

50-352 OL

I-Commonwealth Exhibit E-5

11/28/84



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY

P.O. BOX 3321

HARRISBURG, PENNSYLVANIA 17105



September 29, 1983



Mr. Timothy R. S. Campbell
 Director
 Chester County Department
 of Emergency Services
 Hazlett Building
 14 East Biddle Street
 West Chester, Pennsylvania 19380

Dear Mr. Campbell:

The Chester County Municipal Radiological Emergency Response Plans for the Limerick Generating Station have been reviewed. Since the plans follow a patterned format, comments applicable to all of the plans are contained in the two enclosures. One enclosure contains review comments applicable to municipalities wholly within the plume exposure pathway EPZ, and the other pertains to municipalities partially within it. In our view, the plans will not be satisfactory until the recommended changes and additions are made. If, however, there are specific circumstances or considerations in a municipality that substantially preclude adoption of the recommended changes or additions, please let us know so that any problem areas can be discussed and resolved.

The comments appearing in the two enclosures do not, however, include additions needed in the East Vincent Township Plan relative to the Pennhurst Center. Although Pennhurst is within East Vincent, there is no reference in the township plan to indicate that the development, maintenance and implementation of a response plan for the Center is a state responsibility. The Pennhurst plan has been completed and should, as a minimum, also be listed in Attachment R of the township plan. We are currently reviewing the Pennhurst plan and we would similarly appreciate your review and comments concerning it (copy attached). As indicated on Page E-1 of the plan, it is anticipated that the required dosimetry and KI will be delivered to Pennhurst by East Vincent at the site emergency classification. If this procedure is indeed to be followed, then the information should be included in Attachment R of the township plan. Tim, in reviewing the Pennhurst plan, it should be noted that except as specifically indicated the Center is to be supported by DPW rather than Chester County. In view of this, it is recognized that Chart 1 to Appendix A will require some additional work.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-352-OL Official Ex. No. Commonwealth E-5
 In the matter of Phila. Elec. Co.

Staff IDENTIFIED ✓
 Applicant RECEIVED
 Intervenor REJECTED

28 Nov 84

OTHER ✓

Panel

Commonwealth
 Exhibit No E-5

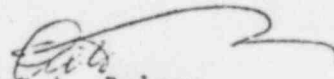
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Mr. Timothy R. S. Campbell
September 29, 1983
Page Two

You may wish to request the Philadelphia Electric Company to provide consultant support from Energy Consultants, Inc. to assist the municipalities in bringing their plans up to acceptable standards.

Please make the necessary changes and resubmit the plans to PEMA not later than November 1, 1983, along with a transmittal letter containing your evaluation of whether the plans are in consonance with your county plan and are deemed by you to be adequate and acceptable. Your professional opinion concerning their adequacy is not only an important fact, but also vital since you are the approving authority for municipal plans.

Sincerely,



Adolph L. Belser
Director
Office of Plans and Preparedness

ALB:jmb

Enclosures

cc: Robert J. Casto, Eastern Area Director
Roberta Kankus, Philadelphia Electric Company
James Fisher, Energy Consultants, Inc.

REVIEW OF
CHARLESTOWN TOWNSHIP RERP
CHESTER COUNTY
DRAFT 3, DATED AUGUST 1983

<u>SECTION</u>	<u>COMMENT</u>
page ii	Eliminate page number column. It is our experience that it is too difficult to show this.
I.B.3.	Add "with changes" to end of sentence.
I.D.	Change second paragraph to read: The plan pertains to that portion of Charlestown Township within the plume exposure pathway EPZ as shown in the map at Attachment J. Based on the 1980 census, the resident population of that portion of Charlestown Township within the plume exposure pathway is 2,493.
I.E.6.	Change the word "directions" in the third line to "information"
I.E.8.d.	Add to end of last sentence: "for more than the immediate site area."
I.E.10.	Add the words "on a 24-hour basis;" after the word "mission" in the second line.
I.E.15.b.	Change the definition to read: "The relocation of the entire population from the plume exposure pathway EPZ."
I.E.18.	Change the first line to read: "RACES or ARES - Radio Amateur Civil Emergency Service or Amateur Radio Emergency Service. Licensed amateur..."
I.E.21.	After the word "located" add "partially or wholly"
I.E.22.	After the word "located" add "partially or wholly"
II.B.2.f.	After the word "ensure" add "that municipal"
II.B.2.h.	Move to end of section and reletter as item k. Reletter items i and j to reflect this change.
II.B.2.	Add a new item j. Upon direction of PEMA, through the Pennsylvania State Police, man predesignated Access Control Points (ACPs).
II.B.3.a.(7)	Add to end of sentence: (PEMA).
II.B.3.b.(1)	Add a new item (g). Participate in training, drills and exercises as programmed by the county emergency management coordinator.
II.B.3.b.(2)	After "Law Enforcement" add (Police Services).
II.B.3.b.(2)	Change Note to read: (Note: Charlestown Township has no municipal police department and normally looks to the Pennsylvania State Police (PSP) for the coverage of most police functions.)

SECTIONCOMMENT

PEMA believes that law enforcement (police services) should not be combined with another function, but should be an entity in itself assigned to a separate individual.

- II.B.3.b.(2)
(a) Change wording to read: Ensure that designated Traffic Control Points (TCPs) located within the municipality are manned as necessary (reference Attachments D & Q).
- II.B.3.b.2. Add a new item (b). In coordination with the PSP, ensure that the required ACPs are designated and manned upon direction of PEMA through the PSP.
- II.B.3.b.(2)
(b) Change to item (c).
- II.B.3.b.(2) Add a new item (d). Assist in traffic control during reentry as necessary.
- II.B.3.b.(4) While PEMA believes that medical/ambulance services should not be a combined responsibility with the transportation officer, but should be an entity in itself assigned to a separate individual.
- II.B.3.b.(5) Delete "Note: This function assigned to the Emergency Management Coordinator" and paragraph under public works. As written the note is confusing and it is not clear whether public works is a functional responsibility or that of an individual. PEMA believes that public works should not be combined with another function, but should be an entity in itself assigned to a separate individual. While specific responsibilities for public works may vary by municipality, the following list of responsibilities should be addressed as appropriate and developed in the municipal plan.
- (a) Maintain current listing of equipment resources needed.
 - (b) Maintain liaison with service utilities, i.e, gas, electric and water agencies.
 - (c) Assist law enforcement in obtaining material for traffic control purposes.
 - (d) Maintain sanitation standards as it affects water supplies and sewage disposal as appropriate.
 - (e) Coordinate efforts with the county public works chief.
 - (f) When directed by the board of supervisors, ensure that municipal roadways are kept clear.
- II.B.3.b.(6) Once again PEMA believes that the radiological function should not be combined with other responsibilities, but rather assigned to a separate individual. This would generally be true regardless of what portion of the township was within the EPZ.
- II.B.3.b.(6) Add a new item (c). Collect and process emergency worker radiation exposure records.
- II.B.3.b.(6)
(c) Change to item (e).

SECTIONCOMMENT

- II.B.3.b.(6) Add a new item (d). Ensure that municipal EOC personnel and emergency workers are trained in the use of dosimetry/KI.
- II.B.3.b.(8) Once again PEMA believes that the Communications function should not be combined with other responsibilities but rather a separate individual. This would generally be true regardless of what portion of the township was within the EPZ.
- II.B.4.a. Show the location of the Charlestown Township EOC.
- II.B.4.c.. Change to reflect final staffing process.
- Add new items (4), (5), (6) and (7) as follows:
- (4) Public Works Officer
 - (5) Medical Services Officer
 - (6) Radiological Officer
 - (7) Communications Officer
- II.B.4.e. Delete the word "back-up" in second sentence.
- II.B.4.f. It is noted that the alternate EOC for Charlestown and Phoenixville is located at the Chester County Library. Is there sufficient space for more than one alternate EOC?
- I.D.2.a.(4) Delete, this is a duplication of II.D.2.a.(3).
- II.D.2.a.(5) Change to II.D.2.a.(4).
- II.D.2.b.(1) Delete the word "normally" from the first and third sentence. Add to last sentence "or inadequate coverage."
- II.D.2.b.(2) Add: (reference Attachment E).
- II.D.2.b.(3) Add to end of sentence "or inadequate coverage."
- II.D.2.c. The first sentence should be specific by identifying Charlestown Township Emergency Management Coordinator rather than "each municipality." As written this paragraph is in conflict with (1), 4th paragraph, Attachment E. The hearing impaired can be notified by either separate individuals or the route alerting teams but it should be specified in the plan.
- II.E.2.d. Change to read as follows: When necessary, Charlestown Township will be evacuated via Local Routes to Route 29 South to Route 202 South (reference Attachments J and Q). Those persons who require mass care support should go to the reception center located at West Goshen Shopping Center from where they will be directed to an appropriate mass care facility.
- The same type of change pertains to all the plans because as it was written the implication is that everyone had to go to the reception center. Only those who need mass care support must go to the reception center.

SECTIONCOMMENT

(II.E.2.e.(3) Delete "are requested to", replace with "should", and fill in the telephone number.

II.E.2.e.(4) A decision must be made concerning whether those without transportation will be picked up at residences or designated pickup points. This must be specified in the plan and the pickup points indicated. Depending upon the decision in each municipality, subparagraphs (3) and (4) should be revised accordingly.

II.E.2.g. Delete paragraph and replace with:

If school is in session at the time evacuation is recommended, children attending schools located within the emergency planning zone will be transported by bus to designated host schools outside the area. They will remain there under school supervision until picked up by parents or guardians. These "Student Pickup Points" have been planned to coincide with main evacuation routes.

Students whose homes are inside but who attend school outside the emergency planning zone will not be sent home if an evacuation is advised. They will remain at the school they attend under school supervision until picked up by parents or guardians.

(Specific information concerning Student Pickup Points will be provided to parents by school officials.

II.E.2.h. If there are hospitals or nursing homes in Charlestown Township they should be mentioned specifically.

II.E.2.i. Delete the second sentence and state the balance as follows:
Upon direction of PEMA, through the PSP, the ACPs will be manned by the PSP, augmented as necessary by municipal police and the National Guard. The ACPs are described in the Chester County RERP and in Attachment D to this plan. Conditions permitting (based upon information received from the County EOC), police personnel will provide security patrols throughout the municipality during the emergency.

SECTION

COMMENT

- II.E.2.j. Delete present paragraph and replace with: Emergency supplies of gasoline and diesel fuel will be provided by (name agency or business establishment and location) (see Attachment C).
- II.E.2.l. Delete paragraphs (1) and (2) and replace with: Fire protection is provided by East Whiteland Fire Company. After the evacuation of the general population has been completed, East Whiteland Fire Company will continue fire protection from its location in East Whiteland. See Annex M of the County RERP for information concerning radiation protection.
- II.E.2.m. Change word "may" to "will" in second line.
- II.F.1.a. Delete present paragraph and replace with: When Charlestown Township is advised through the Chester County Department of Emergency Services that a site emergency has been declared, emergency workers will be issued dosimetry and potassium iodide (KI), a radioprotective drug. A unit of dosimetry/KI contains the following:
- II.F.1.a.
third * Change "on a badge or" in second line to "in a"
- II.F.1.b. After the word "supply" add "when available", also add the word "Chester" before County and change EMA to DES.
- II.F.1.c.(3) After the word "obtained" in last sentence add "from each organization". Change the reference in last sentence from Attachment N to Attachment L. Also add sentence: Emergency organizations will maintain property control by having each worker sign for the property (see Attachment N).
- II.F.1.d.(2) Add after the word "worker" in first line: is responsible for completing the dosimetry/KI report form (see Attachment K) and for reading the self-reading...(pick up on second line). Delete "used by BRP" in second sentence. In the third sentence, delete monitoring/.
- II.F.1.d.(3) Delete present paragraph and replace with:
- Life Saving Missions - If a life saving mission should become necessary, the Charlestown Township elected official in charge may, under conditions shown below, authorize volunteer emergency workers to exceed the established 25 rem whole body limit. In no instance, however, should the emergency worker be authorized to exceed an absolute upper limit of 75 rems. This authorization may be given in advance to avoid the possibility of delay in performing life saving missions. When authorizing volunteer emergency workers to exceed the 25 rem limit the elected officials should ensure that the following conditions are met:
- (a) It is a life saving situation and alternative courses of action cannot be taken to accomplish the mission.

SECTION

COMMENT

- (b) The emergency workers are healthy adult male volunteers, preferably over 45 years of age.
- (c) The emergency workers selected are persons whose normal duties might involve such missions, e.g., policemen and firemen with suitable protective clothing and respiratory equipment.
- (d) The mission will be accomplished in the least amount of "stay time."
- (e) The emergency workers are knowledgeable of and accept the increased risk in exceeding the 25 rem limit.

II.F.1.d.(4) Delete.

II.F.1.e. In first sentence delete monitoring/.

II.F.2. In second sentence delete monitoring/, as well as "and reception evacuation support health care facilities." In third sentence delete monitoring/ and change facilities to centers.

II.I.1. Delete sentence and replace with: As per county policy, notification of municipal EOCs will not take place.

II.I.2.d. Add to end of sentence: Confirm with the county that dosimetry/KI is being delivered. Upon receipt, prepare the dosimetry/KI for distribution to emergency organizations.

II.I.2.f. These institutions should be specified by name.

II.I.2. Add to item g. If public alert system is activated, begin route alerting as necessary.

II.I.3.c. Add "organizations and" after emergency.

II.I.3.f. Delete note and add: Charlestown Township's TCPs will be manned if local conditions warrant. ACPs will be manned only upon direction of PEMA through the PSP.

II.I.3. If it is the policy of Chester County to mobilize all transportation assets at the county level then the new item g. should read: Drivers and transportation assets needed for persons without transportation are mobilized by the county.

If it is the policy to mobilize transportation assets at the municipal level, then new item g. should read: Mobilize drivers and transportation assets needed for persons without transportation.

II.I.4.c. The procedure for the municipality to accept responsibility for notifying those without telephones is unacceptable. It was our understanding that PECO would make special arrangements (i.e., installation of an alert telephone) to handle this contingency. This point needs to be clarified in all the plans.

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- II.I.4.d. Change present paragraph to read as follows: When the public alert system is activated, route alerting will be implemented in those areas of known public alert system failure or inadequate coverage.
- II.I.4.e. Add a new item (4). "Activate pickup points for those without transportation." This addition is necessary if it is decided that pickup points will be used.
- II.I.5.b. Delete all of item 5.b.
- II.J.2. Add the following statement: Additional copies of the plan can be made available upon specific request and justification to the (municipality) emergency management coordinator. As revisions are made to the plan, properly identified change pages will be sent to all organizations, agencies and individuals holding a copy of the plan.
- Attachment A Use the August 1983 plume exposure pathway EPZ map appearing in Annex E, but delete the sector lines, the sector identification, and the two and five mile circles.
- Attachment C Delete the written material portion and replace with actual agreements or statements of understanding, and show their status. Specific agreements are needed with East Whiteland Fire Company and West End Ambulance Company, among others.
- Attachment D Note: The entire question of ACPs, as well as TCPs on main evacuation routes must be further coordinated by the state. Meanwhile, as a minimum, the ACP list in the municipal plan must agree with those shown in the county plan.
- Attachment E As indicated previously, (1) in the 4th paragraph conflicts with the information appearing in II.D.2.c. The procedure must be clarified. After ** change sentence to read: Route alerting will be conducted by fire department personnel. Sufficient, trained members will be mobilized at the time of the incident to man the sector teams. Specific assignments will be made at the time of mobilization from availability lists maintained in the township EOC.
- Attachment E
Tab 1 Sector maps must be developed.
- Attachment F Change the second sentence after the asterisk to read: It will be replaced with actual public survey data as soon as available.
- Attachment G Change the second sentence after the asterisk to read: It will be replaced with actual public survey data as soon as available.
- Attachment I Expand as previously referenced and indicate who the coordinator is. Also add the following: NOTE: The phone numbers are maintained in the municipal EOC and updated quarterly.

SECTIONCOMMENT

- Attachment J Change the title to read Evacuation Plan Map. This map will be developed by PEMA but printed and provided by PECO.
- Attachment M Attachment M must be completed and dosimetry requirements for the West End Ambulance Company must be included.
- Attachment O The information appears to be quite incomplete. If it is under development, please indicate that.
- Attachment P Since the county plan relies so heavily on the East Whiteland Fire Company and the West End Ambulance Company, their equipment and manpower resources should be shown.
- Attachment Q A review of the map indicates that additional municipal TCPs may be needed. Clearly show the trace of the plume exposure pathway EPZ and shade the risk area. If pickup points are to be used, they should be shown on the map. Also put the location of the transportation staging areas and the EOC.
- Attachment S List the pickup points if decision to use them is made.

REVIEW OF
PHOENIXVILLE BOROUGH RERP
CHESTER COUNTY
DRAFT 3, DATED AUGUST 1983

<u>SECTION</u>	<u>COMMENT</u>
page ii	Eliminate page number column. It is our experience that it is too difficult to show this.
I.B.3.	Add "with changes" to end of sentence.
I.D.	Change second paragraph to read: All of Phoenixville Borough is within the plume exposure pathway EPZ as shown on the map in Attachment J. Based on the 1980 census the resident population of Phoenixville is 14,165.
I.E.6.	Change the word "definitions" in the third line to "information"
I.E.8.d.	Add to end of last sentence: "for more than the immediate site area."
I.E.10.	Add the words "on a 24-hour basis;" after the word "mission" in the second line.
I.E.15.b.	Change the definition to read: "The relocation of the entire population from the plume exposure pathway EPZ."
I.E.18.	Change the first line to read: "RACES or ARES - Radio Amateur Civil Emergency Service or Amateur Radio Emergency Service. Licensed amateur..."
I.E.21.	After the word "located" add "partially or wholly"
I.E.22.	After the word "locate" add "partially or wholly"
II.B.2.f.	After the word "ensure" add "that municipal"
II.B.2.h.	Move to end of section and reletter as item j. Reletter items i and j and reflect this change.
II.B.3.a.(7)	Add to end of sentence: (PEMA).
II.B.3.b.(1)	Add a new item (g). Participate in training, drills and exercises as programmed by the county emergency management coordinator.
II.B.3.b.(2)	After "Law Enforcement" add (Police Services)
II.B.3.b.(2) (a)	Change wording to read: "Ensure that designated Traffic Control Points (TCPs) located within the municipality are manned as necessary (reference Attachments D & Q)."

SECTIONCOMMENT

- (II.B.3.b.(2) Add a new item (c). Assist in traffic control during reentry as necessary.
- II.B.3.b.(5) Delete the paragraph. While specific responsibilities for public works may vary by municipality, the following list of responsibilities should be addressed as appropriate and developed in the municipal plan.
- (a) Maintain current listing of equipment resources needed.
 - (b) Maintain liaison with service utilities, i.e., gas, electric and water agencies.
 - (c) Assist law enforcement in obtaining material for traffic control purposes.
 - (d) Maintain sanitation standards as it affects water supplies and sewage disposal as appropriate.
 - (e) Coordinate efforts with the county public works chief.
 - (f) When directed by the board of supervisors, ensure that municipal roadways are kept clear.
- II.B.3.b.(6) Add a new item (c). Collect and process emergency worker radiation exposure records.
- II.B.3.b.(6) Change to item (e).
(c)
- (II.B.3.b.(6) Add a new item (d). Ensure that municipal EOC personnel and emergency workers are trained in the use of dosimetry/KI.
- II.B.4.c.(4) Delete security responsibilities for Radiological Officer. This should logically be a function of the police liaison officer.
- II.B.4.c.(7) Delete National Guard liaison responsibilities from the Transportation Officer. National Guard liaison is at the county level.
- II.B.4.e. Delete the word "back-up" in second sentence.
- II.D.2.a.(4) Delete, this is a duplication of II.D.2.a.(3).
- II.D.2.a.(5) Change to II.D.2.a.(4).
- II.D.2.b.(1) Delete the word "normally" from the first and third sentence. Add to last sentence "or inadequate coverage."
- II.D.2.b.(2) Add: (reference Attachment E).
- II.D.2.b.(3) Add to end of sentence "or inadequate coverage."
- II.D.2.c. The first sentence should be specific by identifying Phoenixville Borough Emergency Management Coordinator rather than "each municipality." As written this paragraph is in conflict with (1), 4th paragraph, Attachment E. The hearing impaired can be notified by either separate individuals or the route alerting teams but it should be specified in the plan.

SECTION

COMMENT

II.E.2.d.

Change to read as follows: When necessary, Phoenixville Borough will be evacuated via Local Routes to Route 23 East to Route 252 South to Route 202 South or Local Routes to Route 29 South to Route 202 South (reference Attachments J and Q).

The same type of change pertains to all the plans because as it was written the implication is that everyone had to go to the reception center. Only those who need mass care support must go to the reception center.

II.E.2.e.(3)

Delete "are requested to" and replace with "should". Also indicate telephone numbers to be called.

II.E.2.e.(4)

Show where the municipal staging area is located.

II.E.2.g.

Add following paragraphs:

If school is in session at the time evacuation is recommended, children attending schools located within the emergency planning zone will be transported by bus to designated host schools outside the area. They will remain there under school supervision until picked up by parents or guardians. These "Student Pickup Points" have been planned to coincide with main evacuation routes.

Students whose homes are inside but who attend school outside the emergency planning zone will not be sent home if an evacuation is advised. They will remain at the school they attend under school supervision until picked up by parents or guardians.

Specific information concerning Student Pickup Points will be provided to parents by school officials.

II.E.2.i.

Delete the second sentence and state the balance as follows: These points are described in the Chester County RERP. There are, however, no ACPs in Phoenixville Borough. Conditions permitting (based upon information received from the county EOC), municipal police will provide security patrols throughout the municipality during the emergency.

II.E.2.j.

Delete present paragraph and replace with: Emergency supplies of gasoline and diesel fuel will be provided by (name agency or business establishment and location) (see Attachment C).

II.E.2.k.(1)

Delete present paragraph and replace with: In Phoenixville Borough removal of stalled vehicles from evacuation routes will be accomplished by use of towing equipment provided by (name agency or business establishment) (see Attachment C).

II.E.2.1.(1)

The relocation point for the fire department must be indicated.

II.E.2.1.(2)

Change the word "may" to "will" in second line.

II.E.2.m.

Change the word "may" to "will" in second line.

SECTION

COMMENT

- II.F.1.a. Delete present paragraph and replace with: When Phoenixville Borough is advised through the Chester County Department of Emergency Services that a site emergency has been declared, emergency workers will be issued dosimetry and potassium iodide (KI), a radioprotective drug. A unit of dosimetry/KI contains the following:
- II.F.1.a. third * Change "on a badge or" in second line to "in a"
- II.F.1.b. After the word "supply" add "when available", also add the word Chester before County and change EMA to DES.
- II.F.1.c.(3) After the word "obtained" in last sentence add "from each organization". Change the reference in last sentence from Attachment N to Attachment L. Also add sentence: Emergency organizations will maintain property control by having each worker sign for the property (see Attachment N).
- II.F.1.d.(2) Add after the word "worker" in first line: is responsible for completing the dosimetry/KI report form (see Attachment K) and for reading the self-reading...(pick up on second line). Delete "used by BRP" in second sentence. In the third sentence, delete monitoring/.
- II.F.1.d.(3) Delete present paragraph and replace with:
- Life Saving Missions - If a life saving mission should become necessary, the Washington Township elected official in charge may, under conditions shown below, authorize volunteer emergency workers to exceed the established 25 rem whole body limit. In no instance, however, should the emergency worker be authorized to exceed an absolute upper limit of 75 rems. This authorization may be given in advance to avoid the possibility of delay in performing life saving missions. When authorizing volunteer emergency workers to exceed the 25 rem limit the elected officials should ensure that the following conditions are met:
- (a) It is a life saving situation and alternative courses of action cannot be taken to accomplish the mission.
 - (b) The emergency workers are healthy adult male volunteers, preferably over 45 years of age.
 - (c) The emergency workers selected are persons whose normal duties might involve such missions, e.g., policemen and firemen. with suitable protective clothing and respiratory equipment.
 - (d) The mission will be accomplished in the least amount of "stay time."
 - (e) The emergency workers are knowledgeable of and accept the increased risk in exceeding the 25 rem limit.
- II.F.1.d.(4) Delete.
- II.F.1.e. In first sentence delete monitoring/. In second sentence after the words "report to" delete monitoring/.

SECTIONCOMMENT

- (II.F.2. In second sentence delete monitoring/, as well as "and reception evacuation support health care facilities." In third sentence delete monitoring/, and change facilities to centers.
- II.G.2. The blanks should be completed.
- II.I.1. Delete sentence and replace with: As per county policy, notification of municipal EOCs will not take place.
- II.I.2.d. Add to end of sentence: Confirm with the county that dosimetry/KI is being delivered. Upon receipt prepare the dosimetry/KI for distribution to emergency organizations.
- II.I.2.f. Change statement to read as follows: The Emergency Management Coordinator will notify Phoenixville Borough and Phoenixville Manor of the emergency classification. This will serve as a verification of a notification provided by the county.
- II.I.2.g. Add another sentence: If public alert system is activated, begin route alerting as necessary.
- II.I.3.c. Add "organizations and" after emergency.
- II.I.3.f. Delete note and add: Phoenixville Borough's TCPs will be manned if local conditions warrant.
- (II.I.3. If it is the policy of Chester County to mobilize all transportation assets at the county level then the new item g. should read: Drivers and transportation assets needed for persons without transportation are mobilized by the county.
- If it is the policy to mobilize transportation assets at the municipal level, then new item g. should read: Mobilize drivers and transportation assets needed for persons without transportation.
- II.I.4.c. The procedures for the municipality to accept responsibility for notifying those without telephones is unacceptable. It was our understanding that PECO would make special arrangements (i.e., installation of an alert telephone) to handle this contingency. This point needs to be clarified in all the plans.
- II.I.4.d. Change present paragraph to read: When the public alert system is activated, route alerting will be implemented in those areas of known public alert system failure or inadequate coverage.
- II.I.4.e. Add a new item (4). "Activate pickup points for those without transportation."
- II.I.5.b. Delete all of item 5.b.

SECTION

COMMENT

II.J.2.

Add the following statement: Additional copies of the plan can be made available upon specific request and justification to the (municipality) emergency management coordinator. As revisions are made to the plan, properly identified change pages will be sent to all organizations, agencies and individuals holding a copy of the plan.

- Attachment A Use the August 1983 plume exposure pathway EPZ map appearing in Annex E, but delete the sector lines, the sector identification, and the two and five mile circles.
- Attachment C Delete the written material portion and replace with actual agreements or statements of understanding, and show their status.
- Attachment D Note: The question of TCPs on main evacuation routes must be further coordinated by the state. Since there are no ACPs in Phoenixville, delete the reference to them.
- Attachment E As indicated previously, (1) in the 4th paragraph conflicts with information appearing in II.D.2.c. The procedure must be clarified. After ** change sentence to read: Route alerting will be conducted by fire department personnel. Sufficient, trained members will be mobilized at the time of the incident to man the sector teams. Specific assignments will be made at the time of mobilization from availability lists maintained in the borough EOC.
- Attachment E Tab 1 Sector maps must be developed.
- Attachment F Change the second sentence after the asterisk to read: It will be replaced with actual public survey data as soon as possible.
- Attachment G Change the second sentence after the asterisk to read: It will be replaced with actual public survey data as soon as possible.
- Attachment I Include the coordinator. Also add the following: NOTE: The phone numbers are maintained in the municipal EOC and updated quarterly.
- Attachment J Change the title to read Evacuation Plan Map. This map will be developed by PEMA but printed and provided by PECO.
- Attachment M This must be completed to show dosimetry/KI required. Also consider dosimetry requirements for Phoenixville Hospital. Dependent upon county policy, dosimetry may or may not be distributed to the hospital through Phoenixville Borough. Liquid KI will be predistributed to the hospital and the municipality will not be involved.
- Attachment O The information appears to be quite incomplete. If it is under development, please indicate that.
- Attachment P The information for this attachment must be provided.
- Attachment Q An evacuation support map is required. Include all the information previously noted in the case of Washington and Collegeville plans.
- Attachment S Show the location of these plans.