

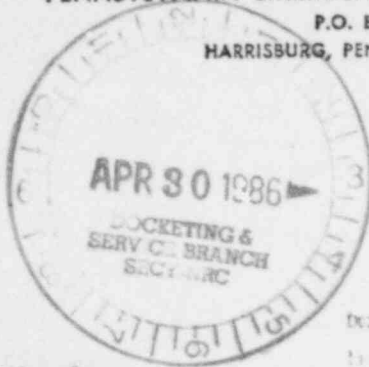
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PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
P.O. BOX 3321  
HARRISBURG, PENNSYLVANIA 17105



January 14, 1985

NUCLEAR REGULATORY COMMISSION PEMA E-10

Doc. No. 50-352-OL Official Ex. No. ~~XXXXXXXXXXXX~~ Ex

To the matter of Phila. Elec. Co.

DATE 22 Jan 85

TYPE Panel

OFFICE Ace-Federal

Mr. Paul P. Giordano  
 Director  
 Federal Emergency  
 Management Agency  
 Region III  
 Curtis Building  
 6th and Walnut Streets  
 Philadelphia, Pennsylvania 19106

Dear Mr. Giordano:

I am aware that the Philadelphia Electric Company, in conjunction with its licensing application for the Limerick Generating Station, has provided the NRC with the latest draft copies of the offsite emergency response plans for the three risk counties, 43 municipalities, 13 school districts and two support counties that would be involved in the event of an incident at the plant.

In accordance with the November 1, 1980 Memorandum of Understanding Between NRC and FEMA Relating to Radiological Emergency Planning and Preparedness (45 Federal Register 82713, December 16, 1980), it is FEMA's responsibility "To make findings and determinations as to whether State and local emergency plans are adequate and capable of implementation...Notwithstanding the procedures which may be set forth in 44 CFR 350...findings and determinations...may be requested by the NRC...and provided by FEMA for use as needed in the NRC licensing process. These findings and determinations may be based upon plans currently available to FEMA or furnished to FEMA by the NRC."

It is my understanding that the NRC has forwarded the drafts specified in paragraph one to FEMA Region III and has requested the finding and determination authorized by the referenced Memorandum of Understanding. The Pennsylvania Emergency Management Agency, on behalf of the Commonwealth of Pennsylvania, has no objection to this review by FEMA providing that it is clearly understood and explicitly stated in the resultant finding that the effort is not to be considered as an informal review requested by PEMA and in no way comprises, or is related to, the formal review and approval process that will subsequently be requested by PEMA under the provisions of 44 CFR 350. It should also be recognized that the drafts in question were

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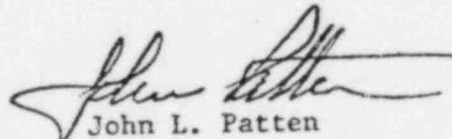
Mr. Paul P. Giordano  
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primarily prepared by the Philadelphia Electric Company's consultant, and have neither been reviewed by PEMA nor, according to information provided to PEMA, have they been accepted by the counties, municipalities and school districts involved. Nonetheless, these plans would, in a practical sense, be the basis for the counties, municipalities and school districts responding should an accident occur at the Limerick Generating Station.

PEMA will not certify to the adequacy and implementation of the plans or submit them to FEMA for formal review and approval as required by 44 CFR 350 until the plans have been finalized, reviewed by PEMA and accepted by the counties, municipalities and school districts.

In April 1984 FEMA released its interim findings of adequacy based upon plans submitted for informal review by PEMA in December 1983. FEMA has also issued its report of deficiencies observed during the July 25, 1984 exercise, as well as for the November 20, 1984 supplemental exercise. Inasmuch as the Limerick Generating Station is now in a five percent, low-power test mode, PEMA would agree that it would be prudent for FEMA to conduct the review requested by the NRC to determine whether the deficiencies noted earlier by FEMA have indeed been corrected.

Sincerely,

  
John L. Patten  
Director

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

cc: Honorable Dick Thornburgh  
Governor of Pennsylvania  
Robert L. Reber, Coordinator  
Berks Co. Emergency Management Agency  
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