

50-352 0L

Commonwealth
Exhibit E-7
11/28/84



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
P.O. BOX 3321
HARRISBURG, PENNSYLVANIA 17105



September 29, 1983

Mr. Robert L. Reber
Coordinator
Berks County Emergency
Management Agency
Agricultural Building
R.D.#1
Leesport, Pennsylvania 19533



Dear Mr. *Reber* Reber:

The Berks 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.

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,

Alto
Adolph L. Belser
Director
Office of Plans and Preparedness

ALB:ss

Enclosures

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

8605080268 841128
PDR ADOCK 05000352
G PDR

Commonwealth
Exhibit E-7

Please
process without
stamp



REVIEW OF
DOUGLASS TOWNSHIP RERP
BERKS 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 Douglass Township is within the plume exposure pathway EPZ as shown on the map in Attachment J. Based on the 1980 census the total population of Douglass is 3,128.
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 j. Reletter items i and j to 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).
I.B.3.b.(2)	Add a new item (c). Assist in traffic control during reentry as necessary.
II.B.3.b.(4)	Delete "Note: This function assigned to the Transportation Officer". 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.

SECTION

COMMENT

- II.B.3.b.) Delete "Note: This function assigned to the Emergency Management Coordinator" and 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 supplies.
 - (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) Delete "Note: This function assigned to Fire Services Officer." PEMA believes that the radiological function should not be combined with another function, but should be an entity in itself assigned to a separate individual.
- II.B.3.b.(6) Add a new item (c). Collect and process emergency workers 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.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.c. Change to reflect final staffing process.
Add new items (5), (6), (7) and (8) as follows:
- (5) Medical Services Officer
 - (6) Radiological Officer
 - (7) Communications Officer
 - (8) Public Works Officer
- II.B.4.e. Delete the word "back-up" in second sentence.
- II.B.4.f. Indicate the location of the alternate EOC.
- 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).

SECTION

COMMENT

- 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 Douglass 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, Douglass Township will be evacuated via Local Routes to Routes 562 and 662 (references J and Q). Those persons who require mass care support should go to the reception centers located at Oley Valley High School at Oley 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.
- II.E.2.e.(3) Delete "are requested to" and replace with "should"
- 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 which pickup points are to be used. Depending upon the decision in each municipality, subparagraphs (3) and (4) should be revised accordingly.
- II.E.2.e.(5) Change paragraph to read as follows: Transportation requirements for public and private schools have been prearranged and will be coordinated by the county. Transportation resources allocated for evacuation of schools are identified in the county RERP and are not considered as municipal transportation resources. There are no hospitals and nursing homes located in Douglass Township.
- 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.

SECTION

COMMENT

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

- II.E.2.h. Add the following: There are no hospitals or nursing homes located within Douglass Township.
- II.E.2.i. Delete the second sentence and state the balance as follows: These points are described in the Berks County RERP. There are, however, no ACPs in Douglass Township. Conditions permitting (based upon information received from the County EOC), police personnel 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.2.1.(1) Delete since there are no fire companies located within the township.
- 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.
- II.F.1.a. Delete present paragraph and replace with: When Douglass Township is advised through the Berks County Emergency Management Agency 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. Change "on a badge or" in second line to "in a" third *
 - II.F.1.b. After the word "supply" add "when available", also add the word Berks before County.
 - 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 change to:

Life Saving Missions - If a life saving mission should become necessary, the Douglass 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

SECTION

COMMENT

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/.

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. 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. Delete for Douglass Township. In municipalities with these institutions, specify which are to be notified.

II.I.2.g. Reletter as item f.

II.I.2. Add a new 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: Douglass Township's TCPs will be manned if local conditions warrant.

II.I.3. If it is the policy of Berks 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.

SECTION

COMMENT

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 plans.
- 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.
- Attachment D Note: The question of TCPs on main evacuation routes must be further coordinated by the state. Since there are no ACPs in Douglass, 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 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.

SECTION

COMMENT

- 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.
- Attachment J Change the title to read Evacuation Plan Map. This map will be developed by PEMA but printed and provided by PECO.
- Attachment O The information appears to be incomplete in some cases. If it is under development, please indicate that.
- Attachment Q A note should explain the entire township is in the plume exposure pathway EPZ. Since there are no ACPs, that symbol should be deleted from the legend. When pickup points are determined, they should be shown on the map. Also show the transportation staging area location and EOC location.
- Attachment R Show the location of the plan.
- Attachment S List the pickup points if decision to use them is made.

REVIEW OF
WASHINGTON TOWNSHIP RERP
BERKS 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 paragraph to read: The plan pertains to that portion of Washington 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 Washington Township within the plume exposure pathway EPZ is 514.
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 redesignated Access Control Points (ACPs).
II.B.3.a.	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: Washington 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. It is, however, recognized that only a small portion of Washington Township is within the EPZ and in this particular instance it may be advantageous for the coordinator to combine law enforcement and fire 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.
- 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 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.
- II.B.3.b.(4) While PEMA believes that medical/ambulance services should not be a combined responsibility, the size of the EPZ for Washington Township may, as indicated above, make it advantageous in this instance to do so.
- II.B.3.b.(5) Delete "Note: This function assigned to Transportation Officer" 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 services 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.c. Change to reflect final staffing process. PEMA believes, however, as a minimum the Radiological Officer and Communications Officer should be added as separate individuals. Add new items (4) and (5) as follows:
- (4) Radiological Officer
(5) Communications Officer
- 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 Washington 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, Washington Township will be evacuated via Local Routes to Route 100 North (reference Attachments J and Q). Those persons who require mass care support should go to the reception center located at Emmaus High School 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.
- II.E.2.e.(3) Delete the words "are requested to" and replace with "should"
- 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.

SECTION

COMMENT

- II.E.2.g. Delete paragraph and replace with:
- Washington Township has no schools within the plume exposure pathway EPZ, however, the following policy statement is provided for information:
- 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. Add the following: There are no hospitals or nursing homes located within the Washington Township portion of the plume exposure pathway EPZ.
- 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 Berks 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.
- 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 Washington Township 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) Delete. (Fire company not required to relocate since outside the EPZ.)
- II.E.2.1.(2) Delete the number (2) and change word "may" to "will" in second line.
- II.E.2.m. Change word "may" to "will" in second line.
- II.F.1.a. Delete present paragraph and replace with: When Washington Township is advised through the Berks County Emergency Management Agency 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. Change "on a badge or" in second line to "in a"
third *

SECTIONCOMMENT

- (II.F.1.b. After the word "supply" add "when available", also add the word "Berks" before County EMA.
- 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" add: the decontamination station at the Oley Valley High School in Oley.
- 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.H.1. Delete sentence and replace with: As per county policy, notification of municipal EOCs will not take place.
- (II.H.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.

SECTION

COMMENT

- II.H.2.f. Delete for Washington Township. In townships with these institutions, specify which are to be notified.
- II.H.2.g. Reletter as item f.
- II.H.2. Add a new letter g. If public alert system is activated, begin route alerting as necessary.
- II.H.3.c. Add "organizations and" after emergency.
- II.H.3.f. Delete note and add: Washington Township's TCPs will be manned if local conditions warrant. ACPs will be manned only upon direction of PEMA through the PSP.
- II.H.3. If it is the policy of Berks 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.H.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.
- II.H.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.H.4.e. Add a new item (3). "Activate pickup points for those without transportation." This addition is necessary if it is decided that pickup points will be used.
- II.H.5.b. Delete all of item 5.b.
- II.I.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.

SECTIONCOMMENT

- 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, and they do not in all cases.
- 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 Sector maps must be developed.
Tab 1
- 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.
- 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 Thirty-two ambulance personnel seems to be an unduly high number, considering that there are only three vehicles available. With a normal staff pattern of two persons per vehicle, a total of 12 ambulance personnel should be sufficient to cover two-12 hour shifts, or 18 personnel for three-eight hour shifts. Verify the number required.
- Attachment O The information appears to be quite incomplete. If it is under development, please indicate that.
- 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 R As applicable, list the plans of schools, nursing homes, hospitals and any other public institutions located in the risk area of the municipality and show their location.
- Attachment S List the pickup points if decision to use them is made.