

50-35201

I-LEA Exhibit E-48

11/28/84

LEA E-48

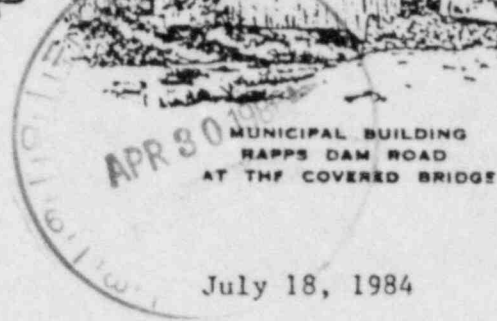
## EAST PIKELAND TOWNSHIP

## BOARD OF SUPERVISORS

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JOHN D. DOYLE, SECY., TREAS.



July 18, 1984

Pennsylvania Emergency Management Agency  
 P.O. Box 3321  
 Harrisburg, PA. 17105

Re: Radiological Emergency Response Plan Exercise - July 25, 1984

Dear Sir:

This is to notify you that East Pikeland Township, Chester County will participate in the Limerick radiological emergency response plan exercise scheduled for Wednesday, July 25, 1984 with the following reservations.

A select committee of township residents has conducted a detailed study of the proposed radiological emergency response plan submitted by Energy Consultants, of Harrisburg, PA., consultants to the Philadelphia Electric Company. In view of the significant concerns (attached) of the committee (concerns shared by the Planning Commission and Board of Supervisors) regarding the provisions of the proposed plan (Draft #5 dated April 1984), East Pikeland Township will not approve/adopt the plan in its present form.

Thus we wish to note for the record that the township's participation in the July 25th exercise does not in any way constitute approval of the plan nor does it bind the township to future participation in the program.

Sincerely,

John D. Doyle, Sec'y

/jdd

cc: Chester County Dept. of Emergency Services

Federal Emergency Management Agency

Division of Emergency Preparedness & Emergency Response  
 Office of Inspection & Enforcement  
 Nuclear Regulatory Commission

Mr. George Hughes, EPT Emergency Management Coordinator

EPT Planning Commission

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 PDR ADOCK 05000352  
 G PDR

NUCLEAR REGULATORY COMMISSION

Docket No. 50-352-OL LEA E-48  
 Official Exh. No.  
 In the matter of Phila. Elec. Co.

Staff	IDENTIFIED	X
Intervenor	RECEIVED	X
Contractor	DATE	28 Nov 84

OTHER Panel

Ace-Federal Reporters, Inc.

POST OFFICE ADDRESS: EAST PIKELAND TOWNSHIP, BOX 58 KIMBERTON, PENNSYLVANIA 17042

July 6, 1984

To the East Pikeland Township Planning Commission:

The undersigned, representing a committee investigating the Evacuation Plan for East Pikeland, recommend that Draft #5 of the Radiological Emergency Response Plan (RERP) not be approved as it exists and not be submitted for review by the Chester County Department of Emergency Services (CCDES), the Pennsylvania Emergency Management Agency (PEMA), the Federal Emergency Management Agency (FEMA), and the Nuclear Regulatory Commission (NRC) until the following areas of concern be resolved.

This recommendation arises from the identification of a large number of serious deficiencies and uncertainties in our study of the RERP (Drafts #4 and #5) for East Pikeland, associated materials, and discussion with various parties.

Foremost among these concerns are:

- 1) TIME FRAMEWORK FOR PUBLIC RESPONSE TO A RANGE OF POSSIBLE EVACUATION EVENTS: the plan does not precisely relate effective times for evacuation to the imaginable range of radiological events.
- 2) INADEQUATE ROAD SYSTEM: need to realistically review the NRC required evacuation time study recently released by PECO and prepared by HMM Associates of Concord, MA. This computer based study indicates a total evacuation time of 6 hours and 15 minutes for the 74,498 residents of Chester County during the worst of possible conditions, ie., "a snowy winter weekday" (The Mercury, Pottstown, 6/22/84). Township records indicate a total of 8-12 hours to plow out East Pikeland.
- 3) CO-ORDINATION WITH NEIGHBOURING MUNICIPALITIES: determine the relationship and impact of the plans (particularly the evacuation routes, joint use of services - ambulances, fire company, buses, tow trucks, etc.) of surrounding municipalities and school district on the East Pikeland Evacuation Plan. This is one of the objectives cited in Draft #5, "insure that planned actions are current and in consonance with those of surrounding jurisdictions, as well as with the Chester County RERP".
- 4) INADEQUATE EVACUATION MANAGEMENT AND CONTROL MECHANISMS: need for verified availability of equipment and services (ambulances, tow trucks, snow plows, etc.), realistic assessment of available volunteers, realistic assessment of amount of volunteers needed in time to fill one job, training program for volunteers and public, information availability and maintenance, etc.
- 5) COST: undefined liability of costs to the Township and public for implementation and perpetual maintenance of Plan.

- 6) **LIABILITY:** undefined liabilities of Township, County, State, Federal Government, Philadelphia Electric and individuals, such as volunteers, against damage to person and property in the Township. Energy Consultants, Inc( the consulting firm hired by PECO to prepare the RERP) suggested that we ask our solicitor to look at Pamphlet Law #1332, "Emergency Services Code".
- 7) **SHELTERING:** when will we be asked to shelter, is it safe, for how long, and how is it accomplished?
- 8) **DRILL TEST:** the superficiality of the proposed test of the RERP planned for July 25, 1984, as a measure of Plan feasibility. FEMA will be holding hearings on the Drill two days following the test. (July 27 in Pottstown)

These points are proposed as sufficient to support the recommendation. Many other concerns and deficiencies can be elaborated. It is suggested that full resolution of the listed points be demanded by the Township before the committee should undertake study of the plan in more detail.

The committee is, of course, ready to extend or deepen it's study as available information may permit.

The committee has chosen not to express opinion of the overall feasibility or practicality of the idea of an Evacuation Plan for a Limerick Radiological Emergency. It should not be interpreted, moreover, that in recommending resolution of the listed concerns the committee is endorsing the concept of the Plan.

Sincerely,

*J. Edward Matthews*

J. Edward Matthews

*David K. Adams*  
David K. Adams

*Lindsay Brinton*  
Lindsay Brinton

*David Churbock*  
David Churbock

*Ann Raymond*  
Ann Raymond