

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA '84 JUN 27 A10:30  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

APPLICANT'S FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO LIMERICK  
ECOLOGY ACTION AND FRIENDS OF THE EARTH REGARDING  
OFFSITE EMERGENCY PLANNING CONTENTIONS

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740(b) and the Atomic Safety and Licensing Board's "Special Prehearing Conference Order Ruling on Admissibility of Offsite Emergency Contentions" (April 20, 1984) (slip op. at 90-91), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Limerick Ecology Action ("LEA") and Friends of the Earth ("FOE")<sup>1/</sup> to be answered fully in writing, under oath, in accordance with the definitions and instructions below.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that intervenors produce for inspection and copying

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<sup>1/</sup> As to the specific interrogatories below, only those related to Contention LEA-24 must be answered by FOE. The general interrogatories and document requests are, of course, also applicable to FOE.

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(or provide copies of) those documents designated by intervenors in their respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.

2. The following definitions shall apply:

a. "Intervenor" shall refer to LEA or FOE, or both, as appropriate, or any officer, member, employee or consultant thereof.

b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatsoever means made.

c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).

d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate,

including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.

- e. "Specify," when referring to a proceeding means that the answer shall set forth the case name, parties, docket number, date of filing, decision or other relevant date, and any other descriptive information appropriate to the request.
- f. "Specify" or "identify," when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and if a corporation or other entity, its principle place of business or, if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.
- g. "Emergency plans" and "implementing procedures" shall refer to the most currently available version of the Radiological Emergency Response Plans for the Counties, Municipalities and School Districts within

the plume exposure pathway EPZ for the Limerick Generating Station, the Commonwealth of Pennsylvania's Disaster Operations Plan - Annex E - Fixed Nuclear Facility Incidents, and all written procedures for the implementation of such plans. In accordance with intervenor's obligation to supplement its answers, as discussed below in Instruction No. 5, intervenor shall amend its answers as appropriate based upon subsequent revisions of the plans as they become available.

- h. "EPZ" shall refer to the plume exposure pathway Emergency Planning Zone for the Limerick Generating Station.
- i. "Radiological emergency" shall refer to any event at the Limerick Generating Station which precipitates initiation of any emergency plan.

3. These interrogatories request all knowledge and information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, consultants, and unless privileged, attorneys. If any privilege is claimed, identify the privilege and the basis for its assertion.

4. In each instance in which an interrogatory requests a statement of intervenor's assertion, contention, view or

opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

5. In accordance with 10 C.F.R. §2.740(b), these interrogatories are continuing in nature and require prompt supplemental answers should intervenor obtain or identify supplemental information or documents.

General Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in intervenor's contentions. If so, identify each such expert witness and further state (a) the expert's business and residential addresses; (b) his professional qualifications; (c) the subject matter on which the expert is expected to testify; (d) the substance of the facts and opinions to which the expert is expected to testify; and (e) the grounds for each opinion. Identify by court, agency or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. State whether you intend to present any fact witnesses on the subject matter at issue in intervenor's contentions. If so, identify each such fact witness and further state (a) his business and residential addresses; (b) the subject matter on which the witness is expected to testify; (c) the substance of the factual testimony which the witness is expected to offer.

3. Identify by title, author, publisher and date of issuance or publication all documents that intervenor relies

upon as a basis for its contentions, that it intends to use (by way of reference or evidentiary proffer) in presenting its direct case on its contentions, or that it intends to refer to in conducting cross-examination of other witnesses who may testify in connection with any such contentions.

Document Request

Please attach to intervenor's answer(s) to the interrogatories listed above a copy of all documents identified in the answers above, or upon which intervenor otherwise intends to rely in the presentation of its direct case or in the cross-examination of witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

Specific Interrogatories<sup>2/</sup>

1. As to each School District for which LEA contends that there are insufficient school buses to evacuate students within that District, state: (a) the specific School District(s) for which there are insufficient buses; (b) the specific school(s) for which there are insufficient buses; (c) the number of students, as to each school, for whom

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2/ The instant discovery requests do not encompass those contentions proposed by LEA as to which the Licensing Board deferred its ruling in its Special Prehearing Conference Order of April 20, 1984. Should the Licensing Board admit further contentions, Applicant reserves the right to serve further interrogatories related to them upon LEA.

there is insufficient bus transportation; (d) the number and capacity of buses necessary to fulfill the unmet transportation needs of such students; (e) the number of buses and capacity of each which LEA asserts to be available during normal operating conditions; (f) the source of the information (e.g., \_\_\_\_\_ School District, Radiological Emergency Response Plan, Draft \_\_\_\_\_, p.\_\_\_\_). If the source is other than the RERP's provided to LEA by Applicant, please identify the source of the information, the date it was obtained and the substance of all information obtained from that source related to this contention; (g) the reasons LEA asserts that the plans and/or implementing procedures are deficient in ensuring that unmet transportation needs of students cannot be fulfilled.

Contention LEA-12

2. Discuss in detail any deficiency which LEA asserts to exist in the various plans, implementing procedures, or training provisions as regards the assignment of school teachers and staff to supervise students and remain with them during the various stages of a radiological emergency.

3. State whether any school teacher or staff assigned to a school within the EPZ who would supervise students and remain with them during the various stages of a radiological emergency has indicated that he would be unwilling to perform this function because of any human response factor, a desire to evacuate himself or his family first, or for any other reason. As to any such person identified, state: (a)

his name; (b) address; (c) school assignment; (d) the emergency function assigned to the person; (e) the emergency function which the person has stated he will not perform; (f) the substance of the statement; (g) the date and circumstances under which the statement was made.

4. State whether any school teacher or staff assigned to a school within the EPZ to supervise and remain with students during the various stages of a radiological emergency has ever indicated by word or action an unwillingness to perform any similar supervisory function during non-radiological emergencies. If so, state: (a) his name, (b) address; (c) school assignment, (d) the emergency function assigned to the person; (e) the emergency function which the person has stated he will not perform, or did not perform; (f) the substance of the statement; and (g) the date and circumstances under which the statement was made or the actions occurred.

5. State whether any teacher or staff in any school in the United States has failed to perform his assignment to supervise and remain with students during any radiological or non-radiological emergency at any time, or has stated that he would not do so in the event of an emergency due to any human response factors or a desire to tend to the needs of his family first, or for any other reason. If so, please provide the information requested by Interrogatory 4(a)-(g), above.

6. State the level of nonperformance by teachers and staff required to supervise students and remain with them during the various stages of a radiological emergency which LEA alleges as likely to occur due to human response factors, a desire to evacuate oneself or one's family first, or for other reasons. Discuss in detail the basis for this projection, whether expressed numerically or as a percentage of available staff, for each school district in which LEA alleges that such nonperformance will occur.

7. As to each school within the EPZ, state the level of nonperformance by teachers and staff assigned to supervise students and remain with them during a radiological emergency which, if occurring, would render evacuation of school children incapable of implementation. Discuss in detail the basis for LEA's conclusions, including the underlying assumptions and methodology by which such conclusions were made.

8. Unless otherwise fully stated above, discuss in detail the basis for LEA's allegation that teachers and staff assigned to supervise students and remain with them during a radiological emergency will abandon their assigned duties because of human response factors, a desire to evacuate oneself or one's family first, or any other reason.

9. State and discuss in detail each measure which LEA contends that the responsible emergency planners at any level should take, which has not already been taken (including but not limited to revisions of the Plans and/or

implementing procedures), to provide reasonable assurance that school teachers and staff will remain with students to whom they are assigned in the event of a radiological emergency.

Contention LEA-13

10. Specify each deficiency which LEA asserts to exist in the plans and implementing procedures with regard to the evacuation of day-care centers and preschools in the event of a radiological emergency. As to each such deficiency, identify the plan(s) and the exact provision(s) thereof and/or implementing procedures claimed to be deficient, the precise population at risk, and the basis for LEA's assertion that reasonable assurance does not exist that such population will be evacuated in the event of a radiological emergency.

11. Discuss in detail each change in the plans and/or implementing procedures which LEA asserts that planners must make in order to provide reasonable assurance that children from day-care centers and preschools will be evacuated in the event of a radiological emergency.

12. Discuss in detail each instance, whether involving a radiological or non-radiological emergency, in which LEA contends that any day-care center or preschool children became insecure, frightened and totally unmanageable and traumatized during an evacuation of their school or center.

Contention LEA-14

13. Discuss in detail the basis for LEA's assertion that a single lift will be insufficient to evacuate school children. Specify each school within the EPZ for which LEA contends that two lifts will be necessary to evacuate school children. As to each school, discuss in detail LEA's basis for contending that two lifts will be necessary, and specify the number of buses and capacity, and the drivers or other resources necessary to assure that a single lift will be sufficient to evacuate all children from that school.

14. Specify each dosimetric device (by manufacturer, model number or other designation) and the amount of KI supplies which LEA asserts to be necessary for school bus drivers, teachers, or other school staff who may be expected to make multiple trips into or remain within the EPZ because of shortages of equipment and personnel during an evacuation.

15. Specify each change in the plans and/or implementing procedures which LEA asserts to be necessary in order to ensure that school bus drivers, teachers or other school staff who may be expected to make multiple trips into or remain within the EPZ receive adequate dosimetry and KI supplies.

16. Specify all elements of training which LEA asserts that planners should provide to school bus drivers, teachers and other school staff who may be expected to make multiple trips into or remain within the EPZ in the event of a radiological emergency. As to each element of training,

specify the level and detail appropriate for such personnel in comparison to the training provided emergency workers under the plans.

17. Specify each change in the plans and/or implementing procedures and training provisions which LEA asserts to be necessary in order to ensure that school bus drivers, teachers or other school staff who may be expected to make multiple trips into or remain within the EPZ receive adequate training.

Contention LEA-15

18. Discuss in detail any deficiency which LEA asserts to exist in the various plans, implementing procedures, or training provisions as regards the assignment of school bus drivers to transport students to their respective schools and/or out of the EPZ during a radiological emergency.

19. State whether any school bus driver who would be assigned to transport students to their respective schools and/or out of the EPZ has indicated that he would be unwilling to perform this function because of any human response factor during radiological emergencies, a desire to evacuate himself or his family first, or for any other reason. As to any such person identified, state: (a) his name; (b) address; (c) school assignment; (d) the emergency function assigned to the person; (e) the emergency function which the person has stated he will not perform; (f) the substance of the statement made; (g) the date and circumstances under which statement was made.

20. State whether any school bus driver assigned to transport students to their respective schools and/or out of the EPZ during the various stages of a radiological emergency has ever, by word or action, indicated an unwillingness to perform his duties during non-radiological emergencies. If so, state: (a) his name; (b) address; (c) school assignment; (d) the emergency function assigned to the person; (e) the emergency function which the person has stated he will not perform, or did not perform; (f) the substance of the statement, and (g) the date and circumstances under which the statement was made or the actions occurred.

21. State whether any school bus driver in any school district in the United States has failed to perform his assignment to transport students to their respective schools and/or out of the school district during any emergency at any time, or has stated that he would not do so in the event of an emergency due to any human response factors, a desire to tend to the needs of his family first, or for any other reason. If so, please provide the information requested by Interrogatory 20, above.

22. State the level of nonperformance by school bus drivers required to transport students to their respective schools and/or out of the EPZ during the various stages of a radiological emergency which LEA alleges as likely to occur due to human response factors, a desire to evacuate oneself or one's family first or for other reasons. Describe in detail the basis for this projection, whether expressed

numerically or as a percentage of available staff, for each school district in which LEA alleges that such nonperformance will occur.

23. As to each school in the EPZ, state the level of nonperformance by school bus drivers assigned to transport students to their respective schools and/or out of the EPZ during a radiological emergency which, if occurring, would render the evacuation of school children incapable of implementation. Discuss in detail the basis for LEA's conclusions, including the underlying assumptions and methodology by which such conclusions were made.

24. Unless otherwise fully stated above, discuss in detail the basis for LEA's allegation that school bus drivers assigned to transport students to their respective schools and/or out of the EPZ during a radiological emergency will abandon their assigned duties because of human response factors, a desire to evacuate oneself or one's family first, or any other reason.

25. State and discuss in detail each measure which the responsible emergency planners at any level should take, which has not already been taken (including, but not limited to revisions of the plans and procedures), to provide reasonable assurance that school bus drivers will perform their assigned duties in the event of a radiological emergency.

Contention LEA-22

26. Specify each provision of the plans and/or implementing procedures which LEA asserts to be deficient in failing to provide adequate training to read dosimetry and administer KI for farmers who reenter or remain within the EPZ during a radiological emergency.

27. Explain the basis for each change in the provisions of the plans and/or implementing procedures which LEA asserts to be necessary in order to assure that farmers are adequately trained to read dosimetry and administer KI in the event they reenter or remain within the EPZ during a radiological emergency.

Contention LEA-24

28. With respect to LEA's and FOE's assertions that traffic congestion connected with the Marsh Creek State Park, Valley Forge National Historic Park, King of Prussia area and Exton Mall would impede evacuation of the EPZ, specify: (a) the exact contours of each of these areas, as defined by natural boundaries, highways or other parameters; (b) the total number of vehicles exiting from these areas upon public notification to evacuate the EPZ; (c) vehicle distribution verses time from public notification (e.g., 30% within the first 15 minutes, 75% within the first half hour, etc.); (c) the number of vehicles which would enter on to an evacuation route from the EPZ (specify number in each direction); (d) the point along each such route at which congestion attributable to the four designated areas would

occur. Discuss in detail all analyses, assumptions and bases for these answers.

29. With respect to the "Evacuation Time Estimates for the Limerick Generating Station Plume Exposure Emergency Planning Zone" (May 1984), prepared by HMM Associates, Inc. ("HMM Associates study"), state whether intervenor agrees or disagrees with the analysis of vehicle queuing in Appendix 11 for evacuation routes which intervenor asserts would be affected by traffic congestion from the Marsh Creek State Park, Valley Forge National Historic Park, the King of Prussia Area and Exton Mall. Discuss in detail all analyses, assumptions or other bases for this answer.

30. With respect to the HMM Associates study, state whether intervenor asserts that access control points in addition to those designated in Table 7.1 are necessary to alleviate traffic congestion which intervenor asserts would be connected with the Marsh Creek State Park, Valley Forge National Historic Park, the King of Prussia area and Exton Mall. Specify any additional access control points by intersection and discuss in detail the basis for intervenor's assertion that they would be necessary.

31. With respect to the HMM Associates study, state whether intervenor asserts that traffic control points in addition to those designated in Table 7.2 are necessary to alleviate traffic congestion which intervenor asserts would be connected with the Marsh Creek State Park, Valley Forge National Historic Park, King of Prussia area and Exton Mall.

Specify any additional traffic control points by intersection and discuss in detail the basis for intervenor's assertion that they would be necessary.

32. State whether intervenor agrees or disagrees with the data, analyses or conclusions with regard to evacuation time estimates for any route which intervenor asserts would be affected by traffic congestion connected with the Marsh Creek State Park, Valley Forge National Historic Park, King of Prussia area, and Exton Mall. Discuss in detail all analyses, assumptions or other basis for the disagreement. State intervenor's time estimates for evacuation with regard to any affected areas and discuss in detail the basis for such conclusions, including how they would result in any impediment to plans for evacuation which are capable of implementation or how such conclusions would demonstrate the failure to meet any regulatory requirement.

33. Specify any change in the plans and/or implementing procedures or any other measures which intervenor asserts that the responsible planners must undertake in order to assure that evacuation of the EPZ would not be impeded by traffic congestion connected with the Marsh Creek State Park, Valley Forge National Historic Park, the King of Prussia area, and the Exton mall.

Contention LEA-26

34. Specify each provision of the plans and/or implementing procedures which LEA asserts to be deficient in demonstrating that there are enough personnel and vehicles

for prompt route-alerting. Discuss in detail why these provisions are inadequate.

35. Specify as to each municipality any further personnel or vehicles necessary for prompt route-alerting which must be acquired in order to assure that route-alerting provides an adequate means of public notification in the event of a radiological emergency.

36. Specify each provision of the plans and/or implementing procedures which LEA asserts to state that notification of emergency response organizations will be made by sequential telephone calls. Discuss in detail the basis for LEA's assertion or inference as to each such provision.

37. Specify by reference to the County plans and/or implementing procedures each Emergency Broadcast System which uses a radio station which does not operate 24 hours a day. State and discuss in detail any basis for LEA's assertion, if so, that such station could not operate in the off-hours in the event of a radiological emergency.

Contention LEA-27

38. Specify each deficiency which LEA asserts to exist in the plans and/or implementing procedures with regard to the evacuation of the Spring Mountain House, the Camp Hill Village School and the Camp Hill Special School in the event of a radiological emergency. As to each such deficiency, identify the exact provision(s) of the plans and/or implementing procedures claim to be deficient, the precise population at risk, and the basis for LEA's assertion that

reasonable assurance does not exist that such population will be evacuated in the event of a radiological emergency.

39. Discuss in detail each change in the plans and/or implementing procedures which LEA asserts that planners must make in order to provide reasonable assurance that persons from the Spring Mountain House, the Camp Hill Village School and the Camp Hill Special School will be evacuated in the event of a radiological emergency.

Contention LEA-28

40. Discuss in detail the basis for LEA's assertion that the National Guard could not be promptly mobilized in heavy traffic or bad weather to perform its assigned task in the event of a radiological emergency. Specify the particular Guard function to be performed, the point(s) at which the Guard will mobilize, the point(s) to which the Guard must travel to perform the assigned function, and the time which LEA asserts that the Guard would require to reach its duty station in the event of heavy traffic or bad weather.

41. Specify any changes in the plans and/or implementing procedures which LEA asserts that the planners should make in order to shorten the time it would take the Guard to mobilize and respond in heavy traffic or bad weather. Discuss in detail why and by what length of time the Guard's response time would be shortened.

42. Specify by Municipality and access control point or other appropriate designation each location as to which LEA contends there is no assurance of sufficient resources to

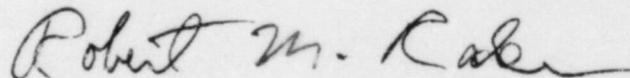
provide towing, gasoline and snow removal on non-state roads in the event of a radiological emergency.

43. Specify any change in the plans and/or implementing procedures which LEA asserts that the planners must make in order to provide assurance that there will be adequate towing, gasoline and snow removal resources on non-state roads in the event of a radiological emergency.

Document Request

Please attach to intervenor's answer(s) to the interrogatories listed above a copy of all documents identified in the answers above, or upon which intervenor otherwise intends to rely in the presentation of its direct case or in the cross-examination of other witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

CONNER & WETTERHAHN, P.C.



Troy B. Conner, Jr.  
Robert M. Rader  
Counsel for the Applicant

June 25, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's First Set of Interrogatories and Requests for Production of Documents to Limerick Ecology Action and Friends of the Earth Regarding Offsite Emergency Planning Contentions," dated June 25, 1984 in the captioned matter have been served upon the following by deposit in the United States mail this 25th day of June, 1984:

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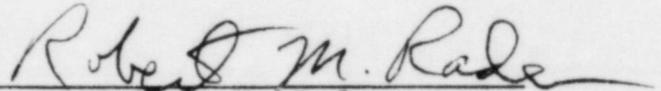
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