

LEA / Limerick Ecology Action

BOX 761 POTTSTOWN, PA 19464

(215) 326-9122

Helen F. Hoyt, Chairperson
Dr. Richard F. Cole, Administrative Judge
Dr. Jerry Harbour, Administrative Judge

Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Limerick Generating Station
Docket Nos. 50-352, 50-353 *OL*

Dec. 28, 1984

Dear Administrative Judges,

Limerick Ecology Action hereby informs the parties to the above captioned proceeding of the schedule for additional LEA witnesses to be called to testify on Jan. 2, 3, and 4, when the hearings resume in Philadelphia. LEA has discussed this matter with Mr. Rader, counsel for Philadelphia Electric Co., and Zori Ferkin, counsel for PEMA. Mr. Hassell, counsel for the NRC Staff was not reached directly at his office today, and will be called Monday Dec. 31 to insure that he has received this information. FEMA and the Board will also be contacted on Dec. 31 to verify that this information has been received.

LEA discussed with Mr. Rader and Ms. Ferkin the possibility of the following stipulations:

Dr. William Wescott, letter of Nov. 20, 1984 to Montgomery County Commissioner Rita C. Banning (attached to schedule)

Mr. Anthony D'Alonzo, Ashbourne Transportation, Inc. (being prepared)
Mr. Martin Javage, Carol Lines, Inc. (proposed stipulation being prepared)

The parties will be contacted about this on Dec. 31 and will be updated on the progress made by Jan. 2, 1985.

LEA also informed Mr. Rader of its plans to try to present stipulated testimony from the following:

Mr. Anthony Newman, PSEA's general counsel (relating to portions struck from testimony of Donald Morabito)
Jim Brown, Chairperson, Methacton School District Emergency Evacuation Committee (regarding survey results from bus drivers and school staff indicating unmet needs)
Michael Churchill, designated emergency coordinator for Charlestown Play House, Inc. (Charlestown Twp.)
Alice Sprague, Director of Little People Day Care School (Pottstown)

8501020043 841228
PDR ADOCK 05000352
G PDR

DSB

LEA / Limerick Ecology Action

BOX 761 POTTSTOWN, PA 19464 (215) 326-9122

NOTE: Hearings will be held at the Old Federal Building, 9th. & Market Sts., in Philadelphia in courtroom #6

84 DEC 31 10:08
OFFICE OF SECRETARY
DOCKETING & SERVICE
PHILADELPHIA

LEA WITNESS LIST FOR THE WEEK OF JAN. 2, 1985

Jan. 2 (Wed.) 12:00 noon to 6:00 p.m.

Sandra Hurst, Director
Upattinas School Open Community Corp. (pre-filed testimony)

Dr. Paul Beck, Superintendent
Upper Moreland School District (subpoenaed bus provider)

Mr. Frank Wilson, Assistant General Manager of Operations
Southeastern Pennsylvania Transportation Authority (SEPTA)
(subpoenaed bus provider)

Dr. Thomas Davis, Superintendent
Springfield Twp. School District (subpoenaed bus provider)

Mr. Ed Van Artsdalen, owner
Van Trans, Inc. (subpoenaed bus provider)

Jan. 3 (Thurs.) 9:00 a.m. to 5:00 p.m.

Roger Tauss, President (represents SEPTA bus drivers)
Transport Workers Union of Phila., Local #234 (subpoenaed witness)

Ilna Seidel, Director (Pottstown Center)
Day Care Association of Montgomery County, Inc. (pre-filed testimony)

Dr. William Wescott, Superintendent
Perkiomen Valley School District (** stipulation offered - see
attached letter of Nov. 20, 1984)

Edward Stokes, Superintendent
Hatboro--Horsham School District (subpoenaed bus provider)

Mr. Ronald Wagenmann, Upper Merion Township Manager (LEA-24)
(subpoenaed witness)

Jan. 4 (Fri.) 9:00 a.m. to 2:00 p.m. (THESE WITNESSES SUBJECT TO BOARD APPROVAL)

Mr. Anthony D'Alonzo, Ashbourne Transportation, Inc. (** stipulation being
Mr. Martin Javage, Carol Lines, Inc. (** worked on)

Anthony Newman, General Counsel PSEA

Jim Brown, Chairperson, Methacton School District Emergency Evacuation Committee

Michael Churchill, Charlestown Play House, Inc.

Alice Sprague, Director, Little People Day Care School

THIS COMPLETES LEA'S WITNESSES ON CONTENTIONS LEA-11,12,13,14,15,22,26-28

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.

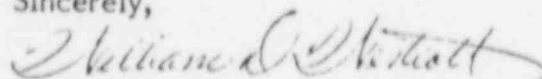
In the drill on November 20th, we attempted to reach all fifty-two drivers. Fourteen (14) drivers could not be reached by telephone and three (3) refused to participate in an evacuation exercise.

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

