

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
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Before the Atomic Safety and Licensing Board NOV 13 11:20

In the Matter of )  
 )  
Philadelphia Electric Company ) Docket Nos. 50-352  
 ) 50-353  
(Limerick Generating Station, )  
Units 1 and 2)

TESTIMONY OF TIMOTHY R.S. CAMPBELL  
ON LIMERICK ECOLOGY ACTION CONTENTIONS  
ON OFFSITE EMERGENCY PLANNING

Q.1. Mr. Campbell, please state your name, address and position.

A.1. My name is Timothy R.S. Campbell. My business address is 14 East Biddle Street, West Chester, PA 19380. I am Director, Department of Emergency Services of the County of Chester, Pennsylvania.

Q.2. Have you prepared a statement of your professional qualifications?

A.2. Yes. My statement is appended to my testimony.

Q.3. What is the purpose of this testimony?

A.3. The purpose of this testimony is to respond to Limerick Ecology Action (LEA) offsite emergency planning contentions related to Chester County.

LEA-11

Q.4. LEA contends that there is no assurance that bus companies in Chester County are committed to providing even

a "minimum" number of busses to assist in an evacuation in the event of a radiological emergency at Limerick. What is your response?

A.4. The total number of busses required has been identified within the County and municipal plans. The Commonwealth of Pennsylvania, Pennsylvania Emergency Management Agency, has been requested to provide those shown as an unmet resource.

Q.5. What is the status of letters of agreements with bus companies in Chester County?

A.5. Chester County does not have any signed agreements with bus companies covering school evacuation. Efforts to negotiate such agreements continue, however. As stated above, unmet school transportation needs have been passed to the Commonwealth for resolution. This includes cases in which verbal, but not written, commitments have been given.

Q.6. What do you consider to constitute a "sufficient" letter of agreement regarding provisions for busses?

A.6. Chester County considers that a written agreement stating that a bus company will provide a certain number of busses during disasters including nuclear power plant incidents to be sufficient assurance of a response.

Q.7. What is your response to LEA's concern that school district and county RERPs are deficient because they fail to indicate assignment of busses to particular schools?

A.7. The number of busses required is known. Assignment

of busses to specific tasks is a tactical decision made at the time of an emergency or need.

Q.8. LEA contends that radiological emergency planning for school districts adjacent to or outside the plume EPZ must take into consideration whether bus resources have been committed to provide assistance in the EPZ in the event an evacuation is recommended, and that such school districts must develop particular emergency procedures to deal with conflicting agreements by bus companies. What is your response?

A.8. Presently no such conflicts exist in the Chester County RERP.

Q.9. What assurance is there that unmet transportation needs identified in the most recent draft Chester County RERP can be met?

A.9. Unmet needs have been passed to the Commonwealth for resolution.

Q.10. The Limerick RERPs do not include assignments of busses to particular schools. What assurance is there that buses sent from other areas can evacuate children in a timely manner?

A.10. The speed of evacuation is not dependent upon assigning specific busses to particular schools in the plan before an event. Early mobilization will reduce deployment time to a minimum.

Q.11. LEA contends that there has been no pre-identification of teacher volunteers willing to stay on duty in the event of a radiological emergency. What is your response?

A.11. School Districts have been encouraged to identify teacher volunteers as part of the planning process.

Q.12. LEA contends that there has been no determination of which school district buildings are adequate for sheltering purposes in a radiological emergency; thus teachers may not be willing to stay on duty in such an event. What is your response?

A.12. The Pennsylvania Bureau of Radiation Protection (BRP), in conjunction with PEMA, will be relied upon to make sheltering recommendations. The selection of a protective action is made during an event based on the situation as it exists and a comparative evaluation of which protection action will achieve the best results. Protection factors for a number of school buildings in Chester County are included in the FEMA National Shelter Survey All-Facility Listings dated July 31, 1983.

Q.13. Must units of dosimetry and KI be distributed to school districts for use by school staff?

A.13. Present Commonwealth policy regarding use of dosimetry and KI does not provide distribution to school

staff because they are not classified as emergency workers.

Q.14. Must school staff be trained in the use of dosimetry, in the event sheltering is recommended as a protection measure?

A.14. No. There is no Pennsylvania plan to issue dosimetry to this segment of the general population.

Q.15. Does the Chester County plan provide reasonable assurance that school bus drivers, teachers or other school staff are properly trained for radiological emergencies?

A.15. Training has and will be made available in those areas appropriate to various groups. Training has been monitored by Chester County staff as far as possible considering the volume of planning requirements. In addition, as a matter of practice in all Chester County-sponsored emergency training, pre- and post-testing was done.

Q.16. Should school staff and bus drivers be trained in procedures for dealing with contaminated individuals and equipment?

A.16. Emergency medical and other emergency responders are trained in these areas. There is therefore no plan to train school staff and bus drivers in these areas since they can obtain assistance from emergency forces.

Q.17. Should school staff and bus drivers be trained in risks of exposure to radiation and proper use of any necessary equipment?

A.17. Appropriate training has and will be made available.

Q.18. Should school staff receive instruction in the proper use of dosimetry?

A.18. School staff will not be issued dosimetry.

Q.19. Should school staff be instructed in the adequacy of school district buildings for sheltering purposes?

A.19. School staff must be aware of those sections of plans in which they are involved. This would include procedures involved in sheltering. A decision on sheltering as a protective action will be made on the situation as it exists during a particular event.

Q.20. Must school staff receive special training in dealing with children under "stress conditions?"

A.20. If a school district believes such training is necessary it should be arranged by the district involved. It would appear that such conditions could exist in other emergency situations, such as evacuation for fire or bomb threat.

Q.21. Is post-training surveying necessary to find reasonable assurance that teachers/school staff will participate in a radiological emergency?

A.21. This is an option available to school districts in the preparation of their plans.

Q.22. LEA contends unannounced evacuation and sheltering drills to determine the effectiveness of training programs are critical to the workability of school district RERPs.



What is your response?

A.22. Various forms of exercises are used to evaluate plans. These will also measure the effectiveness of training. Selection of drill types is a matter of negotiation between involved officials at participating levels.

LEA-13

Q.23. How are the needs of pre-school, day care and nurseery schools determined?

A.23. The general transportation survey sent out to the public is but one method of determining needs. As these types of facilities are identified they are provided with a model plan and asked to communicate their needs to the municipal emergency management planners. Required resources will be identified or passed on to the Commonwealth as the requirement develops in accordance with the customary process of addressing unmet needs.

Q.24. LEA contends that present municipal and county RERPs fail to identify adequately day care, nursery and pre-school centers. What is your response?

A.24. Present municipal and county RERPs are still in draft stage and subject to frequent revision. The assistance of various groups has been obtained to identify facilities. Phone book surveys have been conducted and

information is being gathered from the community. All these sources will be utilized to form the basis for identification of affected day care, nursery and pre-school centers, many of which are not licensed by any government agency.

Q.25. In the case of day care, nursery and pre-school facilities, is there basis for LEA's contention that any decision to shelter must be a "last resort?"

A.25. A decision on implementation of a protective action, including sheltering, will be made based on the circumstances of a particular event and the advice of the appropriate technical staff.

Q.26. What is your opinion as to the participation and commitment of staff of the types of institutions outlined in LEA-13 in plan implementation?

A.26. One can only assume that persons who care for young children have a sense of commitment and that this is acknowledged by the parents placing their children in the custody of these individuals. Planning guidelines call for children to remain with the persons in whom their parents have placed this trust.

LEA-14

Q.27. LEA contends that school district RERPs and the Chester County RERP are deficient because they do not



provide adequately for units of dosimetry/KI for school bus drivers, teachers or school staff. What is your response?

A.27. Dosimetry/KI are not required for these persons since school evacuation will be accomplished in one lift. The personnel involved will not be required to return to the plume EPOZ. School bus drivers, teachers and school staff are not emergency workers. Dosimetry/KI are issued only to emergency workers.

Q.28. Please explain plans in Chester County for provisions of dosimetry/KI where school bus drivers are concerned?

A.28. Dosimetry/KI for school bus drivers are not required since school evacuation will be accomplished in one lift, and personnel involved will not be required to return to the plume EPZ. All other busses will be routed in the transportation staging area.

Q.29. Please explain how the number of units of dosimetry/KI at the Chester County staging area was determined.

A.29. The Chester County RERP states that the transportation staging area will be utilized as a processing area for emergency vehicles and busses that are not assigned to a specific assignment in the EPZ. Busses used in school evacuation will not pass through the transportation staging area since they will complete the evacuation in one lift and will not be required to return

to the EPZ.

Q.30. How are school staff made aware of their roles and responsibilities to assist in implementation of school district RERPs?

A.30. Training in school district RERPs can be arranged.

LEA-15

Q.31. How will it be assured that bus companies with whom letters of agreement will be negotiated will provide enough bus drivers in a radiological emergency?

A.31. Letters of agreement currently in negotiation will reflect both vehicles and drivers.

Q.32. Is it required that bus driver volunteers be identified prior to an emergency?

A.32. There is no requirement to identify individual bus drivers before the event.

Q.33. Must letters of agreement with bus companies indicate the terms of employment contracts between bus companies and drivers?

A.33. The issue of the terms of bus driver employment contracts with bus companies is to be addressed by each bus company as it reviews the signing of an agreement to provide busses.

Q.34. How will bus drivers become familiar with the routes to which they are assigned during a radiological emergency?

A.34. Bus drivers will be given appropriate directions when assigned to destinations. Guides will be provided when necessary.

Q.35. LEA is concerned that there is no assurance that bus drivers will be aware of their role in providing transportation from host schools to mass care centers. What is your response?

A.35. Since assignment of busses before the emergency event is not required or possible, it is not possible to provide this "awareness." In addition, the bus drivers involved in the movement from risk to host schools may not be the same involved in any subsequent movement from the host schools. Transport from host schools to mass care centers will occur entirely outside of the plume EPZ.

Q.36. Will bus drivers receive training for their role in radiological emergency evacuation?

A.36. Training for bus drivers has and will be provided.

Q.37. Must the possibility of "multiple trip scenarios" be included in training programs and in actual plans?

A.37. Plans are being formulated on the basis of one lift evacuation of all risk schools.

LEA-22

Q.38. How is Chester County planning to ensure that sufficient dosimetry/KI is available for farmers who may

choose to re-enter the EPZ to tend to livestock?

A.38. 200 units of dosimetry/KI is currently assigned to farmers in the Chester County RERP. This number is considered sufficient based on present information. Since the number of farmers may vary over a period of time, this figure may be adjusted. It is noted that a unit of dosimetry includes a fourteen-day supply of KI. Since KI is the only "consumable," this should provide sufficient time for replenishment of supplies. If the need for additional dosimetry/KI for farmers is identified in the process of refining and finalizing the Chester County RERP, this will be passed on to the Commonwealth as an unmet need.

Q.39. How does Chester County in its RERP define "farmers" with "livestock?" Should the term "livestock" be specifically defined as particular types of animal?

A.39. The term "livestock" is considered adequate. Chester County will utilize a list provided by the county Emergency Board, plus other information as available, for verification of individual status.

Q.40. What information is available to farmers with livestock regarding radiological emergencies?

A.40. Primary public information for farmers is the responsibility of the Pennsylvania Department of Agriculture and the County Emergency Board. Farmers will also receive all general public information distributions.

Q.41. Is training available for farmers with livestock in the Limerick plume EPZ?

A.41. Appropriate training has and will be provided.

LEA-26

Q.42. LEA contends that the draft county and municipal RERPs do not comply with 10 C.F.R. 50.47(b)(5) because there is no prompt alerting system operative and in place before an evacuation alert can be implemented, and there is no assurance of adequate capability to conduct route alerting. What is your response?

A.42. Applicant is responsible for demonstrating that an alerting system exists. Installation of a computer based rapid telephone system for notification of emergency workers is being completed.

Route alerting was demonstrated during the July 25, 1984 exercise. A survey has been conducted to ascertain additional equipment that may be necessary. This equipment is being procured.

Q.43. LEA is concerned that notification of essential organizations and staff through the automatic dialer RECALL system not delay activation of the public notification system. What is your response?

A.43. RECALL is a system for automatic phone notification. Draft 9, Chester County RERP, Page C-1-4 states:

As EOC staff arrive at the EOC, they will be provided with RECALL printout indicating notifications accomplished, and will initiate remedial notifications and verify notifications for their respective areas pursuant to appropriate implementing procedures.

This is a simple and logical procedure. The Chester County RERP provides further that, "*i*n rapidly developing situations requiring expeditious public alert, the Communications Center can, on direction of the DES duty officer or Director, activate the EBS network and appropriate sirens, simultaneously with the initiation of the RECALL notification sequence."

Q.44. How is the response of volunteer fire company personnel that would or could be available at the time of a radiological emergency assured?

A.44. Requirements for personnel are known. There is no requirement to list the number of personnel that would or could be available. Volunteer fire companies have developed a substantial record of their ability to respond and of the number of available personnel.

LEA-27

Q.45. How will radiological emergency response planning for the Camp Hill Village Special School, Inc. in East Nantmeal Township and the Camp Hill Village School in West Vincent Township be assured?

A.45. The essential factors such as notification and



transportation needs will be included in respective township plans. In the event a municipality is unable to provide required resources, these unmet needs are passed to the county, and if necessary the Commonwealth, for resolution. Separate plans for each facility could be written if each wished to participate in the planning process.

Q.46. How will use of these schools buildings for sheltering be approached?

A.46. As stated in response to LEA-12, the Pennsylvania Bureau of Radiation Protection, through PEMA, will be relied on to make sheltering recommendations. And protection factors for many school buildings in Chester County are included in FEMA's National Shelter Survey listing.

LEA-28

Q.47. How will towing, road clearance and snow removal be provided in Chester County?

A.47. Towing or road clearance can be provided from inside or outside the EPZ in accordance with customary procedures with reasonable assurance. Sufficient gas stations are expected to be available outside the plume EPZ. The Pennsylvania National Guard will have emergency supplies of gasoline on main evacuation routes. Municipalities already have contracts or their own equipment for snow removal.

## Professional Qualifications

Timothy R. S. Campbell

Since 1978, I have been the Director of the Department of Emergency Services of the County of Chester, Pennsylvania. As such I direct the operation of a central communications center for the fire, police, ambulance, and rescue organizations in the County. I supervise the activities of the Chester County Fire Marshal, Chester County Fire School, Chester County EMS Council and Chester County EMS Training Institute.

Also in 1978, upon recommendation of the Board of County Commissioners, I was appointed County Coordinator of Emergency Management by Governor Milton Shapp. In this capacity, I am responsible for the county's emergency response to natural and man-made disasters, for effecting coordination between the county and operating agencies of other levels of government and for coordinating operations by local emergency preparedness forces as outlined in Pennsylvania's Emergency Management Service Act of 1978 (P.L. 1332).

Prior to assuming my present position, I was an active member of the volunteer fire and ambulance services for ten years. I have served as Chairperson of the Southeastern Pennsylvania Emergency Health Services Council. I am presently Chairperson of the Emergency Medical Services Committee, Pennsylvania Chapter, Associated Public-Safety Communications Officers, Incorporated; Vice-Chairperson, Procedures Committee, Pennsylvania Fire Service Professional Qualifications Board; Director, Keystone State Chapter, International Society of Fire Services Instructors; Member, Pennsylvania Insurance Commissioner's Anti-Arson Advisory Committee.

In addition to 2,500 total hours of courses on emergency management and related topics, I have completed the Radiological Emergency Planning Course and Basic Disaster Operations Course at the Emergency Management Institute of FEMA.

RELATED CORRESPONDENCE

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BIOGRAPHICAL SUMMARY

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MICHAEL A. WORMAN

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Michael A. Worman, a native of Harrisburg, Pennsylvania, was appointed Executive Deputy Secretary of the state Department of Education by Governor Dick Thornburgh in January, 1983. Prior to that, he served as executive assistant to the Secretary of Budget and Administration for four years.

He is a graduate of Grove City College in Mercer County, and received a master's degree in international relations and a doctorate in political science from Florida State University, where he was a Florida State University Fellow and a World Law Fund Fellow.

Dr. Worman has served as an associate professor of political science at Elizabethtown College, a news broadcaster and producer with Radio Station WGAL AM-FM in Lancaster, and as an administrative assistant with the Florida House of Representatives.

Active in community affairs, Worman is a former member of the Elizabethtown Borough Planning Commission, a former director of the Elizabethtown Area School District, and a member of the Board of Directors of the Elizabethtown Public Library.

Michael and his wife, Susan, reside in Elizabethtown and are the parents of two sons and a daughter.

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NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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PHILADELPHIA ELECTRIC COMPANY ) Docket Nos. 50-352  
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Units 1 and 2)

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Testimony of Timothy R.S. Campbell" and "Biographical Summary of Dr. Michael Worman" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Commonwealth of Pennsylvania's internal mail system, this 9th day of November 1984:

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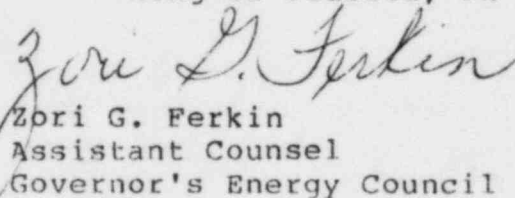
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