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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station,  
Units 1 and 2)

Docket Nos. 50-352  
50-353

SUPPLEMENTAL MOTION OF THE  
INMATES AT SCIG REGARDING FULL DISCLOSURE  
OF THE EVACUATION PLAN FOR SCIG

I. INTRODUCTION

On December 20, 1984, the inmates at the State Correctional Institute at Graterford, Pennsylvania, filed a Motion before the Atomic Safety and Licensing Board requesting full disclosure of the evacuation plan for the State Correctional Institute at Graterford, Pennsylvania. On January 2, 1985, the Nuclear Regulatory Commission staff filed an Answer to said Motion. The applicant and the Pennsylvania Emergency Management Association also filed responses. On January 22, 1985, during a public hearing before the Board, Chairman Hoyt requested counsel for the inmates to respond to the N.R.L. staff request on page 5, which states, "...the inmates should be required to specify the information they need, based on expert opinion, which is beyond that provided in the 'sanitized' version." The purpose of this supplemental motion is to respond to this question.

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PDR ADOCK 05000352  
G PDR

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II. Inmates have retained John Case, Field Director of the Pennsylvania Prison Society as their expert.

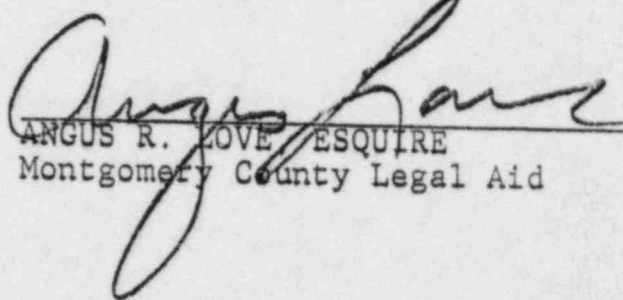
Initially, the inmates would like the record to reflect that they have retained the services of John Case to act as their expert in this matter. Mr. Case is currently the Field Director of the Pennsylvania Prison Society (see Vita attached as Exhibit A).

III. The inmates' expert, John Case, requests that all information contained in the unsanitized version of the evacuation plan is needed in order to ascertain the viability of such.

The inmates' expert, John Case, served twenty-one years in the United States Marine Corps (1942-62). During this period, he obtained a security rating of Top Secret "Q". It is his opinion that all the information contained in the sanitized version is necessary to determine the viability of the plan. He further indicated that said material is secure in his hands due to his prior security clearances in the Marine Corps and his top secret rating. He also indicated that the unsanitized version contains virtually no useful information, therefore further inquiries as to the type of information needed are premature. Accordingly, the inmates request full disclosure of the plan to

their expert and counsel. See Pacific Gas and Electric Company  
(Diablo Canyon Nuclear Power Plant, Units 1 and 2, ALAB-592  
11 N.R.C. (1980).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Angus R. Love", is written over a horizontal line.

ANGUS R. LOVE ESQUIRE  
Montgomery County Legal Aid

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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PHILADELPHIA ELECTRIC COMPANY :  
(Limerick Generating Station,  
Units 1 and 2) :

CERTIFICATE OF SERVICE

I, Angus R. Love, attorney for Inmates, SCIG, hereby certify that a true and accurate copy of the Supplemental Motion of the Inmates at SCIG Regarding Full Disclosure of the Evacuation Plan for SCIG, in reference to the above-captioned matter, was mailed on January 28, 1985 via regular first class mail, postage prepaid, to the following list:

Helen F. Hoyt, Chairperson  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Richard F. Cole  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Jerry Harbour  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Frank R. Romano  
Air and Water Pollution Patrol  
61 Forest Avenue  
Ambler, PA 19002

Ms. Phyllis Zitzer, Pres.  
Ms. Maureen Mulligan  
Limerick Ecology Action  
762 Queen Street  
Pottstown, PA 19462

Mr. Edward G. Bauer, Jr.  
V.P. and General Counsel  
Philadelphia Electric Co.  
2301 Market Street  
Philadelphia, PA 19101

Troy B. Conner, Jr., Esq.  
Mark J. Wetterhahn, Esq.  
Conner and Wetterhahn  
1747 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

Mr. Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149



Joseph H. White, III  
15 Ardmore Avenue  
Ardmore, PA 19003

Martha W. Buxh, Esq.  
Kathryn S. Lewis, Esq.  
1500 Municipal Services Bldg.  
15th and JFK Blvd.  
Philadelphia, PA 19107

Thomas Gerusky, Director  
Bureau of Radiation Protection  
Dept. of Environmental Resources  
5th Floor, Fulton Bank Bldg.  
Third and Locust Streets  
Harrisburg, PA 17120

Director  
Pennsylvania Emergency  
Management Agency  
Basement, Transportation &  
Safety Bldg.  
Harrisburg, PA 17120

Robert L. Anthony  
Friends of the Earth of  
the Delaware Valley  
103 Vernon Lane, Box 186  
Moylan, PA 19065

Charles W. Elliott, Esq.  
Brose & Poswistilo  
325 N. 10th Street  
Easton, PA 18042

David Wersan  
Consumer Advocate  
Office of Attorney General  
1425 Strawberry Square  
Harrisburg, PA 17120

Jay Gutierrez  
Regional Counsel  
USNRC, Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Steven P. Hershey, Esq.  
Community Legal Services, Inc.  
5219 Chestnut Street  
Philadelphia, PA 19139

Zori G. Ferkin  
Governor's Energy Council  
P.O. box 8010  
1625 N. Front Street  
Harrisburg, PA 17105

Spence W. Perry, Esq.,  
Associate General Counsel  
Federal Emerg. Managemt Agency  
Room 840, 500 C. Street, S.W.  
Washington, D.C. 20472

Robert J. Sugarman, Esq.  
Sugarman, Denworth & Hellegers  
16th Fl. Center Plaza  
101 N. Broad Street  
Philadelphia, PA 19107

James Wiggins  
Sr. Resident Inspector  
U.S. Nuclear Regulatory Comm.  
P.O. Box 47  
Sanatoga, PA 19464

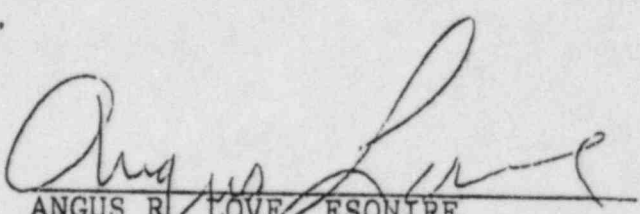
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Gregory Minor  
MHB Technical Associates  
1723 Hamilton Avenue  
San Jose, CA 95126

Timothy R.S. Campbell, Director  
Department of Emerg. Services  
14 East Biddle Street  
West Chester, PA 19380

  
ANGUS R. LOVE, ESQUIRE  
Montgomery County Legal Aid

VITA  
JOHN D. CASE

WORK EXPERIENCE

May 1977 to present

Field Director, The Pennsylvania Prison Society,  
Philadelphia, PA 19107

December 1962 to  
February 1977

Warden, Bucks County Prison, Doylestown, and  
simultaneously from 1969 Director, Bucks County  
Department of Corrections

1969 to 1978

Member, Governor's Justice Commission, Pennsylvania

January 1942 to  
December 1962

Private to Major, United States Marine Corps  
1954 to 1957 Instructor, Marine Corps Command  
Staff School, Quantico, VA  
1948 to 1950 Custody Officer, Naval Prison,  
Portsmouth, N.H.  
1960 to 1962 Brig Officer, Marine Corps Base,  
Camp LeJeune, N.C.

EXPERT WITNESS

June 1970

Nez vs Marila, U.S. District Court of Arizona,  
#70-216

August 13, 1970

Legislative-Executive Task Force on Reorganization  
of Government, Commonwealth of Pennsylvania

May 29, 1971

Committee on the Judiciary, House of Representatives,  
Washington, D.C.

June 22, 1972

Committee on the Judiciary, Senate of the United  
States, Washington, D.C.

July 1977

Sutton vs Washington, Civil Action #77-0279, U.S.  
District Court for District of Columbia

March 1979

Valentine vs Englehardt, Civil Action #78-270, U. S.  
District Court for New Jersey (Passaic County Jail)

September 1979

Ippolito vs Howell, Civil Action #78-0911, U.S.  
District Court for the District of New Jersey  
(Atlantic County Jail) (Consent Decree)

1980

Morrison vs Brennan, Civil Action #77-0765 consoli-  
dated with Civil Action #78-0628, U.S. District  
Court for the District of New Jersey (Burlington  
County Jail), Consent Decree.

October 23, 1980

Lareau vs Manson, Civil Action #H-78-145 and  
H-78-199, U.S. District Court for District of  
Connecticut.

January 28, 1981

Smith vs Montgomery County and Commissioners, civil  
action #80-4492, U.S. District Court for the Eastern  
District of Pennsylvania

EXPERT WITNESS

March, 1980	Davis vs H.G. Evatt, Sheriff of Hamilton County Tennessee, Civil Action #1-79-100, U.S. District Court for the Eastern District of Tennessee
1980	Tammy Lee, James Earl Morehead, et al vs Bradley County, Tennessee, et al, Civil Action #1-80-38 in the U.S. District Court for the Eastern District of Tennessee, Southern Division (Consent Decree)
April, 1981	Laurie DeMier, et al vs Arlington County, Civil Action #80-1086-A, U.S. District Court, Eastern District of Virginia (Consent Decree)
April 2, 1981	Fisher vs Arlington County, et al, Civil Action #80-1104, U.S. District Court, Eastern District of Virginia
August, 1981	Pontate, et al vs Richard Frey of Jefferson County, Civil Action #C75-0031-L(A), C79-0492-L(A), C79-0570-L(A), U.S. District Court, Western District of Kentucky at Louisville
July 3, 1981	Raymond Lattisaw, et al vs Hughes, et al, Civil Action #K-78-1718, U.S. District Court, District of Maryland (Deposition)
January, 1982	Early vs District of Columbia, Civil Action #1245178 and Civil Action #739579, Superior Court of District of Columbia
January, 1982	Bland, et al vs Norvell, Sheriff of St. Lucie County, Florida, et al, Civil Action #80-8251-CIV-JCP, (80-0016-CIV-MAG-PJK), U.S. District Court for Southern District of Florida, Fort Pierce Division, (Consent Decree)
December, 1981	Billy Curtsinger, et al vs Billy Ray Shephard, et al of Bullitt County, Civil Action, #C80-0048-L(A), U.S. District Court, Western District of Kentucky at Louisville, (Consent Decree)
March 1, 1982	McElvern, et al vs County of Prince William, et al Civil Action #81-1049AM, U.S. District Court of Virginia, Alexandria Division
May, 1982	Gary Hendricks vs Paul Davis, et al, Civil Action #HM-80-2038 in the U.S. District Court for the District of Maryland
February, 1984	Wheeler vs Sullivan, et al, Civil Action #80-177-WRS U.S. District Court of the District of Delaware
December 7, 1984	Michael Wayne Spivey vs Roy Banks, et al, Civil Action #82-1060-CRT, U.S. District Court for Eastern District of North Carolina, Raleigh Division



## AWARDS

- 1968 G. Howland Shaw Award of the National Jail Association, Jailer of the Year, presented at the American Correctional Association Convention, San Francisco
- 1975 Exemplary Project Award for Corrections, presented by the National Association of Counties
- 1976 Ambassador of the Year, presented by the Bucks County Chamber of Commerce
- 1976 Liberty Bell Award, Young Lawyers, Pennsylvania Bar Association
- 1977 Citizen of the Decade, presented by the Bucks County Association for Corrections and Rehabilitation
- 1977 Commendation from the Senate of Pennsylvania for nine years of service as a member of the Governor's Justice Commission

## PUBLISHED ARTICLES

- January-February, 1965 Modern Corrections in Old County Jail, American Journal of Corrections
- 1965 Citizen Participation in the County Jail, American Correctional Association Proceeding
- September, 1966 We Operate a Salvage Business--Not a Junk Yard! Federal Probation Quarterly
- December, 1966 Citizen Participation: An Experiment in Prison-Community Relations, Federal Probation Quarterly
- March, 1967 "Doing Time" in the Community, Federal Probation Quarterly
- Spring-Summer, 1967 Incentives in a County Prison, Prison Journal
- January 8, 1969 Pennsylvania's County Prisons, a presentation to Task Force on Corrections, the Legislature of the Commonwealth of Pennsylvania
- June, 1969 Reintegration of the Offender into the Community
- February 9, 1971 Does Anybody Really Care? Presented at New York University, and published as a chapter in book Social Disabilities.
- June 23, 1971 Testimony, Committee on the Judiciary, United States House of Representatives, Washington, D. C.
- January-February, 1973 Correctional Volunteers in Bucks County, The American Journal of Corrections



#### CONSULTANT EXPERIENCE AND STUDIES

1968 to present	Certified Jail Consultant, National Jail Association
1968	Jail Study, Dixon County, Sioux City, Nebraska
1969	Monroe County, Rochester, New York Rockland County, New York
1970	Hamilton County, Cincinnati, Ohio
1971	Jefferson County, Louisville, Kentucky
1973	Onondago County, Jamesville, New York
1974-1975	Burlington County, Mount Holly, New Jersey (consulted in planning of new minimum security corrections center)
1978	Columbia County, Bloomsburg, PA
1978	Lancaster County, Lancaster, PA
1981-1982	Dauphin, Lycoming, Westmoreland, Lackawanna Counties

#### SPECIAL PROJECTS

1964	Planned and opened Bucks County Rehabilitation Center, minimum security institution, first such institution in any county in the United States.
1966	Assisted in preparation of Chapter 3, Community Detention Facility, of 1966 edition of <u>Manual of Correctional Standards</u> , American Correctional Association.
1970-1971	Member ad hoc committee on work release, American Correctional Association
1972	Member of team which conducted seven training seminars (three days each) for sheriffs under sponsorship of National Sheriffs Association
1973	Member of ad hoc committee of American Correctional Association to test accreditation procedures. Included visits to several institutions to evaluate all aspects for accreditation.

#### PROFESSIONAL AFFILIATIONS

National Jail Association - Was Director and past President. Now called American Jail Association, serving as Parliamentarian.

American Correctional Association - Former Director

Pennsylvania Association on Probation, Parole and Corrections

Member, American Correctional Association - Local Detention Committee

## TRAINING

January, 1955	Instructor Orientation Course, Marine Corps School, Quantico, VA
February, 1960	Senior Officers Short Course in Military Justice
January, 1962	Correctional Administration Course, Class #1, Fort Gordon, Georgia
April to June, 1962	Correctional Administration, American University, Washington, D. C. (2 months, full-time)
July, 1962	Course in Jail Management, Federal Jail Inspection Service, Bureau of Prisons, Washington, D. C.
November, 1962	Speed Reading Course, Marine Corps Base, Camp LeJeune, N. C.
May, 1964	Counseling of Inmates, Public Service Institute of Pennsylvania
December, 1964	Clinical Criminology I, Public Service Institute, Department of Public Instruction, Harrisburg, PA
May, 1965	Security and Discipline in Prison, Public Service Institute
June, 1965	Group and Case Counseling in Correctional Settings, Public Service Institute
June, 1966	Correctional Counseling, Psychotherapeutic Techniques, Public Service Institute
January, 1967	Prison Staff Development, Public Service Institute
May, 1967	Modern Approach to Administration of Justice, Pennsylvania State University
December, 1967	Advanced Course - Prison Security
January, 1968	The Executive Workshop, Pennsylvania Adult Correctional Training Institute, Pennsylvania State University
August, 1968.	Juvenile Behavior and Child Care, Public Service Institute
October, 1968	Jail Management Correspondence Course, Jail Management Institute, Bureau of Prisons
December, 1968	Group Counseling, Public Service Institute

EDUCATION

1940 to 1942

After high school graduation (valedictorian), I attended Fordham University, Bronx, New York, on a combined athletic (football) and scholastic scholarship (Dean's List). In 1942, I enlisted in the U.S. Marine Corps. During my Marine Corps career, I attended Fordham University and George Washington College part-time, but did not complete the work required for a degree.