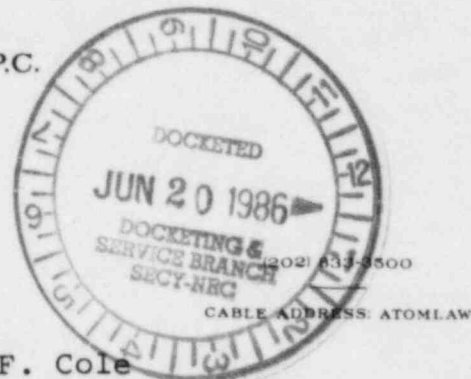


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OF COUNSEL

June 19, 1986



Helen F. Hoyt, Esq.  
Chairperson, Atomic Safety  
and Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Richard F. Cole  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
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Dr. Jerry Harbour  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

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

Dear Board Members:

On June 16, 1986, I forwarded to the Licensing Board "Licensee's Proposal for Resolution of Remanded Issue Regarding the Availability of School Bus Drivers for the Owen J. Roberts and Spring-Ford School Districts," as required by the Board's Order dated May 22, 1986. At that time, I indicated that the originals of the affidavits of Mr. A. Lindley Bigelow, Coordinator of Emergency Preparedness for Montgomery County, Pennsylvania, and Vincent S. Boyer, Senior Vice President Nuclear Power, Philadelphia Electric Company, would be forwarded as soon as they were received. In accordance with that letter, enclosed please find copies of those documents, the originals of which have been sent to Docketing and Service.

Sincerely,

*Troy B. Conner, Jr. / NWW*

Troy B. Conner, Jr.  
Counsel for the Licensee

8606230318 860619  
PDR ADOCK 05000352  
G PDR

TBC/dlf  
Enclosures  
cc: Service List

DS03

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

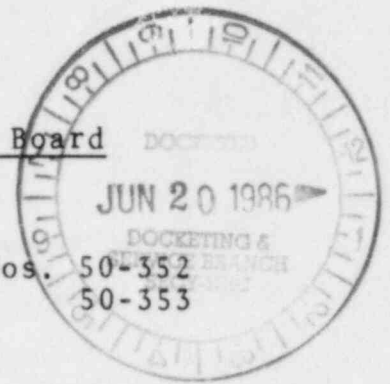
Before the Atomic Safety and Licensing Board

In the Matter of )

Philadelphia Electric Company )

(Limerick Generating Station,  
Units 1 and 2) )

Docket Nos. 50-352  
50-353



AFFIDAVIT OF VINCENT S. BOYER

VINCENT S. BOYER, being first duly sworn, hereby deposes  
and says:

My name is Vincent S. Boyer, I am Senior Vice President,  
Nuclear Power, Philadelphia Electric Company, owner and  
operator of the Limerick Generating Station.

I am familiar with the Order of the Atomic Safety and  
Licensing Appeal Board, dated May 7, 1986, which remanded Phase  
Three of the proceeding to the Licensing Board for  
consideration of the availability of bus drivers for the school  
district plans for the Owen J. Roberts and Spring-Ford School  
Districts.

Since the close of the record in this proceeding in 1984,  
our Company has continued to cooperate with the State, county  
and local authorities in implementing their emergency plans  
involving Limerick. Our efforts included the developing of  
volunteers from the Company for various aspects of the plans.  
Among these efforts was the identification of employees who

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posses drivers licenses, who would volunteer to drive buses, if needed, in the event an actual evacuation were ordered.

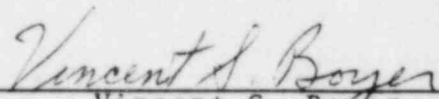
On December 28, 1984, Chester County had specifically requested Philadelphia Electric Company to determine what additional volunteers might be available to assist in emergencies. Various discussions occurred concerning Chester County's developing efforts, as well as those of Montgomery County.

At the time the Appeal Board Order was issued, Philadelphia Electric Company intensified its program to obtain volunteer bus drivers. As of this date we have numerous drivers who could reach the marshalling center for Chester County at Exton and the Company's Berwyn Transportation Center, from which drivers can be dispatched as appropriate for Montgomery County.

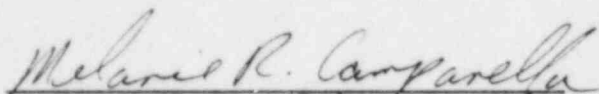
At the present time there are 570 Philadelphia Electric employees who have volunteered to do the following for Chester and Montgomery Counties:

- (a) To drive school buses as may be necessary in the event so requested by the county coordinator under the county's emergency plans.
- (b) To take training to qualify for a Commonwealth of Pennsylvania Class 4 driver's license which applies to the operation of school buses and to maintain such license.

Two hundred seventy Company individuals who can reach Berwyn within 30-90 minutes have now volunteered to serve as school bus drivers in the event of an emergency requiring evacuation. The estimates show that for Berwyn, 105 could arrive within 30 minutes, 40 within 60 minutes and 125 within 90 minutes. For Exton, 300 have volunteered; 95 could arrive within 30 minutes, 25 within 60 minutes and 180 within 90 minutes.

  
\_\_\_\_\_  
Vincent S. Boyer

Subscribed and sworn to  
before me this 13<sup>th</sup> day  
of June, 1986.

  
\_\_\_\_\_  
Notary Public

MELANIE R. CAMPANELLA  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 12, 1990

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

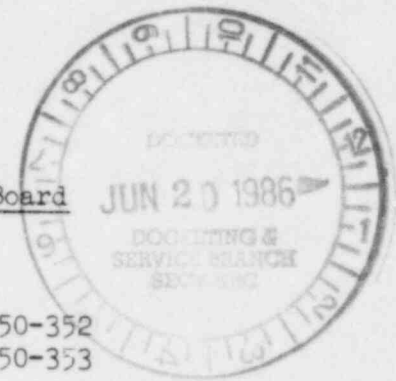
Before the Atomic Safety and Licensing Board

In the Matter of )

Philadelphia Electric Company )

(Limerick Generating Station )  
Units 1 and 2 )

Docket Nos. 50-352  
50-353



AFFIDAVIT OF A. LINDLEY BIGELOW

A. LINDLEY BIGELOW, being first duly sworn, hereby deposes and says:

My name is A. Lindley Bigelow. I am the Coordinator of Emergency Preparedness for Montgomery County, Pennsylvania. My office is at 50 Eagleville Road, Eagleville, Pennsylvania, 19403.

I am familiar with the Order of the Atomic Safety and Licensing Appeal Board, dated May 7, 1986, which remanded Phase Three of the proceeding to the Licensing Board for consideration of the availability of bus drivers for the school district plan for Spring-Ford School District.

That order, as applicable to the Spring-Ford School District, suggests that only 57.5% of the drivers for the school district would, in fact, perform in the event of an emergency. Based on my experience, I do not agree that the drivers would fail to perform their duty.

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Moreover, I have made arrangements with other bus companies outside the EPZ to provide buses and drivers if necessary for an evacuation. The total number of buses available in Montgomery County, as reflected in our latest annual survey, is 1,257 (does not include 242 minibuses,

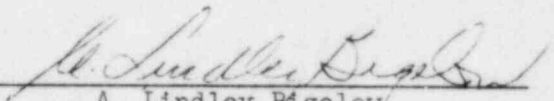
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205 vans, and 79 handicapped vehicles) and the total number of drivers is 1,919, recognizing that these numbers change continually. On this basis, I am confident that there would be no shortage of drivers for any evacuation of the Spring-Ford School District.

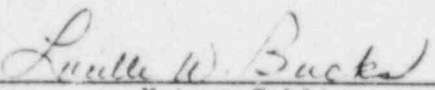
In addition, the Philadelphia Electric Company has advised me that it has identified 270 individuals, each of whom has agreed

- (a) to drive school buses in Montgomery County as may be necessary upon my request.
- (b) to take training to qualify for a Commonwealth of Pennsylvania Class 4 driver's license, which authorizes operation of school buses, and to maintain it.

These individuals have also agreed that, upon my request, they would report to the Berwyn Transportation Center, where they could be transported wherever needed in Montgomery County, to include the Custer Garage, to drive any buses as may be necessary in the Spring-Ford School District. Further, Philadelphia Electric has advised me that it estimates that 105 of the volunteers could arrive at Berwyn within 30 minutes, 40 within 60 minutes, and 125 within 90 minutes if needed.

  
A. Lindley Bigelow

Subscribed and sworn to  
before me this 16<sup>th</sup>  
day of June, 1986.

  
Notary Public

My commission expires  
March 19, 1989.

LUCILLE W. BUCKS, Notary Public  
Norristown, Montgomery County, Pa.  
My Commission Expires March 19, 1989