

RE: PHILA ELEC. CO. Limerick Gen. Sta. Units 1 and 2 DOCKET # 50-352,353 *8L*

July 25, 1985

R.L. ANTHONY/FOE PROPOSED FINDINGS AND CONCLUSIONS ON EMERGENCY PLANNING CONTENTIONS FOR
GRATERFORD PRISON INMATES

CONCLUSION As an intervenor in the Limerick licensing process with contentions on emergency planning, R.L. Anthony/FOE assert our direct involvement with the emergency plans for Graterford inmates, and we find as the outcome of the hearings before the Board on the contentions admitted, and because of the failure of the Board to admit other inmates' contentions vital to their safety, and the safety of all the other occupants of the EPZ that the emergency plans for Graterford are not adequate nor able to be implemented. These plans are in violation of NRC regulations and FEMA as shown below.

Graterford emergency evacuation plans are intimately interrelated with emergency plans for the whole EPZ and these plans are not adequate and not able to be implemented, starting from the boundaries of the EPZ which were not set up with FEMA consultation as required, as shown in our submissions cited below.

In addition to the flaws in offsite emergency planning are the flaws in PECO plant, personnel, and operating procedures at the plant itself which make the safe operation of Unit 1 impossible at this time as shown below.

Consequently we find that the Graterford inmates prevail in their contentions and that the emergency plans in their present form are inadequate and not able to be implemented, and hence NRC and FEMA requirements have not been satisfied and the Board cannot authorize the issuance of a full power license.

EVIDENCE AS THE BASES FOR FINDINGS We cite our submissions below as overwhelming evidence for our conclusions and include all of the documents cited in their entirety by reference.

Submissions related to emergency plans for Graterford and for the whole EPZ :

3/15/85 Motion in opposition to PECO's motion for exemption for Graterford plans	ASLB
3/27/85 Additional statement vs. " " " " "	ASLB
5/16/85 Statement in opposition to granting " " " "	ASLB
6/2/85 Appeal from ASLB order implementing exemption and authorizing issuance	ALAB
6/6/85 Brief in support of our appeal from ASLB third partial initial decision	ALAB
6/7/85 Brief in support of our appeal from LB's granting of exemption & authorizing lic.	ALAB
6/25/85 Notice of appeal to Director, FEMA, to revoke certification of offsite plans	FEMA
7/3/85 Response to PECO's renewed motion for an exemption for Graterford plans	ASLB
7/3/85 Opposition to PECO's motion for exemption from requirement of exercise, 1 yr. NRC	

Submissions related to inability of PECO to operate Unit 1 without endangering ^{public} safety:

12/23/84 Petition to Dir. Off. of insp. and enforcement to issue show cause order	NRC
2/25/85 To H.R. Denton to issue show cause order to revoke low power license	NRR
4/5/85 Appeal to the Commission from refusal of Dir. NRR " " "	NRC
4/27/85 Appeal to H.L. Thompson, Div. of Lic., to refuse test operation of turbine	NRR
4/30/85 Petition to reopen the record on Limerick effluent releases	ASLB
5/9/85 Petition to H.R. Denton to reconsider show cause order on new information	NRR
7/2/85 Brief in support of our appeal on Limerick effluent releases	ALAB

cc: NRC- ALAB, Staff Counsel, Docketing
PECO, FEMA, PEMA, A. LOVE, others on Serv List.

Respectfully submitted,
Robert L. Anthony
Box 186 Moylan, Pa. 19065

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PDR ADOCK 05000352
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