

MONTGOMERY COUNTY



NORRISTOWN, PENNSYLVANIA

COMMISSIONERS
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RITA C. BANNING

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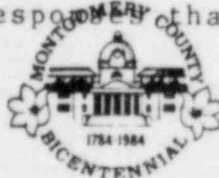
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
LIMERICK GENERATING STATION

TESTIMONY OF RITA C. BANNING, COUNTY COMMISSIONER
11/26/84

My name is Rita C. Banning. I was first elected Commissioner in Montgomery County in 1979 and was re-elected in 1983. I graduated from Ursinus College in 1961 with a B.S. in Mathematics. I have taught in the secondary schools for 10 years in Montgomery County in the Norristown and Methacton School Districts and at the Abington Friends School. I graduated from Villanova Law School with a J.D. in 1976, and am a member of the Montgomery County Bar Association. I reside in Pottstown at 967 Warren Street.

I am submitting testimony to the Nuclear Regulatory Commission because of my concerns about the lack of a workable evacuation plan to protect the residents of Montgomery County in the event of a radiological emergency at the Limerick Generating Station. I have reviewed the draft plans developed by the Montgomery County Office of Emergency Preparedness. The most recent draft I have received is #7, dated October 1984. I am particularly concerned about the provisions for transportation to evacuate the schools as well as the general public. I have corresponded with Mr. Bigelow, the Director of the Montgomery County Office of Emergency Preparedness to request additional information documenting the status of arrangements and agreements for buses and drivers in the event that an evacuation is ordered due to a radiological emergency. On November 15, 1984 I sent a letter to the school district bus providers listed in Annex I, Appendix I-2 of the Montgomery County Plan to obtain additional information regarding the status of agreements between the School Districts and the County. I am attaching to this testimony the responses that I have received to date.

Montgomery County Bicentennial



A Celebration of Two Centuries

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The Draft #7 Montgomery County Plan does not include reliable letters of agreement to document the arrangements with support organizations and resource providers. The responses I have received from Mr. Bigelow (OEP) and the school district bus providers raise further questions about proper authorization of such "letters of understanding" and show confusion or disagreement as to what the understanding was.

Furthermore, the bus providers have not been informed by the Montgomery County OEP that they indeed have a specific "Limerick assignment" for which their drivers are expected to volunteer. To the best of my knowledge, most drivers have not been surveyed to determine their willingness to assume this responsibility, let alone properly trained.

As to the use of SEPTA (Southeastern Pennsylvania Transportation Authority) buses as a backup, I have serious doubts that they would be able to meet the needs of such a crisis. Within the past six months, SEPTA has had a shortage of bus drivers which led to the curtailing of some routes and elimination of others or an unscheduled basis. They are training more, but clearly do not have an excess of drivers.

As a County Commissioner I am particularly concerned about the inadequacy of the evacuation plans for the County Geriatric Center at Royersford. Draft #6 calls for evacuation by 15 coach buses and 6 ambulances. It should be realized that the patients at the Geriatric Center are classified as needing skilled or intermediate care nursing, and very few could ride in a regular bus without considerable adaptation. Ambulances or vehicles adapted for transporting persons in wheelchairs would be the appropriate way to transport most of the patients at the Geriatric Center.

In Draft #6, one assumption which I am unwilling to accept is #H - that Montgomery County's unmet needs will be met on a timely basis by the State or other resources. It would be absolutely irresponsible to be so casual about the safety of the citizens of the County, since there is no evidence to support this assumption.

I do not believe that the county or the municipalities involved have obtained reliable information regarding the number of transport dependent people who will require transportation assistance in the event that an evacuation is ordered. Using Pottstown Borough as an example, Draft #4 of the Radiological Response Plan, dated October 1983, indicated that there was an estimated 4,175 residents who would require transportation assistance in the event of an evacuation.

This information is contained in Attachment G, and it is based on estimates from the 1980 Census Data. This page notes that this information will be replaced with actual public survey data as soon as it becomes available. Turning to Draft #6 of the Pottstown Borough Radiological Emergency Response Plan, dated September, 1984, Attachment G indicates that there are 605 residents requiring transportation assistance in the event of an evacuation. This page indicates that this figure is based on public survey data. The plan also notes that it is understood that there may be additional individuals who will require transportation assistance at the time of the evacuation, and that these individuals are to contact the municipal EOC to arrange for pick up.

The amount of time required to mobilize, transport, and load buses to be used to assist members of the public without their own transportation, including school children, is an important factor affecting the reliability of the evacuation time estimates being used by both Philadelphia Electric Company and local planners. The Philadelphia Electric Company evacuation time estimate study for the Limerick Generating Station assumes that "up to one hour may be required to assemble, buses, transport vehicles, and to load students onto buses". (page 5-5)

A review of Annex I, Appendix I-2, of the Montgomery County Radiological Emergency Response Plan (Draft #7) indicates that for most of the school bus transportation providers, the estimated mobilization time is approximately one hour. To the best of my knowledge this does not include the time required for travel to the assigned destination, or loading. Using the example of the 20 buses assigned to provide evacuation assistance to the Pottstown School District coming from the Wissahickon School District, this time factor could be significant, depending upon the weather and traffic conditions involved.

I am also convinced that traffic problems, both as they currently exist, and as they can be expected to exist in the event that an evacuation is ordered, will have a considerable impact on the response time of bus transportation providers, even if the required number of units is available.

Appendix K of the Montgomery County RERP lists roadway clearance/fuel resources as being all outside the 10 mile radius. There are no letters of agreement for towing or snow removal in the plan. The importance of letters of agreements is clear. There are many townships relying on the county to fulfill their towing and snow removal needs. These include Royersford, Upper Providence, Trappe, Lower Pottsgrove, Douglass, Schwenksville, Collegetown, Perkiomen, West Pottsgrove, Lower Providence, Green Lane, Marlborough, Skippack, Upper and Lower Salford,

New Hanover, Limerick, Pottstown, Upper Frederick and Upper Pottsgrove. This suggests that all but one township, Lower Frederick, will be relying on the County to provide or coordinate towing and snow removal services. The County could also use more assurance and/or better understanding of the resources and personnel PennDot has available. To the best of my knowledge, at present, none of the townships have a letter of agreement for towing for a radiological emergency. This is of particular concern because many of the townships have personnel deficiencies in several of the transportation and communication officers categories. The Public Works Group is supposed to coordinate with the townships on this issue according to page 3 of the County RERP.

Also, in most cases, the townships appear to be relying on PennDot for either the primary or secondary roles for snow removal.

Page 1 of the Montgomery County RERP states that it is supposed to assure appropriate resources to protect the population within Montgomery County within the Plume EPZ (10 mile radius) and the Ingestion EPZ... including public alerting and notification, protective action guidelines, and mobilization of County forces to support necessary actions.

The Montgomery County Commissioners have not discussed Draft #7, or for that matter, any of the other Draft RERP's for Montgomery County. It is not an approved plan, nor is it a workable plan.

At the Editor's Desk

'Junk mail' message is unnerving

BY BOB URBAN

"Any mail today?" I asked my wife the other evening when I came home from work. I was hungry and tired, and hoping not to find any unexpected bills or other unpleasant correspondence waiting on the living room hutch.

She handed me a white envelope while I was removing my coat. An old rerun of "The Bob Newhart Show" flashed on the television screen.

"What's this?" I asked. "It looks like junk mail."

"Wait'll you read what's inside," my wife replied. "That'll be a column item for you. It's scary."

The envelope didn't look intimidating. In fact it looked like hundreds of others most of us receive and discard with little thought. It could have been a flyer announcing a store sale, an invitation to "borrow up to \$10,000" from a finance company, or a brochure from a politician or religious group.

The envelope had no lettering other than a postage meter 17-cent first class stamp and a Philadelphia postmark. My name and address were affixed on a little sticker that appeared to be punched out of a computer.

Inside was a form to be filled out (in duplicate), along with a letter under the heading "County of Montgomery, Office of Emergency Preparedness and Medical Services."

Dear Resident, the letter said:

The Montgomery County Office of Emergency Preparedness is presently in the process of updating its records to better serve the public in the event of an emergency or an incident at the Limerick Generating Station.

As Director of the Montgomery County OEP, I am asking that you take a few minutes to complete the enclosed survey form, if applicable. Your county Office of Emergency Preparedness and municipal emergency services are responsible for developing plans to protect county residents in the event of a major emergency. The information gathered by this survey will remain confidential to be used only by municipal and county emergency services personnel (police, fire, rescue, ambulance) in a time of emergency such as fire, flood, hazardous materials incident or protective action in the event of an incident at the Limerick Generating Station.

The letter went on to explain how in certain emergencies the special needs of individuals with disabilities must be met. It urged everyone to complete the form as soon as possible and return it in the self-addressed stamped envelope. It was signed by Samuel L. Ely 3rd, the county's director of emergency preparedness.

I examined the form and thought to myself that in the 17 years I had been a resident of Pottstown, never before had I been asked to fill out a survey of this nature — not even after the devastation of Hurricane Agnes in 1972.

The form asked if everyone in my family usually had private transportation available, if my residence had a telephone, and if everyone in my family understood English.

I was quizzed if anyone had a hearing impairment, a speech or sight impairment, if anyone was confined to a wheelchair or bedridden. The survey asked if anyone would need personal assistance, a special vehicle or medical equipment, or an ambulance.

Fortunately, no one in my family falls into those categories, so I was told that I wouldn't have to fill out and return the form. I guess that means that in case of a nuclear accident I'll be on my own.

It's will be at least a year before any radioactive materials even arrive at Limerick. And despite claims by PE officials that there's no need for concern, many people are tough to convince.

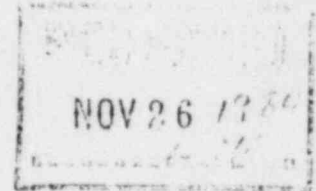
The Nuclear Age scares people. One extremely foggy morning several months ago a distraught woman called The Mercury and, half crying, reported that "the two towers at Limerick disappeared overnight. Where could they have gone?" She was assured that as soon as the fog lifted, the towers would reappear.

About a month ago the paper's switchboard lit up because residents and passersby were concerned about the "giant plume of smoke" that was spotted above Cooling Tower One. The callers were informed in a story the next day that the "plume" was just steam generated from some work being done to test a water system in the tower. But when the steam reappeared a few weeks later, the calls started up again.

Despite assurances, the memory of Three Mile Island remains clear. And, as we continue to fill out emergency forms, the apprehension about the Limerick Power Plant will continue to grow.

NORTH PENN
School District

November 20, 1984



Rita C. Banning, Commissioner
County of Montgomery
Court House
Norristown, PA 19401

Dear Mrs. Banning:

In reference to your letter addressed to our Superintendent regarding provision of buses and drivers for Limerick Evacuation, I am responding with the only information we have on file which does not conform to the data listed in your letter of 11/15/84.

North Penn's approved agreements were to act as host for Perkiomen Valley School District in the event of a nuclear accident at Limerick, as well as to offer use of district facilities as mass care shelters in the event of any disaster. This was the extent of our signed agreement.

Very truly yours,

BOARD OF SCHOOL DIRECTORS

W. J. Jacobs, Secretary

j

cc: G. P. Starkey, Director of Business Affairs

Upper Merion Area School District

435 CROSSFIELD ROAD • KING OF PRUSSIA, PENNSYLVANIA 19406 • (215) 337-6000

November 20, 1984

NOV 26 1984

Mrs. Rita C. Banning
Montgomery County Commissioner
Norristown, PA 19401

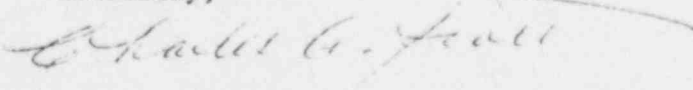
Dear Mrs. Banning:

Regarding your letter of November 15, 1984, please be advised of the following. Mr. A. Lindley Bigelow, Montgomery County Director of Emergency Preparedness, visited our school district last March 1984. He spoke with Mr. Philip H. Mowry, our Director of Operational Services, and Mr. Walter dePrefontaine, our Supervisor of Transportation, concerning the need to provide transportation for evacuation of children from some Montgomery County school districts in the event of an emergency at the Limerick Generating Station. Mr. Bigelow was accompanied by two gentlemen whose names I do not know who apparently represented a state agency.

Mr. Mowry and Mr. dePrefontaine informed me that they made a verbal agreement to try to supply drivers on a voluntary basis only for assistance in this situation. They gave Mr. Bigelow the names of the people to call in our school district in the event of an emergency. We did not guarantee anything. We merely said we would assist if drivers did volunteer to do this.

Your letter is the first communication we have had from anyone indicating what our assignment would be in terms of location and numbers of vehicles required. If you require further information, please do not hesitate to call me.

Sincerely;

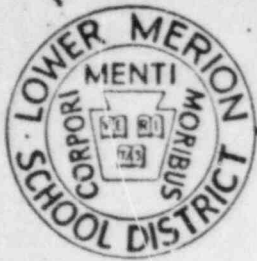


Charles A. Scott
Superintendent of Schools

svj

cc PH Mowry

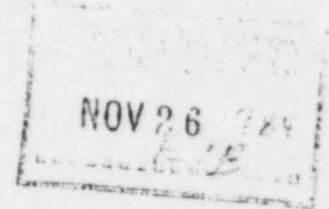
W dePrefontaine



Lower Merion School District

301 Montgomery Avenue, Ardmore, PA 19003 (215) 645-1800

November 19, 1984



Commissioner Rita C. Banning
Montgomery County Courthouse
Norristown, Pennsylvania 19404

Dear Commissioner Banning:

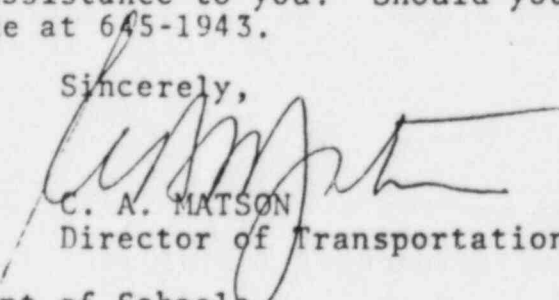
The purpose of this letter is to confirm our conversation of this date.

On March 13, 1984 Mr. A. Lindley Bigelow and Mr. John Cunnington met with me to discuss what vehicle assets would be available for possible use in the event the Governor determined an evacuation was necessary from the area surrounding the Limerick Generating Station. On April 2, 1984 Mr. Bigelow forwarded a "Letter of Understanding" and requested that the Board of School Directors execute same, thereby agreeing to "provide buses and drivers to the maximum extent possible, etc.." On April 30, 1984 Dr. James B. Pugh, Superintendent of Schools, in a letter addressed to Mr. Bigelow, indicated that "At its meeting on April 23, 1984, the Lower Merion Board of School Directors took action and indicated its willingness to cooperate with the Montgomery County Office of Emergency Preparedness in the event of a man-made or natural disaster. Specifically, the Board of School Directors agreed to provide school buses and drivers to the degree possible for use during an emergency." Dr. Pugh's letter also indicated that the "Board of School Directors did not, however, find the 'Letter of Understanding' acceptable and, therefore, did not approve it."

In summary, and in response to your letter of November 15, 1984 addressed to Dr. Pugh, the Board of School Directors of the Lower Merion School District while agreeing to "assist to the degree possible", has not made a "commitment" to supply the amount of buses indicated in your letter of November 15th, nor has the Board "guaranteed" drivers for the buses requested.

I hope this information is of assistance to you. Should you have further questions please call me at 645-1943.

Sincerely,


C. A. MATSON
Director of Transportation

Copy to:
Dr. James B. Pugh, Superintendent of Schools
Mr. Scott Shafer, Business Manager

MONTGOMERY COUNTY OFFICE OF EMERGENCY PREPAREDNESS

BUS TRANSPORTATION PROVIDER SURVEY

Organization Name: Lower Merion School District
 Mailing Address: 301 Montgomery Avenue
Ardmore, PA 19003
 Location: Same - behind High School off Montgomery Avenue
 Municipality: Lower Merion Township
 Other Garage Facilities: No
 Business Telephone: () 645-1943
 Owner/Operator: District - Claude Matson, Dir. of Trans. 0600-1830
 Emergency Contact: Matson - Director of Transportation
 Alternate: Mr. Andre Michael 645-1944
 Alternate: Mrs. Hudgeons 645-1941
 Emergency Telephone: () 645-1941 with recorder after 1830
 Other Telephone: (Matson Home) 446-9332 Hours: 1830-0600

Vehicles Operated:

	Number	Capacity	Type of Fuel		
			Gasoline	Diesel	Propane
School Buses	<u>58</u>	<u>5(48) 34(65) 1(64)</u> <u>16(72) 2(84)</u>	<u>*19 reg.</u>	<u>39</u>	<u> </u>
Coach Buses	<u>--</u>	<u>--</u>	<u> </u>	<u> </u>	<u> </u>
Vans/Mini Buses	<u>8</u>	<u>5(16) 3(20)</u> <u>3(36)</u>	<u>8 reg.</u>	<u> </u>	<u> </u>
Handicapped Vehicles	<u>3</u>	<u>8 passengers</u> <u>3 wheelchairs</u>	<u>3 reg.</u>	<u> </u>	<u> </u>
Other	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Availability: Daytime 17 buses, 1/4 hour Evening 25%, 1 hour
 Weekend 10-20%, 1 hour

Drivers: Number: 85 Availability: 20% female, 80% male, 11 full-time, 5 seasonal

Mobilization Time: 1/4 - 1 hour

Fuel Supplies (Capacity): Gasoline (2000 unl., 8000 reg.) Diesel (15000 Deisel)
 Propane (No) Supply Located: Garage

Radio Equipped: No Frequency: N/A Base Station: N/A

NOTES:

*School bus scheduling 0545-0945, 1130-1300, 1400-1645, Late runs (1845)
 Chains for all vehicles

Date: March 14, 1984



Lower Merion School District

301 Montgomery Avenue, Ardmore, PA 19003 (215) 645-1800

April 30, 1984

Mr. A. Lindley Bigelow, Coordinator
Montgomery County Office of Emergency
Preparedness
1000 Wilson Boulevard
Eagleville, Pa. 19403

Dear Mr. Bigelow:

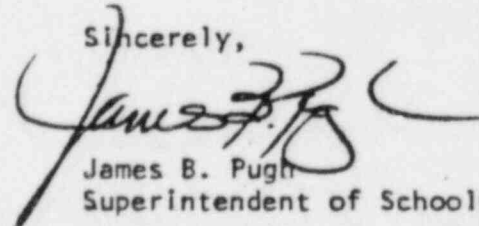
At its meeting on April 23, 1984, the Lower Merion Board of School Directors took action and indicated its willingness to cooperate with the Montgomery County Office of Emergency Preparedness in the event of a man-made or natural disaster. Specifically, the Board of School Directors agreed to provide school buses and drivers to the degree possible for use during an emergency.

The Board of School Directors did not, however, find the "Letter of Understanding" acceptable and, therefore, did not approve it.

Last, the Bus Transportation Provider Survey has been reviewed and appropriate corrections made. A copy of the corrected survey form is enclosed.

If you have further questions or concerns, please do not hesitate to telephone me at 645-1930.

Sincerely,



James B. Pugh
Superintendent of Schools

jbp/c

cc: Board of School Directors
Mr. Claude Matson

Perkiomen Valley School District

SCHWENKSVILLE, PENNSYLVANIA 19473

"Where the accent is on excellence"

November 20, 1984

WILLIAM D. WESTCOTT, Ed. D.
Superintendent

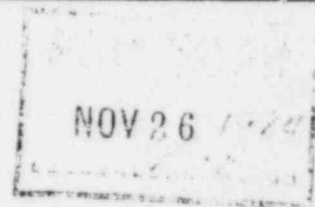
THOMAS P. HENRY, JR.
Administrative Assistant
Instruction

GEORGE L. ALTHOUSE
Business Manager

DONALD G. DILLON
Operations & Maintenance

SHARON SHERWOOD
Food Services

Commissioner Rita C. Banning
Montgomery County Court House
Norristown, PA 19404



Dear Commissioner Banning:

In response to your letter of November 15, 1984, it appears that you are asking two questions:

1. The first question deals with the Perkiomen Valley School District's commitment to supply the number of buses, vans, and other vehicles indicated in your letter.

To this question, the answer is "yes", we are prepared to commit the number of vehicles indicated.

2. Your second question indicated, by implication, that we were guaranteeing drivers for these vehicles.

Nowhere in our plan did we ever indicate that there will be a guarantee of drivers.

Our drivers have had the in-service training and we expect them to respond; but, I would never place myself in the position of guaranteeing that all drivers would show up in an actual emergency situation. I don't think that anyone could make such a guarantee.

In the drill that we participated in on November 20th, one of the items that we wanted to test was the availability of drivers. With our vehicles, we also deal with two contractors who supply buses. In total there are fifty-two drivers involved. All of them are part-time and have other jobs or home responsibilities.

In the drill on November 20th, we attempted to reach all fifty-two drivers. Fourteen (14) drivers could not be reached by telephone and three (3) refused to participate in an evacuation exercise.

We would assume that in a real emergency some of the fourteen drivers would be alerted by radio broadcasts and report to their stations.

The drill did point out, however, that we would be short of drivers. This means that we must plan some alternative strategies to assure adequate driver coverage.

I hope that this answers your concerns. If you desire additional information, please do not hesitate to be in touch with me.

Sincerely,

William D. Westcott, Ed. D.
Superintendent

WDW/tr



SPRING-FORD AREA SCHOOL DISTRICT

199 Bechtel Road
Collegeville, PA 19426

NOV 26 1984
113

PHONE: 489-1666

November 19, 1984

Ms. Rita C. Banning
Montgomery County Commissioner
Norristown, PA 19401

Dear Commissioner Banning:

Your letter of November 15, 1984 refers to an agreement between this school district and the county to provide buses, vans and other vehicles and drivers for the evacuation of Montgomery County school children. I am unaware of the existence of such an agreement. If such an agreement has been executed and is on file, I suspect that it exists without proper authorization.

The school to which school district-owned vehicles are identified as having been assigned is a district facility. Certainly, you may reasonably anticipate that with or without an agreement we would plan to use district-owned facilities to implement an evacuation plan. The issue of whether drivers will assume responsibilities, contractual or otherwise, in the event of an emergency is not resolved with any degree of certainty.

A contract form was submitted to my office several months ago which indicated that the school district would provide access to drivers and vehicles to the extent of its ability. I declined to execute the agreement because it did not appear to establish any useful or dependable obligations on behalf of either party. I do not wish to give you the impression that the district would not look favorably on committing its facilities for general evacuation purposes after the needs of the school population have been adequately addressed. However, it is quite likely beyond the authority of the school district to make a similar commitment on behalf of the personnel who are regularly employed to drive district vans for district purposes.

I trust that this communication addresses the concerns set forth in your letter. If this is not the case, please contact me (489-1666) at your earliest convenience.

Sincerely yours,

William A. Welliver, Ed.D.
Superintendent

WAW/t



Abington School District
Abington, PA 19001
Phone (215) 884 4700

November 20, 1984

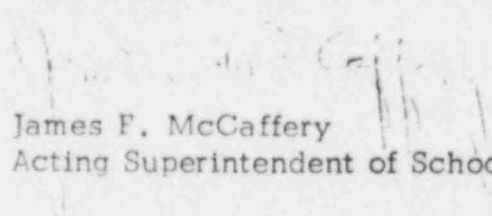
NOV 26 1984
R.C.B.

The Honorable Rita C. Banning
Commissioner, Montgomery County
Norristown, Pa. 19404

Dear Ms. Banning:

I write in response to your letter dated November 15, 1984 regarding buses and drivers for a Limerick evacuation. In that correspondence you indicated that I have guaranteed to provide drivers. You ask, "IS THIS REALLY TRUE?" On May 14, 1984, I signed an agreement that states as follows: "The Abington School District hereby agrees to provide buses and drivers to the maximum extent possible . . ." (emphasis mine). I stand by that commitment.

Very truly yours,


James F. McCaffery
Acting Superintendent of Schools

JFMc/mpm

STATEMENT IN SUPPORT OF
LIMERICK ECOLOGY ACTION'S REQUEST
FOR THE ISSUANCE OF
SUBPOENAS TO OBTAIN TESTIMONY
ON THE FOLLOWING CONTENTIONS:

LEA-1, LEA-2, LEA-3, LEA-5, & LEA-23

LEA-1, LEA-2

The approval of subpoenas to be requested by Limerick Ecology Action would provide the "competent evidence" requested by the Board to "be placed in the record demonstrating the current status on adoption and implementability by local bodies of their various plans for Limerick". (See ASLB Memorandum and Order on LEA's Deferred and Re-specified off-site emergency planning contentions, Oct. 26, 1984; page 4, item 4.d.)

LEA has been unable to obtain this testimony from the municipal governments involved, and hereby informs the parties of its plans to request subpoenas in order to obtain the information requested by the Board from those who have the most direct knowledge of current local concerns. LEA believes that this information is essential to the development of a sound record on the subject matter of LEA's deferred contentions. (LEA-1, LEA-2, and LEA-5) The same applies to current staffing deficiencies.

The possibility of PEMA conducting a survey of the 'risk' municipalities was discussed with Zori Ferkin, counsel for PEMA. When it became evident that this information would not be available to the parties, LEA inquired what type of testimony could be anticipated to be filed by PEMA in this proceeding. As of this date, it is our understanding that PEMA intends to present testimony from Mr. Timothy Campbell, the Director of the Chester County Department of Emergency Services, and Mr. Robert Reber, the Berks County Director of Emergency Preparedness. LEA is not aware whether or not PEMA will be presenting any testimony from Montgomery County officials. For these reasons, LEA believes that the testimony of the individuals it desires to subpoena, is necessary to insure the development of a sound record on these contentions.

LEA-3

LEA intends to subpoena testimony on behalf of the Bucks County Board of Commissioners, and is providing the most current letter available to the parties with this filing, regarding the Bucks County Support Plan. (See letter from Carl Fonash to FEMA and PEMA, 11/16/84) LEA has been unable to obtain this testimony without the issuance of a subpoena from the Atomic Safety and Licensing Board. The Commissioners would be requested to designate a representative, probably including Mr. William Rieser, the Chief Clerk.

LEA-5

LEA proposes, in order to facilitate litigation of this contention, that all bus providers and School District Superintendents subpoenaed under contentions LEA-11 and LEA-15, cover any questions relating to the status of Letters of Agreement at the time that they have already been scheduled to appear to testify on those contentions.

LEA hereby informs the parties that it intends to request subpoenas to obtain testimony from the Chester County and Montgomery County Public Works Officers, in order to determine the existence and content of any Letters of Agreement, or other arrangements that they currently have on file, or have made for towing, snow removal, and the provision of gasoline supplies as is discussed in the respective County RERP's. In addition, LEA would anticipate any municipal officials that were concerned about Letters of Agreement regarding snow removal, towing, and gasoline supplies, would have an opportunity to state their concerns when testifying on contentions LEA-1 and LEA-2, particularly if there are any unmet needs which have been passed along to the Counties.

LEA also intends to request subpoenas to obtain testimony from representatives of Teachers Associations and teachers union officials, based upon the requirement that Letters of Agreement should be considered for organizations, and not individuals. (See ASLB Order, 10/26/84; page 6, item 7.b.) It is the position of the PSEA teachers union that regulation, statute, or executive order, or existing teacher contracts, do not bind them as teachers to any specific performance in an emergency. (See testimony of Donald Morabito, 11/1/84). Mr. Morabito's testimony states that the issue of such performance is a contract matter to be agreed upon during contractual negotiations, a 'Letter of Agreement' in fact. Therefore, in the event that this subject matter is not permitted to be litigated elsewhere, it is extremely relevant and important to consider under the subject matter of LEA-5.

LEA is following the Board's Order (10/26/84; page 6) in making a distinction between school "officials" (administration) and an organization of personnel (the Teachers Association). The same reasoning would hold true for any school bus drivers represented by a union, including PSEA.

LEA-23

On November 26, 1984, LEA presented the Board and the parties with a list of witnesses already scheduled to appear on behalf of Limerick Ecology Action. In order to facilitate the hearing, and to avoid having to call back the bus provider and School Superintendent witnesses to testify on the subject matter of LEA-23 at a separate time, LEA hereby requests permission to cross-examine these witnesses on the subject matter contained in LEA-23, particularly LEA specification 1, discussed in the Board's 10/26/84 Order on page 7, item 8.a. Furthermore local officials who will be called to testify on LEA-1, particularly from the Boroughs of Pottstown and Phoenixville, have direct knowledge relating to LEA-23, specification 6, and LEA requests permission to cross-examine them on this subject matter at the time they are called to testify.

SUBPOENA REQUESTS ANTICIPATED BY
LIMERICK ECOLOGY ACTION

Montgomery County

Paul Bartle, Chairman of the Montgomery County Commissioners

Joe Brauner)
Joe Kuntz) Public Works Officers (for letters of agreement relating
to towing and snow removal)

Chester County

Earl M. Baker, Chairman of the Chester County Commissioners

R. Wilking)
W. Betz) Public Works Officers (for letters of agreement relating
to towing and snow removal)

Berks County

Donald Bagenstose, Chairman of the Berks County Commissioners

Bucks County (LEA-3)

Board of Commissioners, or a designated representative
Carl Fonash, Chairman
William Rieser, Chief Clerk

A PRELIMINARY LIST FOR THE MUNICIPALITIES FOLLOWS: (Chester County)

Bonnie August, President, Phoenixville Boro Council (Chester Co.)
Norman Vutz, Supervisor and Emergency Management Coordinator,
Schuylkill Twp. (Chester Co.)
Richard Whitlock, Chairman of the South Coventry Twp. Supervisors
Mike Burnley, Chairman of the West Vincent Twp. Supervisors
Steve Grenz, Harry Rauch, Samuel Matthews (or a designated representative)
on behalf of the Uwchlan Twp. Supervisors
John Yeager, Chairman of the East Pikeland Twp. Supervisors
A representative from East Coventry Township
A representative from North Coventry Township

Preliminary List
Municipalities (continued)

(Montgomery County)

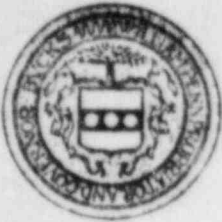
Mike Giamo, Supervisor, Skippack Twp.
Ceasar Gorski, Chairman of the Skippack Twp. Supervisors
Richard Brown, Chairman, Lower Providence Twp. Supervisors
Harry J. Miller, Lower Providence Twp. Fire Dept.
Michael Conroe, Lower Providence Twp. Ambulance
Hugh Kelly, Chairman Douglass Twp. Supervisors (Montg. Co.)
Virgil Templeton, Chairman, Upper Providence Twp. Supervisors
George Waterman, Upper Providence Twp. Manager
Ed Doman, Limerick Twp. Emergency Management Coordinator
Barry Lenhardt, Chief of Police, Limerick Twonship
Richard Bacchi, Chairman of the West Pottsgrove Twp. Commissioners
Carol Mattingly, Pottstown Boro Transportation Officer
Edmund Skarbeck, President Pottstown Boro Council
a representative of Lower Pottsgrove Twp.
Kenneth Hagy, Upper Salford Twp. EMC and Chairman of the Supervisors
Richard Kratz, Chairman of the Perkiomen Twp. Supervisors
John Salamone, Mayor of Royersford
Robert DiAngelo, Royersford EMC
Richard Buckman, Chairman Upper Frederick Twp. Supervisors
Charles Meehan, Upper Frederick Twp. EMC

(Berks Co.)

Ronald Kretzman, Donald Gutekurst, Donald Button (Union Twp. Supervisors)
or a designated representative

A representative from Boyertown Boro

A representative from Douglass (Berks) Twp.



COUNTY OF BUCKS
OFFICE OF THE COMMISSIONERS

Administration Building, Doylestown, Pa. 18901

215-348-2911 215-752-0281

County Commissioners

CARL F. FONASH, *Chairman*
LUCILLE M. TRENCH, *Vice-Chairman*
ANDREW L. WARREN

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

November 16, 1984

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

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

Dear Sirs:

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

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

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

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

November 16, 1984

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

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

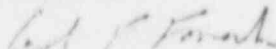
Within the above context, Bucks County will test its telecommunications interconnections and responses on November 20, with the expectation and foreknowledge that they will not constitute any evidence as to the appropriateness or feasibility of the draft plan, or its concepts; these we believe to be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

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

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

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

Sincerely,



Carl F. Fonash
Chairman,
Bucks County Commissioners

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Enclosures

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

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

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

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

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

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

REFERENCES

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

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CERTIFICATE OF SERVICE

I hereby certify that I have served the following information on the entire service list below on this 26th. day of November, 1984 by hand delivery to those attending the evidentiary hearings in Philadelphia, or by deposit in United States mail, first class postage prepaid:

Testimony of Commissioner Rita C. Banning
Notice of LEA's plans to request additional subpoenas to obtain testimony on LEA's deferred contentions on off-site emergency planning contentions

LEA's schedule for witnesses whose testimony has been previously submitted, and clarification of Mr. Wagenmann's subpoena:

Judge Helen Hoyt, Chairwoman
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Dr. Jerry Harbour
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and
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Chester County Dept. of
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DATE: Nov. 26, 1984

Phyllis Zitzer

(Phyllis Zitzer, President LEA)