· " · 50:352 0L	IT- Expibit E-8
	MERGENCY MANAGEMENT AGENCY P.O. BOX 3321 BURG, PENNSYLVANIA 17105
APR 30 1995	A November 2, 1983 NUCLEAR REGULATORY COMMISSION Docket No. <u>50-352-OL</u> Official Exh. No. <u>Commonwealth E-8</u> in the matter of <u>Phila. Elec. Co.</u>
Mr. Robert L. Reber Line Coordinator Berks County Emergency	StaffIDENTIFIED
Management Agency Agricultural Building, R.D.#1 Leesport, Pennsylvania 19533	Cont's Off'r 28 Nov 84
Dear Mr. Reber:	Other

Dear Ph. Reber.

PEMA has concluded its review of your draft county radiological emergency response plan for the Limerick Generating Station. While it is a good start, there are a number of revisions that are recommended for your consideration.

Reporter .

Many of the changes are recommended to cover oversights or to clarify certain sections of the plan, but one annex in particular can stand major revision. That is Annex N, School Services. In our view that annex, as it is now written, attempts too much, consequently it is entirely too detailed and confusing. Moreover, it has a serious basic error in state policy. The error has already been pointed out in our review of the school district plans. By state policy, non-profit private schools are to be included in the appropriate school district plans, and that includes parochial schools. It is recognized that a sub-system of the Telabs 294 system will enable your school services officer to talk to all schools and school districts simultaneously, but that does not change the basic policy of using school district superintendents and their staff as a controlling headquarters for all schools within its district boundaries.

There are other things wrong with the School Services Annex and they are mentioned in the enclosed comments. One is an over reaction during the Alert classification. It is not necessary to close schools and cancel special activities during an Alert. Indeed, to do so might start a panic reaction in the public that would be completely inappropriate. Also, the basic decisions to be made up to the point when PEMA may recommend specific protective actions are the prerogative of each school district superintendent not the school services officer. Consequently, Annex N should be written in a simple, concise manner and deliberately kept flexible until the point when specific protective actions become necessary. Detailed planning is done at the school district level in consonance with the basic guidance provided in the county plan, which in turn is in consonance with the state plan.

> Commenwealth Exilet No E-B

8605080272 841128 PDR ADOCK 05000352 Mr. Robert L. Reber November 2, 1983 Page Two

Another significant area is the information about evacuation routes in Annex D, Appendix 3. See attached comments.

Finally, the information needed to support Chester and Montgomery Counties needs to be more complete. This matter has been discussed with Robert Bradshaw of ECI, and it is my understanding that corrective action is underway already.

I hope the attached comments will be helpful to you as you consider revisions you wish to make with the help of ECI, and if you have any questions or need anything, please call me.

Sincerely,

Adolph L. Belser Director Office of Plans and Preparedness

ALB/TJC:ss (Tel: 717/783-8150)

Attachments

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

COMMENTS ON BERKS COUNTY RERP FOR LIMERICK GENERATING STATION

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Page	Section	Comments
1	11.	Add the following references to the paragraph:
		 Emergency Plan for Limerick Generating Station, Units 1 and 2, Volumes 1 and 2.
		 PA Code, Title 4, Part 1, Chapter 3, Subchapter C, "Emergency Management Responsibilities of Departments and Agencies."
		3. Commonwealth of Pennsylvania Disaster Recovery Plan, April 1977.
		 Pennsylvania Emergency Management Agency Directive 32, "Development of a Mass Care Operational Program," November 14, 1980.
2	II.C.	After the date, add: "with changes."
_ 2	III.D.	Replace the definition for Emergency Broadcast System (EBS) with the definition in Annex E.
4	111.1.	Under the host school definition, will students always remain under supervision of risk school officials or could this responsibility in some instances be turned over to host school officials?
5	III.M.	Change the definition to read: "The act of bringing a staff department or agency to the strength required to accomplish its mission on a 24 hour basis including"
6	III.V.	Change the first sentence to read: "Public announcements made by the Pennsylvania Emergency Management Agency (PEMA) or county official spokespersons via newspaper, emergency."
10	V.E.	Delete "at a minimum."
11	v.I.	Change last portion of first sentence to read: "including dairy herds and foodstuffs." Also, delete the second sentence.
11	VI.A.	The head of the emergency management agency in Berks County is a coordinator, not a director. The correct title should be used throughout the plan. Change the last sentence of the firs paragraph to read: "The Berks County Commissioners may recommend an evacuation, but they can not compel it."
12	VI.A.5.	Explain what PECO means either here or in the definitions.

P	age	Section	Comments
C	16	VI.B.l.c.	Delete as written and replace with: "Coordinate the municipal emergency response operations in the event of an incident at the Limerick Generating Station."
	16	VI.B.2.b.	Add at end of sentence: "in accordance with this plan."
	20	VI.B.10.b.	Delete as written and replace with: "Maintains radiation reports received from PEMA."
	21	VI.B.10.c.	Delete, there is little if any situation analysis to be done and supply of information is covered under 10.a.
	21	VI.B.10.d.	Change the sentence to read: "Coordination of the distribution of dosimetry, survey meters and radio- protective drugs in accordance with this plan."
	21	VI.B.11.b.	Delete "and buildings."
	21	VI.B.12.b.	Delete "on monitoring matters".
	21	VI.B.12.c.	Delete "sheltering or".
r	22	VI.C.2.	Delete the words "and the Limerick Generating Station."
C	23	VI.E.8.	Eliminate the word "backup" and change siren system to the alert notification system.
	24	VI.F.	Change paragraph to read as follows:
			1. Provide liaison personnel to the county EOC.
			 Provide security and man traffic control points within their area of responsibility.
			3. Develop an access control plan, coordinate the use of resources from the PSP, municipal police and National Guard to man required ACPs and activate the ACPs upon notification from PEMA.
	25	VII., 2nd Para.	Add to last sentence after radioprotective drugs: "to emergency workers."
-	26	VIII.A.	Change the third sentence to read: "In the event of an evacuation, a system of reception centers and mass care centers is established. Mass care centers are located at least 20 miles from the Limerick facility."
(Change the last sentence to read: "Thus, a plan is

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Change the last sentence to read: "Thus, a plan is required for mass care...persons."

Page Section

Comments

Verify the number 17,400 and specifically show how many will come from each county.

29 VIII.D.3.f. Change to read: "Decontamination monitoring teams are placed on standby status." We question the statement as it is presently written, as it does not seem feasible to have all the decontamination monitoring teams report to the county EOC to receive equipment and assignments. Normally, fire departments are tasked with the responsibility to provide decontamination monitoring teams and their assignments should be prearranged.

30 VIII.D.3.m. In first sentence, delete the words "and private schools." This is a school district responsibility.

30 VIII.D.4.c. Delete the words "and private schools." Add at the end of the sentence, "or protective response."

31 VIII.D.4.d. Change to read: "In coordination with PSP, access control and traffic control are dispatched to predesignated duty stations."

31 VIII.D.4.f. Change to read: "Emergency worker decontamination stations are activated."

32 VIII.D.4.g. (1)(d) Last sentence, change to read: "If a contaminating incident occurs, emergency workers will be dispatched to decontamination stations...duties."

32 VIII.D.4.g. Change to read: "Orders for the administration of radio-(1)(e) protective drugs to emergency workers...through PEMA." Delete the words, "if received."

32 VIII.D.4.g. Change to read: decontamination monitoring teams.

33 VIII.D.4.g. Delete in its entirety.

(2)(a)

(2)(c)

34 VIII.D.4.g. At the end of sentence, add the words: "after evacuation (2)(g) is completed."

34 VIII.D.4.g. Change to read: "Order for the administration of radio-(2)(i) protective drugs to emergency workers...through PEMA." Delete the words, "if received."

35 IX.D.1. Add: "(Through PEMA)."

2-1 The table across the top should include a column for county commissioners and a column for municipal officials.

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A-1-1

Change the note at bottom of page to read: Home telephone numbers are maintained in the EOC. Telephone numbers are reviewed and updated quarterly.

	Page	Section	Comments
(1-1-4		Under MILITARY retain only the PA National Guard Liaison Officer. The USMC, USN, and USAR liaison officers have no authority and no role.
	B-1	III.A.	Change the first paragraph to read: The Berks County communications center will operate on a 24 hour basis. It will maintain communications
	B-3	IV.F.	Add at end of sentence: as a backup to the telephone 'system.
	B-4	IV.I.2.c.	Change sentence to read: Notification sequence is initiated by communications center personnel as directed by emergency management coordinator.
	B-4	IV.I.2.g.	Change sentence to read: Communications Center personnel assist as directed by the emergency management coordinator in activating the public alert system.
	B-2-1		Add a note at top of page to read: Home telephone numbers are maintained in the EOC. Telephone numbers are reviewed and updated quarterly.
			This comment should appear every time telephone numbers are needed.
(C-1	II.A.	On third line, delete schools and replace with school districts. Also, change Director to read Coordinator.
	C-1	III.	The Tellabs (294) community alerting system may not be adequate to alert all areas or facilities within the EPZ. Consideration should be given to a supplemental system other than route alerting. For example, how will people within shopping malls be notified as well as those without telephones? In this regard, the fourth paragraph under III. on page C-2 is unacceptable because it places the entire problem on the municipality to accomplish this task by means of route alerting.
	C-3	IV.B.	Add a subparagraph 11 which states: Mobilize route alert teams.
	C-3	IV.C.4.	Change to read: Decontamination monitoring teams are mobilized and placed on standby status.
	C-2-1		Should be expanded to include a telephonic cascade notification system.
	C-3-1		We question why it is necessary for the incident notification form to appear both in Annex B and Annex C.
(C-6-1		The first paragraph is too general in its reference to responsibilities of route alerting. It implies that route alerting will be a substitute for Tellabs 294 where the latter is not adequate. There must be some type of a

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]	Page	Section	Comments
(mechanical system developed to supplement the Tellabs system where necessary.
	D-1	1.	The purpose of public information is not to notify persons, but rather to inform them. The first sentence should thus read: "To establish policies and procedures for informing persons"
	D-1	II.D.	It was our understanding that PECO would prepare and distribute a brochure for the general public. How did this responsibility get shifted to the county?
	D-2	III.B.	This paragraph conflicts with II.D. which states that the county is responsible for printing and distribution of the brochure. PECO is responsible and paragraphs A, B and D should be written to show it.
	D-3	III.E.	Third line, add after county PIO: "in coordination with PEMA."
	D-3-1	App. 3	This message needs substantial revision.
			 In the first line of the message, change to read: "The Governor has announced that a General Emergency presentlyfacility."
(In the list of affected municipalities, delete the word "All." Simply state the name of the municipality.
			 For \mity Township state: "Eastern half of Amity Township."
			4. Begin ing with the second paragraph from the bottom of pa e D-3-1, delete everything up to the parenthetical remark in the middle of page D-3-2, and replace it with the following information:

"Main evacuation routes are provided traffic control by the Pennsylvania State Police for your rapid movement out of the endangered area. Please follow the main evacuation routes for your community. If you will need a place to stay, report to the designated reception center enroute. Please follow the main evacuation routes for your community:

- Union Township East of L.R. 06097 (Shed Road). Take Route 724 West. Reception center is Cumru Elementary School in Shillington.
- Amity Gardens of Amity Township. Take Route 422 West. Reception center is Reading Mall.

Page	Section	Comments
C		 Eastern half of Amity Township except for Amity Gardens. Take Route 662 North. Reception center is Oley Valley High School.
		 Douglass Township, Southern portion. West on L.R. 06155 to L.R. 06102 to Route 662 North. Northern portion - West on Route 562 to Route 662 North. Reception center is Oley Valley High School.
		 Earl Township South of Powder Mill Road. Route 562 West to Route 662 North. Reception center is Oley Valley High School.
		 Colebrookdale East of Route 100 and Boyertown Borough. West on Route 73. Reception center is Oley Valley High School.
		7. Colebrookdale West of Route 100 and that part of Washington Township East of Route 100 and South of L.R. 06033. Route 100 North. Recep- tion center is Emmaus High School."
E-4	V.C.4.a.	Change to read: "Be prepared to conduct route alerting as necessary."
(ż-6	App. E-3	The reference should be to relocation points instead of relocation centers.
E-6	App. E-5	Change to read: "Emergency Worker Decontamination Stations."
E-3-1		Title should be changed to relocation points instead of centers.
E-5-1		Title should be changed to Emergency Worker Decontamination Stations.
E-6-1	L	Why is this in the county plan? This is a municipal responsibility. Recommend deletion.
F-1	II.A.	Change to read: "The PSP Troop L in Reading is responsible for PSP functions in Berks County. It will coordinate its activities with Berks County. The PSP are responsible for control of traffic on main evacuation routes and for planning and coordinating access control." Also, delete paragraph II.C.
F-1	II.F.	Change to read: "The PSP, supported by the National Guard and municipal police, will control access into the plume exposure pathway EPZ during sheltering or evacuation."
(^{F-3}	V.B.5.	One vehicle may not be sufficient to deliver to seven munici- palities. (Let alone other municipalities that may be involved.)

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	Page	Section	Comments
(-5	V.D.4.d. (3)&(3)(a)	In both instances, change relocation centers to read, relocation points.
	F-6	App. F-5	Change to read: "Emergency Worker Decontamination Stations."
	F-5-1		Change the title to read: "Emergency Worker Decontamination Stations."
	G-1	1.	Change to read: "To establish policies and procedures for the provision of medical support in Berks County and to assist other risk counties in the event of an incident at the Limerick Generating Station."
	G-2	III.D.	The meaning of this paragraph is not clear. It should be rewritten for clarity.
	G-3	III.F.2.	Delete last two sentences as written, they may form the basis for a contention and the comment is unnecessary.
	G-3	IV.B.2.	Change the word "should" to "shall."
	G-3	IV.C.	Change the word "should" to "shall."
	G-4	IV.C.1.e.	Change the words "radioprotective drugs" to "KI."
(-4	IV.D.2.c.	In this paragraph either state the staging area locations or make a reference to the appropriate appendix.
	G-5	IV.D.2.d.	Change the word "assigned" to "sent."
	G-5	IV.D.2.e.	Change the words "radioprotective drugs" to "KI."
	G-5	IV.D.3.a.	In the fourth line delete the word monitoring.
	G-5	IV.D.3.b.	Change the words "radioprotective drugs" to "KI."
	H-1	I.	In the first sentence, add the word "policies" before the word "procedures." In second sentence, change the word "in" to "to support."
	H-1	II.B.	Add the sentence: "Request for National Guard support will be made through PEMA."
	H-1	II.D.	Delete the word "normally" in first sentence.
	H-2	III.A.	Delete items 5 through 12. These missions are not in consonance with Annex E of the state plan.
	H-3		In the title of OP 1-81, make the word "Engineers" singular instead of plural.
(I-1	IV.A.	Add a sentence: "An average of three persons per car is assumed."

•	Page	Section	Comments
1	2	IV.B.	In last sentence, change Appendix 3 to Appendix 2.
•	1-2	V.B.3.	Change this sentence to read: "The Transportation Coordinator will request an update of requirements for transportation from municipalities and school districts." Support agencies responsible for maintaining lists of invalids and homebound individuals are the responsibility of the appropriate municipality which should consolidate their requirements and report them to the county.
	1-2	V.B.4.	Appendix I-4 contains a large number of providers. Precisely whom do you want to contact?
	I-3	v.c.3.	Change Appendix I-3 to read I-2.
	I-4	V.D.8.	Delete. This is not a county function.
	1-1-1		How can unmet needs be zero when resources are yet to be determined?
	I-3-1		List the specific municipal staging area locations.
	J-2	IV.	In this paragraph show three columns: Population, Percentage of Population in the EPZ, Population in the EPZ.
(*-2	V.B.	Add at the end of the sentence: "and they will not require -mass care support."
	J-1-1	Amity Township	Pleas: verify the accuracy of the routes shown.
	J-1-1	Douglass Twp.	It appears the evacuation routes listed are incomplete. It appears that PA 662 North should be added after PA 562 West.
	J-1-1	Union Township	Reception center is shown as Governor Mifflin School, while the evacuation plan map indicates Cumru Elementary School. Therefore, show Cumru Elementary School here.
	J-2-1		Indicate which host school is applicable for each school district (e.g., which is the host school for Boyertown Area, Berks County Intermediate Area and the Montessori Academy?).
	J-4-1	I.	In the first sentence add "Berks County" after the word "activate." Also, add the following sentence: "The reception center at Morgan Corporation, although it is located within Berks County, will be activated by Chester County."
	K-1	III.	In second line, change the word "primarily" to "main."
(९-3	IV.D.2.a.	After the word "Coordinator" add "in coordination with the PSP liaison officer, ensures"
	K-4	IV.D.3.h.	Change this paragraph to item 4 and title it Reentry.

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- Page	Section	Comments
(-1-6		Is Washington also covered by State Police? If so, please add the entry. If not, explain how Washington receives its police support.
L-1	II.	In second paragraph change the first sentence to read: "Decontamination monitoring teams will be assigned" In the second sentence change to read: "These decontamina- tion monitoring teams shall receiveEOC."
L-1	III.A.	In this paragraph show the breakout of the mass care requirements. How many will come from each of the counties being supported and how many from Berks County?
L-1	III.B.	Change to read: "Mass care centers will be located at least 20 miles from the Limerick Generating Station."
L-2	IV.C.4.	Change to read: "Decontamination monitoring teams pick up their equipment and go to their assigned locations and report to the mass care coordinator. Decontamination monitoring teams advise the mass care coordinator concerning monitoring and decontamination."
L-2	IV.C.5.	Change to read: "RACES operators report to their assigned mass care centers and prepare to operate the alternate means of communication."
C-1-1	I.A.	-Under the reception center identification add: "Planned maximum requirement: 5,785"
L-1-1	II.A.	Under the reception center identification add: "Planned maximum requirement: 4,260"
L-1-2	III.B.	Under the reception center identification add: "Planned maximum requirement: 7,350"
L-1-3		Add a note stating: "Reception center at Morgan Corporation will be operated by Chester County."
N-1	II.A.	Change to read: "The Berks County Emergency Management Coordinator will monitor and coordinate the development of radiological emergency response within the school districts of Berks County affected by an incident at the Limerick Generating Station. Non-profit private schools, including parochial schools, are the responsibility of the school district superintendent in whose territory they are located."
N-1	II.B.1.	Change to read: "Developing radiological emergency response

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N-1 II.B.1. Change to read: "Developing radiological emergency response plans for the school district and requiring acceptable plans from each school in the district including non-profit private schools."

Page	Section	Comments
(1-1	II.B.2.	Change to read: "Coordinating plans with individual risk schools, appropriate municipalities, host school districts, and host non-profit schools as appropriate."
N-2	IV.	Paragraphs E, F, G and H are not assumptions, they are policies, therefore, suggest after paragraph IV.D. add paragraph V. entitled "POLICIES" and list them there.
N-3	٧.	This will become VI.
N-3	V.B.2.	Change to read: "District superintendents with schools located within the plume exposure pathway EPZ and those with schools located outside the plume exposure pathway EPZ, but who have students who live inside the EPZ are notified." Please note that it is our understanding that there are no colleges or profit private schools within the plume exposure pathway EPZ of Berks County. If there are, they also should be mentioned in this paragraph.
N-4	V.B.4.	Change to read: "Direct communications between risk school districts and host school districts are initiated."
N-4	V.B.6.	Delete. This action is premature during an Alert classification.
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N-4	V.B.7.	Change to read: "Based upon the facts of the situation, the school district superintendent may decide to close the schools during a school day or at the end of the day. Conversely, he might decide to keep the schools open during the Alert classification."
N-4	V.C.2.	Change to read: "Host school districts and host schools are brought to standby status."
N-4	V.C.3.	Change to read: "School services officer will request report of unmet transportation needs for risk school districts."
N-4	V.C.4.	In second sentence delete: "for all risk schools."
N-4	v.c.5.	Change to read: "School district superintendents report to their offices, assure readiness of appropriate vehicles, and keep host school districts advised of the situation. Any requirements for transportation beyond the district's capability are reported to the county EOC."
(^{N-5}	v.c.	Add a new paragraph 7. "Based upon the facts of the situation, school district superintendents may decide to close the schools during a school day or at the end of the day while being particularly careful to avoid sending the children home when a requirement to take shelter or to evacuate may be imminent."

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Page	e Section	Comments
(-5	V.D.2 and 3	Move these to site emergency.
N-5	V.D.4.	Change to read: "The school services officer shall communicate protective action requirements from PEMA to school district superintendents."
N-5	V.D.5.	Delete this paragraph.
N-5	V.D.6.	Change to read: "The school services officer shall assist in the implementation of protective action recommendations, coordinate actions to satisfy unmet needs capability with the Berks County Emergency Management Coordinator, and monitor implementation of protective actions by all schools within the EPZ and those schools outside the EPZ whose students reside within it."
N-6	V.D.7.	Change to read: "If an evacuation is ordered, the school services officer shall notify all risk school districts, monitor the transportation"
N-6	V.D.8.	Change to read: "If sheltering is recommended, the school services officer shall notify risk school district superintendents and:"
N-6	VI.B.2.	Delete "and private schools".
C7	VI.C.2.	-Change to read: "The school services officer shall transmit PEMA recommendations for school closings to school district superintendents. Note: Should"
N-7	VI.C.5.	Delete the third line.
N-7	VI.D.	Delete paragraph 1-4 and replace with the following: "Every effort will be made to ensure that schools are closed before an incident reaches general emergency classification. If a general emergency occurs without any warning and sheltering or evacuation becomes necessary, actions will be accomplished in the manner shown in the plan for schools in session."
N-1	-2	In the fifth line, change the title to read: "Non-Profit Private Schools"
	-1 & 3-1	It is recognized that the school district profile forms come from the school district plans. In the county plan, however, the information should be summarized and rewritten for clarity and conciseness.

Comments

Page Section

1-4-1

N-5-1

Again, it is considered better to consolidate the information in this appendix and make it more concise.

In the first paragraph, add the following sentence at the end of the paragraph: "Please refer to the Limerick Generating Station Emergency Information Brochure."

N-5-1

In the second paragraph, change to read: "Parents with children attending school within a 10-mile radius of the Limerick Generating Station are advised that their children will be evacuated to safe locations where they may be reunited with their parents or guardians. Students will be bused to safe locations in host schools outside the risk area. Parents are asked to meet their children there. I repeat, children will be bused directly to safe locations in host schools outside the risk area where parents or guardians may pick them up. Parents or guardians are urged to go directly to the host schools. Attempting to pick up your children at the schools they attend might interfere with their safe evacuation."

In third paragraph, change to read: "Parents or guardians of school children who live within the risk area but whose children attend schools outside of it are advised that their children will be safe at the schools they attend, and they will be retained their until they are picked up by their parents or guardians."

In fourth paragraph, second line under the ":" change the word "buildings" to "schools."

. Delete third and fourth paragraph from bottom. Note: If there are any schools located outside the risk area, but some of those students reside within it, they also should be listed in this message. Or if there are no such schools then no mention should be made of that situation in this message.

N-7-1

N-5-2

Change the title to read: "Non-Profit Private Schools in the EPZ." Within the body, show which school district they come under for RERP.

0-1 II.C. Delete this paragraph.

0-2 III.A.

In first line, delete "assisted by the state government" and add at the end of the sentence "as advised by PEMA."

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Page	Section	Comments
(-4	IV.B.	In first line replace "radioprotective drugs" with the symbol "KI." Also clarify that dosimetry, KI and forms should be issued at the location where the USDA issues the emergency worker certificates. Also indicate where that location is.
0-1-1		Change the note to read: "To be developed by Pennsylvania Department of Agriculture."
P-6	IV.C.1.	Change to read: "Prepare to resume school operations."
. R-4	· IV.	Add the title: "Refresher Training."
S-4	III.B.	Change to read: "For small-scale exercises in which Berks County participates, the Pennsylvania Emergency Management Agency is responsible for the development of exercise scenarios in coordination with the Limerick Generating Station."
T-1	I.H.	Change to read: "Decontamination stations for emergency workers."
T-1	I.J.	This category (host schools) is not required because it is an appropriate part of each school district plan.
(Note 1: For each of these agreements, show the current status and location if the agreement is not included as an appendix to this annex.
		Note 2: Each agreement included is a separate appendix to this annex and should have an appropriate appendix number. Also each page should have an appropriate page number.
U-1	I.B.	In the first line delete the letter "s" in the title of the 103rd Engineer Battalion, and in the second line delete "Philadelphia."
U-1	I.D.	Change the title to read: "Non-Profit Private Schools" and show what districts they are under.
U-1	I.D.4.	Change to read: "(Non-profit private school plans are maintained on file in the Berks County EOC, and in each appropriate school district.)"
U-1		Note 1: Also list the Pennsylvania State Police Troop L plan and other risk county plans.
W-1	II.C.	Change the word "Route" to "Plan."
(21	VI.B.10.	Add an additional responsibility: "Collection of municipal and county radiological records and sent them to PEMA, as required.

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1. 1. A.

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