



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

May 22, 1985

DOCKETED
USNRC

RELATED CORRESPONDENCE

Helen F. Hoyt, Chairperson
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Dr. Perry Harbour
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

OFFICE OF SECRETARY
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BRANCH

Dr. Richard F. Cole
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 50-353 *DL*

Dear Administrative Judges:

Enclosed is a copy of a memorandum dated May 21, 1985 from Richard W. Krimm, Office of Natural and Technological Hazards Programs, Federal Emergency Management Agency (FEMA) to Edward L. Jordan, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission concerning FEMA's finding on offsite planning and preparedness at the Limerick Generating Station. The memorandum refers to two FEMA remedial evaluation reports which the Staff will provide to the Board and parties when the reports are received. The May 21, 1985 memorandum is being provided for the information of the Licensing Board and parties.

Sincerely,

Donald F. Hassell
Donald F. Hassell
Counsel for NRC Staff

Enclosure: As stated

cc w/enclosure: See page 2

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Federal Emergency Management Agency

Washington, D.C. 20472

MAY 21 1985

MEMORANDUM FOR: Edward L. Jordan
 Director
 Division of Emergency Preparedness
 and Engineering Response
 Office of Inspection and Enforcement
 U. S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
 Richard W. Krimm
 Assistant Associate Director
 Office of Natural and Technological
 Hazards Programs

SUBJECT: Finding on Offsite Planning and Preparedness at the
 Limerick Generating Station

Attached are two copies each of the Region III Exercise Evaluation Report on the April 10, 1985, Limerick Remedial Exercise, involving risk school districts and South Coventry Township; and the April 22, 1985, Remedial Exercise on alert and notification capabilities at Limerick. These remedial evaluation reports were prepared by the FEMA Region III staff and indicate that both exercises were successful in correcting the two remaining Category A deficiencies identified during both the July 25, 1984, full-participation exercise and the November 20, 1984, supplemental exercise.

The following is a brief summary of the earlier supplemental and remedial exercises conducted at Limerick which corrected the other Category A deficiencies:

- o November 20, 1984, supplemental exercise: A report on this exercise was transmitted to NRC on January 10, 1985.

Corrected the Category A deficiency resulting from the non-participation of Bucks County, Pennsylvania and 11 municipalities. Failure of South Coventry Township to participate in this remedial exercise resulted in a Category A deficiency which was subsequently corrected during the April 10, 1985, remedial exercise.

- o March 7, 1985, remedial exercise: A report on this exercise was transmitted to NRC on March 27, 1985.

Corrected the Category A deficiency related to emergency response procedures for Graterford, the Pennsylvania State Correctional Institution.

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1 The planning deficiency concerning staffing resources for South Coventry
2 Township has now been corrected through the submission of a new staffing
3 plan which provides for adequate resources for prolonged emergency
4 response, and through their demonstration of a capability to respond
5 during the April 10, 1985, remedial exercise.

1 The two remaining planning deficiencies, unmet needs regarding buses and
2 ambulances for Chester and Montgomery Counties and the process for esta-
3 blishing access control points, have now been addressed. The Pennsylvania
4 Emergency Management Agency (PEMA) has received confirmation that written
5 agreements have been reached with a bus company in Lancaster County and a
6 bus company in York County in order to address the unmet needs of Chester
7 County. In addition, Berks County has a sufficient number of reserve
8 buses to meet the needs of Montgomery County.

1 The Division of Emergency Health Services, Pennsylvania Department of
2 Health, has identified a minimum of 467 ambulances, approximately three
3 times the 139 needed by both Montgomery and Chester Counties. Detailed
4 response planning for the ambulances will be undertaken by the Pennsylvania
5 Department of Health. Arrangements have been made by the three risk
6 counties to man all thirty-nine access control points that were listed as
7 a concern in the March 29, 1985, Interim Finding. Revisions will be made
8 to the applicable county and municipal plans to reflect the updated
9 information. Therefore, the two remaining planning deficiencies regarding
10 unmet needs and access control points have now been corrected.

1 As a result of the July 25, 1984, full-participation exercise; the
2 November 20, 1984, supplemental exercise; the March 7, April 10 and 22,
3 1985, remedial exercises; all Category A preparedness deficiencies
4 requiring demonstration have been corrected. Also, as indicated above,
5 all Category A planning deficiencies have now been corrected. Therefore,
6 offsite radiological emergency planning and preparedness is now adequate
7 to provide reasonable assurance that protective measures can be implemented
8 to protect the public health and safety in the event of a radiological
9 emergency at the Limerick Generating Station.

1 In your memorandum of May 10, 1985, you requested FEMA assistance in responding
2 to the two conditions set forth in the Third Partial Initial Decision issued
3 by the Atomic Safety and Licensing Board on May 7, 1985, which are:

- (1) Verification of plans to implement a level of traffic control in the King of Prussia area sufficient to assure that all the traffic evacuating along Route-363 to the Pennsylvania Turnpike can continue to move upon reaching the EPZ boundary, as implicitly assumed in NUREG-D654 Planning Standard J(10)(1).

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FEMA RESPONSE:

In a May 10, 1985, telephone conversation PEMA informed FEMA Region III that Montgomery County had developed a plan of action to address the traffic control issue and has submitted it to PEMA for review. PEMA has forwarded this information to the Pennsylvania State Police for a detailed review. After the State has reviewed and commented on this plan, it will be forwarded to the FEMA Region III Office for review. When we have received their comments and recommendations, an update will be forwarded to you.

- (?) Verification of the satisfaction of the unmet municipal staffing needs as they relate to a capability of continuous 24-hour operation during a radiological emergency prior to operation above 5% of rated power.

FEMA RESPONSE:

FEMA has determined that adequate staffing now exists in all risk municipalities to respond to a radiological emergency over an extended period of time.

If you should have any questions, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division, at 646-2861.

Attachments
as Stated