

ORIGINAL

UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

PHILADELPHIA ELECTRIC COMPANY

(Limerick Generating Station,
Units 1 and 2)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

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| PHILADELPHIA ELECTRIC COMPANY | Docket Nos. 50-352-OL |
| (Limerick Generating Station, Units 1 & 2) | 50-353-OL |

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Old Customs Courtroom
U.S. Customs House
2nd and Chestnut Streets
Philadelphia, Pennsylvania

Tuesday, November 27, 1984

The hearing in the above-entitled matter convened,
pursuant to recess, at 9:00 a.m.

BEFORE:

HELEN F. HOYT, ESQ., Chairwoman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

DR. RICHARD F. COLE, Member
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

DR. JERRY HARBOUR, ESQ., Member
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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C O N T E N T S

WITNESS

DIRECT

CROSS

REDIRECT

RECROSS

Robert Bradshaw
John Cunnington
Robin Hoffman Wenger
by Mr. Stone
by Ms. Zitzer

13,306

13,459

E X H I B I T S

None

Morning recesspage 13,362

Afternoon recess. page 13,458

P R O C E E D I N G S

1
2 JUDGE HOYT: The hearing will come to order. Let the
3 record reflect that all the parties to the hearing who were
4 present when the hearing recessed are again present in the
5 hearing room, that the panel has taken its place on the
6 witness stand. Once more I will remind the panel that they
7 are still under the oath that they took in the first days
8 of this hearing.

9 At the conclusion of the testimony yesterday I
10 believe you had indicated you had some additional questions
11 on LEA-14, I believe it is.

12 MR. STONE: Yes, LEA-14(a).

13 Whereupon,

14 ROBERT BRADSHAW,

15 JOHN CUNNINGTON,

16 and

17 ROBIN HOFFMAN WENGER,

18 having been previously called as witnesses by the Applicant,
19 and having been previously duly sworn, resumed the stand,
20 continued to be examined and continued to testify as follows:

CONTINUED CROSS-EXAMINATION

21
22 BY MR. STONE:

23 Q This is a question to the panel. Yesterday you spoke
24 in general about the amounts of dosimetry available at the
25 various transportation staging areas and you referred to your

1 various transportation staging areas and you referred to your
2 recollection and gave us some numbers. I would like to refer
3 today to the Berks and Montgomery county plans. That is
4 section M-3-9.

5 JUDGE COLE: What was the reference, sir?

6 MR. STONE: Section M-3-9. It is applicants
7 exhibit E-3, it is the Montgomery County Plan.

8 JUDGE HOYT: Which draft is that?

9 MR. STONE: Draft seven.

10 JUDGE HOYT: Very well.

11 MR. STONE: I am referring to the section in the
12 middle, item 29 for transportation staging areas.

13 BY MR. STONE: (Resuming)

14 Q The question is, it indicates, does it not, units
15 of dosimetry for each staging area in Montgomery County?

16 A (Witness Bradshaw) Yes, it does.

17 Q Could you state for the record what is the
18 assignment of dosimetry for each staging area then?

19 A (Witness Cunningham) The plan indicates that this
20 is Montgomery County's estimate of the number of units that
21 would be necessary at each of the three staging areas that
22 they establish in a radiological emergency.

23 JUDGE HOYT: We can't hear you, sir. Please turn
24 on the microphone.

25 WITNESS CUNNINGTON: The plan indicates that these

1 are Montgomery County's estimates of the number of units of
2 dosimetry and KI that would be necessary at each of the
3 three staging areas that they established during a
4 radiological emergency.

5 BY MR. STONE: (Resuming)

6 Q Is this according to your knowledge an estimate
7 of what would be necessary or an estimate of what is currently
8 available for those places?

9 A (Witness Cunningham) It is a conservative estimate
10 of what would be necessary.

11 Q That is estimate is for all incoming emergency
12 vehicles or just school buses?

13 A As we indicated in our testimony yesterday, it is
14 for any emergency vehicle that would be required that would
15 meet the condition whereas its driver would be designated
16 as an emergency worker.

17 Q Would that include, for example, ambulance drivers?

18 A Under certain circumstances it could if an ambulance
19 service were designated but I would call your attention to
20 other parts of the document where the ambulance services that
21 are in the emergency planning zone and those ambulance services
22 that routinely serve the emergency planning zone already have
23 units of dosimetry and KI provided for them.

24 Q What then are the other incoming personnel who
25 would have these supplies available to use?

1 A. I believe we indicated any transportation vehicle
2 that would be required based on the conditions at the time,
3 buses, an ambulance -- any other vehicle that might be
4 required that would not have been previously designated as an
5 emergency worker but would at the time of an incident be
6 required to be so designated.

7 A. (Witness Ecadshaw) It must be pointed out that
8 dosimetry and KI are not automatically provided to incoming
9 vehicles as a matter of course. It is only under certain
10 circumstances where these vehicles would be entering the EPZ
11 after the general timeframe for the evacuation of the general
12 public.

13 Q. Who according to your knowledge determines what
14 those circumstances are at each staging area?

15 A. The decision to issue dosimetry and KI is a
16 decision made by the county emergency management agencies.

17 Q. Could you please describe the mechanism for relaying
18 that to the staging area and who actually on the spot would
19 convey that information?

20 A. (Witness Cunningham) There is a transportation
21 group in Montgomery County that has responsibility for
22 providing instruction to those individuals who are designated
23 to operate the transportation staging areas.

24 Q. Do you have any knowledge of the number of personnel
25 assigned at these staging areas, in particular Montgomery

1 County?

2 A The staging areas in Montgomery County have been
3 designated to be operated by local emergency management agencies
4 and those particular local emergency management coordinators
5 could call on their staff or volunteer staff at the time
6 and have designated individuals who would work with them to
7 operate the staging areas.

8 Q Is it fair to say then that there are no preassigned
9 personnel for these staging areas? Is that what you are
10 saying?

11 A No. That is not what I am saying. I am saying that
12 the agencies themselves are responsible, the local emergency
13 management agencies are responsible to Montgomery County to
14 staff those. I don't know what individuals they have
15 preassigned. I know functions, but I do not know the
16 individuals who have been assigned to the functions.

17 Q Going back to other personnel who may need this
18 dosimetry and KI, you mentioned a couple. Would it include
19 PennDOT personnel under certain circumstances entering the
20 EPZ or reentering the EPZ?

21 A (Witness Bradshaw) Normally it would not, no.
22 The dosimetry for PennDOT personnel would be provided through
23 Commonwealth sources.

24 Q Is that described somewhere in the county plan?

25 A No, it is not. It is a Commonwealth function.

1 Q Is it, to your knowledge, described in Annex E
2 of the state plan?

3 A Not to my knowledge, no.

4 Q Back to the personnel who would use this KI and
5 dosimetry. Could it include under certain circumstances
6 traffic control personnel?

7 A (Witness Cunningham) In specific
8 reference to Montgomery County, no, it should not because
9 if you also consult other areas of the same annex that we
10 are reviewing, M3, you will find that there are units
11 of dosimetry already made available for traffic control
12 personnel.

13 Q Can you find that --

14 A I believe we can start somewhere around M31.
15 That would be fairly close to where -- page M31, item one,
16 you will see that traffic control support personnel
17 have a designated number of dosimetry and KI provided for
18 them.

19 Q That is a total of -- if I am on the right place,
20 that is, M31 -- that is 85 units. Is that --

21 A I believe it is 58 units.

22 Q I see. Okay.

23 Is that municipal traffic control personnel
24 or would that include state police or any other supplementary --

25 A It may include municipal personnel from outside

1 the emergency planning zone. It does not necessarily
2 include municipal personnel from inside as their numbers
3 for their traffic control personnel would be reflected
4 in the municipal totals which begin on item three and
5 end on item 23.

6 JUDGE HOYT: In order that we can be sure that
7 we are talking in the same terms, that is draft number what
8 that you are using?

9 MR. STONE: Draft number 7.

10 JUDGE HOYT: Is that what the witness has
11 before him?

12 WITNESS CUNNINGTON: Yes. Draft number 7, ma'am.

13 MR. STONE: Exhibit 3, E-3.

14 JUDGE HOYT: Thank you.

15 BY MR. STONE:

16 Q So then it is your testimony that the 58 units
17 assigned here to traffic control support personnel, in fact,
18 does satisfy all dosimetry, KI requirements for traffic
19 control support personnel and that none would need to avail
20 themselves of the --

21 A Yes. That was the number that was indicated by
22 Montgomery County.

23 A (Witness Bradshaw) That is not the only
24 dosimetry being provided for traffic and access control,
25 however. As I believe Mr. Cunnington stated, the municipal

1 plans include an allocation for the local law enforcement
2 agencies. In addition, the Pennsylvania State Police,
3 who are conducting a substantial part of the access and
4 traffic control, have their own allocation which is
5 outlined in Annex E of the state plan.

6 Q Should any of these separate supplies of KI and
7 dosimetry prove insufficient, would there be any
8 circumstance in which these agencies would look to the
9 transportation staging areas as a source for supplementary
10 KI or dosimetry?

11 A (Witness Cunnington) I would not -- I
12 do not feel that the supplies, as indicated, would prove
13 insufficient. They were conservatively estimated.
14 But if we can accept the premise that there might be
15 a condition whereby there could be a situation where some
16 dosimetry was needed, there are two or three reserve
17 capabilities within the county and dosimeters at transportation
18 staging areas could be used for other purposes.

19 But it is not anticipated that they would
20 and the figures that are provided and, I think, a review
21 of the listing in item one shows it to be fairly exhaustive
22 of providing dosimeters for those kinds of personnel
23 who would support activity within the emergency planning zone.

24 Q Again, is it your testimony that these other
25 supplies of dosimetry are, as indicated here, are estimates of

1 what would be needed, or do they reflect actual supplies
2 currently on hand? Is that a subject of your knowledge?

3 A (Witness Bradshaw) I believe it is understood
4 that these are estimates. The figures obtained from the
5 emergency forces in the EPZ. The actual provision of
6 the dosimetry has not yet occurred.

7 There has been an agreement between the
8 Commonwealth of Pennsylvania and Philadelphia Electric
9 to obtain the supplies. In fact, the supplies, as I
10 understand it, have been ordered.

11 Q Thank you.

12 Going back to page M-3-9, we have gone through
13 several kinds of personnel who might avail themselves of
14 these KI and dosimetry supplies. In particular, avail
15 themselves of the 50 units at each transportation staging
16 area.

17 According to your knowledge, are there any
18 other types of personnel who would look to these staging
19 areas for their dosimetry and KI?

20 A (Witness Cunnington) I believe we have
21 indicated that the primary source would be those
22 people who operate vehicles who might under an unusual
23 circumstance be required to be designated as an
24 emergency worker. But it would be basically transportation-
25 related incidents.

1 Q Would this include towing, tow truck drivers, for
2 example?

3 A The provision of towing services would most
4 likely fall within the time frame of the evacuation of
5 the general public and, therefore, I would not expect that
6 they would have to be designated as emergency workers.
7 If, for some circumstance, an individual might have
8 to be so designated, they could receive their supply
9 from those that are available at the transportation
10 staging area.

11 Again, the towing and other resources should
12 be within the time frame of the evacuation of the general
13 public and, therefore, would not be designated as
14 emergency workers and would not have to be issued dosimetry.

15 Q Should it not occur within a time frame then,
16 this would be the logical source of supply for these
17 personnel?

18 A It would be a source of supply, yes.

19 Q Would there be any other source of supply
20 to your knowledge?

21 A I believe I indicated that there are some
22 reserves. There are reserves at the municipal level and
23 there are also reserves at the county level that are
24 indicated.

25 Q Finally, before we leave Montgomery County here,

1 according to your understanding of the procedures for
2 school bus drivers upon completing their lift of the
3 school children, what do they do?

4 A I believe we testified previously that the
5 school bus driver is requested to contact the Montgomery
6 County EOC whereby he could be dismissed or he could be
7 requested to remain on standby to complete any other
8 assignment.

9 One of the assignments we previously discussed
10 in these hearings might be that secondary movement of
11 students at 8:00 p.m. which is totally outside the
12 emergency planning zone. He might be, if an unusual
13 circumstance were to occur, he could be requested to
14 report to a staging area for a second assignment.

15 Q You mentioned a contact between the bus
16 driver and the Montgomery County EOC. What form of
17 contact would that involve? A phone call, for example?

18 A Yes, sir.

19 Q And would you, according to your understanding
20 of these plans, envision every bus driver having completed
21 their lift of school children making a phone call then to the
22 county EOC?

23 A No. I would not. I believe the provisions in
24 the school plan indicate that bus drivers would be dismissed
25 by a building principal or their superintendent, and the

1 superintendent could make a phone call for the entire
2 complement of bus drivers that had completed their
3 assignment.

4 It would not be necessary for every
5 individual bus driver to call the Montgomery County EOC
6 before they left the host school.

7 Q But then there would be at least a call then
8 from each building -- is this a host building or from
9 each --

10 A I believe we testified that the school plans
11 call for that contact to come from the host facilities, yes.

12 Q Just to specify this a little more, would
13 the person making the phone call for the complement of
14 busses, would it be the risk school authority, the
15 supervisor, or would it be the host facility, or would
16 it be the bus company?

17 A The plans are risk school plans and it is
18 made the responsibility of the risk school officials
19 to make sure that contact is made. They could make it
20 themselves or request that a bus driver made the contact.
21 But it is the risk school official's responsibility.

22 Q And to your knowledge, this is included in
23 the training, for example, of the school officials?

24 MR. RADER: Objection. Your Honor, again, I
25 had attempted to give Mr. Stone some latitude in an attempt

1 to finish this as quickly as possible. But we are into
2 an area which has absolutely nothing to do with this
3 contention regarding the provision of KI and dosimetry
4 to bus drivers.

5 MR. STONE: I think, if I may, that -- I
6 am trying to establish the numbers of busses who
7 will show up at these staging areas. If we are going to
8 have a large number of busses showing up for further
9 duty and there should be only 50 units of KI, the
10 KI and dosimetry becomes a limit on the usability
11 of those busses. I think that it goes to the heart of
12 this contention.

13 If, on the other hand, we are only going to
14 have a few busses showing up and there is an efficient
15 mechanism for predetermining the numbers who are going
16 to be sitting there waiting, then it is a different
17 situation.

18 JUDGE HOYT: Hasn't that been answered though?

19 MR. STONE: I am pretty much done with that.

20 I would like to move on to the other counties.
21 I am prepared to do that.

22 JUDGE HOYT: Very well. We will sustain
23 the objection and have you move into your next area of
24 inquiry.

25 BY MR. STONE:

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Q With respect to Berks County then, we are talking -- draft 6, I believe, is the draft which has been identified by the Applicant, page M-4-2. It is Applicant's Exhibit E-1.

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I think the question here is going to have to be, because I don't see in this Annex A comparable list to that in Montgomery County.

Do you have any knowledge of any list in the Annex M we are referring to of dosimetry and KI supplies at the transportation staging areas?

A (Witness Bradshaw) As we stated in our written testimony, Berks County does not distribute dosimetry and KI to a transportation staging area because of the excess number of buses. It is not envisioned as even a possibility that they would require a multiple lift concept.

They do, however, have a reserve at the County level, County Emergency Operations Center, which could be made available for any unforeseen circumstances, and would be made available.

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1 Q I believe we were at the point of asking the
2 question which would try to establish if there was an Annex M
3 of the Berks County Plan any list comparable to that you
4 have talked about in the Montgomery County plan which
5 indicates supplies of dosimetry and KI and you had answered
6 that there wasn't. There was a reserve at the county level.
7 Is that correct?

8 A (Witness Bradshaw) There is not a supply of
9 dosimetry and KI for transportation staging areas in Berks
10 County. There is a county reserve.

11 Q Are there in fact transportation staging areas in
12 Berks County?

13 A Yes, there are.

14 Q How many?

15 A I would have to check. It is either one or two.

16 A (Witness Cunningham) I will check.

17 Q Would these staging areas serve a similar function
18 to those in Montgomery County, that is, other transportation
19 workers and personnel would report there in those circumstances
20 where they would need to before reentering the EPZ?

21 A (Witness Bradshaw) Yes, that is correct.

22 Q Would they have available to them supplies of
23 dosimetry there?

24 A As I indicated none are required because of the
25 substantial number of both bus and ambulance resources

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1 available to Berks County. This is a decision made by the
2 Berks County emergency management agency as are the procedures
3 that are reflected in the Chester and Montgomery county plans.
4 It is a policy decision made by the county and I believe
5 that Berks County can substantiate its position because of
6 the amount of resources available to it.

7 Q Is there a similar procedure for Berks County of
8 contacts between the risk school authority and the county EOC
9 prior to dismissing bus drivers or reassigning them?

10 A (Witness Cunnington) The procedures in the risk
11 school plans are not different among the counties. The contact
12 is back to the transportation coordinator in the case of
13 Berks County prior to the dismissal of the bus resources.

14 I also have the information, Your Honor. Our
15 recollection was correct. There are two transportation
16 staging areas in Berks County.

17 JUDGE HOYT: All right. Thank you. Go on, Mr. Stone.

18 BY MR. STONE: (Resuming)

19 Q According to your information then neither of them
20 would have supplies of dosimetry and KI under the present
21 arrangements for either school bus drivers or other
22 transportation personnel?

23 A (Witness Cunnington) As we have indicated the
24 number of buses available in Berks County far exceeds the
25 number that are required and therefore, the county felt that

1 its reserve would be sufficient. I might also point out that
2 the Berks County reserve dosimetry for the emergency management
3 agency, the entire emergency management agency office is
4 outside of the emergency planning zone so the entire reserve
5 is not required for the actual workers that are at the Berks
6 County EOC.

7 The emergency management staff would not require
8 dosimetry. So therefore, the entire reserve could if needed
9 be made available for transportation staging areas but that
10 is a very unlikely circumstance.

11 Q. While we are on Berks County, let me jump ahead to
12 where in your testimony you reiterate your position and it
13 begins on page 19 and it runs over to page 20, section 43,
14 you state, do you not, for Berks County a number of buses
15 and drivers which you allege are available and you also
16 mention a number of buses which is a total need. What is
17 the source of that information?

18 For the Board, I don't want to get into details
19 of Berks County buses but we did not discuss them under
20 "11" and "15" and they do mention that in their testimony
21 here. So what is the source of the information then?

22 A. (Witness Bradshaw) It is information developed by
23 the Berks County emergency management agency through contacts
24 with their bus providers and that county. I would point out
25 that that 252 number is the number of buses and drivers that

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1 they have sought to place under agreement and have, in fact,
2 done so. When they reached that number, that 252, it was
3 substantial enough that they stopped pursuing such agreements.
4 There are, in fact, additional buses and drivers available
5 in Berks County through school district resources which have
6 not even been tapped or approached with regard to this
7 planning process.

8 Q Do you have any knowledge of why they went up to
9 252 as opposed to staying at the 97?

10 A Yes, because it far exceeded the need that was
11 identified in the plans.

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1 Q Was it a perceived need on their part, according
2 to your knowledge, to have that cushion, so to speak, of
3 reserve?

4 A It wasn't a perceived need, it was a result of the
5 needs identified through the public information, through the
6 public needs survey and other sources for the schools and
7 special facilities within that county.

8 It is not perceived, it is readily identified.

9 Q And we will go off this after this question -- are
10 the contracts which exist then between the Berks County EOC
11 and the bus companies, the same as in the two counties we did
12 discuss?

13 MR. RADER: Objection. Again it appears that
14 Mr. Stone is attempting to insinuate the issue of bus numbers
15 and litigate that, which was as he pointed out not a part of
16 LEA-11 in this contention, which relates to the availability
17 of dosimetry and KI.

18 MR. STONE: If I may, since they saw fit to put in
19 these numbers, I feel like a little bit of cross examination
20 to establish the solidity of them would be in order.

21 JUDGE HOYT: I think we have done that on the LEA
22 11. So, would you like to move to your next point of
23 inquiry, please.

24 MR. STONE: Okay.

25 BY MR. STONE:

MMQ

1 Q If I may -- and this will be the last question
2 on this subject, of the 97 buses in Berks County which you
3 have referred to here, now many of them would be, in particu-
4 lar, school buses which could need the dosimetry and KI
5 supplies we have been talking about?

6 A There are no bus drivers or buses that would require
7 dosimetry, KI. As I pointed out, it is a one-lift principle,
8 and under the principle they are not designated emergency
9 workers, and don't receive dosimetry.

10 Q I guess, what percentage of those 97 are then for
11 schools, do you know?

12 A We could reference the Table 11-A in our written
13 testimony, which would give an indication of the number of
14 buses.

15 Q Okay. Back to -- we have done Berks and Montgomery
16 -- to Chester County now. And we are talking about Draft 9--
17 I don't have the -- Applicant's Exhibit E-2. This is page --
18 in the Appendix M-3-3.

19 Again, can you tell us how many transportation
20 staging areas are indicated or exist, to your knowledge, for
21 Chester County?

22 A I haven't found that page yet, but I can tell you
23 that there is one transportation staging area in Chester
24 County.

25 JUDGE HOYT: Take your time and find that page

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1 before you testify any further, please.

2 WITNESS BRADSHAW: I have it.

3 JUDGE HOYT: Very well, the witness has it,

4 Mr. Stone.

5 BY MR. STONE:

6 Q Okay. And you have just mentioned a single staging
7 area for Chester County. I know that is not indicated here,
8 but could you tell us where that is according to your
9 knowledge?

10 A (Witness Bradshaw) Offhand I could not.

11 Q And would the single staging area serve a function,
12 the same as that described for the transportation staging area
13 in Montgomery County?

14 A Yes. The transportation staging areas in all three
15 counties would perform similar functions.

16 Q Do you have any knowledge of the source of the
17 200 units of dosimetry figure which is referenced here in,
18 say Section 18, or line 18?

19 A Yes, the source is the Chester County Department
20 of Emergency Services, which designated 200 units for that
21 purpose.

22 Q Do you have any knowledge of what that estimate
23 was based on?

24 A No, I do not.

25 Q Do you have any knowledge of why the estimated

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1 need for dosimetry in Chester County which has approximately
2 one half the population of the Montgomery County EPZ, is
3 in fact larger than that for Montgomery County?

4 MR. RADER: Objection. No foundation.

5 Also calls for a conclusion on the part of the
6 witness. The witness has previously testified that he has
7 no knowledge as to the basis --

8 JUDGE HOYT: Well, let's see if we can get the
9 answer and move on.

10 Objection overruled.

11 WITNESS BRADSHAW: I can only say it is an
12 estimate developed by Chester County, and I could not conclude
13 what the County's basis was for determining that number.

14 BY MR. STONE:

15 Q To explore this one step further, to your
16 knowledge does Chester County have any greater need for the
17 kind of transportation workers who would need to avail
18 themselves of dosimetry, KI?

19 A (Witness Bradshaw) I would say that Chester
20 County equipment and personnel resources are generally
21 less than Montgomery County.

22 Q And that would indicate -- strike that.

23 As an emergency planner, would that fact that
24 the transportation needs in Chester County are less than
25 those in MONTgomery County, lead you to a judgment that

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1 the chance of the necessity of availing oneself of dosimetry
2 and KI at the transportation staging area was greater than
3 that in Montgomery County?

4 A (Witness Cunningtor) My professional estimate
5 is that both of the numbers for Chester and Montgomery are
6 extremely conservative.

7 Q But again you have testified that you have no
8 particular knowledge of the basis -- is that in both
9 counties, for these estimates?

10 A We have testified that it was the Chester and
11 the Montgomery County Emergency Management Agencies that
12 developed the estimates.

13 I just testified that my -- that I feel the
14 estimates are conservative. That does not refer to their
15 rationales for determining the numbers, it is my review of
16 those numbers I believe they are conservative.

17 MR. STONE: If I may have just a minute to proceed.

18 (Pause)

19 BY MR. STONE:

20 Q You testified yesterday, did you not, that under
21 certain circumstances, should a bus driver exceed, I believe
22 you said the protective action guidelines, that they would
23 be replaced.

24 Do you remember that?

25 A (Witness Bradshaw) Yes. We developed a scenario

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1 for you in which an emergency worker, whether it be a bus
2 driver or anyone else performing a function as an emergency
3 worker, would approach the protective action guideline of
4 25r, 25 rem, in which case all emergency workers are instructed
5 to seek replacement.

6 Q Would that process then involve a return to a
7 transportation staging area in the case of a school bus driver?
8 Or, what else would that involve if not that?

9 A Not necessarily a transportation staging area.

10 In all likelihood, he would be instructed to
11 proceed to a decontamination station for monitoring.

12 Q Who determines that?

13 A It is determined by the County, by PEMA and the
14 County Emergency Management personnel at the time of the
15 emergency.

16 Q Is it correct then that you are talking about a
17 general policy and not a specific decision made for each
18 bus driver which would exceed a protective action guideline?

19 A As a general policy for any emergency worker, yes.

20 Q Do you know what is the policy then for -- let's
21 start with Montgomery County for school bus drivers in
22 particular, is there a policy?

23 A (Witness Cunnington) I believe we testified that
24 the policy is the same for all emergency workers. It is --
25 it is policy consistent with that of the Commonwealth and it

mm7 1 is expressed in the radiological exposure control annex of
2 the County plan.

3 Q And just to facilitate things, do you know, do these
4 emergency workers, including these school bus drivers, do they
5 return to a transportation staging area, or do they go some-
6 where else?

7 MR. RADER: Objection. Asked and answered.

8 MR. STONE: If I may, I don't believe we quite
9 established where they went. I think he raised -- he mentioned
10 a couple of possibilities. I don't think we quite established
11 where they would go.

12 MR. RADER: If I may, Madam Chairman, I object to
13 this entire line of questioning.

14 The dose commitment of bus drivers or related
15 subjects is not a part of this contention. It is a very
16 straightforward, simple contention related to the supply of
17 dosimetry and KI to bus drivers, which is entirely irrelevant
18 to whatever dose commitments may be permitted under Annex E.

19 MR. STONE: If I may, some of these particular
20 mechanisms do bear upon the training of the bus driver, that
21 they have a clear idea of what they should do.

22 And, this particular point also bears upon the
23 supply of dosimetry at the transportation staging area.

24 If I may develop that a little bit, if every
25 emergency worker including school bus drivers is going to

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1 return to the transportation staging area, another person
2 is going to be sent out as a replacement, it presents a
3 scenario where demands are placed on those supplies.

4 JUDGE HOYT: The objection is sustained.

5 BY MR. STONE:

6 Q You referred to situations which developed out of
7 a scenario we were talking about yesterday where a bus
8 driver would exceed a protective action dose, and then take
9 some action, reporting to some location.

10 According to your knowledge, is the bus driver
11 required to be trained to make that determination of --
12 how does he know he exceeded the protective action dose?

13 MR. RADER: Same objection, your Honor.

14 MR. STONE: Maybe if I rephrased the question, your
15 Honor --

16 (Board conferring)

17 JUDGE HOYT: Go ahead.

18 MR. STONE: I think what we are dealing here is
19 with something somewhat different than the previous
20 objection. We are talking of a situation where the driver
21 would be replaced.

22 What I am trying to get at is, does the training
23 which is provided deal with that situation, in particular
24 now with respect to, can they read the dosimetry and so
25 forth, and make that determination that they should report

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1 to some other place.

2 JUDGE HOYT: I believe, Mr. Stone, that was
3 covered in yesterday's testimony.

4 MR. STONE: Okay, fine.

5 JUDGE HOYT: This objection will be sustained, then.
6 If it is not when you review the transcript,
7 you can, of course, come back and ask the question.

8 MR. STONE: Thank you.

9 BY MR. STONE:

10 On page 19, Section 42 of your testimony, you
11 begin a discussion of school staff. The first sentence
12 states that Annex E does not include school staff within
13 the definition of emergency workers.

14 Is that a basis then for any opinion you may have
15 about the need of school staff for training in dosimetry?

16 A (Witness Bradshaw) In part it is. In fact, the
17 responsibilities of the school staff or bus drivers would
18 not subject them to any task which would result in a dose
19 or exposure to them that would not be subjected to the public
20 at large, as an emergency worker would have a possibility of
21 doing.

22 For that reason they do not receive dosimetry and
23 for that reason they have not received training on dosimetry.

24 Q In talking about school staff and their particular
25 role -- and we have done that to some extent in the other

mm10

1 contentions--can you envision a scenario -- scratch that.

2 Could, in your opinion, occur that sheltering
3 would be implemented for certain schools in situations where
4 it would not be recommended for the general public? And if
5 so, could you describe such a situation according to your
6 knowledge as a planner and so forth?

7 A I do not envision a protective action recommenda-
8 tion directed only to a school.

9 Protective action recommendations will be extended
10 for the public in general, including schools.

11 Q What will happen, in your opinion, if a school was
12 awaiting transportation and the general public was evacuating,
13 would a shelter recommendation be appropriate then?

14 A The general public, at least a portion of the
15 general public, would be also be awaiting those transportation
16 resources. The Emergency Management Agencies would be aware
17 of that, if your assumed scenario is accepted. And therefore,
18 it would be envisioned that while they were waiting for those
19 resources, a sheltering recommendation would be in effect for
20 anyone who did not have transportation readily available.

21 A (Witness Cunningham) The school district and
22 individual school plans also provide that they would be
23 waiting inside the building, and that the windows and doors
24 would be closed.

25 And that is, by my understanding, the criteria for

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1 sheltering that we described in detail yesterday. So, in
2 effect, they are sheltered whether or not there would have
3 been a recommendation to shelter. They are inside, and the
4 windows and doors are closed.

5 Q So, according to what you have described, this
6 could occur at a time when the general public was getting in
7 their cars and evacuating for example?

8 A (Witness Bradshaw) I don't understand the
9 question.

10 Q We have just been talking, I believe, about a
11 situation where the school is awaiting transportation, perhaps
12 transportation which has been delayed or -- and we had the
13 general public evacuating.

14 You had just described, I though, that a school
15 could take what is essentially a sheltering action while
16 awaiting such transportation.

17 A (Witness Cunningham) I didn't say it was
18 essentially a sheltering action. I said they were essentially
19 sheltered based on the criteria of being inside with windows
20 and doors closed. Not using the term meaning sheltering, I
21 am saying they are effectively doing the same thing they
22 would be if they were sheltered.

23 A (Witness Bradshaw) We have accpeted a hypothetical
24 presented by you, which is not the planning basis, and which,
25 in fact, is not what we envisioned to be the protective action

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1 recommendation or how it would operate.

2 But in the hypothetical scenario that you have
3 portrayed, if there in fact was a need to wait for transporta-
4 tion, the schools would wait the same way the general public
5 would wait.

6 Q But again the general public is not everybody in
7 the general public. The majority of the general public is
8 not dependent on the arrival of outside transportation. Is
9 that not correct?

10 MR. RADER: I object. Mr. Stone is arguing with
11 the witness.

12 MR. STONE: I will just rephrase that.

13 JUDGE HOYT: Very well.

14 BY MR. STONE:

15 Q In the event a school population was, in effect,
16 sheltering prior to the arrival of their designated
17 transportation, is it your position that school staff would
18 not need any training, or dosimetry in addition to that
19 available to the general public?

20 A (Witness Bradshaw) It is correct under a
21 sheltering recommendation there would be no need for school
22 staff to have dosimetry, as there is no need for the general
23 public to have dosimetry.

24 As we have indicated in our testimony, the dose
25 commitment to the general public is projected by Commonwealth

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1 Bureau of Radiation Protection and federal monitoring teams.

2 Q I take it what you are saying is -- I'll phrase
3 it as a question -- it is your opinion -- is it your opinion,
4 that it is not more likely that a school population would have
5 to shelter while awaiting their designated transportation than
6 the general public would have to shelter in a situation where
7 they could not evacuate in their private vehicles?

8 MR. RADER: I object to the form of the question
9 as being without foundation. The witnesses have clearly
10 testified several times that that hypothetical construct is
11 contrary to the plans.

12 I don't believe Mr. Stone presented it as a
13 hypothetical in that form of the question.

14 I also object to the question as asked and
15 answered.

16 JUDGE HOYT: Mr. Stone, do you want to reply?

17 MR. STONE: May I just have a minute.

18 JUDGE HOYT: No, do you want to reply to the
19 objection?

20 MR. STONE: Yes. I just wanted to refer back to
21 the Board's order, and also the contentions admitted.

22 MR. RADER: If it will save Mr. Stone some time,
23 I am not objecting that the question was beyond the scope
24 of the admitted contention.

25 My objections were otherwise.

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#4-1

1 MR. STONE: I would like to try to rephrase the
2 question and if that doesn't satisfy counsel for the
3 applicant --

4 JUDGE HOYT: It is not the applicant that you must
5 satisfy.

6 MR. STONE: I know, but what I am saying is I
7 think that if it is the form of the question I believe I
8 can rephrase it. If there is something else, I am not quite
9 sure what it is and I think I would have to hear another
10 objection.

11 JUDGE HOYT: Why don't you try rephrasing it and if
12 there is an objection, we will rule on the objection and we
13 will move on.

14 MR. STONE: Thank you.

15 BY MR. STONE: (Resuming)

16 Q Could in your view sheltering for school population
17 as a protective action be a useful emergency planning tool
18 in any case where the general public with its own transportation
19 is able in fact to begin evacuating?

20 MR. RADER: Again I object to the question as without
21 foundation. There has been no showing that there is going to
22 be any sheltering by schools in a situation which the public
23 itself is evacuated.

24 MR. STONE: If I may, I think we got as far as the
25 sheltering like situation that Mr. Cunningham referred to.

mn4-2

1 MR. RADER: That mischaracterizes Mr. Cunningham's
2 testimony which was that both schools and the general public
3 would in effect be sheltered during the situation which Mr.
4 Stone hypothetically constructed. It was not a distinction
5 drawn by Mr. Cunningham as to schools and the general public.

6 MR. STONE: I believe we had gotten to the point where
7 there was a distinction which was drawn between a sheltering
8 like situation while the school was awaiting transportation.
9 I don't think he went so far as to say it was sheltering but
10 I think we got that far. I would submit that is a foundation.
11 I am just trying to get to the next stage.

12 JUDGE HOYT: The objection is sustained.

13 BY MR. STONE: (Resuming)

14 Q Is it your testimony that there are no situations
15 which you can envision as a planner in which schools would be
16 sheltering and the general public would not?

17 A. (Witness Bradshaw) I believe we have addressed that
18 situation. The plans provide for transportation resources
19 necessary to evacuate the schools in one lift. The plans, in
20 fact, call for prepositioning of those resources at the
21 school before a protective action recommendation so it is not
22 likely that the schools would require sheltering while the
23 general public is evacuating. But resources are in fact
24 prepositioned through the plans.

25 A. (Witness Cunningham) We have also testified that

mn4-3

1 sheltering recommendation is not specific to schools but is
2 made to the population in general.

3 Q Is it possible in those situations where bus
4 supplies are coming from a distance that we would find
5 ourselves in the situation where school populations are in a
6 sheltering like mode?

7 MR. RADER: Objection, again a lack of foundation
8 plus I would point out that the Board expressly excluded the
9 issue of mobilization time under LEA-11 and LEA-15 which this
10 question explicitly brings into play.

11 MR. STONE: I do not know how relevant it is
12 but I do believe there is a little bit of mobilization time
13 in the deferred contention, LEA-23. But I think aside from
14 that, I think it is pretty clear what I am trying to get at
15 and if that is beyond the scope of this contention, that is
16 fine.

17 (Board conferring off the record.)

18 JUDGE HOYT: I believe, Mr. Stone, that question
19 has pretty much been answered before at least that is the
20 best recollection of the Board. I will sustain the objection
21 of counsel. You are going back and forth between 14(a) and (b)
22 here.

23 MR. STONE: Again I am trying to focus in on
24 Section 42 on page 19 of their testimony.

25 BY MR. STONE: (Resuming)

mn4-4

1 Q Maybe this will be the final question on the subject,
2 I take it then that it is the testimony of EC as a Panel
3 that you do not believe that it is possible for school
4 populations to be in a situation such as we described where
5 they are subjected to a sheltering scenario where the
6 general population is evacuated?

7 MR. RADER: Objection. That has been asked and
8 answered three times now.

9 JUDGE HOYT: Objection sustained, Mr. Stone.

10 MR. STONE: All right. I will just move on if
11 that is beyond the scope of what we can do here.

12 JUDGE HOYT: No. The objection was that it had
13 been asked and answered.

14 BY MR. STONE: (Resuming)

15 Q Would in your opinion as an emergency planner
16 be useful in any medical or therapeutic context for a
17 sheltered school population to have site-specific data
18 with respect to doses such as would be measured by
19 dosimetry?

20 MR. RADER: Objection. That is well beyond the
21 scope of any admitted contention let alone this one.

22 MR. STEON: Again, I am trying to get at whatever it
23 is that might make school staff need the dosimetry and KI
24 and I believe it is the EC's testimony that there is no
25 reason why they would need dosimetry and KI and for that

mn4-5

1 matter training. I think LEA's attempt here is simply to
2 explore grounds which may lead to their conclusion being
3 inaccurate.

4 JUDGE HOYT: Mr. Stone, if that is your question
5 why don't you just ask that question.

6 BY MR. STONE: (Resuming)

7 Q You have testified in section 42 on page 19 that if
8 sheltering were implemented school staff would be treated as
9 any other sheltered member of the public. In a situation where
10 all the public is being sheltered, is there any reason in your
11 view for school staff to have dosimetry?

12 MR. RADER: Objection, Your Honor. Again, this
13 has been asked and answered. This is now the fourth time
14 that the witness has been asked to make some hypothetical
15 distinction between treatment of the general public and
16 school staff with regard to the use of dosimetry.

17 (Board conferring off the record.)

18 JUDGE HOYT: Mr. Stone, I think it has been asked
19 and answered a number of times. I think you are trying to
20 force testimony from the witnesses. I don't think you are
21 going to get it no matter which way we proceed. Either we
22 are going to get an objection or you are going to get
23 qualifications from the witness.

24 MR. STONE: With that in mind, I guess we will move
25 on.

mn4-6

1 JUDGE HOYT: Thank you.

2 BY MR. STONE: (Resuming)

3 Q In your relationship with the various school officials
4 and teachers and bus drivers, have you had any comment or
5 feedback on the arrangements for dosimetry and KI which
6 we have been discussing under contention 14, part "a".

7 A. (Witness Wenger) Could you repeat that, please?

8 Q In your relationship and I believe you have
9 testified before that you have a close and ongoing relationship
10 with various parts of the public, in your relationship with
11 school officials, teachers or bus drivers, have you
12 received any comments or input that you can recall with
13 regard to the present arrangements for supplies of dosimetry
14 and KI again as it fits under contention 14(a).

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1 MR. RADER: I object to the question as
2 lacking foundation. There has been no testimony as to any
3 provision of training to school staff regarding dosimetry
4 or KI. I believe the testimony was that this information
5 was provided to bus drivers and their training and that their
6 supplies would be sufficient for any school staff whom
7 they accompanied in a hypothetical second trip into the
8 EPZ.

9 MR. STONE: I think that the question was
10 really just asking if, in presenting the training, for
11 example -- I will limit it to school staff, if that
12 would help.

13 Has any school staff expressed such concern?

14 JUDGE HOYT: Very well. We will overrule the
15 objection. And we will take the qualifying --

16 BY MR. STONE:

17 Q We will limit that to school staff.

18 In your relationship with school staff and your
19 involvement with training, has there been any comment or
20 feedback with respect to the arrangements that they would not
21 be given dosimetry and KI in this case?

22 A (Witness Wenger) There have been questions
23 from members of the audiences in school staff training
24 about dosimetry, what it does, what it is good for, would
25 they or would they not receive dosimetry. Yes.

1 Q Can you give us your general response or do we
2 need to go through each case? Do you give a response in
3 those cases, and could you please describe what that is?

4 A Basically we would cover dosimetry and what it was,
5 a lot of misunderstanding, I think, with the public on what
6 dosimetry is and what it does. And tell them basically that,
7 no, they would not be given dosimetry and explain again that
8 emergency workers would receive dosimetry.

9 Q Can you recall any instance where according to your
10 knowledge that answer was questioned by members of the
11 audience? In other words, did members of the audience ever
12 express -- and school staff express a desire to have
13 dosimetry and KI regardless of your answer?

14 MR. RADER: I object to that question as
15 irrelevant.

16 JUDGE HOYT: Sustained.

17 BY MR. STONE:

18 Q Do you recall any particular training that you
19 were involved in or have knowledge of where these kinds of
20 questions were raised?

21 MR. RADER: Objection, irrelevant.

22 JUDGE HOYT: That is irrelevant. Can you move
23 ahead?

24 Sustained.

25 MR. STONE: I believe I am ready to move on to

1 LEA-14-B which deals with training. I am not sure.

2 BY MR. STONE:

3 Q You have testified in your bus training --
4 bus driver training program, you instruct bus drivers
5 in the use of dosimetry and KI, have you not?

6 A No. I testified that we do not instruct them
7 on the use -- on the hands-on use of dosimetry. We do
8 cover briefly what it is.

9 Q Do you have available to you Applicant's Exhibit
10 E-64?

11 A Which is?

12 Q Which is the -- I'm sorry. This is the
13 school officials. What we want here is the bus drivers
14 training manuel. I have to get the exhibit number for you.

15 MR. RADER: If Mr. Stone is referring to the bus
16 driver training module, that is Applicant's Exhibit E-66.

17 MR. STONE: We have E-66.

18 JUDGE COLE: My records indicate that that
19 is E-64.

20 MR. STONE: That is what I have as well.

21 JUDGE HOYT: Yes, I believe that is correct,
22 Mr. Rader.

23 MR. RADER: I will have to consult the
24 transcript then. I stand corrected.

25 BY MR. STONE:

1 Q Could you turn to the section -- has ECI -- has
2 EC been involved in the development or implementation of
3 this training module?

4 A Yes.

5 Q Could you turn to the section in there which
6 describes the training given with respect to dosimetry
7 and KI?

8 A Yes.

9 JUDGE HOYT: Mr. Rader, let me -- excuse me,
10 Mr. Stone. Let me interrupt. The Board indicates that
11 64 is the training module for bus drivers, and E-66 for
12 identification is the training module for school officials.

13 MR. RADER: We may have misnumbered our
14 exhibits. I will check the transcript. If there is any
15 problem, I will advise the Board.

16 JUDGE HOYT: Yes. We will adhere at this
17 point -- is that what you have, Mr. Hassell?

18 MR. HASSELL: Staff's records indicate that
19 Applicant's Exhibit E-66 is the training module for bus
20 driver training and that Applicant's Exhibit E-64 is
21 the school officials training module.

22 JUDGE HOYT: In other words, you have just --

23 MR. RADER: The Board is correct. I have
24 consulted the transcript. The Board's recollection is
25 correct.

1 JUDGE HOYT: Then you will have to correct
2 yours also, Mr. Hassell.

3 MR. HASSELL: Okay.

4 JUDGE HOYT: We are now using Applicant's
5 Exhibit E-64 for identification.

6 MR. STONE: Okay.

7 JUDGE HOYT: And the witnesses have that
8 before them?

9 WITNESS WENGER: Yes.

10 JUDGE HOYT: Yes.

11 Now, I am sorry, Mr. Stone, but I think it is
12 best to correct those errors in the beginning.

13 BY MR. STONE:

14 Q I believe you just testified that you have found
15 the section which refers to the dosimetry and KI training.

16 What page is that?

17 A Page 12.

18 Q How do you characterize -- you do not characterize,
19 do you, this training as being training in the use of dosimetry
20 and KI?

21 A When this training lesson plan was first
22 developed, at that point in time the trainers were not
23 certain as to whether or not there would be enough
24 busses procured in order to do the one-lift principle.
25 So at that point in time the lesson plan was written to

1 include some dosimetry training in case there had to
2 be a multiple-lift concept.

3 Now, as soon as the trainers informed us that
4 enough busses had been procured, that there would be
5 a one-lift principle, we stopped training any dosimetry.

6 The most they would have received was just,
7 this is a dosimeter, you know. That would be about it.

8 Q Is it your testimony that the original
9 concept of including training for bus drivers is in
10 this document, Applicant's Exhibit E-64 then?

11 A Excuse me. Could you repeat that?

12 Q In other words, the training as indicated
13 here does include what you would characterize as
14 training in the use of dosimetry and KI?

15 A Yes. The first draft lesson plan does still
16 include the section on dosimetry. It was not yet
17 removed.

18 Q Will it, according to your knowledge, be
19 removed for future training?

20 A (Witness Bradshaw) The lesson plan is not
21 necessarily going to be revised. It was simply a matter
22 of not presenting that information at the sessions.

23 Q You have described in previous testimony,
24 I think, the three training sessions. To your recollection,
25 in those sessions was the instruction, as indicated here,

1 given or not for bus drivers?

2 A The information was presented in the first
3 training session and has not been presented in
4 subsequent sessions.

5 Q Is there any particular reason why it was
6 omitted other than a time consideration, for example?

7 A I believe we have stated the reason. The
8 reason is, it was drafted by training personnel in the
9 absence of knowledge of the one-lift principle. And,
10 in fact, when it was pointed out to the training staff that
11 that was a principle, it was no longer presented in these
12 sessions.

13 That is the reason it is not presented is
14 because there is a one-lift principle.

15 Q Is it your testimony, therefore, that to go
16 ahead and give this training then would not serve a
17 useful purpose?

18 A That is correct.

19 Q With further respect to the training of
20 bus drivers, do you consider route information, both for
21 the entering and leaving phases of a bus driver's mission,
22 to be an item suitably included in the training of bus
23 drivers?

24 (Witnesses consulting.)

25 A There is a difference in the presentation for

1 school bus drivers as opposed to public transportation
2 providers. The information in the school plans included
3 information on routing and that type of general information
4 with regard to the specifics of the school plan would
5 be presented to school bus drivers.

6 However, there is not pre-designated routes for
7 bus drivers coming in from outside the area. The information
8 on routing is provided through the transportation staging
9 area through strip maps and, therefore, training sessions
10 for those drivers would not describe specific routes but
11 generally the procedures involved.

12 Q Have there, in fact, been any training sessions
13 for the bus drivers, school bus drivers described who are
14 coming from outside the EPZ?

15 A There have been training sessions conducted for
16 school bus drivers, yes. Those sessions that we described
17 yesterday.

18 Q Were any of those for school bus drivers coming from
19 outside the EPZ, to your knowledge?

20 A I wouldn't have any direct knowledge.
21 There is certainly a possibility that some of them reside
22 or work outside the EPZ and service school districts inside
23 the EPZ.

24 Q Miss Wenger, do you know if training has been
25 done for any school bus drivers coming from outside the EPZ

1 who would, therefore, not be trained in the particulars
2 of a risk school district plan but who would, in fact,
3 be given the orientation described?

4 That is, told about the strip maps and the
5 transportation staging area and so forth.

6 A (Witness Wenger) I believe my colleague
7 has already stated that some of the bus drivers who have
8 received training may reside outside of the EPZ. Training
9 is being offered to bus companies who would be providing
10 transportation.

11 Q Has it been conducted -- I guess you
12 asked and answered it.

13 MR. RADER: Thank you. You're right.

14 JUDGE HOYT: Would you like to sustain it as well,
15 Mr. Stone?

16 BY MR. STONE:

17 Q Going back to the particular training we
18 are talking about, the provision that strip maks would
19 be used and the transportation staging area, have those
20 particular training procedures been used as yet, to your
21 knowledge?

22 MR. RADER: I am not sure I understand the
23 form of the question -- have the training procedures been
24 used.

25 Perhaps the witness understands the question.

1 I don't understand it, unless Mr. Stone is asking if there
2 have been actual drills or something of that nature.

3 JUDGE HOYT: If the witness doesn't understand
4 it, Mr. Rader, I am sure that he will let us know.

5 MR. STONE: I will rephrase that or try
6 to lay a little foundation.

7 JUDGE HOYT: Does the witness understand
8 the question.

9 WITNESS WENGER: I would like to hear it
10 repeated.

11 BY MR. STONE:

12 Q You have described the process of training,
13 the procedure of training which would involve instructions
14 as to the use of strip maps, transportation staging
15 areas, so forth, prior to entering the EPZ. I believe
16 that was limited to bus drivers from outside the EPZ who would
17 not normally be assigned to the school they will be
18 transporting?

19 Is that a correct summation of where we are
20 at this point?

21 A Maybe I should answer that training programs
22 incorporate information that is available from our
23 planners, that this information could be incorporated --

24 MR. FERKIN: We can't hear you.

25 JUDGE HOYT: Maybe we can close the window a

1 little bit. Let's open it during recesses wide open
2 and try to cut down on the noise. That may help you.

3 If you have any difficulty, Miss Ferkin,
4 please let me know.

5 MS. FERKIN: Thank you.

6 JUDGE HOYT: Would you please begin your
7 answer again?

8 WITNESS WENGER: Can I ask for the question
9 again?

10 MR. STONE: At the risk of repeating myself,
11 I will try.

12 JUDGE HOYT: Would you like to have it read
13 back from the record?

14 MR. STONE: I think I can get to it. We will
15 try one more time.

16 BY MR. STONE:

17 Q Are we to the point that you have described
18 the procedure of training for strip maps and transportation,
19 and this would be applied to or used for bus drivers who
20 did not normally transport the school they were being
21 assigned to but who, in fact, would be traveling into the
22 EPZ to do that.

23 And the question is, has any training been held
24 using those training procedures?

25 A The training that has been conducted so far has

1 been with school bus drivers in the three school districts
2 that either are in whole or partially inside the EPZ.
3 Therefore, training expressly covering the use of
4 strip maps has not been given thus far.

5 Q Thank you.

6 This is to the panel: In any other respect,
7 does the training for bus drivers from within the EPZ
8 normally assigned to a risk school district and
9 training for bus drivers coming into the EPZ from some
10 other source differ?

11 A We haven't as yet conducted training for
12 bus companies who would be coming in from outside the
13 EPZ.

14 Q I realize that. Have you, in fact, developed
15 a training procedure, the training materials?

16 A No. The materials have not been developed. What
17 would happen would be that some supplemental information
18 would be made available by the planners.

19 It could be inserted into the training lesson
20 plan.

21 Q And by planners, you mean whom?

22 A Energy Consultants planners.

23 A (Witness Bradshaw) If I may add, the lesson
24 plan is a generalized lesson plan. It is adopted to the
25 audience which you present it to.

1 The particulars of a school district would
2 be added to it. If it were a bus provider from outside
3 the area, the different procedures involved would be
4 discussed. So in that sense, there is flexibility in the
5 lesson plan. Information is added or deleted as need be.

6 Q Does this flexibility include the flexibility
7 to include instruction in dosimetry and KI, or would
8 that be beyond the scope of what you are describing?

9 A As we have indicated, bus drivers are not
10 included as emergency workers and do not receive
11 dosimetry and KI. Therefore, they do not receive
12 instructions on it as part of the lesson plan.

13 Q Is it fair to say then that EC has no plans or
14 intention to train bus drivers coming from outside the EPZ
15 in dosimetry and KI?

16 A Energy Consultants presents lesson plans as
17 directed, reviewed and approved by Commonwealth and
18 county authorities, and those lesson plans are consistent
19 with the policies and procedures of those entities.

20 And the information which we present is
21 consistent with that. So in light of the one-lift
22 principle and the fact that school staff and bus drivers
23 are not emergency workers, in that context, we do not
24 intend to present information on dosimetry and KI unless
25 there were a change in policy.

1 Q And do those entities rule out such
2 instructions? Do the county and state entities which you
3 described, which you say your instructions are consistent
4 with, do those entities, in fact, rule out such instructions
5 in KI, dosimetry as we are discussing here?

6 A I would not say, in fact they rule it out.
7 There is an open discussion, and they attend the training
8 sessions which we conduct. And if they were unhappy,
9 displeased with or disagreed with anything in our
10 program, we would amend it accordingly.

11 Q Could you tell me, Exhibit E-64, has it been
12 reviewed by any of these county or state entities which
13 we are talking about?

14 A (Witness Wenger) Yes. The lesson plans are made
15 available to the counties. The Pennsylvania Emergency
16 Management Agency had previously reviewed the plan of
17 instruction for the bus drivers.

18 Q Was there any -- at that time was there any
19 attachment or cover letter describing the situation with
20 respect to the difference between the training procedure
21 as indicated and the one, in fact, which ECI plans to
22 implement with respect to KI and dosimetry?

23 A (Witness Bradshaw) I am not aware of any
24 cover letter this so states the difference.

25 Q Is it your understanding that the agencies

1 reviewing this material understood that the
2 procedures described in the lesson plans with respect to
3 dosimetry and KI would not, in fact, be implemented?

4 A Yes. I have no doubt that they are aware of
5 the status of bus drivers and the fact that they do not
6 receive dosimetry and KI. I would have to check our
7 records, but I am sure that they would have an
8 opportunity to attend the sessions and to make any
9 appropriate comments.

10 Q You just said that they are aware of the
11 provision that bus drivers would not normally be given
12 dosimetry and KI.

13 I believe I asked were the reviewing
14 authorities, the actual reviewing personnel
15 specifically aware of whether or not you were training
16 the bus drivers as indicated in the text of your
17 lesson plan or were, in fact, doing something else?

18 A You would have to ask those authorities.

19 I know we have had discussions on the subject.
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1 Q With respect to school staff, has your lesson plan
2 for school teachers, for example, been reviewed as well by
3 these County and State authorities we have been discussing
4 with respect to bus drivers?

5 A (Witness Wenger) Yes. Copies are submitted to
6 the counties.

7 Q Is there, to your knowledge, any similar section
8 regarding instruction in KI, dosimetry in the school staff
9 plans?

10 A No.

11 Q Is it your position that the school staff plans
12 are consistent with the recommendations and policies of these
13 reviewing authorities?

14 A Yes, there should be. I can quickly go through it
15 if you wish.

16 Q I'm trying to avoid that just for time.

17 To your knowledge, does the policy of these
18 reviewing authorities rule out instruction in dosimetry and
19 KI with respect to school staff, or take any position whatso-
20 ever with regard to the necessity of doing that, of training?

21 A (Witness Bradshaw) I believe we have answered that.

22 The training sessions are consistent with the
23 County and State policy in this regard. They have had ample
24 opportunities, and in fact have done so, to observe the
25 sessions and have made no comments to us with regard to the

mm2 1 content, with regard to dosimetry and KI.

2 Q Have you discussed this particular issue with
3 representatives of these authorities?

4 A Lesson plans have been reviewed by those authorities
5 and any corrections or amendments which they have requested --
6 and in fact they have requested some -- have been incorporated.

7 Q Simply, have you discussed the issue of whether or
8 not it would be a good idea to train school staff in the use
9 of dosimetry and KI with the reviewing authorities of your
10 school lesson plans?

11 A I can't recall any specific discussions to that
12 regard, nor would I expect there to be any, since the
13 training sessions are consistent with County policy.

14 Q And State policy as well?

15 A Yes.

16 Q According to your experience and function as
17 emergency planners, would not the issue of the need for the
18 use of dosimetry and KI, and therefore the training for its
19 use be an issue somewhat site specific to a particular
20 nuclear facility? That is, those circumstances which may
21 arise which may necessitate the use of these materials, would
22 that not vary, according to your experience as emergency
23 planners, from nuclear site to nuclear site?

24 A Absolutely.

25 Q And it is your testimony that according to your

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1 opinion, there is nothing about the Limerick nuclear site and
2 its emergency planning zone which is significantly different
3 with respect to the likelihood of necessitating use of KI
4 and dosimetry materials, as opposed to the other plants that
5 at least you are familiar with?

6 A There is no difference that would require procedures
7 different than what are currently in the plans. And the site
8 specifics include the specifics of the State and the
9 specifics of the County with regard to policies on this issue.

10 The adequate resources have been identified and
11 other factors have been considered, and the training sessions
12 and in fact the plans are consistent with the State policy.

13 Q When EC draws conclusions from State policy with
14 respect to, for example, the KI and dosimetry situation,
15 discussed in this contention, does EC draw its guidance
16 keeping in view the site specific characteristics of the
17 nuclear plant you are working with?

18 A As I believe we stated in our testimony, Energy
19 Consultants has assisted the counties and municipalities and
20 school districts in this area in a way that is consistent with
21 State, County and local policies in this regard.

22 If we observed some problem that was inconsistent
23 with those procedures and policies, we would point them out.
24 In this regard we see no problem and we believe that
25 sufficient resources have been identified and that there is

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1 no need to certify teachers or school bus drivers or any other
2 school staff as emergency workers to receive dosimetry and
3 KI.

4 Q Is it fair to say that you base that conclusion
5 in part on the general policy, general State policy?

6 A We work in this area assisting these agencies
7 under constraints and under guidance provided by Federal,
8 State and County resources. And we have done that. And we
9 have developed plans that are able to be implemented in that
10 context.

11 Q According to your knowledge -- strike that.

12 JUDGE HOYT: Mr. Stone, is this a good time for
13 a brief recess, about ten minutes.

14 MR. STONE: Sure.

15 JUDGE HOYT: Very well. The hearing will recess
16 for ten minutes.

17 (Recess.)

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1 JUDGE HOYT: The hearing will come to order. Let
2 the record reflect that all the parties to the hearing who
3 were present when the hearing recessed are again present in
4 the hearing room and that the witnesses have taken their
5 place on the witness stand and I will remind you once again
6 you are under oath. Yes, Ms. Zitzer.

7 MS. ZITZER: Your Honor, I would at this time like
8 to request a clarification on a procedural matter that I hope
9 will only take a moment. Mr. Norman Vutz is one of the
10 witnesses that LEA has subpoenaed and his subpoena did command
11 him to appear today. He has been rescheduled by LEA for
12 Monday, December 3rd. He is here in the room and I would
13 like to request to reverse the order on the schedule that
14 was distributed yesterday by LEA to reverse the positions
15 of Mr. Vutz and Mr. Ronald Wagenmann.

16 I don't want to get into an extensive discussion
17 now if it is not necessary but it would be very helpful if
18 those arrangements could be made and if Mr. Vutz could know
19 if that was agreeable to the Board while he is here. If you
20 need time to consider it, we could discuss it later but I
21 just wanted to bring that to your attention.

22 JUDGE HOYT: Let me hear from the applicant on that.

23 MR. CONNER: As we understand the point, it would
24 simply mean to exchange the presently indicated dates for
25 Mr. Vutz and Mr. Wagenmann. As I said yesterday, we have no

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1 particular interest in what order they present the witnesses
2 so long as our witness' testimony is completed first.

3 I would again state that on that particular Monday
4 there were only two witnesses listed and I would say that to
5 avoid dead time, there certainly should be witnesses available
6 to avoid any wasted time in the hearing because I know that
7 our cross-examination will not take as long as LEA's has
8 taken of our witnesses.

9 JUDGE HOYT: Very well. I wonder if the parties
10 have considered perhaps preparing some stipulations as to
11 expected testimony which the Board would entertain favorably
12 if while these witnesses are here perhaps interviewing them
13 and come to a stipulated testimony statement which could
14 be reduced to writing and read into the record or else
15 attached as an exhibit.

16 Do you want to be heard, Mr. Hassell?

17 MR. HASSELL: No, Your Honor.

18 JUDGE HOYT: Ms. Ferkin.

19 MS. FERKIN: No, Your Honor.

20 MR. CONNER: If the Court please, we would be
21 quite willing to try it and I forget the name of the witness
22 she said was here today.

23 JUDGE HOYT: I believe it is Mr. Vutz.

24 MR. CONNER: We are faced with the problem of being
25 in the middle of a hearing and never having even known these

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1 people were going to be called until the subpoenas were asked
2 for and given the fact that there were 30-odd people here
3 and 41-odd in the second wave if they appear, this would
4 present a rather awkward situation to try to pursue this at
5 this point in time. Now we are willing to do anything we
6 can. I am willing to talk to Mr. Vutz but I am not even sure
7 that these witnesses would appear at all except under
8 subpoena and we may in a given case want to ask many questions
9 of a given witness or ask none at all. We simply cannot tell.

10 JUDGE HOYT: That is understandable, Mr. Conner.
11 There is no problem with that. What would be the consensus
12 then as to how you wish to handle Mr. Vutz's appearance here
13 today?

14 MS. ZITZER: In view of the fact that we are all
15 involved in the ongoing hearing, I was simply seeking a
16 clarification for his purposes that it was acceptable to the
17 Board that he appear on Tuesday, December 4th and not Monday,
18 December 3rd. I am very willing to discuss with counsel for
19 the applicant and the other parties any procedure that would
20 help to facilitate the presentation of subpoenaed witnesses.
21 I simply would like to state, however, that being an all-
22 volunteer organization with one attorney assisting us at this
23 point in time, it may be somewhat difficult to agree to
24 stipulations but we will certainly make any effort that the
25 Board deems appropriate to facilitate the presentation of these

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1 witnesses as much as possible.

2 JUDGE HOYT: Very well, Ms. Zitzer, but you
3 understand that was merely a suggested technique. It is
4 not something that the Board has expected you to do. We
5 give you full latitude to present your case in whatever
6 fashion you wish.

7 MR. CONNER: Just so there will be no misunderstanding
8 on the record, we would under no circumstances agree to any
9 stipulation without interviewing the witnesses.

10 JUDGE HOYT: Understood.

11 MR. CONNER: If I may, if they have one of their
12 people to talk to Mr. Vutz while we talk to Mr. Vutz, we
13 will see if we can speed it up by that way right now.

14 MS. ZITZER: I am not sure what you are asking.

15 JUDGE HOYT: I think he wants to interview the
16 witness, and he is asking if you have somebody available
17 if you want to be there when he interviews the witness to see
18 what testimony he has. Is that what you are saying?

19 MR. CONNER: No, ma'am. I understood the offer from
20 LEA to be that they would want to suggest that this witness
21 if he were to testify would say "x" and I would want to talk
22 with him. They would say, "Mr. Vutz, will you say 'x'?"
23 If he says, "No," I would say, "Fine, that is the end of it."
24 If he says, "Yes," then I may want to ask some questions and
25 see whether we could or could not stipulate.

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1 JUDGE HOYT: Very well.

2 MS. ZITZER: My problem, Your Honor, is I did not
3 come prepared to have a specific discussion of Mr. Vutz's
4 testimony today and Ms. Ercole is going to be the person
5 conducting the cross-examination. We are certainly willing
6 to have any discussion that would be of use to the applicant
7 but at this point in time to agree on anything specific
8 is a little difficult.

9 JUDGE HOYT: Every time you get out of the scheduled
10 planning it always never saves time but creates more problems
11 than I think it solves so we will expect him to be here on
12 December 3rd then unless you have made some other stipulation.
13 Very well.

14 MS. ZITZER: Your Honor, the request I made was
15 to ask that he be permitted to appear on December 4th,
16 Tuesday. He presently is scheduled on December 3rd and what I
17 was proposing was to simply exchange the positions of Mr. Vutz
18 and Mr. Wagenmann.

19 MR. HASSELL: The staff would have no objection.

20 JUDGE HOYT: I think the one that has an interest
21 in these two witnesses would probably be the applicant. Do
22 you have any objection to just shifting those two witnesses?

23 MR. CONNER: No, ma'am. As I say, we don't care
24 what order they bring them on in as long as they have
25 witnesses available so that there is no dead time.

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1 JUDGE HOYT: I think that is appropriate then.
2 Very well. Mr. Stone, are you ready to resume your
3 cross-examination of the panel?

4 MR. STONE: Yes, thank you, just a few more
5 questions on LEA-14.

6 BY MR. STONE: (Resuming)

7 Q Back to the bus driver training, we were discussing
8 previously and we have the training module we have referenced
9 earlier and this is to the panel, to your knowledge has the
10 past bus driver training or the future bus driver training
11 which you allege you have offered include any guidance for the
12 school bus driver as to the potential traffic conditions,
13 for example, he or she would face in an evacuation scenario
14 and if so, please indicate in the exhibit where that is
15 located?

16 A (Witness Bradshaw) The bus driver lesson plan
17 includes information on traffic control and access control
18 points which obviously facilitate traffic flow. That is
19 included on page 16 of the lesson plan.

20 Q Is there anything else which you recall or have
21 knowledge of in this document relating to the kinds of
22 traffic conditions that a bus driver would face in the
23 evacuation scenario?

24 A There is additional information on main evacuation
25 routes, how they are designated and a general discussion of

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1 evacuation procedures. To my knowledge that is the extent
2 to which traffic is discussed in the lesson plan.

3 Q In the past training which has been given, has there
4 been any of the kind of additional presentations you have
5 mentioned with respect to traffic conditions you expect to
6 exist at the time of an evacuation?

7 A Other than those items I have just outlined, there
8 is no additional information on traffic congestion.

9 Q Specifically, how are bus drivers trained with
10 respect to such issues as whether or not to obey existing
11 traffic signals or signs, for example?

12 A Obviously, these individuals are certified by
13 the Commonwealth of Pennsylvania as both school bus drivers
14 and school bus drivers and under the criteria for certifying
15 them, they obviously have to have a knowledge of the
16 Commonwealth vehicle code and the general requirements of that
17 code. They are certified drivers.

18 Q Yes, but what I am asking is in your view is it
19 obvious for a bus driver that in a crisis evacuation situation
20 that he or she must obey existing traffic rules or do you
21 envision a more crisis-oriented approach? In other words,
22 does your training indicate to the bus driver the degree to
23 which the normal codes of behavior on the road may be
24 stretched in an evacuation scenario?

25 A The codes of behavior will not be stretched in an

1 evacuation. The documented past response to a disaster show
2 that evacuation is generally orderly and people obey rules
3 and regulations the same way they do on a daily basis and
4 we have no reason to believe that they wouldn't and we
5 certainly would not recommend that a bus driver drive any
6 differently during an evacuation than he would on a daily
7 basis.

8 Q Is that statement in particular made during the
9 course of whatever training you have given and whatever
10 training you would hope to give, that they should in fact
11 obey the existing traffic rules and not drive any differently
12 than they would during normal?

13 A It is not specifically stated, no.

14 Q Are there not according to your knowledge certain
15 circumstances which a bus driver may face in an evacuation
16 which would not be the day-to-day kinds of things they would
17 face every working day? Can you testify to anything that
18 you consider exists in an evacuation scenario as it relates
19 to traffic and what bus drivers would face that doesn't exist
20 in a day-to-day situation?

21 A No. I don't believe there are any conditions
22 relevant to that bus driver's performance that would impact
23 his performance.

24 Q For example, I believe elsewhere in your testimony
25 you have described a situation where vehicles blocking the road

1 would be pushed to the side in order to facilitate the
2 movement of the traffic. Would that be perhaps different
3 that what would occur in day-to-day rush hour traffic,
4 for example?

5 A. No. In fact that happens on a daily basis.

6 Q Do you envision any use of perhaps shoulders or
7 other means to get around obstructions on behalf of
8 bus drivers fulfilling the emergency function that they
9 would perhaps not utilize in the day-to-day course of
10 their duties?

11 A. No, I do not.

12 Q Are bus drivers told specifically not to avail
13 themselves of whatever extra legal or extra traffic rule
14 means that they might think would speed up their evacuation?

15 MR. RADER: Objection. This has been asked and
16 answered several times.

17 JUDGE HOYT: Sustained.

18 BY MR. STONE: (Resuming)

19 Q Are bus drivers trained or instructed according to
20 your lesson plan and intentions with respect to fuel
21 availability and precautions they should take not to run out
22 of fuel in an emergency which might differ from what they
23 would face in day-to-day traffic situations?

24 A. (Witness Bradshaw) There are specifics with regard
25 to school plans and the school plan procedures call for

mn7-10

1 notification of bus providers including those owned and
2 contracted by the school district which would ready vehicles
3 for evacuation and that includes checking them out mechanically
4 and also seeing that a sufficient amount of gasoline is
5 available to them.

6 Q Have bus drivers in particular been instructed
7 as to these procedures by EC?

8 A I believe when it is associated with a school
9 district, yes, they have been although it is not generally
10 directly their responsibility. It is the responsibility of
11 the school district or the bus provider supplying the
12 buses rather than the drivers.

13 Q For example, are bus drivers given any training
14 which would indicate to them the amount of time that could
15 be expected to be in slow moving or what is technically called
16 a queuing or traffic jam type situation in the evacuation
17 scenario as it unfolds?

18 MR. RADER: Objection. This goes to mobilization
19 time which the Board has excluded as an issue under all of
20 these contentions.

21 MR. STONE: May it please Your Honor, not at all.
22 All I want to know is that factor as it relates to gas
23 supplies and the question would go to, does the driver have
24 a means by which to judge for themselves how much gas they
25 need to fulfill a mission.

mn7-11

1 JUDGE HOYT: Objection sustained.

2 BY MR. STONE: (Resuming)

3 Q Not with regard to mobilization time but with
4 regard to knowledge that a bus driver would need to know
5 on the outgoing run as the amount of time he could expect
6 to be in traffic so as to be able to make a judgment about
7 when to start worrying about fuel supplies?

8 MR. RADER: I object, Your Honor. This line of
9 questioning is getting a little bit tangential. The witnesses
10 have already made it clear how the bus companies are told
11 to see that the vehicles are ready to be mobilized and
12 they are instructed as to which schools they are supposed to
13 go to. They have made it clear that this is not a
14 responsibility of the bus driver and I think this entire line
15 of questioning is fruitless.

16 MR. STONE: If it may please the Board, I am simply
17 to list some areas where I think that training would provide
18 very, very useful guidance and instruction to the bus driver
19 as well as allay any erratic behavior or behavior not
20 foreseen by the planners. I am not intending to dwell on
21 each issue but just to move through a series of these.

22 (Board conferring off the record.)

23 MR. STONE: This would relate directly to training,
24 what training they might need.

25 JUDGE HOYT: What is your question again, Mr. Stone?

1 MR. STONE: In this particular case it was with
2 respect to having the training you have given to bus drivers
3 or intent to give is included instruction into the time they
4 can expect to be on the outgoing run in traffic, the
5 procedures they would follow to attain fuel or other
6 mechanical help they may need to stay on the road for that
7 amount of time and actually get the children out and other
8 such information that would prevent inappropriate judgments
9 on the part of bus drivers who have to make ad hoc decisions
10 as they are leaving the EPZ.

11 JUDGE HOYT: Could we approach this, Mr. Stone,
12 what emergency procedure training if any do you give bus
13 drivers on maintaining fuel supplies?

14 MR. STONE: That's fine.

15 JUDGE HOYT: Is that what you are really after?

16 MR. STONE: Yes.

17 JUDGE HOYT: In that event, we will permit the
18 Panel if they know to answer the question.

19 WITNESS BRADSHAW: Yes. The bus driver lesson plan
20 on page 30 describes under alert procedures. Bus drivers are
21 notified and placed on stand-by. They are given assignments
22 and maps. The transportation equipment is inventoried and
23 vehicles are fueled and given priority maintenance. Now
24 there are standard operating procedures that would hold and
25 generally the bus drivers are not involved in fueling their

1 own vehicles. It would be the bus company provider doing this
2 and during the presentation of this material, there is an
3 open exchange through all of our training sessions in which
4 questions are asked and answered and if this comes up, it
5 is discussed. I believe, however, the bus drivers generally
6 know how their buses are fueled and where they obtain the
7 fuel.

8 BY MR. STONE: (Resuming)

9 Q. Would they necessarily know the fuel requirements
10 in an evacuation situation of the outbound trip?

11 MR. RADER: Again I object to that as irrelevant
12 and lacking in any evidentiary foundation as to their
13 necessity for knowing that.

14 JUDGE HOYT: We will sustain the objection. It is
15 simply not relevant, Mr. Stone.

16 BY MR. STONE: (Resuming)

17 Q. For any bus driver who needs to make a multiple trip
18 or return trip or who reports to a staging area on his first
19 trip in to the EPZ, what training or procedures are indicated
20 for that bus driver to attain gas supplies or other mechanical
21 supplies at this transportation staging area?

22 A. (Witness Cunnington) For example, in Montgomery
23 County the personnel at the transportation staging areas through
24 the county are made aware of the location of stations that
25 are proximate to the transportation staging areas. The county

1 has collected information which indicates the type and kind
2 of fuel that is available at those stations and the hours of
3 operation of those stations and the most recent information
4 that is available in Montgomery County indicates that there
5 is a 24-hour fuel service available at each transportation
6 staging area. There is no special arrangements on the part
7 of the bus driver. If a bus driver indicated a need for
8 fuel through information that could be generated between
9 the staging area personnel and the EOC, they would be able
10 to indicate where he might be able to obtain that fuel
11 prior to beginning his run.

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1 Q And just for the record, all of the
2 transportation, in terms of busses, we are talking about
3 would use, to your knowledge, gasoline?

4 A No. I said fuel. I can indicate that
5 the fuel that they look at is regular, unleaded, and
6 diesel. It is the experience in Montgomery County that
7 the majority of vehicles use either regular or diesel fuel
8 with exception that some of the smaller vans use unleaded
9 fuel. And the resources that are available in the
10 areas of the transportation staging areas have been
11 assessed as to those three different kinds of fuel.

12 It is not my understanding that it is limited
13 to gasoline. It is the type of fuel -- regular or
14 unleaded gasoline or diesel fuel.

15 Q And your testimony is then that as far as you
16 know, as far as your knowledge, that the 24-hour capability
17 you refer to at each of these Montgomery County staging
18 areas includes all types of fuel then?

19 A Montgomery County, in selecting the locations
20 of their staging areas, not only included the availability
21 of fuel as one of the criteria for selecting the
22 physical location of the staging area. And my
23 understanding is that they have been able to define a
24 24-hour fuel service capability at each of those
25 stations.

1 In addition, they have been able to find
2 information for other stations that are not routinely
3 open 24 hours a day as to the kinds of fuel that are
4 available and the contacts that would be necessary to make
5 to those stations.

6 Q Are drivers instructed in the training that you
7 give them or would hope to give them, instructed as
8 to procedures to follow in case of breaking down on the
9 outgoing leg of their mission -- that is, leaving the
10 EPZ?

11 A The school plans specifically provide that
12 the county, if there is not a radio-equipped vehicle in
13 each group of busses at each school building that begins
14 its outgoing trip, that they will assign a RACES or an
15 ARES mobile unit to accompany those vehicles if there were
16 a breakdown on the trip. That would give communications
17 capability back to the EOC and instructions could be
18 provided at that time as to what would be the most
19 appropriate course of action for that particular driver.

20 Q And the training that bus drivers are given would,
21 in fact, explain these procedures to them so they would
22 understand that this kind of convoy method would apply
23 to an evacuation scenario; is that correct?

24 A (Witness Bradshaw) It is not a formal part
25 of the training lesson plan.

1 A (Witness Cunnington) I believe I testified it
2 was a county and school district procedure that it would be
3 done.

4 Q And again, for bus drivers coming not from a
5 risk school district, who normally transport those
6 students, they would operate in a similar manner, or
7 would they operate in a different --

8 A I believe we previously testified that they would
9 be, as a matter of course, sent through a staging area
10 where they would be provided resource which includes a
11 strip map or map to get them to their risk school location
12 and that at the risk school they would then, as we described
13 in this outgoing trip that we just completed, that there would
14 be radio-equipped vehicles with them when they made that
15 trip.

16 Q And it is your testimony that whatever
17 orientation or training they would need to fulfill that
18 part of the task could be done as an ad hoc training at the
19 time of the performance of the duties?

20 A We have testified that in relation to training
21 for dosimeters that ad hoc training was necessary.
22 I believe that a review of the course of this testimony
23 that I am giving would indicate that the county and the
24 school districts have recognized several situations and
25 have created a situation whereby the bus driver is

1 basically reduced to driving a vehicle and that they are
2 trying to take care of, through county and school
3 district procedures, to cover the kinds of conditions that
4 you are trying to create.

5 In other words, they provide maps, they provide
6 communication, and they provide accompaniment as
7 individuals move through the scenario. And basically the
8 driver is basically asked to drive his bus and recognize
9 how much gas he has in his gas gauge or -- excuse me --
10 how much fuel he has on his fuel gauge.

11 Q Is it your testimony that there would be, in
12 addition, according to your knowledge, some instruction
13 or training given to bus drivers by these school
14 districts or other agencies supplementary to and in
15 addition to what is included in the training module
16 which is Exhibit E-64?

17 In other words -- the question was, is it your
18 testimony that there would be some additional instruction
19 given by the school districts at some point whether ad hoc
20 or previously on these matters that you have just
21 testified to?

22 A I don't believe I testified that there would
23 necessarily be any training that would be provided.
24 I can't testify that there would not be some training or
25 some orientation provided by a bus company to its providers,

1 to its bus drivers at any time. Training is an ongoing
2 proposition for bus companies.

3 In addition to the certification requirements,
4 there are orientation programs that are conducted
5 routinely by bus companies. Whether this would be
6 the topic of an orientation program for me would be
7 pure speculation as to whether they would do that.

8 What I testified to was that the criteria
9 that are included in the county and the school district
10 plans tend to limit the driver's response to operating
11 his vehicle safely and being able to recognize those
12 things that he routinely recognizes, like how much fuel
13 was in his vehicle and not having to make those kinds
14 of decisions as regarding the location of fuel supplies
15 or the ability or not having the ability to communicate
16 with the base station or whatever.

17 They have been taken care of through the county
18 and the school district plans.

19 Q And the principles -- this is the last
20 question in this area -- the principles of this mode of
21 operation are conveyed in your training that you
22 provide, or is it conveyed through some other kind of
23 orientation or training which you don't know about or
24 can't testify to that would occur at the school district
25 or bus provider level?

1 MR. RADER: Objection. This has been asked
2 and answered. The witness testified several times
3 that ev'rything they teach in the plans is consistent
4 with the principles adopted from the PEMA or county plans.

5 JUDGE HOYT: Objection sustained.

6 MR. STONE: Just a minute before I
7 conclude?

8 JUDGE HOYT: Yes.

9 (Pause.)

10 MR. STONE: That will conclude LEA's
11 cross-examination on LEA-14.

12 JUDGE HOYT: 14?

13 MR. STONE: I said 14. I slurred that one.

14 We are prepared to move on to LEA-22 which is
15 skipping 15 which we previously talked about.

16 If I may begin

17 JUDGE HOYT: Very well. Go ahead, Mr. Stone.

18 BY MR. STONE:

19 Q To the panel: On page 25, paragraph 58
20 of your prefiled written testimony, you state that the
21 county Annex O contains provisions to designate farmers
22 as "emergency workers." Is that correct?

23 A (Witness Bradshaw) Yes.

24 Q Please explain for the record how it has
25 come about that Energy Consultants, in developing the

1 prototype for the county plan, has included in Annex O
2 the provision that farmers can be designated or should
3 be designated as "emergency workers" in the circumstance
4 you describe?

5 MR. RADER: I object to the form of the
6 question insofar as it states that there is some
7 prototype county plan.

8 I believe the witnesses clearly testified that
9 the plan was based upon information received by them from
10 the county officials. It is, therefore, not a prototype
11 of any kind.

12 MR. STONE: I can strike prototype and I
13 could say --

14 JUDGE HOYT: Very well. That question will be --

15 BY MR. STONE:

16 Q In the plan which EC presented to the counties
17 and in that context could you answer the question?

18 A Yes. The format for the county plans is
19 a format developed by PEMA and in use consistently for
20 all off-site facilities within the Commonwealth of
21 Pennsylvania. It was not a prototype or a format
22 developed by Energy Consultants.

23 The procedure for designating farmers
24 as emergency workers in Annex O is a reflection of state
25 policy in this regard and of policy adopted and accepted by

1 the counties which have developed these county RERPs.

2 Q To your knowledge, is this classification of
3 "emergency worker" given to other personnel listed
4 in the county plan? And if so, which personnel, just
5 a quick list of the kinds of personnel who,
6 besides farmers, are being designated as "emergency workers"?

7 MR. RADER: Objection. That is irrelevant
8 to determining the adequacy of the measures in the
9 plans for farmers, as to what other persons may or may
10 not be designated as emergency workers.

11 MR. STONE: I might be able to go to the next
12 question and that might serve to rephrase this one.

13 JUDGE HOYT: Please try that then, Mr. Stone.

14 BY MR. STONE:

15 Q Is there any difference between this
16 characterization as emergency workers in terms of
17 requirements for training or dosimetry as opposed to the
18 training in dosimetry as generally required for other
19 "emergency workers"?

20 A No. They are treated as emergency workers
21 in the plans, and their training includes information
22 on dosimetry.

23 Q In your testimony you speak of an Annex M
24 in the county plans.

25 Could you briefly describe how Annex M plans for

1 farmers to receive any document they may need to
2 reenter the emergency planning zone, is that a general
3 procedure followed in all three counties?

4 A Annex M provides information which
5 designates the number of units of dosimetry and KI
6 which are allocated for farmers. Annex O would generally
7 describe the procedures with regard to emergency
8 workers as farmers as emergency workers.

9 Q And does Annex O include procedures for
10 farmers to follow in obtaining whatever documents they
11 may need to reenter the emergency planning zone?

12 A I would have to take a look at Annex O to see
13 to what extent it describes those procedures.

14 Q Could we do that then for Chester County
15 then, for example.

16 I don't have the exhibit number. It is the
17 draft nine which is the current draft we are all dealing
18 with here of the Chester County plan.

19 Specifically, I believe Annex O is headed
20 Agriculture.

21 Could you review those plans and --

22 (Pause.)

23 A Annex O of the Chester County plan describes
24 generally the procedures for designating farmers as
25 emergency workers in addition to the logistics involved

1 specifically for Chester County such as establishing
2 a distribution point for the dosimetry.

3 Q With respect to the Chester County plan
4 we are looking at, do you know of any location therein
5 which describes the procedure for farmers to obtain
6 whatever pass or document they need to reenter the
7 emergency planning zone?

8 And if not, could you simply describe for us
9 in general that procedure and then maybe we will
10 try to find it in one of the plans?

11 A I believe it is in the plans.

12 Generally on page O-2, Section K describes the
13 farmer distribution point and Section 5 describes the
14 process for designating farmers as emergency workers.

15 Q And this certification referred to in K,
16 Subsection 1, is something that would be obtained at the
17 time of the emergency and not prior to that?

18 A That is correct.

19 Q And then the certification would be
20 presented to traffic control personnel, for example,
21 when the farmer attempted to reenter the --

22 A To access control personnel, yes.

23 Q Without getting into the specifics of
24 KI and dosimetry supplies for Chester County, is it your
25 understanding that as an emergency planning principle, the

1 amount of dosimetry and KI available should not limit
2 the number of farmers allowed to reenter or to receive
3 that certification on the spot at the time of the
4 emergency?

5 A Yes. It is more than my understanding.

6 It has been specifically discussed with the
7 county emergency management personnel and Energy
8 Consultants, and I can guarantee you that there is
9 an understanding on their part as to what constitutes a
10 farmer and who would receive dosimetry and KI at the time
11 of an emergency.

12 Q Does this understanding extend, according to
13 your knowledge, to the responsible county official, the
14 county agriculture agent in Chester County, for
15 example?

16 A I have direct knowledge in that Energy
17 Consultants participated in a meeting with Montgomery
18 County agricultural community, including representatives
19 of the county agricultural agent's office, and it is my
20 understanding through discussions with Berks and Chester
21 County personnel that they have discussed this with their
22 county agricultural personnel and have obtained their
23 estimates as a direct result of discussions with those
24 individuals.

25 Q And it is Energy Consultant's position that

1 pursuant to these discussions and arrangements that
2 county personnel, in particular the county agricultural
3 agents, accept the procedure and are informed as to the
4 procedure for farmers to obtain certification at the time
5 of an emergency to reenter?

6 A Yes. It is.

7 Those individuals, as liaison to the county
8 emergency operation center staff, have received training
9 with regard to not only overall procedures but their
10 specific procedures.

11 Q And what is your testimony, per your
12 knowledge, with respect to the intentions of these
13 county agenst, county agricultural agents, to
14 check or verify the legitimacy of claims of
15 farmers at the time they appear at these staging areas
16 to obtain the certification to reenter the EPZ?

17 A As I believe we have indicated in our
18 testimony, the county officials do not interpret the
19 definition of a farmer or farmers keeping livestock
20 strictly, that, in fact, anyone who they believe had
21 sufficient reason to go in and care for livestock would
22 be permitted to do so.

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1 Q In their judgment, then, the state of emergency
2 would be sufficient to prevent unauthorized individuals
3 who purport to be farmers, for example, from reentry?

4 A Yes. One of the reasons the County agricultural
5 agencies were given this responsibility is because of their
6 knowledge of farmers in the area, and of the general charac-
7 ter of the area. And it is believed that they are best
8 qualified to make those judgments at the time of the emergency.

9 Q It is your personal knowledge, or EC's personal
10 knowledge that each of the individuals who are responsible
11 for this activity do, in fact, as per your testimony, interpret
12 the definition of farmer in the way you have described?

13 A (Witness Cunningham) We believe we testified that
14 we have participated in the meeting with Montgomery County
15 and we have discussed the same issues with Chester and Berks
16 Counties. And, in fact, from direct recollection of the
17 meeting in Montgomery County, you will note references in
18 the Montgomery County plan that would certainly indicate the
19 interpretation of the definition of a farmer was not
20 restrictive. In fact, there is qualifications within the
21 plan that talk about farmers, animal husbanders, livestock
22 owners and veterinarians. If that is a restrictive definition
23 of farmers -- I don't read that to be that.

24 And, being present at the meeting, I can say
25 there was a recognition that the definition of a farmer would

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1 be interpreted by the agricultural people as individuals with
2 concern for livestock regardless of what the livestock was.

3 Q Is that same section that you referred to as being
4 in the Montgomery County Plan, to your knowledge in the other
5 two plans, that is Berks and Chester Counties?

6 A We have indicated that we have had discussions
7 with the County officials in those Counties, and we found
8 from their meetings that they have not defined farmer
9 restrictively.

10 Q Could you identify for us in the Montgomery County
11 Plan the section which you refer to and maybe while you are
12 doing that I could ask another question?

13 A Yes, I can. It is on page O-3, section 4 is one
14 of the references, beginning in A. And I am quoting:

15 "Farmers within the plume exposure pathway
16 EPZ who tend livestock (or animal husbanders,
17 veterinarians, et cetera) are considered to be
18 emergency workers, and therefore. . ."

19 ad infinitum.

20 Q Now, for this we will go to the Montgomery County
21 Plan, I think.

22 A That is not the only reference I can make. We
23 can make references to sections other than that in the
24 annex, if you would like, that are consistent with that.

25 Q Okay. With respect to the Montgomery County Plan

mm3 1 which has the section, to your knowledge what quantity of
2 dosimetry and KI is available for the category of farmers
3 that that section lists?

4 A (Witness Bradshaw) While Mr. Cunnington is
5 looking up the specific reference, I can tell you, if my
6 arithmetic is correct, it is 236 units of dosimetry and KI
7 for those individuals in the Annex M of the County Plan.

8 Q And Annex M is --

9 A (Witness Cunnington) I am referencing page M-3-1,
10 which is in Appendix M-3 of the Montgomery County Plan.
11 Item No. 2, USDA County Agency (farmers who keep livestock)
12 180 units of dosimeters and KI.

13 Second category, animal husbandry workers, 45
14 units of dosimetry and KI.

15 And finally, reserve, 11 units of dosimetry and KI,
16 which I believe adds up to what Mr. Bradshaw indicated as
17 the total amount of dosimetry estimated by Montgomery County
18 as to be required to fulfill the function of designating
19 farmers as emergency workers.

20 Q Again, for the records, this is an estimate, or is
21 this a need which has already been supplied?

22 A We previously testified that this is the estimate
23 of the total needs of dosimeters and the procurement of those
24 dosimeters is now being completed. It is my understanding
25 that some of the equipment has been procured and additional

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1 is ordered.

2 Q With respect to the first entry, the USDA County
3 Agency, and in parens, farmers who keep livestock, what is
4 the source of that number, to your knowledge?

5 A An estimate by representatives of the County agent,
6 the County Agricultural and Stabilization and Conservation
7 County Committee, and the Bureau of Soil Conservation who
8 serve on the Montgomery County Agricultural Group reviewed
9 the EPZ, and based on documents that were on file as to the
10 number of farmers in the EPZ that received materials from
11 those agencies, the numbers that operate farms, they estimated
12 that 180 units would be sufficient.

13 The County then supplemented that with a review
14 of a mailing list that was provided to them and were able
15 to confirm that the number 180 was a conservative estimate
16 based on a general mailing list that is used by one of those
17 three agencies in contacting agricultural personnel in the
18 areas that fall within the Emergency Planning Zone of the
19 Limerick Generating Station.

20 Q And in your answer you referred to certain
21 documents on file. Are these lists of any sort, to your
22 knowledge.

23 A I believe I just testified that they were mailing
24 lists used by the different agricultural agencies to contact
25 and provide information to individuals who purport to

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1 operate farms or have an interest in agriculture in the area
2 covered by the Emergency Planning Zone.

3 Q Is it your understanding of the emergency planning
4 procedure in this area, that personnel at the point where
5 the certificates of reentry will be issued, will have a list
6 of some sort compiled from these resources?

7 A I believe the procedures are common to almost all
8 the counties in the Commonwealth, and I believe that there
9 is a form provided for the registration of an individual
10 as a farm emergency worker. And I do not believe that this
11 particular list, while it is knowledge, the agricultural
12 personnel in the County have knowledge of the list and
13 knowledge of individuals who are on it, it would not be used
14 literally or strictly to designate who was a farmer and who
15 was not.

16 We have indicated that at the time of an emergency,
17 and the procedures are specific, that an individual
18 representing himself as a farmer would be reviewed and would
19 be, then using the form provided, would be authorized to
20 receive dosimetry and KI in that form, and the dosimetry
21 would be what was used to designate him as emergency worker,
22 not that list. That list was used to estimate the number or
23 quantity of dosimetry that would be needed.

24 Q And it is your testimony that in any of the cases,
25 any of the three cases you are aware of, that the supplies of

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1 dosimetry and KI which are estimated, would not, in fact,
2 influence or determine these decisions as to certification of
3 farmers when they show up to reenter the EPZ?

4 MR. RADER: Objection. Asked and answered.

5 JUDGE HOYT: Objection sustained.

6 BY MR. STONE:

7 Q Is it your understanding that a farmer who, in fact,
8 has livestock, and falls within the category referenced --
9 at least specifically in the Montgomery County Plan -- has a
10 right to reenter the Emergency Planning Zone according to
11 your knowledge?

12 A (Witness Cunnington) I have never heard the
13 term "right" used to describe it. It is my understanding that
14 this is based -- that this is a procedure that is established
15 that allows an individual who wants to be designated, to be
16 designated as an emergency worker. But I have never heard
17 the term "right" used to describe that.

18 Q As far as you know, whatever safeguards would be
19 in place to eliminate false applications at the time of a
20 crisis, are left up to the personnel at these various staging
21 areas?

22 MR. RADER: Objection. Asked and answered.

23 This procedure has been the subject of --

24 JUDGE HOYT: I believe, Mr. Stone, procedures
25 have been pretty much described. I think this is just asking

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1 it in a different way.

2 We will sustain the objection, and suggest you
3 move into the next area of inquiry.

4 BY MR. STONE:

5 Q And to follow up on a previous answer, according
6 to your understanding of the section in the Montgomery County
7 Plan describing the eligible farmers or other personnel to
8 reenter in this program, you see no problem with an
9 application based on, for example, the assertion that one is
10 raising furbearing animals, such as chinchillas, for example?

11 This is an actual case in the Emergency Planning
12 Zone?

13 A (Witness Cunningham) I believe I testified the
14 categories, in my estimation, are in no way restrictive
15 when one includes farmers, animal husbanders, veterinarians,
16 et cetera.

17 Q We would even be including chinchillas, so we are
18 well assured in that respect?

19 A I can recall no specific discussion of chinchillas,
20 but I would not expect that the County would be restrictive
21 in that case. I would think that they would view that as
22 animal husbandry.

23 Q Perhaps maybe the credibility of the farmer might
24 be in question. But we will leave that aside.

25 According to your knowledge a. the numbers

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1 developed in these various appendices based on an assumption
2 of one farmer per farm, or in fact did they allow for, you
3 know, multiple farmworker per situation?

4 A There are specific -- there are several specific
5 instances in reviewing the mailing lists, that would indicate
6 that a particular farmer owned several plots. He may, in
7 fact, farm all those plots himself or may have tenant farmers.

8 And, in fact, that information is in the knowledge
9 of the agricultural personnel. It is reflected in the
10 mailing list in Montgomery County that was used. And, in
11 fact, the number 180 that was selected for farmers, is in my
12 estimation conservative enough to cover all instances whereby
13 a particular farmer might own several plots.

14 Q So, in your view this is a matter which would be --
15 another matter which would be left up to the personnel at the
16 various staging areas to determine how many workers a farmer
17 was entitled to ask to accompany him into the Emergency Planning
18 Zone, or would they make a --

19 A The certification of emergency workers is done at
20 the time.

21 Q And it is your understanding that they would not
22 feel bound by any lists or previous calculation that they may
23 have made as to how many workers a farmer could have accompany
24 him to take care of whatever livestock that farmer purported
25 to own?

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MR. RADER: Objection. Asked and answered.

MR. STONE: I think it is a little bit different.
I think if I got the answer to it, I would move on.

JUDGE HOYT: The objection is overruled.
Go ahead.

WITNESS CUNNINGTON: I believe I testified that the list was used for purposes of estimation of the number of individuals who might require that, and that the certification of actual individuals is done at the time of the incident and is provided for in the procedures and that the intent on the part of the County was in no way to be restrictive but to be inclusive of groups or organizations; that might be -- other than farmers -- that might be animal husbanders, veterinarians or other types of individuals with concerns, commercial concerns for animals.

BY MR. STONE:

Q But my question in this instance, which is different from the other one, is that, does this procedure or policy extend to the determination of how many accompanying workers a farmer can get to enter with into the EPZ to perform whatever duties the farmer thinks is necessary to care for his livestock?

A (Witness Cunningham) The numbers provided for and that we are discussing here are conservative enough to cover the situation where more than one farmer, or more than

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1 one individual might be required to provide for the care
2 of animals at a particular facility.

3 Q Could you please describe for the record the
4 quantities of KI and dosimetry available in each of the
5 risk counties, referring to the County Plan only if
6 necessary.

7 A (Witness Bradshaw) I can speak from recollection.
8 The total number of dosimetry and KI allocated for farmers,
9 in the Montgomery County Plan is 236; in the Chester County
10 Plan it is 200; in the Berks County Plan it is 100.

11 JUDGE COLE: Excuse me, while we are there, could
12 you describe to me what you mean by a unit of dosimetry
13 and KI?

14 WITNESS BRADSHAW: Yes. The definition of a
15 unit of dosimetry is in Annex M, I believe, Appendix 3 of the
16 County Plans.

17 It includes two self-reading dosimeters, one low-
18 range, one high range; it includes a TLD thermoluminescent
19 dosimeter and includes a 14-day supply of potassium iodide.

20 WITNESS CUNNINGTON: And the recognized report
21 form.

22 JUDGE COLE: Okay. Thank you.

23 BY MR. STONE:

24 Q This equipment is identical, then, to the equipment
25 received by other emergency workers, is that correct?

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1 A (Witness Bradshaw) Yes, it is.

2 Q On page 26 of your testimony -- and we are still
3 under Section 58 of that -- on page 26 you state:

4 "In the remote event that dosimetry KI supplies
5 proved insufficient, the Counties have reserves which
6 could be used for this purpose."

7 And you go on to give references for that. Is that
8 correct?

9 A That's correct.

10 Q Could you be specific, or could you tell me what
11 is the source of these reserves?

12 Are we getting into the reserves at the transporta-
13 tion staging areas; are we talking about something else?

14 A No. This is a specific reserve allocated for
15 the County Emergency Operations Center, which has no other
16 designated use. It is a backup reserve, a backup supply of
17 dosimetry, KI, not allocated for any specific purpose.

18 Q And, to your knowledge, the quantities of
19 this reserve is sufficient to cover whatever excess number
20 of farmers wanted to reenter the EPZ plus whatever other
21 contingencies would occur in an evacuation scenario.

22 A That is the basis the Counties had for determining
23 that number, that is correct.

24 Q And it is your understanding that -- it is your
25 knowledge that the Counties understand and accept that the

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1 farmers would apply to this County reserve if by any chance
2 supplies at these staging areas would prove insufficient?

3 A Yes. You must understand that the County agent,
4 under an emergency situation is under the direction and con-
5 trol of the County Emergency Management Agency. He is a staff
6 member.

7 The Counties have been directly involved in
8 designating the allocated amounts of dosimetry and KI, they
9 understand the procedures and they would adapt to whatever
10 the situation was at the time, if they had to.

11 Q For clarification purposes, to your knowledge, are
12 these staging areas for farmers, are they different than the
13 transportation staging areas we were talking about earlier?

14 And, if we have to go case by case -- I hope we
15 don't.

16 A Without referring specifically to the plans, as
17 I recall it they are different locations, yes.

18 A (Witness Cunningham) It is my understanding they
19 are. yes.

20 Q And what other uses would these locations, to your
21 knowledge, be used for?

22 A Chester, Berks, and in one case in Montgomery,
23 they are specific locations just for the designation of
24 farmers as emergency workers.

25 In addition, in three situations in Montgomery

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1 County they are colocated with emergency worker decontamina-
2 tion stations.

3 Q Do you have a -- as planners -- a timeframe in
4 mind in which this procedure would be in place and operating?

5 Are we talking about during the evacuation or
6 sometime subsequent to that? I don't need an exact figure.

7 A (Witness Bradshaw) The activation and staffing
8 of all facilities including a farmer distribution point for
9 dosimetry KI is tied to a specific emergency action level.
10 And I believe that is that those agencies or functions are
11 mobilized at site emergency. But I would have to confirm
12 that by looking at the plans.

13 But it is definitely previous to a protective
14 action recommendation.

15 Q I don't think LEA has a need to do that right now,
16 to have that information.

17 With respect to the farmers' knowledge of these
18 various procedures and how they should go about getting their
19 certification, has ECI offered and performed any training
20 for farmers in this context?

21 A Yes, we have.

22 Q Could you specify for us the number that have been
23 trained so far under your program? And, if you can do that
24 by County, that would be helpful.

25 A (Witness Wenger) Total of 83 trained. Berks County
25; Montgomery County 23; Chester County 33.

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1 Q Is there a training module for this kind of
2 training as there is for the other emergency workers?

3 A (Witness Wenger) Yes.

4 MR. STONE: I don't believe that has been entered
5 as an exhibit, am I correct?

6 MR. RADER: That is correct.

7 BY MR. STONE: (Resuming)

8 Q To the best of your knowledge does that training
9 module include the kind of information as to dosimetry and KI
10 which is included in the bus driver training as written but
11 which is not in the school teachers and other training
12 modules, for example?

13 A (Witness Wenger) Yes. When the instructor is
14 presented a training program it did cover dosimetry, its
15 use and so on.

16 JUDGE HOYT: Mr. Rader, are you going to put that
17 particular training module into evidence or offer it?

18 MR. RADER: We had not intended to because we
19 didn't believe that this was in particular part of the
20 contention since the contention is directed primarily to
21 the informational brochure which would be prepared by PEMA
22 or a state agency and to the farmers designated by as the
23 witnesses testified the various lists of the county
24 agricultural agents. So we didn't view this as being relevant,
25 however it is available and if the Board wishes to see it and

1 have it adopted as an exhibit, we certainly would have no
2 objection to that procedure.

3 JUDGE HOYT: I don't think the Board has any desire
4 to have it entered as an exhibit.

5 MR. STONE: May it please the Board, for clarifica-
6 tion LEA is not prepared today and I don't know if we can
7 get something like that or submit something like that as an
8 exhibit. Should we wish to do so, would it be appropriate
9 to do so without the copies or could we do it later with the
10 copies whatever would be easiest for the Board. I don't
11 really have a whole lot of questions right now on it but I
12 think it is relevant to the contention in the same sense as
13 the other training materials are and I think the specified
14 contention clearly deals with the adequacy of training. I
15 don't think training is limited to the brochure and I don't
16 think the contention is written that way.

17 JUDGE HOYT: At the appropriate time that you wish to
18 present it, remember you must have copies of all of this
19 available for all of the parties in the event you wish to offer
20 that.

21 MR. STONE: Fine. I am hoping I can finish up here.

22 JUDGE HOYT: Well, it is after twelve noon and we
23 would like to recess if this is as good an opportunity as any.

24 MR. STONE: I think I will reserve the right to ask
25 a couple more questions after the break and then be able to

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1 move on to the next contention unless I take the time now and
2 I am not quite sure I am finished.

3 JUDGE HOYT: I think we would like to adhere to the
4 schedule of our luncheon recess at noon and reconvene then
5 at 1:10. Is an hour enough time? I don't know this area
6 through here. Is that sufficient for everyone?

7 MR. RADER: It is for the applicant.

8 MR. STONE: I believe it is fine with LEA, no
9 problem.

10 JUDGE HOYT: Ms. Ferkin?

11 MS. FERKIN: That is acceptable.

12 JUDGE HOYT: How about the staff?

13 MR. HASSELL: That is fine, Your Honor.

14 JUDGE HOYT: We will reconvene then at 1:15. I feel
15 generous.

16 (Whereupon, the hearing was recessed at 12:10
17 o'clock p.m., to reconvene at 1:15 o'clock p.m., the same day.)

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1 AFTERNOON SESSION

2 (1:25 p.m.)

3 JUDGE HOYT: The hearing will come to order. Let
4 the record reflect that the parties to the hearing are present
5 and that the witnesses have taken their place on the witness
6 stand and once again are reminded that they under oath.

7 Mr. Stone, are you ready to continue your examination on
8 LEA-22?

9 MR. STONE: Yes, I am. Thank you.

10 BY MR. STONE: (Resuming)

11 Q On page 26 of your prefiled testimony, section 59,
12 you refer do you not to a Pennsylvania Department of Agricul-
13 ture brochure which you say will provide farmers information
14 about remaining with their livestock or reentering the EPZ
15 and so forth, is that correct?

16 A (Witness Bradshaw) That is correct.

17 Q According to your knowledge, is this brochure
18 available for the Limerick EPZ as yet?

19 A It is not available on a widespread basis and it is
20 not drafted particular to the Limerick EPZ. The brochure that
21 has been available is a brochure developed by the Pennsylvania
22 Department of Agriculture for the agricultural community
23 around Three Mile Island. We have made copies of this
24 available to certain farmers and public officials in the
25 Limerick EPZ as a matter of information and courtesy. There

1 has been a request by Philadelphia Electric to the Pennsylvania
2 Department of Agriculture seeking permission to reproduce this
3 same information for the agricultural community around
4 Limerick.

5 Q Is this brochure to which you refer according to
6 your knowledge a brochure designed for a ten-mile EPZ or is
7 it a brochure which also serves, for example, a 50-mile
8 ingestion plume pathway?

9 A I would have to look at it to confirm it but I
10 believe it includes considerations of the ingestion exposure
11 pathway also in that it includes information on protecting
12 crops in addition to livestock.

13 Q Do you know if in fact it is a brochure which was
14 designed for use within the ten-mile EPZ or does it just
15 include information about the ingestion plume pathway?

16 A I would have to look at the document to confirm it.
17 I couldn't tell you offhand.

18 Q Who in your opinion would be the source of
19 knowledge on that?

20 A A Commonwealth witness by the name of Bob Furrer
21 was, I believe, involved in developing the brochure. He is
22 slated to give testimony.

23 Q Fine. Thank you. With reference to the distribution
24 of this brochure, you state that negotiations are under way
25 with Philadelphia Electric and the Commonwealth. At this point

mnl0-6

1 in time do you know who will pay for and distribute and
2 prepare the list and so forth needed to do that for the
3 Limerick emergency planning zone?

4 MR. RADER: Objection. That is irrelevant.

5 JUDGE HOYT: I believe, Mr. Stone, that the
6 witnesses have indicated the appropriate party to
7 address those questions concerning that brochure.

8 MR. STONE: I am really trying to get ECI's
9 knowledge of PECO's role which I am not sure is appropriately
10 addressed by the other party.

11 JUDGE HOYT: The objection is sustained though,
12 Mr. Stone.

13 BY MR. STONE: (Resuming)

14 Q To your knowledge had the contents of a potential
15 brochure been a subject of discussion between ECI in its
16 planning role and the county agricultural agents, for example,
17 who would be carrying out the provisions of the farmer's plan?

18 A (Witness Bradshaw) No, it hasn't. The content
19 of the brochure would be the responsibility of the Pennsylvania
20 Department of Agriculture and whatever other input they
21 solicited. It would not involve Energy Consultants.

22 Q So to your knowledge the option of a locally
23 produced brochure, for example, has not been something that
24 ECI has discussed or presented or rejected for that matter?

25 A That is correct.

mn10-7

1 Q Just to clarify, to your knowledge the contents of
2 this brochure, they weren't written by ECI, is that correct?

3 A That is correct.

4 Q Did ECI in any other planning situation you were in
5 have anything to do with suggestions or reviewing or anything
6 with that brochure?

7 A No, we have not.

8 Q Thank you. In the last sentence of your testimony,
9 section 59, you state that a training program has been offered
10 to farmers in the three counties and will be reoffered
11 regularly and I believe you already stated the number of farmers
12 who had been trained. Could you state for the record who
13 will offer this training in the future to the best of your
14 knowledge?

15 A It has been offered initially through the county
16 emergency management agencies, presented by Energy Consultants.
17 It will be reoffered under the same conditions and the
18 counties have discussed the provision of this service with
19 Philadelphia Electric and it is the intent of Energy Consultants
20 to present this program again in the winter of 1985.

21 Q Have any firm arrangements or commitments been made
22 beyond that to your knowledge involving ECI?

23 A Not to my knowledge.

24 MR. STONE: That completes LEA's cross-examination
25 on LEA-22 and given that LEA-24 is in connection with Mr. Klimm,

1 I propose that we move on to LEA-26 which is next in sequence
2 which I have also prepared the cross-plan on.

3 JUDGE HOYT: Hearing no objection to that
4 procedure by any of the parties, I take it that everyone
5 is prepared to follow-on accordingly.

6 Mr. Stone, if you would like to begin your
7 examination of LEA-26, please.

8 MR. STONE: All right. Thank you.

9 BY MR. STONE: (Resuming)

10 Q Question to the panel, you state in your prefiled
11 testimony on page 27, section 60, that under the system of
12 notification used at the county level "each predesignated
13 county and municipal EOC staff personnel is notified by
14 a prerecorded message." Is the quoted section of that
15 your testimony?

16 A (Witness Bradshaw) That is correct.

17 Q Can you please describe the particular piece of
18 equipment which you have knowledge of to be used in each
19 county to fulfill this function?

20 A Yes. The commercial name of the system is the
21 Recall System. It is a computer-assisted automatic dialing
22 system. As established at the three county emergency
23 operation center it has four telephone lines connected to
24 it. The computer has the capability to dial pre-programmed
25 individuals at their place of business and their home. There

1 is an indication in the program as to what hours they are
2 available at each of those sites. It would dial the
3 appropriate number depending on the time of the day it
4 was activated.

5 It would make these four calls simultaneously and
6 would proceed through the program listings to accomplish the
7 notifications which are programmed into it by the county.

8 Q Is it your testimony that this piece of equipment
9 already exists in the three counties?

10 A Yes, it does.

11 Q To your knowledge, who provided that piece of
12 equipment?

13 MR. RADER: Objection, irrelevant.

14 MR. STONE: I will withdraw the question.

15 JUDGE HOYT: Very well.

16 BY MR. STONE: (Resuming)

17 Q To your knowledge who has the responsibility for
18 maintaining this piece of equipment?

19 A (Witness Bradshaw) It is located in the county
20 emergency operations center in their communications center
21 and therefore would come under the responsibility of the
22 counties.

23 Q Is it your understanding of the existing arrangement
24 then that the counties will in fact maintain this equipment
25 and be responsible for any expenses involved?

mnl0-10

1 A I am not aware of the particular arrangements that
2 the county has made in that regard.

3 Q But these pieces of equipment are the property of
4 the county to your knowledge?

5 A Yes, they are.

6 Q You do not know of any other arrangements for
7 maintaining or programming services or anything like that
8 that have been made?

9 A I know that Philadelphia Electric has provided any
10 assistance that they have requested to this date to
11 establish the system and provided assistance in programming
12 it the way the counties have requested it.

13 Q But you don't know whether that is a future
14 commitment?

15 A No, I do not.

16 Q ~~As an emergency planner involved in these plans,~~
17 what is the time frame that you strive for in this phase of
18 notification and which this piece of equipment is supposedly
19 there to help achieve?

20 A There is no specific time frame for notification
21 of staff involved.

22 Q Would it fair to say that it is the planning
23 objective that the inability to notify key personnel should
24 not be a factor in determining when to evacuate or when to
25 shelter?

mn10-11

1 A That's correct. In fact, notification of staff or
2 organizations is not directly keyed to activation of the
3 public alert and notification systems.

4 Q Do you have knowledge of the number of key personnel
5 and let's start at the county level who would have to be
6 in place before an emergency evacuation protective action
7 could be ordered safely and with some certainty that it
8 could be carried out?

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1 A Activation of the public alert notification
2 system -- and by that I mean activation of the sirens and the
3 emergency broadcast system -- could be conducted with notifi-
4 cation from PEMA to the county.

5 The county emergency operations center in which
6 the activating mechanisms are located is a 24-hour
7 operating facility. It is staffed 24 hours a day.
8 They would activate on authority of the county director
9 of emergency preparedness or his alternate, and they could
10 activate with only those notifications that I have just
11 described.

12 Q Is it your understanding of radiological
13 emergency response plans procedure or policy that
14 personnel such as traffic control points, municipal EOCs,
15 particularly EMCs, emergency management coordinators,
16 and other staff need to be in place before an evacuation
17 order could ever be given?

18 Is that your understanding of radiological
19 emergency planning policy and practice?

20 A In fact, in most instances, that will be
21 the case.

22 However, as I have indicated, there is the
23 capability, if it is deemed necessary at the time of the
24 emergency, that the system could be activated and would
25 be activated without mobilization of those other supporting

1 organizations that you have discussed.

2 Q And in that eventuality, would you anticipate,
3 according to your experience, any problems with the
4 proper operation of the evacuation scenario, for example,
5 with respect to traffic or with respect to coordination
6 at the county level?

7 A No. I believe that that situation would be
8 understood by the authorities at the time of the
9 emergency. It would be a consideration that they would
10 undertake in determining what the necessary protective
11 action would be.

12 Q Could that consideration then lead to a
13 conclusion that it would be better to postpone an
14 evacuation order until such time as key traffic or municipal or
15 county personnel were in place to channel and facilitate
16 the evacuate?

17 A That would depend on the situation and the
18 dose projections that we have discussed previously. It
19 is part of the decision making process.

20 Q With respect to the particular equipment we
21 are talking about, the recall system, as you have
22 described it, do you have knowledge of the rate at which
23 this equipment can make calls and also of the backup
24 means for calls to be verified and/or performed manually?

25 A In a general sense, yes, I do.

1 Q With respect to the first part of that question,
2 do you have a general sense of the rate at which it can make
3 calls, say, expressed in, I believe you testified to four
4 lines of time? But would it be a matter of a certain
5 number of calls in, say, 15 minutes it could perform?

6 A It is my understanding that an average of about 30
7 seconds per call is a good estimate. It depends on
8 how immediately the phone is answered.

9 The system can be programmed to ring a certain
10 number of times before it moves to an alternate.

11 Q And to your knowledge, does this system make
12 the four calls simultaneously, or does it, so to speak,
13 wait for the slowest call in the first four lines to be
14 made before proceeding to the next sequence of four calls?

15 A The four calls are made simultaneously. If we
16 average 30 seconds per call, the system would be making
17 eight call per minute.

18 Q But if you know, are these calls continuously
19 made simultaneously, or do eventually the four lines get
20 out of sync and you have an ongoing pattern of calls?

21 A As I understand it, the four lines are
22 independent of one another.

23 Q And the message is uniform for all the
24 lines, or are there individualized messages available,
25 according to your knowledge?

1 A It can be programmed to provide an individual
2 message, depending upon the target group that you are
3 notifying.

4 Q If you could just briefly list for us the --
5 if it is not the same in all counties, please let us know --
6 the kinds of staff that this system, in particular,
7 is notifying, let's say at the county level?

8 A Yes. It typically could notify the county
9 emergency operations center staff, the municipal
10 coordinators, the schools, and health care facilities.

11 it also has the capability to notify fire,
12 policy and ambulance.

13 Q To your knowledge, have the systems in place
14 in the three counties been programmed to perform that
15 last function: the fire, police, and the other one
16 you mentioned?

17 A In the July 25 exercise, they were used for
18 demonstration purposes. At that time there was one
19 telephone line installed. They now have four telephone
20 lines installed and the counties are in the process of
21 programming the information in a format that they would
22 require and requested.

23 Q From your knowledge, during that July 25
24 drill that you have just referred to, how did the system
25 work out in a general way?

1 A I have no direct knowledge.

2 Q Do you know which county had the longest
3 notification time using the system?

4 A No. The system was used for demonstration
5 purposes only, July 25th. The numbers, the individuals and
6 organizations were contacted manually by individual staff
7 officers at that time.

8 Q Was the system in place in all three counties
9 at that point?

10 A For demonstration purposes, yes, with only
11 one telephone line installed.

12 Q Fine.

13 Q Could you describe, if you know, why an
14 automatic dialing system was chosen for this function?

15 A It was a piece of equipment which the
16 counties indicated to Philadelphia Electric would assist
17 them in implementing their radiological emergency
18 response plans. For that purpose, Philadelphia Electric
19 responded and provided the equipment.

20 Q Would it be your opinion as an emergency
21 planner that a county such as Montgomery County, for
22 example, could perform these calls manually in a sufficiently
23 rapid manner to adequately protect the public?

24 A Yes.

25 Q Do you have any idea of the difference in time

1 frames one would be talking about as opposed to a manual
2 notification versus this automatic one?

3 A No, I do not. Other than knowing that the
4 automatic system would take, indeed, take less time.

5 Q With respect to the automatic system, at what
6 point do the calls stop being made automatically and a live
7 person has to actually get involved to verify or to call
8 back or to track someone down?

9 A At the county level, the point at which the
10 officer, the staff officer involved with responsibility
11 for those notifications, at the time he reports to the
12 emergency operations center, he gets a status report on
13 notifications made by the automatic system, and he follows up.

14 Q What happens to these four phone lines then
15 after this first set of calls have been made? Are they
16 utilized for other purposes or do they remain dedicated
17 to this piece of equipment?

18 A They are dedicated to the recall system.

19 Q And do you know why, given the different size
20 and populations of the EPZs and the three counties
21 ranging from somethinglike 17- or 18,000 in Berks to,
22 I guess, 110,000 to 115,000 in Montgomery,
23 why you have four lines dedicated for each county EOC for
24 this machine and this purpose?

25 A Because the counties felt that that four -- the

1 four-line capability gave them the necessary resources
2 they needed to perform their notifications.

3 Q In other words, Montgomery County didn't
4 feel any need to have more capability in this regard
5 than, for example, Berks County?

6 A Apparently not.

7 Q Was that a subject of discussion to your
8 knowledge, or did EC ever bring it up or --

9 A I am aware that in determining the
10 capabilities of the system and how it would be
11 installed there were extensive discussions between the county
12 coordinators and the individuals in Philadelphia Electric
13 who had knowledge of the system.

14 Q Do you know if Mr. Bigelow, for example, in
15 Montgomery County made the determination that four lines were
16 enough for this purpose?

17 A I am sure he was involved. Although I was not
18 involved and couldn't confirm that.

19 Q Were you involved in any discussions and
20 negotiations in Chester County along those lines?

21 A I was not no.

22 Q Who was, do you know?

23 A We do have an individual on our staff who
24 is a communications specialist who was involved in some
25 of those meetings. I do not know if he was involved in all of

1 them.

2 Q Is it your understanding that this piece of
3 equipment is designed for four lines or does it have the
4 capability to be expanded beyond that should occasions
5 arise?

6 A It has the capability to be expanded, if need be;
7 if the county felt that it needed a higher capability,
8 it could be accomplished.

9 Q And you have testified that Philadelphia
10 Electric paid for this equipment and installed it and
11 assisted in the programming of it.

12 Do you know if Philadelphia Electric is involved
13 in the paying for and the maintenance of the phone
14 lines involved?

15 MR. RADER: Objection, irrelevant.

16 JUDGE HOYT: Yes, Mr. Stone. The objection
17 is sustained. I don't recall that these witnesses
18 testified that they -- they meaning the Philadelphia
19 Electric Company -- had done more than equipment.

20 MR. STONE: If it please the Board, I believe
21 it slipped out subsequent to -- under my intense
22 cross-examination.

23 JUDGE HOYT: We have just slipped it out by
24 sustaining the objection. Would you ask your next
25 question.

1 MR. STONE: Okay.

2 BY MR. STONE:

3 Q Is it your understanding and belief that
4 in no way has financial considerations at the county
5 level caused emergency operations coordinators to settle
6 for fewer lines than they might believe would be optimal
7 for their purposes?

8 A I am confident that that is not the case.

9 Q With regard to the municipal level, do you
10 know whether any similar equipment is in place at the
11 municipal EOCs in any case or all cases or whatever?

12 A (Witness Cunningham) I am not aware of
13 any computer aided automatic dialing systems that have
14 been installed at any of the municipalities.

15 Q To your knowledge, have any discussions or
16 negotiations arisen with respect to that possibility?

17 A I have no direct knowledge of any
18 negotiations or discussions to that possibility of a
19 computer aided dialing system at a municipality.

20 Q Does anyone on the panel have any knowledge
21 at all of whether at least the negotiations and
22 discussions have occurred?

23 A (Witness Bradshaw) No. I am aware that
24 Philadelphia Electric has met with municipalities to discuss
25 their communications needs. I am not aware of any

1 automatic dialing systems that have been requested or
2 provided.

3 A (Witness Cunningham) We are also aware that
4 several municipalities are knowledgeable of the fact that
5 the counties possess this equipment and could approach
6 them to discuss particular concerns as the system is
7 implemented.

8 Q But it is fair to say that EC hasn't offered
9 or promoted negotiations leading to the activation of this
10 equipment at the municipal level according to your
11 testimony?

12 A (Witness Bradshaw) I don't even see that it is
13 related to our testimony.

14 Q I meant just what you just said with respect
15 to -- it is fair to say that EC has not offered to facilitate
16 the acquisition of this equipment at the municipal level;
17 is that correct?

18 MR. RADER: Objection. Lack of foundation that
19 such request was ever made or considered by the municipalities.
20 I believe the witness has so testified.

21 MR. STONE: I think I was seeking to
22 establish whether EC had taken an active role in its
23 planning function to see whether municipalities felt the same
24 kinds of needs for this equipment that, for example,
25 they have testified that the counties did. I could ask a

1 foundation question relating to whether EC promoted
2 or aided in the acquisition of this equipment by the
3 county. For example, that would then lead to the next
4 question, did they do the same for municipalities.

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1 JUDGE HOYT: Mr. Stone, under the provisions of
2 that paragraph 5, isn't it the State and Local response
3 and isn't that division in Pennsylvania then Count, and
4 that's the reason you got the County involved with it?

5 MR. STONE: Paragraph 5?

6 JUDGE HOYT: I beg your pardon, 10 CFR 50.47(b)(5),
7 which is the basis of your contention.

8 MR. STONE: I will have to check the respecified
9 contention as admitted, and I can do that. But I believe
10 we did not make a distinction between whatever municipal
11 personnel would need to be in place prior to an evacuation
12 order.

13 JUDGE HOYT: The provision of the paragraph I
14 cited to you is state and local response organizations.
15 And isn't, in Pennsylvania, that local response organization
16 at the county level and that's the reason you won't find it
17 at the municipal level?

18 Ms. Ferkin, you are the best authority on
19 Pennsylvania procedure here. Could you answer that?

20 MS. FERKIN: Are you asking me whether in
21 Pennsylvania the response organizations exist only at the
22 county level?

23 JUDGE HOYT: Is that the idea?

24 Is that what your Pennsylvania statute provides?

25 MS. FERKIN: As a general matter, there are

1 emergency management organizations at the municipal level
2 as well.

3 JUDGE HOYT: I'm sorry, I don't have the citation
4 in mind.

5 MS. FERKIN: I think you are thinking of Public
6 Law 1332.

7 JUDGE HOYT: 1332 is the one I had in mind.
8 Yes, that's correct.

9 MR. STONE: If it please the Board, I believe
10 EC is testifying that the system can be programmed to notify
11 fire company personnel, which would be a local function.

12 JUDGE HOYT: We will admit the question, Mr. Stone,
13 but -- well, proceed and we will find where you are going
14 with that.

15 BY MR. STONE:

16 Q It was simply that if you remember the question
17 was, has EC aided in or promoted or facilitated negotiations
18 as to the possibility of certain municipalities acquiring
19 the kinds of electronic capabilities the three risk
20 counties now enjoy?

21 A (Witness Bradshaw) In the course of our planning
22 assistance to the municipalities, there has been identifica-
23 tion of equipment needs which, through the planning process
24 have been related through the counties, and the counties
25 have brought to the attention of Philadelphia Electric.

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1 This has included communications type devices
2 such as telephones, such as amateur radio antennas for the
3 municipal emergency operations center. And through that
4 mechanism the needs of those municipalities have been
5 brought to Philadelphia Electric's attention and have been
6 satisfied.

7 Q But to your knowledge nobody wanted a recall
8 system?

9 A I am aware of no such request.

10 Q With respect to the mobilization and adequacy of
11 route alerting teams which, I believe is not a responsibility
12 at the municipal level -- is it a responsibility at the
13 municipal level to mobilize them?

14 A Yes, it is.

15 Q Does that function involve a number of phonecalls
16 by either the municipal EMC or possibly the fire company in
17 that respect?

18 MR. RADER: Objection.

19 Your Honor, With regard to this aspect of the
20 contention, the Board's Order of September 24, 1984 excluded
21 all aspects proposed by LEA relating to effectiveness and
22 timeliness of route alerting.

23 The only aspect admitted as to this particular
24 subject matter relates to the number of volunteer fire
25 company personnel that would or could be available at the time

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1 of an emergency.

2 MR. STONE: I will try to rephrase the question
3 in the context of that particular point. And if I can't --

4 JUDGE HOYT: Very well.

5 BY MR. STONE:

6 Q At the municipal level, whether the EMC or the
7 fire companies, is it a function of their operation that
8 they need to notify personnel who would route alerting?

9 MR. RADER: Same objection.

10 MR. STONE: If it please the Board, I would point
11 out that the key or main paragraph in the respecified
12 reworded contention ends with the phrase dealing with "there
13 is no assurance of prompt notification of emergency workers
14 who must be in place before an evacuation alert can be
15 implemented, and there is no assurance of adequate capability
16 to conduct route alerting."

17 And I think what I am trying to do is see if
18 there is any linkage there to determine what the capability
19 would be at the local level, and whether with respect to
20 this notification function of whether EC has been involved
21 in discussions and negotiations along those lines.

22 MR. RADER: And with regard -- I point out to the
23 Board with regard to its Order of September 24, in the
24 second paragraph at page 16, the Board specifically con-
25 sidered that aspect of the contention as proposed, which

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1 related to an allegation that the route alerting could not
2 be performed within the time required by NUREG 0654. The
3 Board stated that it had previously rejected any issue about
4 the effectiveness, and by implication timeliness of route
5 alerting.

6 I think that is precisely the area in which the
7 question goes.

8 MR. STONE: My last point here, may it please the
9 Board, would be that LEA sees a distinction between timeliness
10 of route alerting, and the capability to have a certain number
11 of personnel in place at a given time.

12 JUDGE HOYT: I believe, Mr. Stone, that the Board
13 as it was previously constituted, had a great deal of
14 difficulty with this particular contention as well. And I
15 find myself in sympathy with them. And, I believe that the
16 scope of what you are inquiring about is beyond what we, as
17 a Board have anticipated you intended LEA 26 to stand for
18 as a contention.

19 Therefore, the objection of counsel will be
20 sustained.

21 BY MR. STONE:

22 Q Are there, to your knowledge, any municipal
23 functions which would be a factor to be taken into considera-
24 tion before an order to evacuate could, in fact, be given?

25 A (Witness Bradshaw) No. As I have previously stated,

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1 the capability to activate the system rests with the County,
2 and that can be accomplished without the mobilization of
3 support forces at the municipal level.

4 Q And that includes, in your opinion, traffic
5 control personnel?

6 MR. RADER: Objection. Asked and answered.

7 JUDGE HOYT: I'm not sure I recall the answer,
8 counsellor. Mr. Stone, I am going to let you ask that
9 question, but caution you again.

10 WITNESS BRADSHAW: If need be, the capability
11 exists to implement the alert notification system without
12 support forces, and that would include traffic control.

13 MR. STONE: If I may have just a minute, I will
14 go on to something else.

15 (Pause.)

16 BY MR. STONE:

17 Q With respect to section 61 on page 27 of your
18 prefiled testimony, that section contains, does it not, a
19 discussion of the route alerting function exercised, as you
20 say, at the municipal or local jurisdiction level?

21 It does deal with route alerting in that section?

22 A (Witness Bradshaw) Yes, paragraph 61 does.

23 Q According to your knowledge, what has been the
24 process by which fire companies have identified, filled and
25 then practiced capabilities to route alert? I just want a

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1 general description if that is possible, of what the process
2 has been.

3 A The process of determining route alerting
4 procedures and the sectors involved with that, began with
5 Energy Consultants drafting route alert sectors based on
6 siren location, municipal jurisdiction and fire jurisdiction.
7 Those draft sectors were provided to the fire companies
8 and the municipal emergency management coordinators for their
9 review.

10 We have responded by meeting with them on their
11 review of these sectors. We have asked them to run the sec-
12 tors to confirm that they indeed have no problems with them
13 and they can be accomplished in a timely manner.

14 And they have gotten back to us and we are in the
15 process of finalizing the maps that have resulted from their
16 runs of those routes.

17 Q You have referred previously to the July 25th
18 test drill in this connection. Are you familiar with the
19 deficiency cited by FEMA in its report on the July 25th
20 test drill with respect to the route alerting function as it
21 was exercised on that day?

22 MR. RADER: Objection. This again goes to the
23 effectiveness of route alerting, which was excluded as an
24 aspect of this contention.

25 MR. STONE: If it please the Board, I would argue

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1 it really goes to the availability of resources which is
2 right in the middle of this contention as it was admitted.

3 JUDGE HOYT: If that is the type of evidence you
4 are eliciting, Mr. Stone, would you address your question in
5 that fashion, then?

6 I will sustain the objection to the question as
7 you have given it, and permit you to redo it, if you will.

8 BY MR. STONE:

9 Q With respect to the July 25 test drill and FEMA's
10 subsequent report on that drill, are you familiar with any
11 deficiencies cited in that report with respect to route --
12 availability of route alerting resources? That is, equipment,
13 personnel or other means?

14 A (Witness Bradshaw) I am generally familiar with
15 that document. It is a very lengthy document, and there is
16 some very detailed comments made.

17 If you would like to point out several in particu-
18 lar, we could discuss the specifics involved.

19 Q I don't think we need to do that.

20 But, subsequent to that time are you aware of any
21 corrective actions in these areas taken by the municipalities
22 in the areas of capability?

23 A Yes, I am.

24 MR. RADER: Objection. Lack of foundation.

25 JUDGE HOYT: Well, Counsellor, he has already

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1 answered.

2 Go ahead, Mr. Stone.

3 BY MR. STONE:

4 Q Do you have knowledge of any involvement by EC
5 or participation in these corrective actions subsequent to
6 the July 25th test drill?

7 A (Witness Bradshaw) Yes.

8 Q Could you tell us, according to your knowledge,
9 what you know about the particular municipalities with
10 which you are familiar?

11 A I cannot give you specifics with regard to a
12 particular municipality.

13 I can tell you that there were municipalities who
14 have indicated to us that they felt the size of their sectors
15 were too large, and we have since adjusted it to the size
16 and dimensions that they requested.

17 Q Do you know who, in any case?

18 A No, I do not personally.

19 Q Does anybody on the panel have that knowledge?

20 A (Witness Cunningham) No.

21 A (Witness Wenger, shaking head negatively.)

22 Q Who would, among ECI's personnel, that you are
23 aware of?

24 A (Witness Bradshaw) We have two municipal
25 planners that are involved in those contacts.

mm10

1 Q And they would be?

2 A Ron Dack and David Dunn.

3 Q Are you aware of any particular cases in a
4 municipality where subsequent drills or exercises have
5 shown that whatever capability deficiencies existed on
6 July 25 have, in fact, been corrected?

7 MR. RADER: Same objection, unless it is limited
8 to the specific area of resources for route alerting, which
9 I assume is what Mr. Stone meant.

10 JUDGE HOYT: I'm sorry, I didn't hear the last part
11 of that.

12 MR. RADER: I said I object to the question,
13 except insofar as it is expressly related to route alerting
14 resources, which is the subject of the contention.

15 JUDGE HOYT: I believe that has been the ruling
16 by the Board previously, and it still stands, Mr. Stone.
17 Within that context, does the panel understand the question?

18 WITNESS BRADSHAW: I believe so.

19 JUDGE HOYT: Very well.

20 WITNESS BRADSHAW: There has been an ongoing ex-
21 change between Energy Consultants and the fire companies
22 involved. They have conducted their own route alerting
23 surveys, independent of the July 25th drill. And that has
24 been part of the planning process to finalize the route alert
25 sector information.

mm11

1 BY MR. STONE:

2 Q I believe the question was with regard to any
3 particular knowledge of a particular municipality that you,
4 at this time, or anyone on the panel has, of a drill or
5 exercise which showed that the resource deficiencies or
6 other capabilities that were missing in the July 25th drill
7 had, in fact, been corrected as of this date.

8 A (Witness Bradshaw) If there were in fact such
9 deficiencies, those I believe we answered that the people
10 on this panel do not have direct knowledge, and have not
11 had direct contact with those municipalities.

12 Q You state in your testimony, do you not, that the
13 responsibility of route alerting rests with the local
14 municipality.

15 A That's correct.

16 Q Is it your view that a volunteer fire company
17 is under the jurisdiction of a municipality in this regard?

18 A For the purposes of the plan, there is a represen-
19 tative at the municipal emergency operations center, who was
20 referred to as the Fire Services Officer, and who performs
21 those responsibilities.

22 He is the liaison with the volunteer fire company.
23 In that sense, the fire companies have agreed to provide
24 that route alerting assistance.

25

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#13-1

1 Q Can in your opinion a volunteer fire company
2 exercise this function without the involvement, coordination,
3 permission or approval of the municipality involved?

4 A I think I have to point out that in developing
5 the route alerting responsibility we have used fire company
6 responsibilities that are based on routine day-to-day
7 responsibilities. They are not performing route alerting
8 outside their normal fire jurisdictions so there are working
9 relationships that have been established. There are charters
10 involved for these route alert companies that show them
11 to have a responsibility for these areas.

12 We have met with them on that basis, the counties
13 and the municipalities have met with them on that basis. They
14 understand the job they are being asked to perform and they
15 understand that they have been given those responsibilities
16 under the municipal plan.

17 Q According to your understanding, who is the
18 individual at the local level who needs to be satisfied and
19 directly involved in the development of these route alerting
20 capabilities? Is it the local municipal EMC? Is it a fire
21 chief or is it somebody else?

22 A There is no one responsible individual. It has to
23 be an effort that involves all of those. In fact, the
24 development of this information has involved municipal
25 emergency management coordinators, municipal officials and

mnl3-2

1 fire chiefs and presidents of the fire associations in
2 addition to the county personnel.

3 Q Is it fair to say that according to your understanding
4 of these plans that the EMC, emergency management coordinator,
5 is in charge of this part of the plan?

6 A He is in charge of implementing the provisions of
7 his plan. The fire company personnel are supervised by the
8 fire chief. As I said, we used the routine areas of
9 supervision and responsibility that occur on a day-to-day
10 basis. Those provisions are not being altered for the
11 purposes of their radiological emergency response plan.

12 Q Are you aware of any circumstance in the emergency
13 planning zone where a volunteer fire company may have questioned
14 or not participated in or otherwise stated concerns about the
15 route alerting function that had been proposed for them?

16 A Yes.

17 Q Could you please state for the record where that is?

18 A Yes. I am aware that the Skippack Township fire
19 company has expressed concerns in that regard.

20 Q To your knowledge, what are those concerns as you
21 understand them to be?

22 A As I understand it, they are concerned about
23 responding to an area involving radiation hazard and their
24 concerns have been incorporated into the planning process.

25 Q Could you explain what that means, "incorporated into

1 the planning process?"

2 A Yes. Both the municipal and the county plans reflect
3 the fact that the Skippack Township Fire Company will be
4 providing services outlined in the plans up until a general
5 emergency stage at which time if there were a need to conduct
6 route alerting, the county would arrange for mutual aid
7 support to cover that area because the fire company has
8 indicated that it would not respond under further conditions.

9 I would also point out that this area is evolving
10 and, in fact, on November 20th when Skippack Township
11 participated in the supplemental exercise conducted on that
12 date that, in fact, when it came to general emergency the
13 fire chief said the company is no longer participating,
14 however the township then solicited volunteer response from
15 the fire company and obtained 17 volunteers who agreed to
16 conduct route alerting. If indeed volunteers had not been
17 obtained at the local level, that need would have been passed
18 to the county and the county would have responded by
19 coordinating mutual aid assistance.

20 Q So this instance is an exception then to your
21 previous statement which said that you weren't aware of any
22 municipality which had corrected resource deficiencies or
23 capability deficiencies subsequent to the July 25th test drill?

24 MR. RADER: I object to Mr. Stone's characterization
25 of the previous testimony which I believe is incorrect.

1 MR. STONE: With all due respect to the Board, I
2 believe it is correct. I think that was exactly the question
3 I was asking.

4 JUDGE HOYT: I am not sure it is either, Mr. Stone,
5 but if the testimony has been mischaracterized I am sure
6 the witnesses are capable of correcting it.

7 BY MR. STONE: (Resuming)

8 Q With that in mind then, is it fair to say and having
9 had that example now before us, are there any other cases
10 where you do know of a particular municipality which in any
11 way similar to Skippack has corrected those kinds of
12 capability deficiencies subsequent to the July 25th test drill?

13 A (Witness Bradshaw) First of all, I think it
14 is a mischaracterization. You spoke previously with regard
15 to the July 25th exercise. This incident was a November 20th
16 exercise and again I am aware of no particulars with regard
17 to specific municipalities regarding the July 25th exercise.

18 Q And subsequent to the July 25th exercise just to
19 clear this up, are you aware of any particularities besides
20 Skippack Township?

21 A Off the top of my head, no. There may well be
22 instances that you could refresh my memory.

23 Q Anyone else on the panel, does anyone have any such
24 knowledge?

25 A (Witness Cunnington) No. I am aware of the

1 situation in Skippack Township and that to my knowledge is
2 the only incident.

3 Q Are you aware of the fact that in Skippack Township
4 it was a vote of the volunteer firemen which led to the
5 actions by the company which produced the situation we have
6 been talking about?

7 MR. RADER: Objection, no foundation.

8 JUDGE HOYT: Mr. Stone, I don't think these
9 witnesses have that knowledge. You are asking them something
10 that is outside the scope of their expertise.

11 MR. STONE: I will withdraw that question.

12 BY MR. STONE: (Resuming)

13 Q In your role as emergency planners with a close
14 relationship as you have characterized it with the municipali-
15 ties and response organizations, are you aware of any situations
16 within fire companies where the issue of voting on the route
17 alerting and other functions have come up and either been
18 approved or denied or discussed?

19 A. (Witness Bradshaw) To the best of our knowledge,
20 we are only aware of Skippack Township.

21 Q This is just to jog your memory if possible and I
22 am not saying that you do have this knowledge, are you aware
23 of any circumstances with respect to West Vincent Township?

24 A. No, I am not.

25 Q. That would be the Ludwig Fire Company.

1 A. (Witness Cunningham) No, I am not on that.

2 Q. Could you describe for us the actual procedure
3 used in route alerting and whatever equipment and capabilities
4 typically would be exercised by these teams?

5 I believe you refer in your testimony specifically
6 to loudspeakers, for example, and just describe the process.

7 A. Route alerting is in the instance of the Limerick
8 Generating Station where there is a primary public alert
9 system, namely a siren system in place, the failure of a
10 particular siren that triggers the county to recognize
11 that the area in which the siren failed has a need for an
12 alert signal, the county can identify then one or more
13 predesignated sectors as we described in our testimony
14 that would need to be provided with an alert signal.

15 They contact the appropriate municipal official
16 and the designated response organization, usually the local
17 fire company in that jurisdiction dispatches appropriate team
18 or teams to cover the sector or sectors that would be affected
19 by the siren failure. They use equipment that has the
20 capability of public address and they travel the sector at a
21 very reasonable rate of speed and deliver a pre-recorded
22 message which is without recalling it directly from memory
23 usually keys the individual to tune to his appropriate
24 emergency broadcast radio station where he can then receive
25 the detailed instruction.

mnl3-7

1 That is exactly the same cue that is used when the
2 siren sounds. The sirens are a key for an individual to tune
3 to his emergency broadcast radio station so the supplemental
4 message that is delivered by travelling the predesignated
5 routes slowly is to tune to your emergency broadcast radio
6 station where, as I said, more detailed instruction would then
7 be given.

8 Q When would it be necessary as it states in your
9 testimony in section 61 to go door-to-door and what does that
10 mean?

11 A In addition to determining a route to travel,
12 considerations are given to the demography of the route
13 and individuals travel along roads. There are instances where
14 in some more rural areas there can be long driveways that
15 might require a modification of the general pattern of
16 travelling along the route at a slow rate of speed and
17 broadcasting the pre-recorded message through the PA system.

18 There can be other individuals who have been
19 identified as having and would have been identified through
20 the public survey that we previously testified as having
21 an inability to comprehend a message that was being delivered
22 from a PA system because they might be hearing impaired or
23 have other infirmities that might require some special
24 attention as they have been identified to the municipalities.
25 There have been adjustments made in the route alerting sectors

mn13-8

1 to account for those individuals.

2 I believe we have testified that that is why it is
3 a cooperative effort, that is one of the reasons that it is
4 a cooperative effort among the county and local emergency
5 management officials and the chief and other officers of the
6 responsible fire organizations so that all of those kinds of
7 aspects can be considered as the route alerting zones are
8 developed and tailored.

9 Q Thank you. You just referred to a situation where
10 a person who is hard-of-hearing or had other disabilities
11 would be notified in a door-to-door fashion, that is a route
12 alerting person would go up to the door and --

13 A That is not the only individual but that could be
14 the situation.

15 Q Right. I was just using that as an example.

16 According to your knowledge what is the basis or
17 source of information which would lead to the development of
18 a list at the local level?

19 A We have already testified that there was a general
20 survey in the fall of 1983. We have testified in these
21 hearings as to its appropriateness to transportation but
22 there was other information solicited on that survey and
23 particular problems with notification were one of the areas
24 that the survey dealt with.

25 Q Did that, in fact, include the long driveway

mnl3-9

1 situation you were just describing?

2 A. That included the problem. The survey itself
3 solicited information on a person's ability to hear. The
4 long driveway or the other alternate approach that we were
5 describing that might require some modification of the route
6 comes from the experience and knowledge of the local
7 officials. As I believe we have indicated the process has
8 involved reviewing the routes and also travelling those
9 routes in advance of a need to implement them having
10 a thorough knowledge of your route and the particular
11 conditions or concerns on that route of which driveways
12 or other special concerns would be one. They have gone
13 through the process and they have reviewed their routes.

14 Q. Has EC been involved in any training of these
15 route alert personnel or any other orientation?

16 A. (Witness Bradshaw) Yes, we have.

17 Q. Do you have knowledge here today of any kind of
18 training totals similar to that we have asked for with
19 respect to farmers, bus drivers or teachers -- if you have it?

20 A. It could be obtained. I am not aware that we have
21 it at the table.

22 Q. Do you have an approximate idea at this time or
23 would you be able at some later time if this is the correct
24 procedure, I am not sure, to provide an answer to this question?

25 A. We would have to call back to the office to get those

mn3-10

1 totals so we could do it at the break or this evening.

2 MR. STONE: May I have a minute?

3 JUDGE HOYT: Certainly.

4 (Counsel for LEA conferring off the record.)

5 BY MR. STONE: (Resuming)

6 Q You referred previously to a situation with
7 Skippack Township in which certain volunteer firemen had
8 expressed a concern about possible exposure to radiation,
9 did you not?

10 A. (Witness Bradshaw) That is correct.

11 Q Is it one of the objectives of your training
12 program to alleviate such concerns?

13 A. Yes. We provide information that describes nuclear
14 power plant operations and some basics on radiation in
15 addition to the protective action guidelines for emergency
16 workers.

17 Q That includes or does that not include the training
18 as to the use of dosimetry and KI?

19 A. It does include that information.

20 Q Do you consider the provision that route alerting
21 teams have dosimetry and KI to be part of their equipment or
22 capability or do you think that is a different issue?

23 A. No. I believe it is essential to their emergency
24 worker status.

25 Q I believe previously you have testified and correct

mnl3-11

1 me if I am wrong that in certain circumstances where personnel
2 would not be in the EPZ beyond the time that the general
3 public would be during an evacuation scenario, they were not
4 in fact considered emergency workers and I believe we talked
5 about school staff and bus drivers and so forth. Could you
6 just explain why it is that among the necessary equipment or
7 capability for route alerting teams which I assume might fall
8 in the same category, there is the requirement that there be
9 KI and dosimetry?

10 MR. RADER: I object to this line of inquiry. I
11 believe that the contentions which refer to KI and dosimetry
12 are very clear on that aspect. This is not an aspect of
13 this particular contention which in my understanding of
14 the Board's order of September 24 and its earlier order of
15 April 20, 1984 relates specifically to manpower resources
16 within the EPZ to conduct route alerting not to their
17 dosimetry or KI supplies.

18 MR. STONE: If it please the Board, the witness
19 has just testified that they considered dosimetry and KI
20 to be an essential resource or capability that these teams
21 should have and I was just following up on that to elicit
22 one answer.

23 MR. RADER: Obviously the witnesses cannot testify
24 to that which the Board has not made an admissible contention.
25 I believe that this is clearly beyond the scope of this

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contention.

JUDGE HOYT: Can you point out to us, Mr. Stone,
how you think it is related to this contention?

end#13

1 MR. STONE: Again, it would be based on
2 the statement by the witness that he considered
3 dosimetry and KI to be part of the equipment that a
4 route alerting team would need, and I think if I had a
5 minute to look at the specific contentions, I would like to --

6 JUDGE HOYT: Would you like to take that
7 moment then?

8 MR. STONE: Yes.

9 JUDGE HOYT: All right.

10 MR. STONE: I would say that clearly in the
11 main paragraph where it discusses resources to conduct --
12 I may need a minute here.

13 (Pause.)

14 MR. STONE: Again in the main paragraph of the
15 required resources to conduct rout alerting LEA would
16 interpret adequate capability to be along those lines.
17 We talked about loud speakers and vehicles and so forth.
18 I would assume that if a limitation of dosimetry and KI
19 woud lead to a situation where the personnel may not be
20 there to do the function -- it is just a follow-up question.

21 JUDGE HOYT: The objection is sustained.

22 BY MR. STONE:

23 Q In addition to the loud speakers which you had in
24 your prefiled testimony and the dosimetry and KI which you
25 just referred to, what other pieces of equipment or resources

1 are part of a route alerting team's capability to perform
2 this function?

3 MR. RADER: Objection. I believe the Board
4 has just instructed the witness not to formulate a
5 question related to KI and dosimetry.

6 MR. STONE: I will withdraw that and simply ask
7 what resources -- what resources are part of a route
8 alerting team's capability in addition to the ones that have
9 been mentioned?

10 JUDGE HOYT: If there are any, now is the
11 time to get them in, sir.

12 WITNESS BRADSHAW: Resources available to the
13 route alert personnel would include maps of the sectors,
14 would include the prewritten message that they give
15 over the EBS, over the public address system, and in addition,
16 their own vehicle which they utilize.

17 JUDGE HOYT: Mr. Stone, that is twice that even I
18 can recall that that question has been answered.

19 MR. STONE: I don't think we got the vehicles
20 before.

21 JUDGE HOYT: Let's move ahead.

22 MR. STONE: Okay.

23 BY MR. STONE:

24 Q According to your knowledge, has it been
25 determined that there are sufficient vehicles to perform this

1 route alerting function in the various municipalities?

2 MR. RADER: Objection. This goes to the
3 adequacy and effectiveness of route alerting which is
4 not at issue here. The only issue admitted for this
5 aspect of the contention relates to the adequacy of manpower
6 resources.

7 MR. STONE: I think the wording of the
8 contention --

9 JUDGE HOYT: Will this help you, Mr. Stone?
10 The objection is overruled.

11 MR. STONE: I think we will live with that.

12 WITNESS BRADSHAW: Could you repeat your question?

13 BY MR. STONE:

14 Q The question was, according to your knowledge,
15 is there presently a sufficient number of vehicles
16 assigned to this function and I would like you also in
17 that context to describe the process with which those
18 capabilities were addressed?

19 A There are some 50 fire companies involved in
20 the response to route alerting over the 43 municipalities.
21 In all but two municipalities the resources have been
22 identified to conduct route alerting.

23 In the other two instances the municipalities
24 have indicated in one instance that they have the
25 capability to respond but simply haven't made the formal

1 assignment and are in the process of doing that and,
2 in the other instance, Skippack Township, which, as I mentioned
3 earlier, the situation is evolving. There are indications
4 that they do have their own volunteers that will do that.

5 However, the county has already addressed the
6 situation where they would provide mutual aid assistance
7 in that regard. So to that extent, yes, those resources
8 have been identified.

9 Q And do you recollect the name of the other
10 municipality besides Skippack that you just referred to?

11 A Yes. It is Providence Township.

12 Q And to your knowledge, what was the capability
13 deficiency there, was it vehicles or something else, personnel?

14 A It was simply a decision as to whether or not
15 they needed vehicles in addition to fire company
16 vehicles, and the assignment as to whether that should be
17 the police vehicles or some other source.

18 They are in the process of better defining who
19 they will utilize to perform those functions. They have
20 reviewed their sectors and found them to be adequate.

21 Q To your knowledge then, that situation there is
22 as yet unresolved?

23 A It is in the process of being resolved, yes.

24 Q But still unresolved?

25 A Correct.

1 Q You state in your testimony on page 28 that
2 each municipality has been divided into separate and
3 distinct route alert zones; is that correct?

4 A Correct.

5 Q Would you say that according to your knowledge
6 and understanding, as of now, that those route alert
7 zones have been established and, as you indicate,
8 divided up and that the relevant municipal authorities
9 are satisfied with the arrangements?

10 A Yes. As I previously described the process
11 of drafting those sectors and the process of review by
12 the local authorities, I could not confirm 100 percent
13 completion. I believe there may be one or two fire
14 companies that have yet to finalize.

15 But an overwhelming majority of those
16 companies have finalized. And all of them have had an
17 opportunity to review their sectors.

18 Q Do you know the name of those one or two
19 fire companies?

20 A No, I do not.

21 Q Does anybody on the panel?

22 A (Witness Cunningham) No.

23 Q Have, to your knowledge, the personnel involved
24 for route alerting received all the necessary equipment
25 then that they would need to perform this function, as you

1 understand it?

2 A (Witness Bradshaw) There have been requests
3 for additional public address systems. The fire companies
4 have met with representatives of Philadelphia Electric
5 to discuss their needs. Philadelphia Electric has
6 agreed to purchase the equipment necessary to conduct their
7 route alerting and, in fact, have agreed to purchase
8 route alerting equipment in excess of the identified need.

9 Q So it is fair to say that according to your
10 knowledge, Philadelphia Electric has agreed to provide all
11 the equipment that was asked for with respect to this
12 route alerting function?

13 A That is correct.

14 Q And you mentioned, I believe, a couple of
15 instances in that last answer where -- did you mention
16 in that last answer -- do you know of any more names of
17 any particular situations with respect to the request
18 of equipment which may yet still be pending?

19 A No. Philadelphia Electric has met with every
20 fire company with responsibility and every municipality
21 with responsibility. They have agreed to provide the
22 public address systems needed.

23 In the instances I identified previously,
24 particularly lower Providence Township, it is simply a
25 matter of determining on which vehicles those public

1 address systems would be mounted.

2 Q And this equipment then has yet to be delivered
3 in some cases, even though it is promised; is that correct?

4 A It has been ordered and, to my knowledge, has
5 not been delivered.

6 Q You state in your prefiled testimony, do you
7 know, that sufficient trained personnel is available
8 on township lists to perform the route alerting function.

9 If I could find the citation there -- was that
10 part of this section of your testimony or is that something --

11 A I have so stated in my testimony.

12 JUDGE HARBOUR: You can try the last sentence
13 under LEA-26 in his testimony.

14 JUDGE HOYT: Page 28.

15 MR. STONE: Okay.

16 BY MR. STONE:

17 Q According to whom -- is this ECI's opinion
18 then as you have expressed it, I guess, previously that
19 there is sufficient trained personnel?

20 A Yes. While we indicated we didn't have the
21 training records with us, the training records will show
22 that training has been provided to fire companies with
23 route alerting responsibilities and that sufficient
24 personnel are trained to conduct those route alerting
25 responsibilities.

1 Q Do you, in your analysis of the situation,
2 make any distinction between daytime and nighttime lists
3 of personnel

4 A No, we do not.

5 Q Do you have knowledge of any typical situation where
6 a volunteer fire company would, in fact, have fewer volunteers
7 available during the daytime as opposed to evening after-work
8 hours?

9 A (Witness Cunnington) There is always the possibility
10 of a differing manpower availability depending upon the
11 time of day of any emergency response organization. But
12 those response organizations are established on a 24-hour a
13 day response capability. And they staff themselves 365
14 days a year for that responsibility, and they have not
15 indicated to us at this time any problems of manpower availa-
16 bility based on considerations of daytime or evening.

17 A (Witness Bradshaw) We are utilizing for
18 route alerting purposes only a small percentage of the total
19 volunteer force available to volunteer fire companies.

20 Q In that connection, aren't there cases where a
21 volunteer fire company might be responsible for more
22 than one township and actually several sectors, many
23 sectors?

24 A Yes. And that consideration has been made in
25 developing the sectors and the assignments. This

1 information has been reviewed with the fire companies,
2 and they have indicated that they can fulfill their
3 responsibilities as outlined in the plans.

4 Q And finally, according to your knowledge,
5 has EC in its negotiations and facilitations with
6 these local agencies asked volunteer fire companies of
7 the difference in daytime mobilization capability or
8 rather daytime personnel capability and nighttime personnel
9 capability was dramatic enough to cause them a
10 problem?

11 A In the instances where we have had direct contact
12 with the fire companies, it was obviously a discussion
13 point, and it was obvious that they accepted the
14 responsibility, recognizing they could satisfy the manpower
15 requirements at any time of day as they do for routine
16 fire response operations.

17 Q In those instances of direct contact, do you
18 recollect the names of those fire companies, or are
19 you speaking generally?

20 A I am speaking generally. As I said, there
21 are over 50 fire companies involved.

22 Q And it is your testimony that most have been
23 subject to that direct contact we are talking about?

24 A (Witness Cunningham) Route alerting has never
25 been represented as anything but a 24-hour capable function.

1 Q I mean, is it ECI's, is it your testimony
2 that ECI has had direct contact with the bulk of these
3 50?

4 A (Witness Bradshaw) It is accurate to say
5 that we have had contact with an overwhelming majority
6 of these fire companies, both in a planning sense and in
7 a training sense.

8 Q And again, this is finally, have any, to
9 your knowledge, have any of the members of these 50
10 or so fire companies with the bulk of which you have had
11 direct contact with, besides Skippack, surveyed their
12 volunteer firemen with respect to daytime availability
13 versus nighttime availability?

14 A (Witness Cunningham) We have testified that
15 the only survey that we were aware of was Skippack Township,
16 and that survey was specific to their willingness to
17 participate and it referenced the situation that we
18 described which was nonparticipation if radiation were a
19 hazard.

20 And we have also indicated, as we have in
21 numerous other occasions here, that when compared to the
22 historical record which was shown on November 20th during
23 the drill or exercise, in fact, the willingness expressed
24 by the members in a survey does not necessarily
25 translate into their availability at time of emergency.

1 In fact, there were, I believe, 17 persons
2 of members of that fire company that were available
3 to conduct route alerting during the exercise when, in fact,
4 there had been a prior expressed willingness not to
5 participate.

6 It is another confirmation of the historical
7 record.

8 Q I'm sorry. I have to follow up here.

9 You are saying that in Lower Providence,
10 according to your knowledge, there was a prior --

11 A I said Skippack. Skippack Township.

12 Q And finally, was the alerting function
13 exercised in most of these townships on November 20th?
14 You mentioned the one case.

15 A As you are aware, I was present in this
16 hearing room on November 20th.

17 Q Does anybody on the panel have that information?

18 A (Witness Bradshaw) No, I do not.

19 Q How is it then -- and I will try to end with
20 this -- how is it that you know of the one particular case
21 of Skippack?

22 A I received a specific report on Skippack.

23 Q From whom, may I ask?

24 A From a member of my staff which was observing
25 at the Skippack Township emergency operations center.

1 Q Who was that?

2 A I got it through my lead planner who is
3 Ron Deck.

4 Q He is the individual who was observing?

5 A No. He was responsible for supevising the
6 individual who was at that location.

7 Q All we need is, if I may, the name of that
8 individual who was actually observing.

9 A I could obtain it for you, if necessary.

10 MR. STONE: Thank you.

11 That does finally complete LEA-24 and
12 actually --

13 MR. RADER: 26, if I may, Judge Hoyt.

14 MR. STONE: 26. I'm sorry.

15 We can go back to 24.

16 JUDGE HOYT: I'm sorry. It is 26.

17 MR. STONE: I think that fortunately
18 concludes my work on these witnesses.

19 JUDGE HOYT: We will recess for about five to
20 ten minutes.

21 (Recess.)

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24

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END 14

T15 MMZmm1

1 JUDGE HOYT: The hearing will come to order.

2 All the parties to the hearing are again present
3 in the hearing room. The panel has taken its place on
4 the witness stand. I remind them that they are still under
5 oath.

6 Ms. Zitzer, Mr. Stone, who is going to do the
7 cross examination this afternoon?

8 MS. ZITZER: I am going to continue the cross
9 examination on LEA 27 and 28.

10 JUDGE HOYT: 28 as well?

11 MS. ZITZER: Yes.

12 JUDGE HOYT: Thank you. Please proceed, Ms. Zitzer.

13 BY MR. ZITZER:

14 Q Moving on to contention LEA 27, which deals with
15 concerns about two of the Camp Hill facilities in Chester
16 County.

17 On page 28 of your testimony, you state that any
18 special needs of such facilities are incorporated in the
19 Municipal and County Plans, is that correct?

20 A (Witness Bradshaw) That's correct.

21 Q Could you please discuss the extent to which the
22 special needs of the two Camp Hill Village facilities are
23 included in their respective municipal plans?

24 A The two facilities responded to the public
25 survey. The information from the public survey was related

1 to the Municipal Emergency Management Coordinators.

2 The Municipal Coordinators were requested to follow
3 up on that information not only with the Camp Hills School,
4 but for all respondents to the survey. And the identified
5 transportation needs resulting from the feedback from those
6 Municipal Coordinators to Energy consultants was added to
7 Attachment O of the Municipal Plans.

8 Q On page 29 of your testimony, you state that the
9 Municipal Plans indicate the transportation needs of these
10 two particular facilities, is that correct?

11 A That's correct.

12 Q And turning to Attachment O, in the West Vincent
13 Township, and East Nantmeal Township Plans, if you could, please,
14 I would like to ask you a couple of questions.

15 For the information of the parties, the two
16 Municipal Plans in question are labeled Applicant's Exhibit
17 E-29, which is the East Nantmeal Township Draft 6 Plan, and
18 the West Vincent Township Draft 6 Plan is identified as
19 Applicant's Exhibit E-41.

20 And I would like you to turn to Attachment O,
21 page O-1 in those particular plans.

22 I would also like you to be prepared to refer back
23 to Attachment G in those plans, which lists the persons
24 requiring transportation assistance in those respective
25 townships.

mm3
1 Is it your testimony that the figures regarding
2 the transportation required in Attachment O of the respective
3 Municipal Plans, include the transportation needs of the two
4 Camp Hill facilities?

5 A Yes. The transportation needs for those facilities,
6 in addition to those of the general public, were provided to
7 the Municipal Coordinators, and the resulting need identified
8 by those coordinators to Energy Consultants has since been
9 incorporated into the consolidated resource lists which are
10 Attachment zero or O, I'm sorry.

11 (Witness Wenger left the courtroom at this time.)

12 JUDGE HOYT: Ms. Zitzer, are the questions that you
13 have being asked from your copy of the current exhibit which
14 I think is Draft No. 6 in the case of -- in both cases?

15 MS. ZITZER: Yes, ma'am.

16 JUDGE HOYT: Thank you.

17 And is that the copy of the draft that you have
18 before you, Mr. Bradshaw?

19 WITNESS BRADSHAW: Yes, it is.

20 JUDGE HOYT: Thank you.

21 BY MS. ZITZER:

22 Q Is it your testimony that this current draft
23 reflects that information?

24 A (Witness Bradshaw) Yes, it reflects the information
25 that we have heretofore received from the municipality. Yes.

mm4

1 Q Could you provide us with the information that
2 you are aware of with regard to the specific numbers of
3 individuals at those two facilities that these transportation
4 requirements are intended to represent?

5 A To a certain extent, yes. I can recall that the
6 survey from Camp Hill Kimberton Farm facility headed by
7 Ms. Zipperlin, reflected a need for 66 individuals. And I
8 am not sure of the exact number from the Camp Hill special
9 school, but the administrator of that school provided surveys
10 for several individuals who reside at that facility.

11 Q This information that you are referring to then is
12 the responses that you refer to in your testimony that was
13 provided as a response to the public survey that was
14 distributed by Chester County, is that correct?

15 A That's correct. Plus any subsequent contact between
16 the municipalities and those facilities.

17 Q And is the statement you just made with regard to
18 that information the most accurate information to the best of
19 your knowledge that you are aware of with regard to the
20 population of those particular facilities?

21 A With regard to identified transportation needs, yes.

22 Q Are you aware of the 66 individuals that you stated
23 you were aware of at the Camp Hill Village, Kimberton Hill
24 facility which you stated were 66 that you had been informed
25 by the Director, Mrs. Zipperlin -- are you aware of whether

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1 that figure of 66 includes staff, or whether that is all of
2 the people at the facility, or just those that would require
3 special assistance?

4 A I only know that the forms said, she would require
5 transportation assistance for 66 individuals.

6 I am not sure that it delineated any further than
7 that.

8 Q Have you had any other contact with Mrs. Zipperlin
9 to provide you with any additional information regarding
10 whether or not 66 people is, in fact, the population of the
11 Camp Hill Village Kimberton Hills facility?

12 A I have not had such contacts. Neither have any of
13 my staff. We have encouraged that kind of followup to be
14 conducted by the municipal emergency management authorities
15 involved to encourage the establishment of a working
16 relationship in that regard. And I am aware that in that
17 instance the West Vincent Township Municipal Emergency
18 Management Agency did send at least in one instance -- that
19 being July 25th exercise -- an individual to the facility to
20 follow up on the needs involved in that regard.

21 Q But along those lines, do you have any particular
22 knowledge regarding information that has been provided to the
23 municipality regarding whether or not in fact the population
24 needing transportation at the Camp Hill Village Kimberton Hills
25 facility is indeed 66 people?

1 A No, I have no further knowledge of such.

2 JUDGE HOYT: Ms. Zitzer, may I interrupt you for
3 just a moment?

4 MS. ZITZER: Certainly.

5 JUDGE HOYT: In the copy of Applicant's Exhibit E-41
6 for identification, we do not have the Attachment O which is
7 supposed to be in this.

8 JUDGE HARBOUR: It is listed in the Table of Contents,
9 but the attachments skip from N to Q, and O and P are not there.

10 MR. RADER: We will check that and obtain a correct
11 copy from the other sets.

12 JUDGE HOYT: Yes, thank you.

13 Go ahead and continue examination.

14 MS. ZITZER: I think our questions will discuss
15 the information, and I think the Board will be able to follow
16 without having it in front of you.

17 BY MS. ZITZER:

18 Q With regard to the Camp Hills special school in East
19 Nantmeal Township, what is the information that you are aware
20 of with regard to the population at that particular facility
21 that is being planned for and that according to your testimony,
22 to the best of your knowledge is included in the transportation
23 resources listed in Attachment O of the East Nantmeal Township
24 plan?

25 A (Witness Bradshaw) As I stated, that facility

mm7

1 returned survey responses for several individuals which would
2 require assistance.

3 I am also aware that that facility has its own
4 emergency plan, which indicates that it has certain transporta-
5 tion resources available.

6 Q But to the best of your knowledge, the population
7 at that facility is certainly more than several individuals,
8 is that correct?

9 A Yes, it is. If I recall the testimony submitted
10 by Mr. Wolf, there were numbers indicated there that were
11 higher in terms of population.

12 Q Are you familiar with those numbers?

13 A Not the specific numbers, I am not.

14 Q Have you had any discussions with the Chester
15 County Department of Emergency Services regarding the status
16 of the transportation arrangements for these individuals at
17 these respective facilities?

18 A Yes. There are ongoing discussions on these and
19 other planning issues.

20 Q If you turn to Attachment O in the respective
21 Municipal Plans, isn't it true that in the East Nantmeal
22 Township Plan on Attachment O, it indicates that one bus is
23 needed for the evacuation of those requiring transportation
24 excluding that which would be necessary for schools?

25 A That's correct.

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1 Q Isn't it also true that that attachment lists that
2 bus as an unmet need?

3 A That's correct.

4 Q Can you provide us with any information regarding
5 the status of that unmet need?

6 A Yes. All unmet needs identified in the Municipal
7 Plans are passed as such to the County to be satisfied.

8 Q Can you provide us with any information regarding
9 arrangements made by Chester County to satisfy that unmet
10 need?

11 A Yes. I think this would be the same discussion
12 which we had regarding the availability of buses under
13 previous LEA contentions. And I indicated at that time that
14 over 200 buses have been identified by Chester County for
15 response to an evacuation at Limerick. This would include
16 the needs identified in the Municipal Plans as a result of
17 Attachment O in each Municipal Plan.

18 Q Is it your testimony then that the estimate that
19 one bus would be needed for transportation assistance to the
20 general public, including the Camp Hills special school in
21 East Nantmeal Township, includes both the resource requirements
22 for the general public, which on Attachment G in that plan
23 on page G-1 is listed as 15 residents, as well as any members
24 -- any people at the Camp Hills special school which would
25 require transportation assistance?

mm9 1 A Yes. It is true that Attachment O would include
2 the need for -- any identified need for the Camp Hill facilities.

3 However, Attachment G of those plans currently
4 does not include the numbers for the Camp Hill facilities.

5 Q Is there any reason why Attachment G does not
6 indicate that the 15 residents who responded to the public
7 survey data did not include the response to the Camp Hill --
8 from the Camp Hill special school?

9 A Yes. Until such time as a municipality further
10 delineates the names of those individuals, Attachment G is
11 a list of the names, and would not be added until that time.

12 Q So, is it your testimony that until the Camp Hills
13 special school provides you with a list, provides ECI or the
14 municipality with a list of the names of the individuals, that
15 that attachment would not indeed reflect the numbers of
16 individuals that had been identified by the public survey
17 data?

18 A Yes. There is an intent to add those names to
19 Attachment G. At the present time we do not have that
20 information.

21 I would point out though, that the Attachment
22 does include the transportation needs. If you take the West
23 Vincent Plan as an example, if we turn to Attachment G --

24 Q We have been talking about East Nantmeal. You

25

mm10

1 would like to go to West Vincent as an example?

2 A Yes.

3 Q That's fine.

4 JUDGE HARBOUR: I would also like to point out
5 that the one which is marked Applicant's E-41 for identification
6 is lacking Attachment G as well.

7 MR. RADER: Yes, we are attempting to rectify that.

8 WITNESS BRADFORD: The Attachment G which I have in
9 Draft 6 identifies 29 residents who require transportation.

10 Attachment O provides three buses available. And,
11 obviously there are more buses there than identified in
12 Attachment G. That is to reflect the need for the Camp Hill
13 School.

14 BY MS. ZITZER:

15 Q However, in the instance of East Nantmeal Township,
16 Attachment G indicates 15 residents who have responded to
17 the public survey data, and Attachment O indicates that one
18 bus is currently being planned with a capacity -- with an
19 estimated capacity of, I believe, 40 persons per bus.

20 Is that correct?

21 A Correct. So that the additional individuals
22 identified by the Camp Hill facility, would not be in
23 excess of 40.

24 Q You have stated previously that you have reviewed,
25 or at least had some familiarity with the testimony that had

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1 been submitted in this proceeding by Mr. Wolf on behalf of the
2 Camp Hill special school, is that correct?

3 A That's correct, although it was largely illegible
4 in my copy.

5 Q And based on the statement you just made regarding
6 the numbers of residents for whom transportation would be
7 available on that one bus that is currently being planned
8 for, isn't it true that you are estimating that there may only
9 be approximately 25 people beyond the 15 already identified from
10 the general public that might indeed need transportation
11 assistance?

12 MR. RADER: Objection, your Honor.

13 Again, Ms. Zitzer intentionally or not, is lapsing
14 into the habit of referring to "you" in her question when I
15 think she is referring to the municipality, rather than
16 Energy Consultants or these witnesses in particular.

17 Additionally, this particular question has been
18 asked and answered. Mr. Bradshaw has explained in some
19 detail as to how the additional 25 members were identified,
20 and I believe he did not characterize it as an estimate.

21 MS. ZITZER: I don't mind rephrasing the question.
22 I would be happy to rephrase the question.

23 JUDGE HOYT: All right, let's see what you can
24 do with the rephrasing it, Ms. Zitzer.

25 MS. ZITZER: All right.

mm12

1 BY MS. ZITZER:

2 Q Mr. Bradshaw, in your opinion, Attachment O
3 indicates that there are spaces for 25 people currently being
4 planned to receive transportation assistance in East Nantmeal
5 Township beyond the 15 that are identified on Attachment G
6 who have responded to the public survey data. Is that correct?

7 A (Witness Bradshaw) That's correct.

8 Q Do you believe that that number of 25 people is an
9 accurate estimate of the population at the Camp Hill special
10 school that might need transportation assistance in the event
11 of a radiological emergency?

12 A Yes, on the basis of the information provided us
13 by the municipality, that is an accurate estimate.

14 Q But you stated previously that you have not had
15 direct conversations with Mr. Wolf regarding that situation.
16 Is that correct?

17 A That's correct.

18 Q On page 29 of your testimony you refer to arrange-
19 ments having been made for relocation to an agreed upon host
20 facility.

21 And then further in your testimony you state that
22 the Devereaux School has agreed in writing to serve as a host
23 facility in the event of an emergency.

24 When you state -- when you use the words "agreed
25 upon," who do you mean has agreed upon those arrangements?

A The County and the host facility.

#16-1

1 Q What specifically has the host facility agreed to?

2 A As I understand it they have agreed to act as a
3 host facility accepting the relocated residents of both
4 Camp Hill facilities.

5 Q What information is your understanding based upon?

6 A A member of my staff attended a meeting along with
7 a representative of the Chester County Department of
8 Emergency Services with the administrator of the host facility.

9 Q Were representatives of either of the Camp Hill
10 schools present at that meeting?

11 A No, they weren't.

12 Q Could you briefly describe what was discussed
13 with the Devereaux School?

14 A Yes. As I understand it there was a discussion as
15 to the purpose of the meeting which was to arrange a host
16 facility in the event of an incident at Limerick which would
17 require movement of the Camp Hill facilities. The logistics
18 involved were discussed with the administrator. His
19 capabilities and his facilities were discussed. It was
20 agreed that he had the facilities to accept that responsibility.

21 Q What information was provided to officials at the
22 Devereaux School regarding the number of potential evacuees
23 from each of the respective Camp Hill schools?

24 A There was a discussion of the total resident and
25 staff populations of those two facilities.

mn16-2

1 Q Could you provide what those totals are that were
2 discussed?

3 A I do not personally know what the totals are. My
4 staff was, however, and I am sure they discussed the
5 accurate numbers and they would agree with the estimates
6 made by Ms. Zepperlin and Mr. Wolfe of those facilities.

7 Q So it is your testimony that the Devereaux School
8 understands how many evacuees it is agreeing to receive at
9 least in an approximate sense?

10 A Yes.

11 Q You say in your testimony that the Devereaux School
12 has agreed in writing to serve as a host facility. Are you
13 familiar with the contents of that agreement?

14 A No, I am not although my staff discussed it with
15 the gentlemen who sent the letter and who indicated that he,
16 in fact, did send a letter to Chester County which indicated
17 his agreement to serve in that capacity.

18 Q So it is your testimony that the Chester County
19 Department of Emergency Service has indeed received a letter
20 from the Devereaux School indicating that it has agreed to
21 serve as a host facility for these two schools?

22 A It is my understanding that that is the case, yes.

23 Q Is it your testimony, however, that you are not
24 familiar with the actual terms of that letter?

25 A That is correct.

mn16-3

1 Q Do you have any knowledge whether or not the
2 Devereaux School has agreed to provide any staff assistance
3 in the event that evacuees from the respective Camp Hill
4 special schools are transported to the Devereaux Schol in
5 the event of a radiological emergency?

6 A At the time of the meeting at which Energy
7 Consultants was represented there was a discussion in that
8 regard and the administrator indicated that he would make
9 staff available to the extent that it was possible at the
10 time of the emergency.

11 Q Do you have any further information or opinion as
12 to what to the maximum extent possible means with regard to
13 the position of the Devereaux School regarding the amount of
14 staff support that it might be able to supply?

15 A No, I do not nor do I believe that it has a bearing
16 on the efficiency of the evacuation.

17 Q Are you aware of whether or not there is sufficient
18 staff at both of the respective schools to assist in an
19 evacuation of the mentally retarded individuals that reside
20 at those facilities?

21 A In that there is sufficient staff to handle those
22 individuals on a daily basis, I believe the same staffing ratio
23 would pertain in an emergency situation.

24 Q Do you have any particular knowledge regarding the
25 number of staff members versus the number of mentally retarded

1 individuals at either of those facilities?

2 A. No, I do not.

3 Q Do you have any knowledge regarding the variation
4 in daytime and evening population at those schools due to
5 the additional daytime students who are sometimes there?

6 A. No, I do not.

7 Q Do you have any idea approximately when the
8 agreement with the Devereaux School that you referred to was
9 executed and transmitted to the Chester County Department of
10 Emergency Services?

11 A. I do not although I can say that it is not a recent
12 occurrence.

13 Q Do you have any particular knowledge regarding the
14 number of vehicles available on a daily basis at either of
15 these facilities that might be used in the event of an
16 evacuation?

17 A. No, I do not although the public needs survey
18 would reflect the unmet need.

19 Q Based on that, is it your testimony that the
20 Camp Hill Special School transportation needs were accurately
21 reflected in the survey information which you referred to
22 indicating that there were a number of individuals needing
23 transportation assistance?

24 MR. RADER: Objection. Asked and answered.

25 JUDGE HOYT: Objection sustained.

mnl6-5

1 BY MS. ZITZER: (Resuming)

2 Q In the event that there is not sufficient staff
3 at either of the facilities to implement necessary protective
4 actions and my primary concern is an evacuation, what
5 mechanism exists to provide additional personnel to assist
6 these facilities in conducting an evacuation?

7 MR. RADER: Objection, no foundation for that
8 premise.

9 JUDGE HOYT: Do you wish to be heard, Ms. Zitzer?

10 MS. ZITZER: No. I am willing to rephrase the
11 question.

12 JUDGE HOYT: Very well. Let's try it again.

13 BY MS. ZITZER: (Resuming)

14 Q You have testified that you do not have any
15 specific knowledge of the ratio between the staff at either
16 of the Camp Hill special schools and the number of mentally
17 retarded individuals which reside at those facilities, is that
18 correct?

19 A. (Witness Bradshaw) I do not have any knowledge as
20 to the specific numbers, yes.

21 JUDGE COLE: Do you have a general idea?

22 WITNESS BRADSHAW: I have an idea of a rough total
23 staff and resident population, yes.

24 JUDGE COLE: What are they?

25 WITNESS BRADSHAW: About 110 to 150 for the Camp Hill

mnl6-6

1 Village Farm facility and about 120 for the Camp Hill Special
2 School.

3 JUDGE COLE: One hundred twenty what?

4 WITNESS BRADSHAW: Residents and staff.

5 JUDGE COLE: Total?

6 WITNESS BRADSHAW: Total.

7 JUDGE COLE: Do you know approximately what the
8 ratio is of staff to patients?

9 WITNESS BRADSHAW: No, I did not.

10 BY MS. ZITZER: (Resuming)

11 Q Based on the fact that you are uncertain what the
12 ratio is between the number of staff and the number of
13 mentally retarded individuals at those respective facilities,
14 in the event that there is not sufficient staff to carry out
15 an evacuation, are you aware of any mechanism to provide
16 additional assistance to those facilities to implement an
17 evacuation?

18 MR. RADER: Objection. There has been no testimony
19 in this proceeding as to any lack of staff at these facilities.
20 The witnesses have expressly testified that there was a public
21 survey for unmet needs and I don't recall any testimony as
22 to reported unmet needs for any school staff.

23 MS. ZITZER: Your Honor, I am simply attempting to
24 determine if the witnesses are aware if there is any
25 mechanism to provide any assistance that might be needed since

mnl6-7

1 he has testified that he does not have specific knowledge
2 of the numbers of mentally retarded individuals at the
3 facility, it is a little difficult to ask him of his
4 opinion if there is sufficient staff since he does not appear
5 to have sufficient knowledge to draw that conclusion.

6 I am simply trying to determine if he is aware
7 of the status of the planning process to insure that there
8 is some mechanism, some support mechanism, probably at the
9 municipality or at the county if necessary. I was simply
10 attempting to explore that.

11 JUDGE HOYT: Ms. Zitzer, I don't think this witness
12 has the information as I understand his responses to these
13 questions.

14 MS. ZITZER: Your Honor, the reason I am asking
15 him is that he has offered an opinion as an emergency planner
16 and please excuse me, I am trying to find a direct quote.

17 JUDGE HOYT: Is that the one at the bottom of
18 page 29 that you are thinking about that the transportation
19 host facility needs for these schools has been met.

20 MS. ZITZER: There it specifically refers to
21 transportation and host facility needs but he has also
22 generally provided testimony stating that he believes that all
23 necessary and correct me if I am misphrasing your testimony,
24 however the thrust of his testimony is to state that all
25 necessary arrangements for these particular facilities have

mnl6-8

1 indeed been arranged for. On page 30 at item number 67 the
2 testimony directly states, "Because of the special needs and
3 concerns of these facilities have been identified and met
4 through the planning process, there is no reason why school
5 staff or officials should have any particular reservation
6 regarding the adequacy of planning for these schools."

7 I am simply trying to attempt to determine the
8 degree to which he has specific knowledge regarding those
9 arrangements which he is using as the basis for that
10 statement.

11 JUDGE HOYT: If that is your area of inquiry,
12 Ms. Zitzer, the Board will agree to that. You may inquire
13 on that level.

14 MS. ZITZER: Thank you.

15 JUDGE HOYT: To the extent that you have not
16 already inquired.

17 MS. ZITZER: Certainly.

18 BY MS. ZITZER: (Resuming)

19 Q Could you please provide the basis for the statement
20 that you make here on page 30 of your testimony regarding your
21 testimony that the emergency planning arrangements for these
22 respective schools is adequate in your opinion and therefore,
23 the school officials and staff involved should have no
24 particular reservations regarding the adequacy of those plans?

25 A. (Witness Bradshaw) Yes. There have been provisions

1 made for notification of these facilities, early notification
2 of these facilities, in the event of an emergency. There have
3 been transportation arrangements provided for the identified
4 need and there has been a host facility provided. In this
5 regard any identified need for these facilities at the
6 present time has been incorporated in the existing plans.

7 Q You are aware that these facilities are comprised
8 of a number of mentally retarded individuals, is that correct?

9 A That is correct.

10 Q Do you have any particular knowledge whether or not
11 there has been a determination that there is sufficient staff
12 at the respective facilities to implement an evacuation in the
13 event that one were ordered?

14 A I am aware of no surveys of the staff.

15 Q You have previously testified that you are unaware
16 of the ratio of staff to mentally retarded individuals, is
17 that correct?

18 A That's true. I am not aware of the specific ratios.
19 However, there is no reason to believe that the ratios in an
20 emergency situation would be any different than those that
21 are available to the facility on a daily basis.

22 Q Do you have any idea whether on a daily basis the
23 entire population of either of these schools takes extended
24 bus trips or takes any kind of a similar trip away from the
25 school that would in any way compare to the activity that would

mn16-10

1 be required for the school to undertake in the event that a
2 radiological emergency required an evacuation?

3 A. I am not aware of any such procedures in the
4 schools or conduct in those schools. However, I am aware
5 of the provisions of a plan developed by the Camp Hill Special
6 School which indicates that it would have the staff and the
7 resources available to it to conduct its own evacuation
8 without outside assistance.

9 Q. With regard to the Camp Hill Village Kimberton
10 Hill School, do you have any particular knowledge regarding
11 the sufficiency of staff to carry out an evacuation?

12 MR. RADER: I object to the form of the question.
13 For clarification of this record, I believe there is a school
14 known as the Kimberton Hill Farm School which is not the
15 subject of this contention. I assume Ms. Zitzer is referring
16 to the Camp Hill Kimberton Farm Community which is not, in
17 fact, a school as such as I understand from the testimony
18 of its administrator, Ms. Helen Zepperlin.

19 MS. ZITZER: Your Honor, for the record I am trying
20 to be very careful regarding the names of the schools and I
21 am reading from their letterheads as I am making the statements
22 to make sure that I don't make a mistake and I am not
23 referring to the Kimberton Farms School which is a private
24 school which is separate from this contention.

25 MR. RADER: I believe the transcript will bear me

mnl6-11

1 out that you did use the word "school," Ms. Zitzer, and that
2 is the basis of my objection, Your Honor.

3 MS. ZITZER: The Camp Hill Special School in
4 East Nantmeal Township is a state-licensed school for the
5 mentally retarded. The Camp Hill Village Kimberton Hills
6 facility, I believe, is correctly characterized as a farm
7 community. I didn't intend to burden the record with the
8 information but I think there has been some confusion. I
9 think that is the reason there is a particular concern about
10 the planning for this facility. It is not really a school.
11 It is not considered -- it has just fallen through the cracks
12 in terms of the emergency planning process.

13 JUDGE HOYT: I think, Ms. Zitzer, that the head of
14 that school made an appearance on this record in the limited
15 appearances at Limerick.

16 MS. ZITZER: Yes, she did. She was aware of the
17 motion to strike her testimony and I believe she was concerned
18 whether or not she would indeed have an opportunity to testify
19 and therefore availed herself of the opportunity at the
20 limited appearance session.

21 JUDGE HOYT: From her testimony at the limited
22 appearance I think I understand what type of organization she
23 had and my recollection was that it is not a school. It is
24 a farm community or a commune of some type with a special
25 group of people there in residence.

mnl6-12

1 MS. ZITZER: I would agree. For the sake of
2 clarification I have been identifying the West Vincent
3 facility in question as the Camp Hill Village Kimberton
4 Hills facility and that is the facility that Helen Zepperlin
5 is the director of which I believe is correctly characterized
6 as a farm community of approximately 120 people about half
7 of whom are mentally retarded adults.

8 The Camp Hill Special School Incorporated is in
9 East Nantmeal Township and has a similar size population,
10 62 to 72 who are actually mentally retarded individuals
11 and it is a state-licensed school for the mentally retarded
12 and it is also licensed, I believe, by the Pennsylvania
13 Department of Public Welfare as a residential community
14 facility for the mentally retarded. That one I have been
15 referring to as a school for the record.

end#16

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1 JUDGE HOYT: Very well. I think we have a
2 great deal of explanation there as to what
3 everybody understands all these places to be. If you will
4 carefully identify them each time -- I realize it is
5 probably burdensome in wording the question, but
6 apparently it is necessary in view of the close similarity
7 of the names involved.

8 MS. ZITZER: Certainly.

9 BY MS. ZITZER:

10 Q Mr. Bradshaw, let's take a hypothetical
11 situation where there would not be sufficient staff available
12 at either of these facilities to implement an evacuation in
13 the event of a radiological emergency.

14 According to the plans that you are familiar
15 with, is there a mechanism in place for additional
16 personnel to provide assistance to these facilities?

17 A (Witness Bradshaw) First of all, I am not
18 willing to recognize your hypothetical situation because I
19 don't think there is anything that points to the fact that
20 those staff will not be available at the time of the
21 emergency.

22 The plans are certainly flexible enough to
23 respond to any need at the time of the emergency. And
24 in fact, transportation assistance that is being provided
25 would include a bus driver and a navigator. And these

1 individuals would be available to assist in the boarding
2 of busses or any other need at the facility at the time
3 they appeared there.

4 Q Do you have any particular knowledge of
5 plans that might be being considered by the respective
6 municipalities to provide additional assistance in the
7 hypothetical situation where it might be needed?

8 A I am aware of no requests for special
9 assistance. I have no doubt that if there were such
10 a request made that the municipal and county officials
11 would respond. I have no reason to assume that that
12 request even exists.

13 Q You have testified that with regard to the
14 Camp Hill Village Kimberton Hill facility in West Vincent
15 Township that the township emergency coordinator
16 has had some degree of contact with the director,
17 Helen Zepperlin, to discuss the arrangements for that
18 facility; is that correct?

19 A That is correct.

20 Q Are you aware of whether or not they have had
21 any discussions regarding the number of staff required to
22 implement an evacuation and whether or not the school
23 might -- I am sorry -- whether or not the facility
24 might under some hypothetical circumstance need
25 some additional support from either the township or the

1 county?

2 A I am not aware of any such discussion.

3 Q In the hypothetical situation where such
4 a circumstance might occur, do you have any
5 opinion with regard to whether or not West Vincent
6 Township would be able to provide that type of
7 assistance?

8 A I am not aware of the specific capabilities
9 of West Vincent Township to respond to an unmet
10 staffing need.

11 However, there is a planning mechanism
12 to respond to unmet needs in the municipal and county
13 plans.

14 Q With regard to this hypothetical situation,
15 could you please describe what that would be with
16 regard to unmet staffing needs for either of these
17 respective facilities?

18 A As I said, I don't think it is an acceptable
19 hypothetical situation. We are talking about a staff
20 who, in this case, resided with these clients. They
21 are surrogate parents. And as Miss Zepperlin indicated
22 in her testimony, she characterized them as volunteers
23 acting out of conscience.

24 I don't think this type of person would
25 abandon or be unavailable to serve the clients that it

1 resides with on a daily basis.

2 I am sure that they would be available, and
3 they would accompany the clients to a host facility.
4 In fact, in that they are residents of that facility and
5 in a relocation they themselves would be seeking
6 a relocation point, it seems logical to me that they would
7 relocate with the clients.

8 Q Do you have any knowledge of whether or not
9 the staff you referred to would also have family members
10 in the vicinity that they might also have concerns about?

11 A As I understand it, the majority of the
12 staff reside on these facilities with their families.

13 Q What is that information based upon?

14 A Information obtained through the planning
15 process in addition to the testimony provided by the
16 directors of these facilities.

17 Q You are talking about the prefiled testimony
18 that has been submitted by Limerick Ecology Action in this
19 proceeding?

20 A As one source, yes.

21 Q With regard to the testimony that you mentioned,
22 was there other testimony you were referring to?

23 A No. There wasn't.

24 Q Okay.

25 You seem very familiar with Miss Zepperlin's

1 prefiled testimony. Have you read it?

2 A Yes, I have.

3 MS. ZITZER: Your Honor, I don't think this
4 is the appropriate place to discuss it, but there are
5 several concerns in the testimony about the issue of the
6 reliability of provisions of staff.

7 I think that Mrs. Zepperlin is probably the
8 appropriate witness to discuss this with. I wouldn't
9 have brought this up if the witness hadn't offered
10 his knowledge based on the statement that had been filed.

11 I guess I am a little confused at this point
12 whether to simply move on to another subject area, whether
13 it is appropriate to question the witness further.

14 He has expressed opinions as an emergency
15 planner regarding the sufficiency of staff based on
16 testimony that, frankly, contradicts what he is saying.

17 I guess I am looking to the Board for some
18 guidance here as to whether or not it is appropriate to
19 continue questioning him on this subject matter or not.

20 MR. RADER: Your Honor, if I may be heard
21 briefly. I move to strike Miss Zitzer's remarks as
22 argument and improper.

23 Miss Zitzer is a representative of LEA and
24 is certainly familiar at this point; she knows how
25 to conduct herself and cross-examine witnesses.

1 I think it is inappropriate for her to
2 seek guidance from the Board in that capacity. I think
3 that Mrs. Zitzer should continue her cross-examination
4 of the witnesses promptly and expeditiously.

5 JUDGE HOYT: Two things, Mrs. Zitzer.

6 One, I don't think that this or any other Board
7 can extend its guidance to you. You have entered this
8 litigation as a full partner, and are charged with the
9 same responsibilities as any other representative or
10 counsel may have.

11 MS. ZITZER: Might I ask a procedural question?
12 If it is out of order, please instruct me, and I will
13 continue.

14 JUDGE HOYT: Let me finish what I was going to
15 suggest to you.

16 You may conduct your cross-examination of
17 these witnesses in any fashion that you may wish, subject
18 of course to the objections and the necessary rulings
19 which would have to flow from such objections.

20 If in the event you wish to have these
21 witnesses recalled after you have completed other testimony,
22 if you will make that fact known to this Board and to the
23 Applicant, those witnesses would be recalled, in which
24 event they would become your witnesses, albeit a hostile
25 witness or more than likely declared a hostile witness.

1 If you wish to examine the witnesses further in
2 regard to this, it will be permitted. I don't think,
3 however, the fact that they have read the prefiled
4 testimony of another witness in this case necessarily
5 causes any concern at this point.

6 MS. ZITZER: My only concern was whether it
7 was proper to ask one further question regarding that
8 testimony.

9 JUDGE HOYT: Well, that will have to be your
10 decision.

11 MS. ZITZER: Thank you.

12 BY MS. ZITZER:

13 Q Mr. Bradshaw, you have stated previously
14 that you have some degree of familiarity with the
15 prefiled testimony of Mrs. Helen Zepperlin on behalf of
16 the Camp Hill Village Kimberton Hills facility; is
17 that correct?

18 A That is correct.

19 Q You have also testified that you are not
20 aware of any concerns that Mrs. Zepperlin has regarding
21 a possible situation where there would be an insufficient
22 number of staff to evacuate that facility; is that correct?

23 MR. RADER: I object. That is a mischaracterization
24 of the witness's testimony. I believe he clearly
25 testified that there was no reported need to the municipal

1 coordinator regarding any unmet need for staffing.

2 MS. ZITZER: He also testified
3 that he had no knowledge -- I'm sorry.

4 JUDGE HOYT: Mrs. Zitzer, let's see if we can
5 get the anser. If the witness doesn't have the
6 information, I think counsel here is fully prepared to
7 tell us that.

8 WITNESS BRADSHAW: I previously stated that
9 I was aware of no identified need for staffing nor of
10 any survey of the population which would indicate that
11 there was not an indication on the part of the staff to
12 respond in this type of emergency.

13 BY MS. ZITZER:

14 Q To the degree that you recall, Mr. Bradshaw,
15 are you aware of whether or not Mrs. Zepperlin's
16 testimony expressed any concerns about the adequacy of
17 staff available to implement an evacuation in the
18 event of a radiological emergency?

19 MR. RADER: Objection. The testimony
20 speaks for itself.

21 JUDGE HOYT: I will let the question be
22 answered, counsel.

23 The objection is overruled.

24 WITNESS BRADSHAW: I am aware of the concern,
25 although there was no basis established for her concern.

1 (Pause.)

2 BY MS. ZITZER:

3 Q On page 30 of your testimony in the
4 middle paragraph that is numbered 66, you state that
5 orientation offered as training will alleviate any
6 unjustified fear or apprehension which might otherwise
7 interfere with the fulfillment of these responsibilities.

8 Could you please discuss what you mean by the
9 term "unjustified fear"?

10 A I think it is common knowledge that
11 individuals have expressed concern as to the effects of
12 radiation and, in that sense, our training programs
13 address radiation and its effects.

14 Q Could you please explain how the training
15 program will alleviate any unjustified fear or apprehension
16 that these particular individuals might have?

17 A In a general way, yes. By providing the
18 scientific basis of what radiation is or what its
19 biological effects are, a lot of myths are put to
20 rest and a lot of questions are answered.

21 In that regard, it gives people a better
22 understanding of what they may have to deal with and makes
23 them more likely to efficiently implement their
24 responsibilities.

25 Q If you are aware, could you please provide any

1 information regarding the numbers of individuals at either
2 of these respective facilities who have received such
3 training?

4 A I indicated it was offered. The offer was
5 not accepted.

6 Q Is that true in both cases?

7 A Yes, it is.

8 Q Further in your testimony after item number 67
9 you state that county and municipal planners in Chester
10 County have demonstrated their sensitivity to the
11 particular needs and concerns of these facilities.

12 How, in your opinion, have these planners
13 demonstrated their sensitivity to the particular needs
14 and concerns?

15 A By incorporating these facilities into notifi-
16 cation procedures of the municipal plans; by responding
17 to the transportation needs that have been identified;
18 and by obtaining a host facility to which these
19 facilities could be relocated.

20 MS. ZITZER: Just a moment.

21 (Pause.)

22 BY MS. ZITZER:

23 Q Mr. Bradshaw, do you have any information whether
24 or not the respective directors of either of these
25 facilities share your opinion with regard to the adequacy

1 of the arrangements for their particular facilities?

2 A No. I have had no such contact with those
3 directors.

4 Q On page 31 of your testimony, after item number
5 68, you cite a reference to Commonwealth law which you
6 state requires these facilities to develop emergency
7 plans for any contingencies that might require
8 an emergency response.

9 Could you please state whether or not this
10 statute that you refer to includes provisions for an
11 evacuation of the entire facility?

12 A I am sorry. Could you repeat that?

13 Q On page 31 of your testimony, you refer to
14 a section of Commonwealth law specifically the regulations
15 for community, residential, mental retardation facilities.
16 And you state that because this requirement exists
17 to develop -- for the facility to develop emergency plans
18 for any contingency requiring emergency response, that it
19 should be a simple matter for the facilities in question
20 to make any additional arrangements necessary with regard
21 to emergency planning for Limerick.

22 My question to you is, this section of
23 the Pennsylvania law that you refer to, does it
24 specifically refer to an emergency situation requiring
25 an evacuation of the entire facility?

1 A The provision requires emergency planning
2 for relocation of the facility in the event of any
3 manmade or natural disaster, as I recall the provisions.

4 Q Are you aware of whether or not these
5 respective facilities have such plans presently in place?

6 A The Camp Hill Special School is affected by
7 that provision. And they do, in fact, have a plan to
8 meet that licensing requirement.

9 Q Have they ever implemented that plan?

10 A I do not know.

11 Q With regard to the Camp Hill Village Kimberton
12 Hills facility in West Vincent Township, are you aware of
13 whether or not there are any similar provisions that have
14 been developed by the facility?

15 A The requirement of that Commonwealth
16 regulation does not apply to the Camp Hill Farm facility.
17 And I am aware of no such plan that that facility has.

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1 Q Further along in your testimony on that same page
2 with regard to the Camp Hill Special School which is in East
3 Nantmeal Township, you state that the existence of such
4 emergency plans for other emergencies, should resolve any
5 outstanding issue of coordination or participation of school
6 personnel.

7 Do you have any particular concerns about the
8 participation of school personnel?

9 A No, I do not.

10 Q Are you aware whether or not Mr. Wolf has determined
11 whether or not there are sufficient personnel at the school
12 to implement an evacuation?

13 MR. RADER: Objection, asked and answered.

14 I believe the witnesses previously testified that
15 they were unaware of any particular survey taken by Mr. Wolf
16 of his staff.

17 JUDGE HOYT: That is Mr. Wolf of the --

18 MR. RADER: -- Camp Hill Special School.

19 JUDGE HOYT: -- Camp Hill Special School?

20 MR. RADER: Yes, ma'am.

21 (Ms. Zitzer conferring.)

22 JUDGE HOYT: I didn't want to interrupt you while
23 you were conferring. Did you find what you need, and did
24 you want to respond to objection of counsel?

25 MS. ZITZER: No.

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JUDGE HOYT: Very well, objection is sustained.

Thank you.

BY MS. ZITZER:

Q On page 30 of your testimony, you state that Chester County and municipal planners have demonstrated their sensitivity to the particular needs of these facilities and have expressed a willingness to meet with school administrators at any time to discuss and resolve any possible problem.

Are you aware of whether or not they have also expressed any commitment to fulfill any responsibilities which would otherwise not be carried out by the Camp Hill staff in the event that there was some situation that resulted in an insufficient staff -- an insufficient ratio between the staff and the number of mentally retarded individuals there that required transportation assistance?

MR. RADER: Objection. This was again covered in considerable detail several minutes ago. I recall at least ten minutes of discussion on this very point of hypothetical staffing needs.

MS. ZITZER: Your Honor, I was simply trying --

JUDGE HOYT: I will note, Ms. Zitzer, that that particular section had been examined on. I think the question is the same.

MS. ZITZER: I was simply trying to determine whether or not the witness has any knowledge of the

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1 willingness of the County and Municipal officials to provide
2 such assistance were it indeed necessary.

3 MR.RADER: That's exactly the question the witness
4 answered by stating he was sure that any unmet need would
5 be passed on to the appropriate official to be filled.

6 JUDGE HOYT: I believe he described it as the
7 County official, Ms. Zitzer.

8 MS. ZITZER: I don't recall.

9 JUDGE HOYT: It is in the record.

10 If, after you look at the transcript tomorrow you
11 don't find it, I will let you ask the question. But I believe
12 it is there.

13 MS. ZITZER: Okay. Just a minute.

14 (Pause.)

15 I believe at this time I am ready to move on to
16 Contention 28.

17 JUDGE HOYT: Very well, we will start with LEA-28.

18 And, I believe that is divided into two sections,
19 28-A and 28-B.

20 Are you going to go back and forth between the two?

21 MS. ZITZER: No.

22 JUDGE HOYT: You will finish A and then go into B?

23 MS. ZITZER: Yes.

24 JUDGE HOYT: Very well.

25 Please proceed.

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1 BY MS. ZITZER:

2 Q On page 32 of your testimony you state that the
3 National Guard has the capability to assist with towing and
4 the provision of emergency fuel supplies to be furnished on a
5 minimum essential basis.

6 Could you please discuss what you mean by a minimum
7 essential basis?

8 A (Witness Bradshaw) That is the language that is
9 used in Annex E, Commonwealth Disaster Operations Plan.

10 In effect, it means that those resources would be
11 utilized as needed.

12 Q You go on to say that that would be done in
13 coordination and with supplementation to the capabilities of
14 Municipal and County governments and other State agencies.

15 Could you please state what other State agencies
16 you are referring to there?

17 A PennDOT would be another agency with similar
18 capabilities.

19 Q Are there any others that you were referring to?

20 A No.

21 JUDGE HOYT: Then we end up with that testimony
22 being other State agency, do we not?

23 WITNESS BRADSHAW: Yes.

24 BY MS. ZITZER:

25 Q You go on to say that the Pennsylvania Department

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1 of Transportation has the shared responsibility for clearance
2 of obstacles to traffic flow, et cetera, and other responsi-
3 bilities you describe in your testimony.

4 What is the basis for the statement which follows
5 that which states that:

6 "Fuel and towing resources will be provided
7 by the National Guard and PennDOT for all main
8 evacuation routes regardless of whether or not they
9 are state or non-state roads."

10 A (Witness Bradshaw) That information is provided
11 in Annex E, which says it will be provided along all main
12 evacuation routes. No distinction between state and non-state
13 roads.

14 Q Does that statement also apply to resources provided
15 by PennDOT?

16 A Yes, it does.

17 Q On page 33 of your testimony you state that the
18 Pennsylvania State Police is responsible for coordinating with
19 PEMA, PennDOT and the National Guard for a number of
20 responsibilities.

21 Can you please tell us what agreements have been
22 reached with the Pennsylvania State Police on a county by
23 county basis regarding the State Police involvement in
24 traffic control assignments?

25 A Yes. Representative of the State Police is

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1 included as a liaison person to the County Emergency Operation
2 Center Staff. They would be present at the time of the
3 emergency to coordinate with the County the implementation
4 of the Pennsylvania State Police responsibilities.

5 In addition, the Pennsylvania State Police have
6 been directly involved and designated the traffic and access
7 control points which they will be manning. And that information
8 is provided in the plans.

9 Q Have agreements been reached between each of the
10 Counties with the Pennsylvania State Police regarding the
11 provision of these traffic control assignments?

12 A There are no written agreements as per State
13 policy, that such written agreements are not necessary between
14 emergency response organizations.

15 It is understood and the State Police have taken
16 an active role in developing the plans that they understand
17 their role.

18 Q You are not aware of any agreements that have been
19 sought or are currently being sought with the Pennsylvania
20 State Police regarding the assignment of personnel to
21 traffic control assignment, particularly for access -- for
22 the manning of access control points outside the EPZ?

23 MR. RADER: Objection. This goes beyond the
24 scope of the contention which is related to towing and fuel
25 supplies along State roads.

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1 MS. ZITZER: I am willing to wait. It does -- it
2 is part of the -- let me take that back. It is part of the
3 contention, because there is discussion of provisions to
4 ensure that there are no obstacles to traffic flow, and that
5 there are no -- that any potential bottlecks are avoided.

6 That statement is made directly in the testimony.
7 I am simply referring to the sentence where he states:

8 "Accordingly, the State and Local Police will
9 maintain an orderly traffic flow by the avoidance of
10 bottlenecks."

11 Simply determining what knowledge the witness has
12 of those arrangements to provide police for those purposes.

13 MR. RADER: As is sometimes the case, we provided
14 certain background information. But I don't believe that
15 acts to expand the contention which is related as I say,
16 solely to fuel supplies and towing services along state roads.

17 And in particular the responsibilities of the
18 National Guard in that respect.

19 MS. ZITZER: On page 33, after Item 73 is the place
20 I am referring to. There is a statement regarding the
21 Pennsylvania State Police involvement in traffic control.

22 And it is also referred to in Item 72.

23 JUDGE HOYT: I don't find it in the specifications
24 of your contention LEA-28.

25 MS. ZITZER: I think the thrust of the contention

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1 was a concern about assurance that the roads would not be
2 congested in the event of an evacuation for the reasons
3 specified in the contention.

4 And, since the Applicant has offered testimony --
5 the witnesses have offered testimony discussing provisions
6 that it relies upon regarding traffic control, I was simply
7 exploring the degree of the witnesses' knowledge for the
8 statements that are contained in the testimony, particularly
9 the paragraphs numbered 72 and 73.

10 JUDGE HOYT: I believe the witness has responded
11 as to paragraph 72, as to his knowledge of that, the basis for
12 his testimony there, Ms. Zitzer.

13 MS. ZITZER: Your Honor, I was simply looking at --
14 at the end of 73 there is a sentence that says:

15 "Accordingly, the State and Local Police will
16 maintain an orderly traffic flow by the avoidance of
17 bottlenecks."

18 JUDGE HOYT: If you want to inquire on the basis
19 of that --

20 MS. ZITZER: That is what I was attempting to do.

21 JUDGE HOYT: Very well, let's see if you can get at
22 that then.

23 We will overrule your objection and limit the
24 question however, that one, the knowledge they have as a
25 panel, with that testimony, from where that testimony was

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1 derived.

2 WITNESS BRADSHAW: I'm sorry, is it our turn to
3 respond to that?

4 JUDGE HOYT: If we get a question.

5 BY MS. ZITZER:

6 Q You testified that State and Local Police will
7 maintain an orderly traffic flow by the avoidance of bottle-
8 necks. Could you describe what you mean by bottlenecks?

9 A (Witness Bradshaw) Bottlenecks are areas of
10 particular congestion on any evacuation route.

11 Q Are you aware of whether or not any agreements
12 have been sought or are currently under development with the
13 Pennsylvania State Police with regard to the staffing of the
14 access control and traffic control points identified in the
15 respective County draft plans?

16 A No agreements are being sought.

17 JUDGE COLE: I'm sorry, you said, "No, no agreements
18 are being sought," or, "No agreements are being sought."

19 WITNESS BRADSHAW: No agreements are being sought.

20 (Laughter.)

21 BY MS. ZITZER:

22 Q Is it your testimony that no agreements are
23 required?

24 A (Witness Bradshaw) Yes.

25 Q With regard to the municipalities that will

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1 supplement the State Police with regard to manning of traffic
2 control points at key local intersections, are any particular
3 agreements or arrangements required between the municipalities
4 involved and the county and/or the police?

5 A Not formal separate agreements as such. The
6 provisions to man those designated traffic and access control
7 sites and the responsibilities are outlined -- are more than
8 outlined, they are specified in the Municipal Plans. In that
9 the municipality adopts those plans, that in effect serves
10 as confirmation of their willingness to man and perform
11 those responsible functions.

12 Q Can you provide any information regarding what
13 barracks of the Pennsylvania State Police in particular are
14 referred to in Section 72 of your testimony regarding those
15 that will be involved in controlling the flow of traffic
16 involved in conducting traffic surveillance?

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1 A. (Witness Bradshaw) There are more than one barracks
2 involved and it would include any such Pennsylvania State
3 Police facilities in the three counties and to my knowledge
4 it also includes barracks outside those three counties.

5 The state police as I understand it have developed
6 their own plan in this regard.

7 Q. Do the state police have any responsibilities with
8 regard to towing, snow removal or the provision of fuel
9 supplies as the plans are currently developed?

10 A. Not to my knowledge.

11 Q. For Montgomery County, could you please provide any
12 additional information you have knowledge of regarding which
13 barracks are involved?

14 A. (Witness Cunningham) The Limerick barracks is
15 involved and it is my understanding that the Pennsylvania
16 State Police have a plan which would involve other barracks
17 that would be either located in the county or located outside
18 the county as we have previously testified. I do not know
19 the designations of those barracks. I believe the Limerick
20 barracks is Troop K but that is even just from recollection.

21 Q. Are you aware of whether or not PennDot or the
22 National Guard has made any determination that the major
23 evacuation routes are being capable of handling the projected
24 and actual traffic loads in the event of a radiological
25 emergency?

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1 MR. RADER: Objection. This is clearly outside the
2 scope of the contention.

3 JUDGE HOYT: Sustained.

4 MS. ZITZER: Your Honor, I am having some problem
5 with the testimony because of the sections 72 and 73 which
6 even according to the witness' testimony really don't have
7 anything to do with the provisions of towing and snow removal
8 and fuel supplies, the testimony referring to the involvement
9 of the Pennsylvania State Police and the witness has testified
10 that PennDot and the National Guard have the responsibility
11 to insure that the roads are kept open and that the main
12 evacuation routes are not congested. I was simply trying to
13 elicit any knowledge that the witness had regarding any
14 information that they might have regarding the road conditions
15 involved.

16 JUDGE HOYT: Am I to understand that you are moving
17 to strike that testimony in paragraph 72?

18 MS. ZITZER: I would think that it would be
19 appropriate, yes, sections 72 and 73.

20 JUDGE HOYT: If that is your motion, then we will
21 have to argue the motion. Do you wish to respond to that, sir?

22 MR. RADER: As a matter of fact, as I have stated
23 a lot of this was provided as background. If the Board is
24 willing to strike as well the earlier questions and answers
25 relating to those two paragraphs, I have no objection.

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1 JUDGE HOYT: Do any other parties wish to be heard?
2 Ms. Ferkin?

3 MS. FERKIN: The Commonwealth has no position on the
4 motion.

5 JUDGE HOYT: How about the staff?

6 MR. HASSELL: The staff has no position at this time,
7 Your Honor.

8 JUDGE HOYT: Mr. Hirsch.

9 MR. HIRSCH: No, Your Honor.

10 MR. MCGURREN: My name is J. McGurren. I also
11 represent the NRC staff. I just want to make clear, are we
12 speaking of motions to strike of all of 72 and all of 73?

13 JUDGE HOYT: The motion as I understand what
14 representative for the LEA wanted to do was to strike paragraphs
15 72 and 73 of the prefiled testimony of this panel of witnesses
16 that is contained on page 33 of their prefiled testimony.

17 MR. MCGURREN: It just appears to be as an observa-
18 tion that the first part of paragraph 72 does relate to the
19 contention, that part that states, "As stated in Annex E,
20 Basic Plan, Sections VII.A.10.b and VII.A.19.e, the Pennsylvania
21 State Police is responsible for coordinating with PEMA, PennDOT,
22 and the National Guard to control the orderly evacuation of
23 the EPZ ...". That part certainly appears to me, Your Honor,
24 to be relevant.

25 JUDGE HOYT: And there had been questions on that and

1 responses by the witnesses as I recall, counsel.

2 MR. MCGURREN: So to the extent that the motion
3 also includes that portion of part 72, I would think Your
4 Honor, that we would oppose that motion as far as that
5 language is concerned.

6 MS. ZITZER: I would be willing to make the motion
7 apply to section 73.

8 JUDGE HOYT: Do you want to vacate your request then
9 for the striking of 72?

10 MS. ZITZER: I would like to move that item 73
11 from the applicant's prefiled testimony on page 33 be
12 stricken because of it dealing with subject matter not
13 contained in the contention and I would like the Board to
14 consider the portion of 72 regarding the involvement of the
15 Pennsylvania State Police.

16 JUDGE HOYT: Now we have limited it just to 73,
17 Do you wish to be heard, Ms. Ferkin?

18 MS. FERKIN: The Commonwealth still has no position.

19 JUDGE HOYT: Anyone from FEMA?

20 MR. HIRSCH: No, Your Honor, We have no position
21 at this time.

22 JUDGE HOYT: How about NRC staff? Do you want to
23 oppose or no position? You have three possibilities here,
24 column "a", "b" and "c".

25 MR. HASSELL: After consulting, we are sure that we

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1 have no position with respect to striking 73.

2 JUDGE HOYT: Do you wish to make any argument
3 against the motion?

4 MR. RADER: No. As I say, we consent to that
5 subject, of course, to the Board's striking all the prior
6 questions and answers relating to those portions of the
7 testimony and in particular the manning of access control
8 points and traffic control points.

9 JUDGE HOYT: The motion of LEA to strike paragraph
10 73 of the prefiled testimony of the applicant as found on
11 page 33 of that described testimony is denied. The paragraph
12 will remain in the prefiled testimony.

13 MR. RADER: May I inquire is the Board also striking
14 those previous questions and answers related to that paragraph?

15 JUDGE HOYT: No. That was not the ruling, counsel.
16 We will permit the paragraph to remain in and the questions
17 will remain as asked and answered on this record.

18 MR. RADER: Very well.

19 JUDGE HOYT: If your motion was an amendment to
20 it to strike the questions and answers in the testimony, that
21 portion is also denied.

22 MR. RADER: I did not have an amendment as such.

23 JUDGE HOYT: I was merely characterizing what you
24 were doing.

25 MR. RADER: All right.

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1 JUDGE HOYT: Let's proceed.

2 BY MS. ZITZER: (Resuming)

3 Q Do you have any independent information or source
4 of information with respect to the availability of PennDot
5 resources or the National Guard for snow removal other than
6 what is written in the state or municipal plans or county
7 plans that you are aware of?

8 A. (Witness Bradshaw) No, I do not.

9 Q Would the same be true regarding information for
10 the provision of towing?

11 A. Other than what is in the existing plans, I do not
12 have any specific information.

13 Q Would the same statement also apply to the
14 provision of fuel supplies?

15 A. Yes.

16 Q On page 34, part 75 of your testimony, you make
17 two statements with regard to the mobilization of the National
18 Guard. The first one states that "discrete elements of each
19 unit could be deployed when mobilized." What are these
20 discrete units that you are referring to? I am sorry, you
21 used the word "discrete elements of each unit."

22 A. I am not speaking to any specific element or unit.
23 It would apply to any resource, manpower equipment resource,
24 below the overall unit strength.

25 Q Is there any standardized definition for what is a

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1 unit and how many personnel are involved in any given unit?

2 A. I am sure there is a military connotation. I am
3 not familiar with its definition.

4 Q. What information do you base your statement that
5 these discrete units could be deployed when mobilized upon?

6 A. This subject has been discussed frequently at
7 planning coordination meetings between Energy Consultants,
8 the counties and the Commonwealth and PEMA has reported
9 periodically on the status of National Guard mobilization
10 and this type of information has been discussed by PEMA at
11 those meetings.

12 Q. You go on to say that the National Guard could prepare
13 for mobilization and deployment upon notice by PEMA rather
14 than awaiting a formal order by the Governor thereby reducing
15 mobilization time. What information is this based upon?

16 A. The same information I just mentioned, that is
17 information obtained through planning coordination meetings
18 with the Commonwealth and the counties.

19 Q. Is this procedure one that is frequently utilized?

20 A. I would not know.

21 Q. Are you aware of whether or not any special arrange-
22 ments have to be made in order for PEMA to authorize such
23 deployment?

24 A. No, I am not. It would be a Commonwealth procedure.

25 Q. Does PEMA have the authority to issue an order for

mn19-8

1 mobilization and deployment of the National Guard?

2 A. You would have to ask the Commonwealth.

3 Q. In the Limerick EPZ, what facilities does PennDOT
4 have where the required resources that might be necessary for
5 the implementation of either the provision of towing and/or
6 fuel supplies have available to the best of your knowledge?

7 A. As I understand the structure of PennDOT, there is a
8 county office in each county and several supply points where
9 equipment would be stored. I do not have any direct knowledge
10 as to the exact numbers of such equipment.

11 Q. You have stated that it is your opinion that
12 agreements are not necessary with tow truck drivers. Is that
13 correct?

14 A. I believe --

15 Q. I am sorry. I am on the wrong contention again.
16 I will strike that. I will wait until I get to the second
17 part of the contention.

18 MS. ZITZER: I think I have completed 28-A. At
19 this time I could start 28-B if that would be appropriate.

20 JUDGE HOYT: Yes. I think we will go ahead.

21 MS. ZITZER: I am sorry. I have one follow-up
22 question.

23 JUDGE HOYT: That is on 28-A?

24 MS. ZITZER: Yes. It is up there with his last
25 response.

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1 JUDGE HOYT: Very well.

2 BY MS. ZITZER: (Resuming)

3 Q On page 33, paragraph 74, you refer to the
4 facilities that PennDot maintains in each of the risk
5 counties and you state that these facilities can be promptly
6 activated in the event that that were required but it is
7 your testimony that you are not familiar with the actual
8 resources available at any of these facilities, is that
9 correct?

10 A (Witness Bradshaw) It is correct that I am not
11 familiar with the exact numbers although I think it is common
12 knowledge that PennDOT resources are extensive and that
13 they service these areas routinely.

14 Q What is the basis for your statement that these
15 resources could be activated and deployed rapidly independent
16 of and prior to the National Guard mobilization?

17 A Because PennDOT has no affiliation with the National
18 Guard the counties have established relationships with their
19 county offices of PennDOT. As I said, a liason is provided
20 by PennDOT to the county emergency operation center. There
21 is a 24-hour number available to the counties which they have
22 utilized in the past.

23 Q Could you be more specific what you mean when you
24 say "deployed rapidly," could you give me an estimate of the
25 time that you are referring to approximately?

1 A I think the term speaks for itself. In
2 emergency situations, PennDOT commonly responds in the
3 manner appropriate. And I think you would have to talk
4 to the county with regard to specific mobilization times
5 or to PennDOT directly.

6 Q Moving on to item B of the contention which
7 relates to the provisions for towing, gasoline, and snow
8 removal --

9 JUDGE HOYT: That is what we have labeled
10 as LEA 28-B.

11 BY MS. ZITZER:

12 Q You state on page 35, item number 77, in your
13 testimony that support organizations including
14 PennDOT will provide two trucks, snow removal, and
15 emergency fuel service provision along the lines for which
16 they have already been trained and will be performing these
17 tasks on a voluntary basis.

18 Could you please describe what you mean
19 by your statement that these tasks will be performed on a
20 voluntary basis?

21 A Yes. I mean that there is no contractual
22 obligations involved, that these entities have agreed to
23 participate.

24 Q Are you aware of whether that applies to
25 employees of PennDOT?

1 A I am speaking with regard to the organizations,
2 not the individual personnel. Their arrangements would
3 be a matter of their organizational prerogatives.

4 Q So it is your testimony that, as you referred
5 to it, the organization of PennDOT would be performing
6 that task on a voluntary basis rather than your making
7 any reference to the individuals being involved?

8 A That is my understanding, yes.

9 Q And that is what your testimony, when you refer
10 to performance of these tasks on a voluntary basis, you
11 are referring to the organizations; is that correct?

12 A Correct.

13 Q In that same sentence, however, you
14 refer to the personnel from those organizations.

15 My question is, your statement saying that
16 the performance will be on a voluntary basis refers to
17 the organizations themselves and not to the personnel?

18 A That is correct.

19 Q You further, in paragraph 78, state that
20 PennDOT will provide its own equipment to assist in the
21 removal of disabled vehicles and other road obstacles.

22 Is that the equipment that would be maintained
23 at the PennDOT facilities in each of the three risk
24 counties that you are referring to?

25 A Yes, it is.

1 Q Do you have any knowledge how extensive that
2 equipment is?

3 A As I have stated, I do not know exact numbers
4 of equipment involved, only the general scope of their
5 capabilities.

6 Q On page 34 of your testimony, you again state
7 that Annex E does not distinguish between state and nonstate
8 roads that are used as evacuation routes.

9 Is it correct that your testimony regarding
10 PennDOT's responsibilities is that there is no distinction
11 between state and nonstate roads with regard to PennDOT's
12 responsibility in an emergency radiological situation?

13 A That is correct. Annex E provides that
14 these services will be provided on main evacuation
15 routes and does not make a distinction as to nonstate or
16 state roads.

17 Q How are the main evacuation routes that this would
18 apply to determined? Are you referring to the maps in
19 the plans or are you referring to some specific
20 designation of the quote main evacuation routes?

21 A The maps in the county and municipal plans
22 do include designated main evacuation routes. The plans
23 also describe what -- provide a description of what those
24 designated main routes are.

25 Q When you refer to main evacuation routes, there is

1 no distinction with regard to the classification of the
2 road other than whether or not it has been designated for
3 evacuation traffic; is that correct?

4 A That is not a consideration, right. There is no
5 distinction made in designating main evacuation route
6 as to whether it is a state or nonstate road.

7 Q Your testimony states that you believe it is
8 unnecessary for the counties to obtain agreements with
9 tow truck operators; is that correct?

10 A That is correct.

11 Q Who has made this decision?

12 A It is a county decision.

13 Q Are you aware of the basis for that decision?

14 A The basis is that the counties deal routinely
15 with road clearance, towing facilities in their county.
16 They dispatch these services, and these services are
17 provided on a routine basis without agreement. Working
18 relationships exist with those agencies.

19 Q Is the same true for snow removal provisions?

20 A No. It is not.

21 Q Who has the responsibility to make arrangements
22 for the provision of snow removal arrangements?

23 A As the municipal plans indicate, the existing
24 snow removal contracts pertain to a Limerick emergency
25 as well. This varies. In some instances, municipalities

1 have their own resources. In some instances they
2 contract that responsibility. In other instances it is
3 provided routinely by PennDOT.

4 Q Are you aware of whether or not the municipalities
5 have contracted for such services to provide provisions
6 for the removal of snow in the event of a radiological
7 emergency?

8 A To my knowledge, there are no municipalities
9 that have developed specific contracts or agreements
10 specific to a Limerick emergency.

11 As I said, the prevailing existing arrangements
12 would prevail in a Limerick emergency.

13 Q Is that your opinion or is that based on
14 any particular knowledge or discussion that you are
15 aware of that have taken place?

16 A That is based on our discussions with the municipal
17 emergency management agencies.

18 Q Which municipal emergency management agencies
19 has this subject been discussed with?

20 A I couldn't be specific other than that is
21 an item that would be under review when we meet with the
22 municipalities routinely in the development of their
23 plans. There is no municipality that that would
24 be excluded from.

25 Q Are you aware of whether or not generally --

1 I am aware there may be some exceptions, the agreements
2 that the municipalities presently have for the
3 provision of snow removal, whether these are verbal
4 agreements or written agreements?

5 A I do not have any direct knowledge of
6 what those agreements are, although it is my understanding
7 that these are existing contracts and they are written
8 contracts.

9 Q Do you have any knowledge of whether or not
10 these provisions will, indeed, apply to the circumstances
11 of a radiological emergency?

12 A They are not exclusive.

13 JUDGE HOYT: When you get to a good point,
14 I would suggest that you let us know so that the
15 hearing can be adjourned for the day. It is 5 o'clock.

16 MS. ZITZER: This would be a good time.
17 I have probably only a few more questions, but I think I
18 could be much more focused in them if I didn't attempt
19 to complete them now. I think it might be more
20 efficient for everyone's purpose.

21 JUDGE HOYT: Very well. The hearing will recess
22 until 9 o'clock in the morning, and I will remind you that
23 the copies of the order are on the left-hand corner up here to
24 my left.

25 The hearing is adjourned.

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(Whereupon, at 5:02 p.m., the hearing in
the above-entitled matter was recessed, to reconvene
at 9:00 a.m., Wednesday, November 28, 1984.)

END 20

CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the
UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: Philadelphia Electric Company.
Limerick Generating Station
(Units 1 & 2)

DOCKET NO.: 50-352-OL
50-353-OL
PLACE: Philadelphia, Pennsylvania
DATE: Tuesday, November 27, 1984

were held as herein appears, and that this is the original
transcript thereof for the file of the United States Nuclear
Regulatory Commission.

*Rebecca E. Eyster
Marilynn Nations*

(Sigt) *Mimie Meltzer*

(TYPED) Rebecca E. Eyster

Marilynn Nations, Mimie Meltzer

Official Reporter

Reporter's Affiliation