



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

April 23, 1985

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Helen F. Hoyt, Chairperson  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Washington, D.C. 20555  
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BRANCH

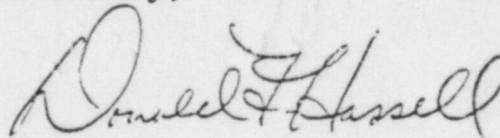
Dr. Richard F. Cole  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353 -OC

Dear Administrative Judges:

On April 16, 1985, the NRC staff forwarded to the Board and parties several memorandums concerning the Federal Emergency Management Agency's (FEMA) updated findings on offsite radiological emergency preparedness for the Limerick Generating Station. The memorandum dated March 29, 1985, which was included in the materials sent on April 16, 1985, made reference to an attached FEMA Region III report reflecting FEMA's Region III's updated interim findings on offsite emergency preparedness for the Limerick Generating Station. That report was received by our office on April 22, 1985 and is being provided (see enclosure) for the information of the Licensing Board and parties.

Sincerely,

  
Donald F. Hassell  
Counsel for NRC Staff

Enclosure: As stated

cc w/enclosure: See next page

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FEDERAL EMERGENCY MANAGEMENT AGENCY

REGION III

INTERIM FINDINGS

OF OFFSITE RADIOLOGICAL

EMERGENCY PREPAREDNESS

FOR THE LIMERICK GENERATING STATION

MARCH 1985





Rating Key: A = Adequate  
I = Inadequate

PLANNING STANDARD/ ELEMENT	RATING	COMMENTS
A.		<u>Assignment of Responsibility (Organizational Control)</u>
A.1.a.	A	Both the Berks and Chester County Radiological Emergency Response Plans (RERPs) have been revised to reflect the updated terminology of the U.S. Department of Agriculture's Food and Agriculture Councils. There is no reference to this change being made in the Montgomery County RERP.
A.1.b.	A	
A.1.c.	A	The "Primary and Support Responsibilities Chart" in the three county RERPs reflects accurate assignments.
A.1.d.	A	
A.1.e.	I	<p>Although a significant improvement has occurred in meeting the staffing requirements at the municipal level, problems still exist in certain areas. One community (South Coventry Township) still has large numbers of unfilled staff positions. Several other communities (such as Lower Providence Township) have one individual as a primary in one position and the alternate in another position, implying that the person would be working round-the-clock. Others have instances where one of the staffing positions does not have 24-hour coverage (Washington Township as an example).</p> <p>The three county plans reflect the fact that the county communications centers operate on a 24-hour basis. Home and business telephone numbers of municipal EMCs are kept on file by the counties.</p>
A.2.a.	A	
A.2.b.	A	
A.3.	I	<p>The risk county RERP's acknowledge that agreements or understandings have been entered into or are in the <u>process of being developed</u>. No agreements have been included in the Chester County RERP, while FEMA has received letters of agreements with transportation providers from Montgomery County. Letters of agreement with other support organizations have not been received from Montgomery County. Many communities have stated that no letters of agreements</p>



are necessary while others have obtained letters for the establishment of alternate EOCs. Continued attempts should be made to obtain agreements with any organization that might provide assistance during an emergency response. In the case of Berks County, Appendix T-19 does not indicate which school district is being referenced.

- A.4. I Berks County has acknowledged that the County EMA Director is responsible for assuring continuity of resources. No reference to this effect could be located in the Chester or Montgomery County RERPs.

See comment to element A.1.e. concerning 24-hour response at the municipal level.

C. Emergency Response Support and Resources

- C.1.c. A A complete statement defining the county's role vis-a-vis the federal response effort is contained in the Berks and Chester County RERPs, Annex Q, Section II.D. It is recommended that additional wording be added to Section II.E, Annex Q of the Montgomery County RERP to read as follows: "PEMA is responsible for making the necessary arrangements to support the federal response personnel. Montgomery County will cooperate with state and federal agencies in planning for and making all necessary support arrangements."

- C.2.a. A It is recommended that the statement that no representative of Montgomery or Chester counties will be sent to the EOF would be more appropriate under the Concept of Operations or Direction and Control Annexes.

- C.4. I Annex M to the county plans has replaced the reference to IRAP with FRMAP.

See comment to element A.3. concerning the lack of completed letters of agreement.

D. Emergency Classification System

- D.3. A

- D.4. A As in the earlier drafts of the plans, the counties refer to the fact that their County Commissioners can recommend an evacuation. However, as previously noted in the April 27, 1984 RAC review, the possible source of that recommendation varies from one county RERP to another. The three risk counties should agree on the same organizational sources(s) for protective action recommendations.

E. Notification Methods and Procedures

- E.1. I Communications capabilities are clearly delineated in Appendix B-1 to the county RERPs.

The Montgomery County RERP has a "Notification Sequence" (Appendix C-2, Tab 1) and Berks County has "Incident Notification Procedures" in Appendix C-8 to its plan. The Berks County approach seems to be the clearest method of describing the notification process and, in fact, contradicts the Montgomery County flow chart, implying that direct notification to Montgomery County by Limerick will not take place in all circumstances (compare page C-8-3 of the Berks County RERP to Appendix C-2, Tab 1 of the Montgomery County RERP). The Chester County RERP does not contain information regarding the organization(s) responsible for initial notification.

Initial notification, classification changes, protective actions and other critical information will be provided to emergency response personnel via telephone, the recall automated dialer system, or pager.

Once again, it is suggested that an abbreviated version of the "Incident Notification Form" be provided to municipalities for their use.

- E.2.           A   For consistency purposes, Annex C of the Chester County plan should call for notification of health care facilities, as it does under the Concept of Operations section and Annex G.
- E.5.           I   The Montgomery County RERP, in Annex D, Section III.E, continues to state that coordination with PEMA in the matter of public information is at the discretion of the Commissioners, the OEP Coordinator, or their designated alternate. Yet, under the Site Emergency section of Annex D to the respective RERP, all the plans state the information releases are to be coordinated with the PEMA PIO. It seems unusual to put a policy statement such as this under a Concept of Operations section rather than the "Requirements" section. Also the sentence should read, "Information releases or statements are coordinated with the PEMA PIO." Once again it should be emphasized that coordination of information releases may be critical to providing the public with accurate information during an emergency. Consistency is necessary in the plan. Both Berks and Montgomery counties have clearly established the officials responsible for activating and monitoring the EBS system. Chester County has designated the authority responsible for seeing that the EBS system is activated but has not specifically established who is responsible for monitoring the EBS station for accuracy of messages.

Berks County has listed four radio stations which have agreed to monitor the designated EBS station, WHUM. Hopefully, this will correct the reception problems



evident during the July 25, 1984 and November 20, 1984 REP exercises. It is recommended that the reference to WCOJ in the Berks County "EBS Station Announcement" (Appendix D-6) be deleted as WCAU is the primary EBS station for Chester County.

All three counties have designated EBS stations that are operational 24-hours a day. Once Chester County has installed a remote pickup unit, both telephone and radio will be available for communications between the county EOCs and the designated EBS station.

E.6.

A

The utility has installed a public alert system consisting of 166 sirens situated throughout the plume EPZ. The counties can activate the sirens within their jurisdiction on an individual basis, or in their entirety. The system can report siren activation, failure, power failure, etc. to the counties. The Great Valley School District RERP continues to refer to the telephone alert/notification system rather than the siren system.

— Activation of the entire system will be coordinated by the Pennsylvania Emergency Management Agency.

Route alerting has been developed as a supplement to the public alert system and will be implemented, as necessary, in the event of public alert system failure or to alert persons or areas which may not be reached by the public alert system. Maps of route alert sectors are to be included in the final drafts of the county and municipal plans, where they are not already available.

Information on transient locations and route alert sector maps should be included in those plans where it is not currently available. Sufficient trained members will be mobilized at the time of the incident to man the sector teams. Some communities (such as North Coventry Township) state that separate route alert personnel will alert the hearing impaired. This does not seem to be reflected in Attachment E, where it appears the designated route alert terms will also notify the hearing impaired.

Those communities which have not done so (Upper and Lower Providence Townships, Montgomery County, Douglass Township, Berks County) should designate specific fire departments to route alert sectors in their communities as soon as possible.

The system is designed to meet the standards of Appendix 3 to NUREG-0654.

E.7.

A

Consideration should be given to providing more precise geographical descriptions of areas such as Pottstown Borough, Montgomery County; Schuylkill



Township, Chester County and Amity Township, Berks County when relating sections within those communities to specific evacuation routes in evacuation announcements and/or the emergency information brochure.

F.

Emergency Communications

F.1.a.

I

See comment (paragraph 2) to element A.1.e. regarding 24-hour manning of communication links. It is once again recommended that an alternate contact at the municipal level be added to the county RERPs. Responsibilities established for the Communications Group under Annex C (message verification, notifying municipalities concerning siren system failure) should also be included in Annex B.

See comment (paragraph 2) to element E.1 regarding the organization responsible for notifying the counties at each classification level.

F.1.b.

I

Communications capabilities of Berks and Montgomery counties, including inter-county communications to other risk and support counties are clearly delineated in Appendix B-1 of the respective county plans. This information was not discernible in the Chester County plan.

No further refinement of the plans has taken place concerning Montgomery County's role as the Alternate Facility Notification. There is not a clear statement as to PEMA's or BRP's position in the communication chain, if any. Since Berks and Montgomery counties may rely on PEMA or BRP for recommended protective actions, it would appear essential that PEMA and BRP should be involved in any communication scheme.

F.1.c.

A

The county RERPs state that all communications with the federal government will be through PEMA.

F.1.d.

A

All three county plans contain information regarding the Limerick Generating Station Incident Notification System. The system allows for simultaneous notification or conferencing among the three risk counties, EOF, Limerick Generating Station, PEMA and BRP.

F.1.e.

A

Once again, it is emphasized that the Alert/ Notification Concept of Operations for Berks County (pp. C-3 and C-4) should be "fleshed out." As an example, at Alert, RACES personnel are notified and placed on standby status. However, after that point personnel being mobilized, as necessary. This applies to other personnel or institutions such as decontamination monitoring teams, reception and mass care centers, host schools, transportation resources,

etc. A similar example in Chester County is where certain ARES personnel are placed on standby at Alert, but never appear to be mobilized, if necessary, at a later classification level.

F.2

A

It is recommended that Chester County add a Notification System Appendix to Annex C as has been done in both the Montgomery and Berks County RERPs, detailing the mode of notification to all applicable parties. Telephone numbers should be included in Appendix 1 to Annex G to the Chester County plan or reference that they are on file in the EOC, as has been done in the Montgomery County plan. It is recommended that this be done in Appendix G-7 of the Berks County RERP, as well.

F.3.

A

Testing information has been added to Annex B of the Berks County plan, and should be added to the Montgomery County plan, as well.

G.

#### Public Education and Information

G.1.a.,  
G.1.b.,  
G.1.c. and  
G.1.d.

A —

A copy of the "Limerick Generating Station Emergency Information for Berks, Chester and Montgomery Counties," "What You Should Know About Nuclear Power Plant Incidents (Emergency Information and Farmers Emergency Information)" has been reviewed and found to be adequate. At a press briefing on March 8, 1985 it was announced that the public would soon receive this information. The brochures are being mailed to approximately 75,000 homes and businesses.

G.2

A

The public information program has been discussed with PEMA officials and is considered adequate.

G.3.a.

A

G.4.a.

A

There still appears to be confusion over whether the county spokesperson will brief the PIO or the PIO will brief the county spokesperson prior to the release of public information during an incident.

G.4.b.

I

This issue, raised in the April 27, 1984 Informal RAC Review, has not been addressed.

G.4.c.

A

G.5.

A

See comment to element G.2.

H.

#### Emergency Facilities and Equipment

H.3.

A

All applicable municipalities have designated alternate EOCs although, in several instances, agreements need to be finalized with the host institution.



- H.4. I Timely activation of the facilities and centers described in the plans is called for but, as noted in the comment to element A.1.e., staffing remains a concern in certain jurisdictions.
- H.7. A All five counties (3 risk and 2 support) have determined the numbers of survey equipment (including reserves) needed to monitor emergency workers and the general public.
- H.10. I The plans continue to call for annual, rather than quarterly, checks of all special RERP radiological exposure control equipment. The Berks County plan now calls for equipment to be calibrated at intervals recommended by the equipment supplier.
- H.11 I Resource lists have been completed by school districts and municipalities and consolidated lists included in the county plans. Unmet needs still exist in certain areas of critical importance, such as bus and ambulance resources.

The various lists should be cross-referenced against one another for accuracy. For example, Douglass Township reports the need for 3 TCP/ACP personnel while Union Township's plan reflects the need for 1 TCP/ACP person. Yet, the Berks County RERP (Appendix Q-9) states that the risk municipalities in Berks County will require 26 individuals for TCP/ACP manning and that all these resources are locally available.

Differences appear in Chester County, as well, most notably in the area of radiological exposure control equipment. The numbers of kits in East Nantmeal, Uwchlen, West Vincent, Upper Uwchlen and West Pikeland differ to a large extent between the municipal and county plans. In the case of the latter two communities, the numbers reflected in the county plan is less than what is shown in the municipal plans. Equipment and personnel figures listed in the Chester County Consolidated Resource List are consistently lower than those figures obtained from the municipal plans. In addition, East Pikeland and East Coventry Townships and Phoenixville Borough reflect an unmet need of 11 ambulance personnel. This is not evident in the county list.

Numbers in the Montgomery County plan should be checked, as well. Collegeville Borough cites the need for 2 buses and 4 ambulances. Yet Appendix I-3 to the county plan shows that 6 buses and 0 ambulances will be supplied to Collegeville. In the same appendix, certain school districts are shown requiring ambulances, but this information does not appear to be reflected in the respective school district plans (see Spring Ford Area School District as an example).



It is suggested that a summary of police services personnel and equipment be included in the county plans as has been done with the fire services in the Berks and Montgomery County plans. Chester County should include both items in their plan.

- H.12. A
- I. Accident Assessment
- I.7. A
- I.8. A
- J. Protective Response
- J.2. A See comment to this element in the April 27, 1984 RAC review.
- J.9. I Although it is obvious that improvement has taken place in many areas, the ability to implement protective measures is still of concern for a couple of reasons. First, as noted earlier, staffing at several municipalities is lacking to a significant degree. Secondly, some resources, such as buses and ambulances to evacuate certain population groups, and radiological exposure control equipment for emergency workers, have not been obtained in adequate numbers.
- J.10.a. I Maps of planned evacuation routes have not been included in the current county and municipal RERPs (with the exception of the Berks County plan - Appendix W-4). Berks County includes a composite map of reception centers, mass care centers and host schools, although it is basically illegible. Separate maps are developed by Montgomery County for distribution and are available at the EOC. Chester County is in the process of developing maps depicting reception and mass care centers and host schools. They are scheduled to be placed in the plan upon completion.
- All communities except East Nantmeal Township and South Coventry Township have included completed evacuation support maps in their plans. Evacuation plan maps will be placed in the final draft of the municipal plans.
- School district plans still do not contain any type of evacuation map in their plans.
- J.10.b. A Berks and Chester counties have included a population distribution plan map in their plans.
- J.10.c. I See comments to element E.5.

J.10.d.

I

Plans have been received from the Commonwealth of Pennsylvania for the State Correctional Institution, Graterford, been reviewed and found to be adequate. Municipalities have developed lists of homebound individuals needing ambulance transportation, based upon a public survey, and have identified institutions where those individuals will be relocated to. The numbers requiring transportation are summarized in the county plans.

Annex M to the Montgomery and Chester County plans state that the evacuation time for certain institutions (Montgomery County - all risk hospitals and designated nursing homes; Chester County - Phoenixville Hospital) are expected to be greater than that for the general population, and thus the staff and medical complement will be provided dosimetry and KI. The plans have not established a clear-cut policy as to how this increased evacuation time will effect protective action decisions. Will the designated institutions evacuate or will they shelter?

No further information has been provided to the Region concerning the issues raised in the April 27, 1984 RAC review comments on the Pennhurst Center's plan.

The concern regarding this element continues to lie in the resource area. Significant numbers of ambulances continue to be listed as unmet needs by Montgomery and Chester counties.

J.10.e.

I

It is apparent from Appendix M-2 to the Montgomery County RERP that radiological exposure control equipment will be predistributed to risk municipalities and health care facilities.

The number of dosimetry/KI kits has been determined by the three risk counties and included as an appendix to Annex M. It is suggested that Chester County differentiate the numbers of equipment needed at specific decontamination mass care centers for the general public as has been done in the Berks and Montgomery county plans.

In Berks County, dosimetry/KI equipment will be distributed to municipalities via County Sheriff's Department staff and vehicles, at the time an Alert is declared. Municipalities are responsible for distribution to user organizations.

FEMA is aware that the necessary dosimetry/KI is in the process of being obtained. In discussions with PEMA, the Region has been informed that 9,000 DCA-622 dosimeters (0-20R) have been ordered, with delivery to commence the week of April 1. It is our understanding that an adequate supply of KI has been obtained and that the TLDs are on order.

J.10.f.

A

J.10.g.

I

The means of evacuation are in the process of being resolved. Berks County reports all bus and ambulance needs have been met. Letters of agreement are contained in the plan from the various bus companies referenced in Appendix I-1 as providing needed resources.

Chester County is currently identifying an unmet need of 132 buses, approximately 80 of which are needed to evacuate schools in one lift. No agreements have been provided in the Chester County RERP. An unmet need of 58 ambulances is being referred to PEMA.

Montgomery County's Appendix Q-1 states that all bus needs have been met. However, in the "Transportation Assignments" list, (starting on page I-2-5). In some instances, the Limerick Assignment/Units exceeds the Units Available for Mobilization (example CMD Services). However, reserves have also been considered in the process. Letters of agreement with transportation providers have been provided to FEMA from Montgomery County. The county is also reporting a minimal unmet need of 12 coach buses and 82 ambulances.

Information on Earl and Washington Elementary Schools is not included in all areas of Annex N. They are not included in Appendices N-1 and N-3.

J.10.h.

I

The estimated number of evacuees requiring mass care is consistent between the various county plans, both risk and host. Internally, however, the Berks County plan appears to be contradictory and confusing. The resident population for the Berks County section of the plume EPZ is said to be 17,089 (page 8). Yet, further down on the page it states that a plan is required for mass care for approximately 17,400. If this figure refers to the total mass care requirement, it differs with the 18,076 figure also given on that page.

J.10.i.

A

A detailed evacuation time estimate has been prepared by HMM Associates, under contract to the Philadelphia Electric Company. A complete copy of the evacuation time estimate is maintained on file in the risk counties' EOCs.



J.10.j.

I

Access Control Points (ACPs) have been designated in the three county plans. The updated Montgomery County plan now designates the responsible agency for manning the various locations, although Appendix K-4 seems to imply that further points are warranted. In discussions with PEMA, the Region has been made aware that as many as 39 ACPs may only utilize barricades to restrict traffic from the plume EPZ. Continued attempts are being made to obtain the necessary personnel for these points, or failing that, establishing the process for implementing a plan involving barricades only.

J.10.k.

I

Removal of disabled vehicles from evacuation routes will basically be accomplished by services dispatched through the counties, although the Berks County RERP appears to contradict this approach (along with their municipal plans), stating that municipalities are responsible for providing wreckers and gasoline trucks.

Snow and other debris on evacuation routes will be removed by PennDOT and municipalities. The National Guard will provide supplemental support, as necessary.

Roadway clearance resources and fuel resources are either on file in the EOC or listed in the plans (Appendix K), with the exception of Chester County where reference to these facilities was not noted.

The municipal RERPs and county plans should be double-checked for accuracy in regard to the establishment of Traffic Control Points. Differences exist between the municipal and county plans in certain instances (Montgomery County - Skippack Township, Lower Salford Township, Upper Frederick Township, Marlborough Township; Berks County - Boyertown Borough; Chester County - Phoenixville Borough, South Coventry Township, Spring City Borough, Uwchlan Township).

J.10.l.

A

A time estimate study has been prepared by HMM Associates under contract to the Philadelphia Electric Company. A summary of the results is included in the county plans and a complete copy of the study is maintained at the county EOCs.

The assumption that was utilized to develop the estimated mobilization time for the risk school districts is contained in Annex N to the Berks County plan. This information should be added to the other risk county plans.

J.12.

I

A Mass Care Registration Form has not been included in the Chester County RERP, although the plan does state that the standard "American Red Cross Disaster Shelter Registration" form will be utilized.

A listing of veterinarians, kennels and/or animal shelters have been added to the Chester and Berks counties' plans.

Neither Chester nor Montgomery counties has made monitoring/decontamination team assignments for decontamination sites as has been done in Annex M, Appendix 2 to the Berks County plan. The numbers of necessary equipment for decontamination mass care centers for the general public is now included in the Montgomery County RERP.

Berks County has called for decontamination monitoring personnel to complete a "Decontamination Monitoring Report Form" for each individual monitored, while Chester and Montgomery counties will do so only for an individual with a reading of 0.05 mR/h or more above background. The latter two counties should consider adopting a policy similar to that of Berks County. Annex L, Appendix 4, Section II.I. of the Chester County plan appears to be in error as it calls for monitoring and decontamination (if necessary) prior to evacuees arrival at mass care centers.

Appendix L-4 of the Montgomery County RERP needs to be updated as presently it is showing mass care centers with a cumulative capacity of 5,700 spaces, while the county has delineated a need for 6,925 spaces.

K.

#### Radiological Exposure Control

K.3.a.

I

An adequate supply of dosimetry is not currently available. FEMA Region III should be informed when all necessary equipment has been obtained and distributed.

All municipal plans now contain the location of the applicable decontamination station for emergency workers, although in several instances it is noted that agreements are still under development.

K.3.b.

A

K.4.

I

See comments for this element in the Regional Assistance Committee's April 27, 1984 Informal Evaluation.

K.5.a.

A

K.5.b.

A

L.

Medical and Public Health Support

L.1.

A

Berks County has added a statement to Appendix G-7 to the effect that "each facility has trained, professional staff adequately qualified to treat radiation exposure and deal with contaminated individuals." A similar statement should be added to the appropriate appendix of the Montgomery and Chester county plans.

A statement defining the Hospital of the University of Pennsylvania's role in dealing with contaminated individuals (such as is contained in Annex G, Appendix 2 of the Chester County RERP) should be included in Appendix G-10 of the Montgomery County plan.

Both Montgomery and Berk counties discuss radiological training for emergency medical technicians and the fact that they will coordinate or encourage participation by appropriate response organizations. A similar statement needs to be included in Annex R to the Chester County plan.

L.4.

A

Montgomery and Chester counties have designated those ambulance companies located within the plume exposure EPZ. Montgomery County also has noted those ambulance services located outside the EPZ but serving areas of the EPZ.

M.

Recovery and Reentry Planning and Post Accident Operations

M.1.

A

N.

Exercise and Drills

N.1.a.

A

The Chester and Berks County plans reflect the fact that full-participation exercises will take place every two years. Montgomery County's RERP continues to utilize the out-of-date language of full-scale and small-scale exercises.

N.1.b.

A

Any reference in the Montgomery County plan to full and small scale exercises should be updated.

N.2.,

A

N.2.a.

N.2.c.

I

Medical emergency drills are to be held annually. None of the county plans have adequately addressed this point. Berks County's plan goes so far to state that the medical emergency drill will take place only once every two years.



N.2.d.	I	Radiological monitoring drills are to be conducted annually. None of the county plans have adequately addressed this point. Berks County's RERP states that the radiological monitoring drill will take place only once every two years.
N.3.a.	A	
N.3.b.	A	
N.3.c.	A	
N.3.d.	A	
N.3.e.	A	
N.3.f.	A	
N.4.	A	
N.5.	A	
O.		<u>Radiological Emergency Response Training</u>
O.1.	I	<p>While Montgomery and Chester counties will "coordinate and encourage" (in the case of the former) and "actively promote and coordinate" (in the case of the latter) the participation of appropriate personnel in training activities, Berks County merely states it will "encourage" participation. Berks County should take a stronger role in promoting the training of response personnel.</p> <p>Under the Responsibilities section of the municipal plans it calls for training for all volunteers operating in the emergency management agency of the municipality. Yet the Training section does not appear to go that far, calling only for the local emergency response personnel to be "familiar" with their responsibilities.</p>
O.1.b.	A	<p>The three county plans reflect the fact that county sponsored training will be made available to all response organizations, including those departments and organizations which have mutual aid agreements with risk municipality departments and organizations, as deemed appropriate.</p> <p>The contents of the training program are contained in the risk county RERPs.</p>
O.4.a.	A	<p>The county plans note that training needs are determined on an ongoing basis as part of recruitment/orientation of emergency workers. Refresher training requirements will be determined at the conclusion of the initial training cycle.</p>

0.4.c.	A	The three county plans call for training in decontamination procedures for appropriate emergency workers. The word "monitoring" has been deleted from Annex R of the Montgomery County plan even though these personnel are referred to as monitoring/decontamination teams.
0.4.d.	A	See comment to element 0.4.a.
0.4.f.	A	See comment to element 0.1.b.
0.4.g.	A	See comment to element 0.4.a.
0.4.h.	A	See comment to element 0.4.a.
0.4.j.	A	See comment to element 0.4.a.
0.5.	I	Montgomery County will require initial and refresher training each year. Chester and Berks counties do not address this issue.
P.		<u>Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans</u>
P.1.	A	
P.2.	A	
P.3.	A	
P.4.	A	The Chester County plan should call for an expanded role of coordination of any plan changes with school districts, special facilities and other counties.
P.5.	A	
P.6.	A	
P.7.	A	
P.8.	A	
P.10.	A	Telephone numbers of critical organizations or individuals will be updated quarterly, according to the Berks and Montgomery County plans. Chester County should make provisions to ensure that the list of municipal EMCs is updated quarterly (Appendix C-5).

ADDENDUM TO REGIONAL ASSISTANCE COMMITTEE'S  
INTERIM FINDINGS ON OFFSITE RADIOLOGICAL EMERGENCY  
RESPONSE PLANS SITE-SPECIFIC TO  
THE LIMERICK GENERATING STATION

1. Radiological Exposure Control

Will emergency workers be "ordered" to take KI, or is that voluntary upon instruction from the Secretary of Health? KI, if it is to be used, should not await completion of tasks before being taken as implied from sequence of steps.

Potassium Iodide (KI) --- KI is not a radioprotective drug, i.e., it does not "offer protection to the thyroid gland from injury due to accumulation of radioiodine in the thyroid." It blocks the thyroid with stable (non-radioactive) iodine to prevent the uptake of radioactive iodine in the thyroid.

The CD V-742 dosimeter is essentially useless for decontamination team use. Exposures of 5R or less will not be detectable with this 0-200 R chamber.

Two inches between the probe and the surface being monitored is excessive. Further, the readings should be compared with background measurements made with the detector shield open also.

There is no need to send individuals to a hospital for a thyroid reading in excess of 0.1 mR/hr (or residual skin contamination in excess of 0.05 mR/hr). Little can be done/observed at a hospital at these levels that can't be done by a radiation specialist at the decontamination center. Follow-up for additional monitoring or bioassays might be warranted.

It is important that injuries be treated (whether or not contaminated), to the extent that the patient is stabilized prior to movement to a medical facility.

The projected thyroid dose commitment level at which the Pa. Dept. of Health is to recommend KI to emergency personnel should be stated. Without such information, consistency with the FDA guidance cannot be evaluated.

2. Protective Response

What provisions are made for emergency workers access to areas secured by the Access Control Points? Similar considerations need to be made for members of the general public who may be attempting to return home to shelter or to pick up family members for evacuation.

3. Recovery and Reentry

The plans should recognize that if there was a contaminating release, it may not be desirable to allow reentry into some areas because of residual contamination. Other areas may be re-entered as soon as significant releases have terminated and the plant is stable.