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United States of America

NUCLEAR REGULATORY COMMISSION

'84 NOV -8 19:02

In the matter of:

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

DOCKET NO.

50-352  
50-353

TO

Barbara Greaser  
President, Souderton Area Education Association  
1660 Old Fourty Foot Road  
Harleysville, Pa. 19438

SERVED NOV 8 1984

YOU ARE HEREBY COMMANDED to appear at the United States Customs  
Court House, Second and Chestnut Streets (Room 300)

in the city of Philadelphia, Pennsylvania

on the 28th day of November 1984 at 9:00'clock A.M. (\*\*)

to testify on behalf of Limerick Ecology Action

(\*\*) You will be placed on 24 hour telephone stand by alert every day  
in the above entitled action and bring with you the document(s) or object(s) described thereafter  
in the attached schedule. until call

Please bring copies of your written statement

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY

*John F. Hogh*  
Administrative Judge

November 5, 1984

XXXXXXXXXX FOR  
Limerick Ecology Action  
P.O. Box 761  
Pottstown, PA 19464  
TELEPHONE (215) 326-9122

8411090308 841105  
PDR ADDCK 05000352  
G PDR

DSG2

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event  
at or before the time specified in the subpoena  
for compliance by the person to whom the sub-  
poena is directed, and on notice to the party at  
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the  
Commission may (1) quash or modify the sub-  
poena if it is unreasonable or requires evidence  
not relevant to any matter in issue, or (2) con-  
dition denial of the motion on just and reasonable  
terms.

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket No. 50-352  
50-353

November 2, 1984

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REQUEST OF LIMERICK ECOLOGY ACTION FOR ISSUANCE OF A SUBPOENA  
TO OBTAIN THE TESTIMONY OF BARBARA GREASER, PRESIDENT OF THE  
SOUDERTON AREA EDUCATION ASSOCIATION ON OFF-SITE EMERGENCY  
PLANNING CONTENTIONS IN THE ABOVE ACPTIONED PROCEEDING

Pursuant to 10.CFR § 2.720, Limerick Ecology Action respectfully requests the Atomic Safety and Licensing Board to issue a subpoena to Barbara Greaser, President of the Souderton Area Education Association so that the attached letter may become her testimony in this proceeding on off-site emergency planning contentions. Ms. Greaser's address is:

✓ Barbara Greaser  
1660 Old Fourty Foot Road  
Harleysville, Pa. 19438

(215-368-5209)

LEA requests that Ms. Greaser appear at the United States Customs Court House, Second and Chestnut Streets (Room 300) in Philadelphia on November 28th., at 9:00 a.m. and that she be on 24 hour standby phone alert standby every day thereafter until called to testify on behalf of Limerick Ecology Action on the subject of off-site emergency planning matters relating to the Souderton School District.

LEA attempted to obtain written testimony from Ms. Greaser on behalf of the Teachers Association on school related contentions in this proceeding. Her statement is attached, but she prefers to be subpoenaed to present this statement as testimony, if the Licensing Board grants LEA's request to issue the subpoena.

Therefore, LEA respectfully requests approval of a subpoena so that Ms. Greaser may appear as a witness on behalf of Limerick Ecology Action.

Respectfully submitted,

*Phyllis Zitzer*  
Phyllis Zitzer, LEA President

Nov. 2, 1984

cc: Service List  
Subpoena forms sent only to Board

*DA 8411060627*

STATEMENT OF BARBARA GREASER  
President of the  
Souderton Area Education Association

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My name is Barbara Greaser. I am the current President of the Souderton Area Education Association. I live at 1660 Old Fourty Foot Road in Harleysville. I am a 14 year math and science teacher at the Indian Valley Junior High School. I represent the concerns of 2 of the school buildings in the Souderton School District.

One of these buildings, Salford Hills Elementary, is located within the 10 mile radius of the Limerick power plant, designated for evacuation in the event of a radiological emergency. The other, Indian Valley Junior High School is a host building. Faculty members at each of these schools have not been approached, questioned, surveyed, or trained about emergency response plans for Limerick. To my knowledge, the parents have not been surveyed either.

Souderton School District is working on the fourth draft of a proposed radiological emergency response plan and after presentation to the School Board, will be open to comments from parents, teachers, and the public.

It has been brought to my attention that this issue was discussed at a Salford Hills Elementary School building meeting. Some teachers question whether they are responsible for the safety and well-being of their own families, as opposed to the children at school in the event of an emergency at Limerick.

I am aware that our Superintendent, Dr. Price, is trying to develop a workable plan in coordination with area townships and county officials. However, at this time, there are still many unanswered questions.

November 1, 1984

Respectfully submitted to the  
Atomic Safety and Licensing Board,  
Nuclear Regulatory Commission