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Mrs. Helen Hoyt, Chairman Nuclear Regulatory Commission Hearings U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Cedar View Farm 501 Hancock Road North Wales, PA 19454 December 19, 1984

SERVED FEB 7 1985

RE: EVACUATION PLANNING AT LIMERICK

Paul Bartle, Chairman of the Montgomery County Commissioners, in a letter of October 25, 1984 to Robert L. Anthony (enclosed) traces the history of Montgomery County's opposition to the construction of a nuclear plant at Limerick. As the letter states, the County was in constant opposition to Limerick, and its right of self-determination was pre-empted by the special powers of the Nuclear Regulatory Commission which chose to permit the construction of a plant at this most inappropriate location. The terrain is hilly; the roads narrow and winding; yet it is very close to major centers of population.

Mr. Bartle writes:

As to emergency procedures, I have stated publicly several times that I have little faith in the implementation of any evacuation plan.

Anyone who has driven these roads at rush hour knows that effective evacuation is indeed impossible. PECO's traffic simulation is just sophistic mumbo-jumbo. In the event of an accident at Limerick, the roads will be blocked with traffic; the only possible evacuation will be on foot.

PECO was aware of this when they chose Limerick as the site for this plant. It is now obvious that the site was chosen so that PECO could use the nuclear 'excuse' in order to mine water from the Delaware River at Point Pleasant, and sell it through the area between the Delaware and Limerick (North Wales and North Penn Water Authorities). PECO's access to the water was to be facilitated by the privileges granted to the nuclear industry. The unfortunate site was chosen by the desire to import, transport, and sell water.

The site is one from which effective evacuation is impossible; but evacuation was not a concern of the planners at the time when the site was chosen.

I urge you to close down the Limerick reactors. (1) They never should have been located here; (2) they were never wanted nor needed by the residents of Montgomery County; (3) they were consistently opposed by the County Commissioners. We do not need a Three-Mile Island accident, or worse, in Montgomery County

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I prepared the above comments for presentation at the NRC hearings first on November 16th and again on December 13th. On both occasions, I was not given an opportunity to speak, while unlimited time was given to those who spoke about nuclear energy in general, not the problems of evacuation from Limerick.

I am not an antinuclear activist. I oppose the Limerick plant because of its location, just as previously my County Commissioners opposed it. I think that strong opposition is called for since the accident at Three Mile Island, and since the electricity Limerick will produce will be more costly than electricity from coal or oil. Limerick will be an economic disaster for our area. It can not be evacuated.

The ignorance demonstrated by the PECO workers who testified on December 13th was appalling. Their testimony was often irrelevant, and the opinions expressed, if honestly held, clearly showed that PECO is not adequately warning its workers of the dangers connected with their workplace. PECO should be reprimanded for indoctrinating rather than informing its workers about the risks they are daily running as a result of their work.

The opinions expressed by the PECO workers on the 13th clearly arose from self-interest, however mistaken. I believe that the views of those who are employed in a nuclear plant should be considered prejudiced by reason of their employment and that such workers should be denied formal standing at the hearings.

I am the seventh generation of my family to live in Montgomery County: I want to see it continue to be habitable and beautiful. Many of those who spoke in favor of Limerick were new residents of the County who spoke out of concern for their jobs. I, however, write out of concern for the future, for a County free from the fear of radiation, of nuclear accident, of dangerous chemicals in our air and water and lethal waste material in our soil.

Sincerely yours,

Jace Freed Muscarella Grace Freed Muscarella

MONTGOMERY COUNTY



NORRISTOWN, PENNSYLVANIA

COMMISSIONERS PAUL BARER BARTLE ALLAN C. MIERS RITA C. BANNING

BOLICITOR FREDERIC M. WENTZ CHIEF CLERK ROBERT W. GRAF

October 25, 1984

Mr. Robert L. Anthony P. O. Box 186 Moylan, PA 19065

Dear Mr. Anthony:

Thank your for your letter of October 2, 1984 regarding the Limerick Plant.

When the plant was first proposed in the mid 1960's, the County petitioned the then Atomic Energy Commission (AEC) for permission to intervene. Permission was granted and the County attended thirty-three (33) days of public hearings during the 1970's. The County presented evidence, cross-examined witnesses and made a strong plea to prevent the construction of Limerick. The County also employed the Franklin Institute as a consultant to study the impact of the plant and its findings were presented to the AEC.

The AEC eventually ruled in favor of the applicant and construction was permitted over the opposition of the County and Congressman Coughlin.

The County also intervened and presented testimony before the Pennsylvania Utility Commission (PUC) recommending that a Certificate of Necessity not be granted to the Philadelphia Electric Company. The PUC, however did grant the certificate. The County also became involved in the Delaware Valley Basin Commission studies and hearings concerning the water supply for the Limerick Plant operation.

The County pursued every available administrative procedure to prevent the construction of Limerick, but the governmental bodies responsible for the decision decreed that the plant could be built. The Nuclear Regulatory Commission (NRC) has preempted all other governmental bodies in the control and licensing of Nuclear Power Plants. They employ experts in the field for the purpose of making decisions in that area. It is incumbent upon the NRC to properly monitor the construction and operation of the . Limerick Plant.

Montgomery County Bicentennial

A Celebration of Two Centuries

Mr. Robert L. Anthony

As to emergency procedures, I have stated publicly several times that I have little faith in the effective implumentation of any evacuation plan. I believe, however, that the County must do everything possible to effectuate as good an evacuation plan as possible, and we will continue to work toward that end.

Thank you for your Interest and concern.

Sincerely,

Jan Dal Battle

Paul Baker Bartle Chairman Montgomery County Commissioners

PBB:kel cc: Mr. Arthur Loeben

EXHIBIT IN