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# United States of America

DOCKETED  
USRC

## NUCLEAR REGULATORY COMMISSION

'84 NOV -8 A9:03

In the matter of:

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

DOCKET NO. 50-352  
50-353

TO

Dr. Laird P. Warner  
Superintendent, Methacton School District  
Administration Building  
Kriebel Mill Road  
Fairview Village, Pa. 19403 (215-489-5000)

SERVED NOV 8 1984

(or a designated representative having personal knowledge of the matters stated in the attached LEA Exhibit on the status of unmet needs relating to LEA's contention  
**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 alert standby every day thereafter in the above entitled action and bring with you the document(s) or object(s) described in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY

*Helmut J. Hoff*  
Administrative Judge

November 5, 1984

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

8411090317 841105  
PDR ADOCK 05000352  
G PDR

DS02

### 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 subpoena 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 subpoena if it is unreasonable or requires evidence not relevant to any matter in issue, or (2) condition denial of the motion on just and reasonable terms.



# METHACTON SCHOOL DISTRICT

DR. LAIRD P. WARNER  
Superintendent

Fairview Village, PA 19403

## EMERGENCY EVACUATION PLANNING COMMITTEE SURVEY FOR BUS DRIVERS

TO: Methacton Bus Drivers  
FROM: Emergency Evacuation Planning Committee  
RE: Attached preliminary driver questionnaire  
DATE: October, 1984

A committee made up of representatives from the administration, teaching staff, bus drivers and community people is currently in the process of preparing a radiological emergency response plan for the Methacton School District. This plan is necessary because all three elementary and the Arcola School are within the ten-mile radius of the emergency planning zone (EPZ) of the Limerick Nuclear Power Plant. Procedures for evacuating and sheltering students are included in the plan.

Bus drivers of the district will be called upon to move students to a host school from each of these four areas in the event of an emergency situation. In addition, bus drivers may also be asked to in turn, transport students from the host school to a mass care feeding center at 8:00 pm.

In addition to the threat of a nuclear accident at Limerick, a good emergency plan will also be useful in the event of any other emergency that might occur at or near any of our schools. Such emergencies could occur at any time and we should be prepared.

It is vital to the committee that we have some idea of how many drivers would be willing to complete emergency driving assignments in any type of emergency. Therefore, we are asking you to complete the attached survey. This survey should be returned to Mr. McMenamin as soon as possible. If you have any questions about the survey, you may direct them to Mr. McMenamin or to Tyrone Johnson who serves as a member of the committee.

The committee is very grateful to you for spending a few minutes to complete this important survey.

METHACTON SCHOOL DISTRICT  
PRELIMINARY DRIVER QUESTIONNAIRE  
AVAILABILITY FOR EMERGENCY SITUATIONS

Please read each of the following questions carefully and answer with sincerity. We would welcome any comments you would have concerning any aspect of the topic of emergency preparedness.

1. In the event of an accident at the Limerick Power Generating station which require student evacuation to a host school during school hours:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with Emergency Response Plan of the Methacton School District.

B. \_\_\_\_\_ I will not participate in the student evacuation.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. In the event of an accident at the Limerick Power Plant which requires student evacuation past regular school hours to a host school and/or a feeding center up until 8:00 pm:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with the Emergency Response Plan of the Methacton School District.

B. \_\_\_\_\_ I will not participate in the student evacuation.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. In the event of an emergency situation (other than nuclear accident), such as a toxic waste spill, flood, fire, etc., which requires student evacuation during school hours:

A. \_\_\_\_\_ I will complete emergency driving assignments as directed by the supervisor of transportation in accordance with the Emergency Response Plan of the Methacton School District.

\_\_\_\_\_ I will not participate in the student evacuation.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



# METHACTON SCHOOL DISTRICT

DR. LAIRD P. WARNER  
Superintendent

Fairview Village, PA 19403

## EMERGENCY EVACUATION PLANNING COMMITTEE SURVEY FOR FOR STAFF MEMBERS

TO: All Methacton Staff Members (excluding bus drivers)

FROM: Emergency Evacuation Planning Committee

RE: Attached preliminary staff questionnaire

DATE: October, 1984

A committee has been formulated to develop a radiological emergency response plan for the Methacton School District. This plan is necessary because all three of our elementary and the Arcola school are in the ten-mile radius of the emergency planning zone (EPZ) of the Limerick Nuclear Power Plant. Procedures for evacuating and sheltering students are included in this plan.

Staff members of the school district will be asked to supervise students during emergency situations. This may require sheltering within a building or evacuating school students on buses to a host school outside the EPZ. An evacuation of school students will be followed by an order to evacuate the entire population from the ten-mile EPZ surrounding Limerick.

In addition to the threat of a nuclear accident at Limerick, a good emergency plan will also be useful in the event of any other emergency that might occur at or near any of our schools. Such emergencies could occur at any time and we should be prepared.

The committee is comprised of representatives from the administrative and teaching staff, parents, and interested community persons. This group has reviewed drafts of an emergency response plan, and will be making recommendations for improving the plan to the board of education. It is vital that the committee have information as to the availability of staff members for supervising students in an emergency situation. The Methacton bus drivers, also being surveyed, are using a separate instrument.

Your cooperation in taking a few minutes to complete the attached questionnaire is gratefully appreciated. Completed questionnaires should be returned to your building principal as soon as possible. If you have any questions relative to the contents of this questionnaire, please direct them to Mr. James P. Brown, Principal of Arrowhead School, who is serving as the chairperson for the committee. It is also important to note that the questionnaire is simply preliminary. It is possible a more specific survey will be devised later in the year.

METHACTON SCHOOL DISTRICT  
EMERGENCY EVACUATION COMMITTEE PRELIMINARY QUESTIONNAIRE

Please read each of the following questions carefully and answer with sincerity. We would welcome any comments you would have concerning any aspect of the topic of emergency preparedness.

\_\_\_\_\_  
Name of School In Which You Work

1. Would you be willing to remain at the school beyond regular hours with students until they are released to their parents or transported to a host school or mass care center in the event of an accident at the Limerick Power generating station?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

2. Would you be willing to accompany students by bus to the host school or mass care center?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

3. Would you be willing to drive your own vehicle (without students) and remain at the host school or mass care center to provide supervision for our students?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      For how long? \_\_\_\_\_ Hours      \_\_\_\_\_ As long as necessary

4. Are you an emergency worker for any other agency?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, please list (e.g., ambulance crew, fire company, CB unit, National Guard) \_\_\_\_\_

5. Are you a resident of the Emergency Planning Zone (approx. 10-mile radius of Limerick)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, can your family be evacuated safely without your assistance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. General Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_