

Docket Nos. 50-352/353

DEC 4 1984

Distribution:

Docket File Vogler, OELD  
NRC PDR ACRS (16)  
Local PDR EJordan  
PRC System NGrace  
NSIC  
LB#2 Reading  
EHylton  
RMartin

Mr. Edward G. Bauer, Jr.  
Vice President & General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: PROPOSED RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR  
THE CAMPHILL SPECIAL SCHOOLS FOR INCIDENTS AT LIMERICK

The enclosed letter to Richard C. DeYoung, NRC from Bernard Wolf, Director of Programs for the Camphill Special Schools, Inc. dated October 1, 1984, discusses the concerns of the Board of Directors of the school regarding the apparent lack of an emergency response plan for the Camphill Special Schools for incidents at the Limerick Generating Station.

The enclosed letter is forwarded to you for your information and request that you continue to coordinate the Limerick emergency planning efforts with those of State and local planning authorities to ensure that the concerns of the Board of Directors for the Camphill Special Schools are addressed in a timely manner. The letter has also been forwarded to FEMA.

Sincerely,

A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing

Enclosure:  
As stated

cc: See next page

LB#2/DL/PM  
RMartin/lb  
12/4/84

LB#2/DL/BC  
ASchwencer  
12/4/84

8412110021 841204  
PDR ADOCK 05000352  
F PDR



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 4 1984

Docket Nos. 50-352/353

Mr. Edward G. Bauer, Jr.  
Vice President & General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: PROPOSED RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR  
THE CAMPHILL SPECIAL SCHOOLS FOR INCIDENTS AT LIMERICK

The enclosed letter to Richard C. DeYoung, NRC from Bernard Wolf, Director of Programs for the Camphill Special Schools, Inc. dated October 1, 1984, discusses the concerns of the Board of Directors of the school regarding the apparent lack of an emergency response plan for the Camphill Special Schools for incidents at the Limerick Generating Station.

The enclosed letter is forwarded to you for your information and request that you continue to coordinate the Limerick emergency planning efforts with those of State and local planning authorities to ensure that the concerns of the Board of Directors for the Camphill Special Schools are addressed in a timely manner. The letter has also been forwarded to FEMA.

Sincerely,

*A. Schwencer*  
A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing

Enclosure:  
As stated

cc: See next page

LIMERICK

Mr. Edward G. Bauer, Jr  
Vice President & General Counsel  
Philadelphia Electric Company  
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr., Esquire  
Conner and Wetterhahn  
1747 Pennsylvania Ave, N.W.  
Washington, D. C. 20006

Zori G. Ferkin  
Assistant Counsel  
Governor's Energy Council  
1625 N. Front Street  
Harrisburg, Pennsylvania 17105

Federic M. Wentz  
County Solicitor  
County of Montgomery  
Courthouse  
Norristown, Pennsylvania 19404

Eugene J. Bradley  
Philadelphia Electric Company  
Associate General Counsel  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Mr. Vincent Boyer  
Senior Vice President  
Nuclear Operations  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Mr. Suresh Chaudhary  
Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 47  
Sanatoga, PA 19464

James Wiggins, SR. R.I.  
U. S. Nuclear Regulatory Commission  
P. O. Box 47  
Sanatoga, Pennsylvania 19464

Mr. Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, Pennsylvania 19149

Frank R. Romano, Chairman  
Air & Water Pollution Patrol  
61 Forest Avenue  
Ambler, Pennsylvania 19002

Charles W. Elliott, Esquire  
Brose & Poswistilo, 1101 Bldg.  
325 N. 10th Street  
Easton, Pennsylvania 18402

Ms. M. Mulligan  
Limerick Ecology Action  
762 Queen St.  
Pottstown, Pennsylvania 19464

Mr. Karl Abraham  
Public Affairs Officer  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19806

Thomas Gerusky, Director  
Bureau of Radiation Protection  
Dept. of Environmental Resources  
5th Floor, Fulton Bank Bldg.  
Third and Locust Streets  
Harrisburg, Pennsylvania 17120

Sugarman, Denworth & Hellegers  
16th Floor Center Plaza  
101 North Broad Street  
Philadelphia, Pennsylvania 19106

Robert L. Anthony  
Friends of the Earth  
Delaware Valley  
103 Vernon Lane, Box 186  
Moylan, Pennsylvania 19065

Martha W. Bush  
Deputy City Solicitor  
Municipal Services Bldg.  
15th and JFK Blvd.  
Philadelphia, Pennsylvania 19107

David Wersan, Esq.  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Steven P. Hershey, Esq.  
Community Legal Services, Inc.  
Law Center North Central - Bevery Bldg.  
3701 North Board Street  
Philadelphia, Pennsylvania 19140

Mr. J. T. Robb, NS-1  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Timothy R. S. Campbell, Director  
Department of Emergency Services  
14 East Biddle Street  
West Chester, Pennsylvania 19380

Director, Pennsylvania Emergency  
Management Agency  
Basement, Transportation &  
Safety Building  
Harrisburg, Pennsylvania 17120

Angus Love, Esq.  
107 East Main Street  
Norristown, Pennsylvania 19402

Helen F. Hoyt, Chairman  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. Jerry Harbour  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. Richard F. Cole  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Spence W. Perry, Esq.  
Associate General Counsel  
Federal Emergency Management Agency  
Room 840  
500 C St., S.W.  
Washington, D. C. 20472

3515  
THE  
CAMPBELL  
SPECIAL  
SCHOOLS,  
INC.

BEAVER RUN, R.D. 1, GLENMOORE, PA. 19343

DOCKETED  
USNRC

'84 OCT -9 P1:29

October 1, 1984

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Director  
Atomic Safety & Licensing Board  
NRC  
Washington, DC 20555

DOCKET NUMBER  
PROC & UTIL. FILE  
50-352 04  
50-353 04

Re: Off-site emergency response  
plans, Limerick Nuclear  
Station

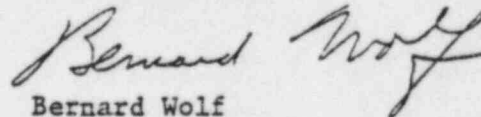
Dear Sir:

I am writing to inform you that to the best of my knowledge no radiological response plan for accidents at Limerick exists for our facility for the mentally retarded. No staff at our school has ever seen such a plan, nor have our staff or Board of Directors approved such a plan.

I am enclosing my statement of July 10, 1984, which describes this situation in detail.

Please consider the seriousness of this omission before the plant is issued a low-level testing license or a full operation license.

Most sincerely,



Bernard Wolf  
Director of Programs

jad  
Enclosure

8410110192 841001  
PDR ADOCK 05000352  
G PDR

D503



# THE CAMPHILL SPECIAL SCHOOLS, INC.

BEAVER RUN, R.D. 1, GLENMOORE, PA. 19343

July 10, 1984

TO WHOM IT MAY CONCERN:

## I. INTRODUCTION

### A. Incorporation and Licensure

Camphill Special Schools, Inc., located in E. Nantmeal Township is a non-profit corporation which provides education and residential living for mentally retarded children. To do so it is licensed by the Pa. Dept. of Education as a school for the mentally retarded, and by the Pa. Dept. of Public Welfare as a community residential facility for the mentally retarded. In school year 1983-84 the placements of 9 children were approved by the Pa. Dept. of Education and its Intermediate Units and school districts for public educational funding. The placements of 4 children were approved by MH/MR Boards and their Base Service Units for public welfare funding. For brevity, Camphill Special Schools, Inc., will be referred to as "the School" in the rest of this letter.

### B. Population

The population of the School varies from year to year. The residential population usually lies within these parameters: 62-72 mentally retarded children; 55-65 staff members of which 30-35 are permanent and 20-25 are in training; and 20-30 staff children. Day-time population can also include 1-10 day students (mentally retarded), and 2-12 employees.

## II. RESOLUTION OF THE BOARD

On June 23, 1984, the Board of Directors of the School passed a resolution concerning its position in regards to the proposed Limerick Nuclear Plant. The resolution stated that until such time as the Philadelphia Electric Company or its agents produces an adequate radiological emergency plan for the School, the Board is opposed to the licensing of the Limerick Nuclear Plant.

This position is taken because the Board is concerned for the safety and welfare of the School, and at this time no written plan at any stage of development exists for the School. Some specifics as to the planning process and the necessary provisions for an adequate plan follows.

### III. SHELTERING

No agency has discussed with the School the problem of sheltering. There have been no evaluations of buildings to determine their feasibility and time-relevance for sheltering. There are no plans for building improvements or additions to allow for sheltering for the necessary periods of time. The School's buildings are of unconventional architectural design and will need careful study to evaluate and modify sheltering.

### IV. EVACUATION PLANS<sup>for</sup>

Except for an initial interview in January of 1983 with Energy Consultants, Inc., and Chester Co. DES, the School has not been formally involved in the development of any plans. No written plan or draft exists at this time.

#### A. Chester Co. Needs Survey

Forms were received in the fall of 1983 addressed to several of the School's electric meters! This form was a generic listing of possible special needs a household may have during an evacuation. A form was completed for each of the School's 10 residences and returned to Chester Co. DES. The responses, tailored to the form, showed some of the kinds of problems each household might have. However, no specific census information was contained or submitted. The specific needs of each household in terms of actual numbers of people, including specific problems or complexes of problems, was not asked for on the form, and was not submitted.

To date there has been no follow-up to these forms to further clarify and specify the needs. As the actual census of the School and its residences changes from time to time, such information would have to be up-dated at regular intervals, say every three-months. No communication to up-date the information submitted in fall 1983 has been received by the School.

#### B. Transportation

The School maintains a fleet of family-type vehicles (a van, a pick-up truck, several station wagons, sedans, etc.) for both School functions and also staff needs. The School owns or operates no school busses.

The School's fleet could not evacuate the entire population, even if all vehicles were available and operational. It has not been determined if any of the vehicles owned by the School are available for an evacuation. It must now be assumed that none are. No alternative vehicles have yet been assigned to the School.

It has not been determined if any of the School staff are available for driving evacuation vehicles. It must now be assumed that none are. Besides, no current staff person has a Class 4 (school bus) license to drive large school busses. No alternative drivers have yet been assigned to the School.

Furthermore, it is the opinion of School staff that evacuation by ground transportation is not an adequate plan. It is believed that evacuation by air lift (helicopters) would be an adequate plan. No helicopters or trained crew have yet been assigned to the School.

C. Staff Coverage of Students

In an emergency situation, staff-student ratios would have to be 1:3, 1:2, and 1:1 depending on which students are to be covered. Groupings have not been worked out. Those supervising the students would have to have adequate experience and training with children of this kind. Certified special education teachers or mental health professionals would in most cases be needed. It has not yet been determined if any of the School staff are available to accompany the students during an evacuation. It must now be assumed that none are available. No alternative staff have been assigned to accompany the students.

Among the special needs of this student population are some problems that would necessitate ancillary personnel. Particularly, the conditions of those children with convulsive disorders and behavioral problems can be expected to be exasperated during an evacuation. Intervention by medical personnel will be necessary. Such personnel would have to accompany the evacuation and be available during the internment. No such ancillary personnel have been identified or assigned to the School.

D. Medical Supplies and Equipment

The special needs of the population of the School would necessitate an evaluation of actual and potential medical needs existing prior to and precipitated by an evacuation. The necessary supplies and equipment would have to be stored ready to go with the evacuation. Such supplies and equipment would have to be renewed and also updated periodically. No such inventory has been compiled, nor has someone been assigned to this responsibility.

E. Telephone and Radio Communication

No assessment of the telephone and radio communications needed by the School during a radiological emergency has been made. No one is responsible for procuring such equipment. No one has been assigned to be trained and to man such equipment, during a radiological emergency. No arrangements have been made or personnel assigned even to ensure that the telephone will be answered.

F. Host Facility

The School has recently been told over the telephone by Energy Consultants, Inc., and Chester Co. DES that the Devereux Foundation has agreed to host this School's population. No agreement has been seen in writing. Nothing of the details of the agreement has been



conveyed. Exact location, details of the facility, staff available, services available, other organizations which will be also hosted there, and so on are all unknown. The School is thereby unable to assess the appropriateness of the proposed host site.

Furthermore, it is the opinion of the staff of the School that a host site can only be considered appropriate if it is located beyond the Ingestion Zone of the plume.

Very Sincerely,

Bernard Wolf  
Director of Programs

jad

REC'D  
APR 24 1964

641128