upon recommendations from the Bureau of Radiation Protection, utilizing monitoring data from its own sources, federal

agencies and the plant itself. Similarly, the decision to terminate sheltering would be based on data from the same sources. School staffs are considered part of the general public and dosimetry is not issued to the populace as a precondition to determining the initiation or termination of sheltering as a protective action. (R. Hippert)

LEA-14(b)

The Chester, Berks, and Montgomery County School District RERP's fail to provide reasonable assurance that school bus drivers, teachers, or other school staff are properly trained for radiological emergencies.

For the second part of this contention the question is: Have the school bus drivers, teachers, and school staff received adequate training to enable them to respond effectively in the event of a radiological emergency? What is the basis for this determination? Follow-on questions are:

1. Have they been trained to deal with contaminated individuals and equipment?

2. Have they been advised as to the hazards of radiation exposure and the use of equipment to ensure their safety?

3. Do teachers and staff know what areas of the school building or complex are to be used for sheltering?

4. Has any training been accomplished as to the handling of the potential stress and anxiety that could be displayed by the school children during a radiological emergency?

5. Are bus drivers familiar with the routes they are to use?

16. Training specific to the needs of school bus drivers, teachers and school staffs for response to an accident at Limerick has been and continues to be offered. It is available through contact with the emergency management agency for the respective risk county. (D. Taylor, R. Hippert).

17. School bus drivers, school staffs and teachers will have been evacuated prior to any release of radioactive material from the Limerick facility. Hence, there is no need for training in dealing with contaminated persons and/or equipment for these groups. Further, in the remote possibility that decontamination may become necessary, the involved individuals and equipment would be referred to decontamination centers at the periphery of the plume EPZ, or at the mass care centers. (D. Taylor)

18. Similarly, school staff personnel will not be issued dosimetry because they will have been evacuated prior to any release of radioactive material from the facility. Hence, there is no need for instruction in the use of dosimetry. (D. Taylor)

19. If bus drivers are not familiar with the routes they are to travel then provisions must be made to provide them with strip maps. (R. Hippert)

LEA-15

The Chester and Montgomery County RERP's and the School District RERP's are not capable of being implemented because the provisions made to provide bus drivers who are committed to being available during a radiological emergency, or even during preliminary stages of alert are inadequate.

Like LEA-11, this contention deals with the availability of sufficient buses to effect an evacuation of the school children but becomes more definitive by raising the question: Even if sufficient buses are available, will there be enough drivers to man them? Follow-on questions are:

1. Are there letters of agreement with the bus companies to provide drivers as well as buses?

2. Do employment or union contracts authorize or conversely prohibit, the utilization of bus drivers to evacuate school children during a radiological emergency? If authorized, have the drivers been preidentified?

3. Are bus drivers aware that some of them may be needed after the evacuation to transport the children from host schools to mass care centers?

4. Have considerations been given to the possibility that drivers living within the EPZ may give a higher priority to evacuating their own families than to transporting school children out of the EPZ? What is to preclude this from happening?

5. Has the possibility of drivers being required to make multiple trips to effect the evacuation been addressed in the ongoing training programs?

20. As stated in response to LEA-11, Chester County has identified for PEMA the County's unmet bus needs. In the case of Montgomery County, the County has advised PEMA by copy of Annex Q, Draft #7 that there are no unmet bus needs. This information does not include the nature, number or language of any existing county/bus company agreements. Therefore PEMA is not in a position to comment on the specific points raised in this contention. In making arrangements to fill reported unmet needs PEMA will ensure that procedures are established to provide a driver for each bus being made available. When arranging to fill unmet needs PEMA gives priority to those necessary for the evacuation of school children. The requirement for identifiable resources to fill both the unmet bus needs of schools and the general public is recognized and will be handled accordingly. (R. Hippert)

The State, County, and Municipal RERP's are inadequate because farmers who may be designated as emergency workers in order to tend to livestock in the event of a radiological emergency have not been provided adequate training and dosimetry.

For this contention the issue is: Have farmers who reenter the EPZ as emergency workers after an evacuation to tend livestock received adequate training and will sufficient dosimetry be available? Follow-on questions are:

1. Have the actual number of farmers who would be in this category been identified?

2. Will sufficient dosimetry be available to allow for multiple reentries?

3. What does the definition of "livestock" include?

4. Will an informational brochure be issued to farmers? If so, when and how often?

5. In addition to ongoing training will refresher training be offered to farmers on a regular basis?

21. In recognizing farmers with livestock in the EPZ as emergency workers, PEMA has made no attempt to limit the definition of livestock, nor to restrict what is meant by a farmer with livestock to the U.S. Department of Agriculture (USDA) list. It is the responsibility of the county USDA

agent, the county emergency management agency and the municipalities involved to develop a comprehensive list and ensure that it is as complete as possible. Dosimetry must then be available for the number of farmers so identified. It is not necessary, however, to have additional dosimetry available for multiple reentries or replenishment of supplies. Dosimeters are not expendable items. Each farmer will be issued two self-reading dosimeters and a permanent-record dosimeter, as well as KI and a Dosimetry-KI Report Form when authorized access to the EPZ. The self-reading dosimeters can be used over again, if necessary, by rezeroing on dosimetry chargers located at the issuing points. The permanent-record dosimeters are to be used only by the individuals to whom originally issued, and are to be retained by that person until no further reentries are to be made into the EPZ. (R. Hippert)

22. The reference to farmers with, or who keep, livestock is found in several places in Annex E to the Commonwealth's Disaster Operations Plan. See paragraphs II.M.(6) page E-16-2, V.A. pages E-16-B-8 and 9, Tab 6, Attachment B on page E-16-B-6-1 and VI.C.1. page E-17-8. In none of the references is the phrase limited or restricted to any type of livestock. (R. Hippert)

23. While PEMA will provide for the training of instructors or a course of instruction, it is the responsibility of the counties to train municipalities and

organizations in their respective areas (see paragraph II, Appendix 19, Annex E, Commonwealth Disaster Operations Plan). This would include training for farmers in the use of dosimetry. The existence of an Emergency Workers Instructor Course is specifically referenced in paragraph III.H, page E-19-2 of Annex E. (R. Hippert) Such training is currently available and has been offered to farmers affected by Limerick. Such training will continue to be made available to all farmers in the plume EPZ. (D. Taylor)

24. An informational brochure was prepared by the Pennsylvania Department of Agriculture for distribution to farmers within the plume EPZ of the Three Mile Island Nuclear Station. The brochure could be adapted by the Department of Agriculture, in conjunction with PEMA, for use within the Limerick plume EPZ. The applicant could then print and distribute the brochure within the Limerick EPZ, as was the case in the TMI area. (R. Hippert)

LEA-26

> The Draft County and Municipal RERP's are deficient in that they do not comply with 10 C.F.R. 50.47(b)(5) because there is no assurance of prompt notification of emergency workers who must be in place before an evacuation alert can be implemented, and there is no assurance of adequate capability to conduct route alerting.

25. This contention was apparently developed under the assumption that county and municipal EOCs must be fully mobilized, and emergency workers in-place, before the

public can be alerted by activation of the siren system. The sirens can be activated from the communication centers, manned 24-hours a day, in each of the risk counties. In the unlikely situation that an accident escalates so rapidly that only minimal mobilization, if any, can be achieved, the sirens could be activated by on-duty personnel in the communication centers, after telephonic coordination between PEMA and the risk county coordinators. Activation would be acomplished, however, only upon order of the county coordinator to his communication center and after appropriate verification as to the validity of the order. This would indeed be a worst case situation and is used only to illustrate that the degree of emergency worker mobilization has little relation to the capability for activating the sirens. While route alerting would not be possible in this worst-case scenario, it is but a supplemental system to be used if necessary. (R. Hippert)

26. The sole purpose of activation of the sirens is to alert the public to tune their radios or TVs to the EBS. It is not an automatic notification to evacuate. In a situation moving as fast as that referenced above, evacuation would not really be a feasible option and sheltering would be the protective action to be recommended. Broadcast of such a message over the EBS could also be handled without mobilization of the county EOC. (R. Hippert)

27. As indicated in paragraph V. B., page E-8-2, Appendix 8 of Annex E to the Commonwealth's Disaster Operations Plan, the sirens may be sounded:

1. When there is significant information that will reassure the public of their safety.

2. When the public is to be informed of a plant status that may lead them to implement specific actions on their own.

3. When specific actions (to include protective actions) are to be taken by the public.

28. This contention appears erroneously to equate activation of the sirens only to "an evacuation alert". While an orderly and effective evacuation would necessitate nearly full mobilization of emergency workers, the sirens could be activated for any of the purposes enumerated above well before this degree of mobilization is reached.

(R. Hippert)

PROFESSIONAL QUALIFICATIONS

Ralph J. Hippert

I am the Deputy Director, Plans and Preparedness for the Pennsylvania Emergency Management Agency. I am involved in planning response to man-made and natural disasters at the State, county and municipal level with emphasis on potential accidents at fixed nuclear facilities.

I joined the Pennsylvania Emergency Management Agency in July, 1980, as a planner in the areas referenced above and assumed my present position in May, 1981. For several months prior to that I was a consultant working on municipal preparedness plans for communities surrounding TMI.

In October, 1979, I completed over 32 years of active and reserve military service with the last seven years on active duty as a faculty member at the U.S. Army War College. I have held Army Reserve assignments from platoon leader to battalion commander to deputy commander of brigade size units. These assignments included responsibility for mobilization planning and response to civil disturbances, such as the Watts Riot in Los Angeles.

My civilian positions were: Public Relations Manager for a multi-plant international company; Advertising Manager for the same concern; and Assistant to the Sales Manager for the Agricultural Division of an international chemical company.

I hold a B.S. in Business Administration from the University of California and a M.A. in Political Science from Shippensburg State College. I am a graduate of the U.S. Army Command and General Staff College and the Army War College.

BIOGRAPHY OF DONALD F. TAYLOR

Donald F. Taylor is presently the Director of Training and Education for the Pennsylvania Emergency Management Agency. His office is in Harrisburg, but he conducts a wide variety of training sessions throughout the Commonwealth.

Mr. Taylor, a native of western Pennsylvania, received his bachelor's degree from Geneva College, which is located in Beaver Falls, Pennsylvania. He completed graduate work on two master's degrees and a doctorate at the University of Pittsburgh.

His employment with the Commonwealth of Pennsylvania began in April, 1977 when he was named as the Nuclear Civil Protection Officer and charged to develop the Pennsylvania Crisis Relocation Plan. In July, 1978, Mr. Taylor was promoted to head the Office of Training and Education. He designs, implements and manages a state-wide comprehensive training program in the field of emergency management.

Mr. Taylor has experience as a high school teacher, a college teacher and a college administrator. He has also managed political campaigns and has been a political speech writer. In addition to being the editor of two newsletters, he has written for both newspapers and magazines. He served as the director of a rehabilitation center. Mr. Taylor has also been active in several business ventures.

He presently resides in New Cumberland, Pennsylvania.