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HOUSE OF REPRESENTATIVES
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

COMMITTEES

AGRICULTURE AND RURAL AFFAIRS,
CHAIRMAN
CONSERVATION

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November 19, 1984

Judge Helen F. Hoyt, Chief Administrative Judge
and Judges Richard F. Cole and Jerry Harbour
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
Washington, D.C. 20555

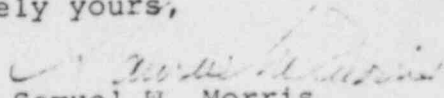
In Re: Docket #50-3525L

Dear Chief Judge Hoyt and Judges Cole and Harbour:

Enclosed is a written statement amplifying certain points in my oral testimony before the Licensing Board on November 16th concerning the adequacy of the current emergency plans to deal with a radiologic "incident" at the Limerick generating facility. Unfortunately, it is impossible to deal in any detail with such matters in oral testimony and at the same time be fair to others who also wish to testify. This written statement will primarily concern agro-industry in the vicinity of Limerick, but will also apply in a general way to the protection of human lives by sheltering, evacuation or otherwise.

This statement is intended for general distribution through the N.R.C. Service List and I am also sending copies directly to Ralph Hippert, Pennsylvania Emergency Management Agency, B151 Transportation and Safety Bldg., Harrisburg, Pa., 17120, and Timothy Campbell, Director, Chester County Department of Emergency Services, 14 East Biddle Street, West Chester, Pa., 19380.

Sincerely yours,


Samuel W. Morris

Enclosure

CC: Ralph Hippert, PEMA
Timothy Campbell, Chester County Emergency Service

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Judge Helen F. Hoyt, Chief Administrative Judge
and Judges Richard F. Cole and Jerry Harbour
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
Washington, D. C. 20555

In Re: Docket #50-352

Written Statement of Rep. Samuel W. Morris, Pennsylvania House of Representatives, 155th Legislative District, Chester County, Pennsylvania, amplifying oral testimony in the above matter given on November 16th, 1984, regarding adequacy of emergency plans to deal with a possible radiologic "incident" at the Limerick generating facility, primarily concerning agro-industry in the vicinity of the plant, but also more generally to the emergency planning in its entirety.

First, a word about the special nature of agriculture in such a situation. Every phase of agro-industry is a link in the food chain for human beings - fruits, vegetables and animal products, milk or meat, and grain whether grown for direct human consumption or as animal feed. Contaminated feed will produce contaminated milk or meat. These considerations alone make farming different from other industries. Moreover, once contaminated, livestock and feed as well as food products for immediate human consumption, will be in all probability rendered unusable or at least very difficult and expensive to decontaminate. As a practical matter a dairy farmer, for example, would probably be put out of business entirely by a radiologic incident, with little chance of recovery because of the Price-Anderson Act. Farmers are in a special category needing special protection and assistance.

Second, I conclude, therefore, that the following steps must be taken:

1. The farmers within the EPZ must be identified and located. This is not a simple matter as I have found out from experience when trying to locate all the farmers in Northern Chester County with a view to setting up Agricultural Security Areas under the Pennsylvania Agricultural Area Security Law. The information obtained from the Chester County Agricultural Development Council, the County Planning Commission and the Extension Service was neither complete nor altogether up to date.
2. The next step is to have a training program for farmers to teach them what may be done in an emergency. No such program has been even started. Neither I, nor the men who work for me, have received any notice of such a program, nor any information

whatsoever on this subject (with one exception to be covered later). I have also checked with a number of prominent local farmers within the EPZ and their experience has been the same as ours.

3. Farmers should also be furnished with the same equipment as other emergency workers. I have no reason to believe that any effort at all has been made in this direction. The farmers I have spoken to have heard nothing from any government agency.

At this point, I would reiterate what I suggested in my oral statement, that emergency plans should obviously be more than just plans. They must be practiced, practiced, until all persons involved not only know their respective roles, but can and do carry them out automatically. This is what training is all about. The operating license for Limerick should not be issued until we can be sure that such is the case.

Third, I shall now discuss the Pennsylvania Department of Agriculture brochure entitled "Farmers Emergency Information - What You Should Know About Nuclear Power Plant Incidents", a copy of which I have obtained. As I said in my oral testimony, this brochure is informative and for that purpose it is useful. It does not, however, to any degree assure farmers that they can effectively protect their property, their valuable capital, or the human food chain, by applying the information in the brochure.

(1) Let us start off with crops or food products for direct human consumption. The brochure states inter alia:

a. "Contamination just before or during harvest time requires washing or peeling of fresh fruits and most vegetables before consumption."

Comment - This statement would not inspire confidence in me, either as grower or as consumer, that the suggested information would be useful or effective to protect human beings.

b. "Contamination of field crops at harvest time can be minimized through storage."

Comment - Does this statement mean storage taking place before contamination? One would assume that to be so. If so, how is that to be accomplished? Can it actually be accomplished in many instances?

Incidentally, this statement would apply also to feed crops for animals and I will cover that problem hereinafter.

c. "Radioactive decay will reduce contamination of field crops with time." Also: "Other foods may be canned or frozen to allow time for radioactive decay." (emphasis added.)

Comment - The reaction of the average common sense person reading these two statements will certainly not be one of confidence. Nor, I suppose, would Drs. Einstein, Bohr, Heisenberg or Fermi be favorably impressed.

- d. "At other periods in the growing cycle, effects of contamination should (emphasis added) be limited depending on the length of time before harvest. Further information on protective actions for crops and food products will be available through the Emergency Broadcast System (EMS)."

Comment - No comment is needed - Res ipsa loquitur.
The thing speaks for itself.

- (2) Turning now to livestock, I will cover the various types of operations or enterprises separately, starting with dairy cattle maintained for milk production.

- a. Some dairy farmers within the affected area, including myself at present, milk their cows in a stable large enough to hold all of their producing cows at one time. Many do not, however; these latter farmers milk a few cows (relative to the size of the whole herd) at a time in a milking parlor. Of these, some maintain shelter for the balance of the herd which could be adequate for protection against radiation or made so; most, however, do not, but rather shelter their animals in open sheds or in open yards.

The brochure goes into considerable detail of how to protect the milking herd in a shelter barn, and also stresses the need for ventilation, which is well known to all good dairy farmers. Inadequate ventilation is a passport to diseases, including pneumonia. The need for radiation protection is obviously at war with the need for ventilation, and the brochure so states in so many words.

- b. So far, however, I have been discussing only the milking herd - only those animals which are actually producing at any given time and which make up roughly half of the whole herd. The rest are milkers which for the time being are dry, and young stock - calves and heifers of various ages which have not as yet come into milk at all. Today relatively few dairymen maintain closed stabling capable of providing radiation protection for their dry cows and young stock. In fact, for reasons of health, we are encouraged not to do so.
- c. Virtually the entire herd of a beef operation is in this category too. Few beef farmers have closed stable space only sufficient to hold a very small part of the herd.
- d. The same is true of most sheep flocks.
- e. As to swine, farrowing sows may on some farms be kept in closed or closable housing, but much swine housing is open or non-existent.

- f. Poultry present special problems. Most poultry operations today are under cover and protected, but there is an extreme need for ventilation, resulting in the same problem as that of milking cows when stabled, only worse.
- g. Finally comes the problem of feed for the animals. I think that as to scale or degree this presents less of a problem than housing, but it is still serious. The brochure rightly points out that contaminated feed may contaminate livestock and thus also the food the animals produce in the form of milk, meat or eggs. There is considerable use of sealed or at least well covered feed storage facilities today, which lessens the feed contamination problem, but a great deal of animal feed is still stored in relatively open facilities which will be very difficult to cover in an emergency.

Comments on the livestock sections of the brochure -

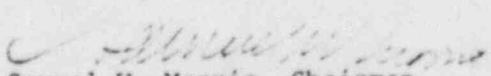
Although a certain amount of useful and common sense is provided concerning radiation protection for a livestock operation, much of that information cannot be really useful for this purpose, either because of limitations or reasons stated clearly in the brochure itself, or because of the nature of modern farming operations.

Fourth, (and finally), I would suggest that there are not even real or definite plans as yet for the protection of agriculture within ten miles of Limerick and that training for farmers has not been initiated.

I understand that N.R.C. Regulations do not require such training, but I would strongly recommend that the Regulations be amended to do so, because of the affect a radiological incident might have on the human food chain.

I also urge in the strongest possible terms that a full operating license for Limerick I be denied until it can be clearly demonstrated that complete evacuation plans exist, that the emergency personnel are fully trained and that sufficient drills have been carried out successfully to demonstrate that the evacuation system really works. The burden of proof should be on PECO and the local government agencies. It should not be assumed that personnel, for example, school teachers and school bus drivers, will actually be available and able to perform tasks which have been planned for them.

Respectfully submitted,


Samuel W. Morris, Chairman
Agriculture and Rural Affairs Committee