

57-35202

I - Anthony G. L. 11/18/85

Anthony/FOE

Box 186 Moylan, Pa. 19365



Mr. Ralph P. Volpe, Chairman
Upper Merion Board of Supervisors

November 14, 1984

King of Prussia, Pa

Dear Mr. Volpe,

I would like to call the Board's attention to Nuclear Regulatory Commission hearings in Philadelphia which start on 11/19. These hearings are on the subject of emergency plans for evacuation in case of a nuclear accident at Phila. Electric's Limerick plant. We have subpoenaed Mr. J. Waters to testify as U.M. Emergency Management Coordinator. We hope that the Supervisors may be available to testify also and we ask that they further authorize Mr. Wagenmann to testify on all of the matters which may concern the township, including evacuation planning and the safety of public necessities such as water and food supplies.

We realize that the Supervisors have the responsibility for the safety of the township's residents and for all who work, and shop and visit or pass through. We are told that the township's current population is about 27,000. Workers in King of Prussia number about 48,000 and at peak times the total parking spaces, 226,000, are filled. This would bring the combined workers, shoppers and transients in K. of P. at peak times to over 300,000, plus township residents. The total vehicles to be evacuated in a nuclear emergency would be about 250,000 at peak times (K. of P. and residents.). There are these principle exit routes: # 363, # 23, # 202 (East and West), PA.TPK (E. and W.), Expressway, and Henderson and So. Gulph Rds. The congestion at the township's main intersections are shown on the accompanying exhibit from the current Simpson and Curtin U.M. traffic study. We ask that the Supervisors authorize these consultants to testify as to the possibility of forming a workable evacuation plan for U.M. in conjunction with the County's and State's emergency evacuation plans for the Limerick plume zone (EPZ).

The State and County have laid out evacuation plans for the population within 10 miles of Limerick. This 10 mile circle includes 185,220 residents and 16,633 workers. This is obviously a lesser number than the totals in K. of P. alone. In addition Valley Forge National Park in the township has visitor peaks in the thousands. The Park extends into the 10 mile EPZ but is not included in emergency plans. Upper Merion lies 12 to 15 miles from the plant. The 10 mile radius is an arbitrary NRC limit. A radioactive cloud blowing in the U.M. direction would not stop at the 10 mile circle. EPZ evacuation also provides for townships with 21,279 population in the 10-11 ring and 10,349 in the 11-12 mile ring.

As intervenors in the Limerick NRC licensing process we have made a study of the Limerick evacuation plans and the way in which they would effect U.M. and the implications for the residents and workers in the township. We are convinced that there is the potential for a dangerous panic in K. of P. and Valley Forge Park unless careful planning is carried out and an evacuation plan set up by the Counties and State. We urge the Supervisors to testify to the risks for U.M. which have not been confronted. The city of Philadelphia will testify as to the contamination of the Schuylkill in case of a Limerick accident. The U.M. water supply is considerably more vulnerable since the Green Lane reservoir itself is within the EPZ.

cc. FEMA, FEMA, NRC, Phila. Elec., Limerick Ecology Action, City of Phila.
Montgomery County Commissioners
Mr. John Maguire KRAVCO (K. of P. malls)
Mr. Joseph Palmeri, Pres. K. of P. Park Assn.

Sincerely yours,
Robert L. Anthony
Intervenor for himself
and Friends of the Earth in Del Valley

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NUCLEAR REGULATORY COMMISSION

Docket No. 50-352-0L Official Ex. No. Anthony/FOE E-1
in the matter of Phillips Elec. Co.

Staff _____ IDENTIFIED _____
Applicant _____ RECEIVED ~~_____~~
Intervenor _____ REJECTED
Contractor's Off'r _____
Contractor _____ DATE 8 JAN 85
Other _____ Witness _____
Reporter _____