

016  
**United States of America**

**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 CC  
50-353 CC

TO

Dr. Robert B. Murray  
Superintendent  
Phoenixville Area School District  
1120 S. Gay Street  
Phoenixville, Pa. 19460  
(215-933-8861)

SEARCHED  
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 26th day of November 19 84 at 11:30 o'clock P.M. (\*\*)  
to testify on behalf of Limerick Ecology Action

(\*\*) you will be placed on 24 hour phone alert standby every day  
in the above entitled action and bring with you the document(s) or object(s) described thereafter  
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY [Signature]  
Administrative Judge

November 5, 19 84

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

8411090340 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 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.



PHOENIXVILLE AREA SCHOOL DISTRICT

DR. ROBERT B. MURRAY, SUPERINTENDENT

August 6, 1984

Mr. Henry C. Tamanini  
Emergency Planning Specialist  
Energy Consultants, inc.  
Riverside Office Center 3  
2101 N. Front Street  
Harrisburg, PA 17110

Dear Mr. Tamanini:

The Phoenixville Area School District has great concern regarding the lack of progress with the Radiological Emergency Response Plan which we have been attempting to develop for approximately the past two years. I wish to particularly call attention to what we consider to be the facts in this situation:

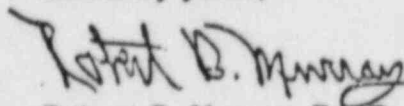
- (1) Our group has not had a meeting since November 3, 1983. Until a call to Mr. Leahy, made on July 31, 1984, we have not had any communication with your organization since April, 1984.
- (2) Concerning the April communication, I telephoned your office on April 17th attempting to discover when we would receive copies of Draft 5. (Draft 4 was received the first week of November, 1983.) At that time, you informed me that Draft 5 would be sent to us "in the next couple of weeks." While this might be a misunderstanding, we still have not received copies of Draft 5.
- (3) Since the first meeting, representatives of the School District have questioned the workability of our Plan; for example, we are seventeen buses short, do not have a list of supervisors for students, have no set evacuation route, and do not have emergency equipment as mentioned in the Plan.
- (4) We have also questioned, from the beginning, the financial responsibility for buses, equipment, supervision, etc.; for example, the School District does not own any buses and contracts at a cost of \$80.00 per bus per day. Who is responsible for the cost of buses required for the evacuation?

- (5) The Plan mentions the need for an emergency telephone/communications system. When will this be provided and again, who has the financial responsibility?
- (6) Who is legally responsible for injuries to pupils and damage or destruction of equipment during either a drill or an actual emergency situation?
- (7) One drill has been held to date and the newspaper speaks of another drill. We would feel much more comfortable if we were prepared for future drills.
- (8) We also read that Philadelphia Electric Company is moving nuclear fuel to the plant loading site. With loading of fuel scheduled for on or about September 15, a lack of preparedness is of great concern.
- (9) Mr. Leahy informs me that as of this morning we have a meeting scheduled for August 28, 1984. It was felt that you should be fully aware of our concerns prior to that meeting.

We are of the opinion that Philadelphia Electric Company anticipates receiving approval to become fully operational regardless of the fact that the Phoenixville Area School District and many other school districts and municipalities have totally inadequate and incomplete Radiological Emergency Response Plans. Our Board of Education questions whether or not the development of our Plan, to date, coincides with the schedule of Philadelphia Electric Company. There is no doubt that this subject will be discussed fully in the very near future by our Board.

We are looking forward to seeing you on August 28. In addition to the administrative members, we will be joined by Mrs. Diana Roberts and Charles Gutkowski, members of the Phoenixville Area Board of Education.

Sincerely yours,



Robert B. Murray, Ed. D.  
Superintendent

RBM/csv

CC: Robert Cane, Phila Elec. Co.  
Timothy Campbell, Ches. Co. Dept. of  
Emergency Services  
Don Sees, Phoenixville Emergency  
Operation Center