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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION '86 OCT 20 P4:17

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

PHILADELPHIA ELECTRIC COMPANY )

(Limerick Generating Station,  
Units 1 and 2) )

Docket Nos. 50-352  
50-353-06

NRC STAFF'S PROPOSED FINDINGS OF FACT AND  
CONCLUSIONS OF LAW IN THE FORM OF A SUPPLEMENT  
TO THE FOURTH PARTIAL INITIAL DECISION RELATING TO THE  
REMANDED CONTENTION REGARDING MANPOWER MOBILIZATION  
AT THE STATE CORRECTIONAL INSTITUTION AT GRATERFORD

The NRC staff, pursuant to 10 C.F.R. § 2.754 and this Licensing Board's Order of September 22, 1986 (Tr. 21,568-569), hereby transmits its Proposed Findings of Fact and Conclusions of Law in the form of a partial initial decision as styled above.

Respectfully submitted,



Benjamin H. Vogler  
Senior Supervisory Trial Attorney

Dated at Bethesda, Maryland  
this 16th day of October, 1986

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DESIGNATED ORIGINAL

Certified By

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| In the Matter of              | ) |                    |
|                               | ) |                    |
| PHILADELPHIA ELECTRIC COMPANY | ) | Docket Nos. 50-352 |
|                               | ) | 50-353             |
| (Limerick Generating Station, | ) |                    |
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Joseph Rutberg  
Deputy Assistant General Counsel

Benjamin H. Vogler  
Senior Supervisory Trial Attorney

October 16, 1986

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

BEFORE ADMINISTRATIVE JUDGES:  
Helen F. Hoyt, Chairperson  
Dr. Richard F. Cole  
Dr. Jerry Harbour

|                               |   |                       |
|-------------------------------|---|-----------------------|
| In the Matter of              | ) |                       |
|                               | ) |                       |
| PHILADELPHIA ELECTRIC COMPANY | ) | Docket Nos. 50-352-OL |
|                               | ) | 50-353-OL             |
| (Limerick Generating Station, | ) |                       |
| Units 1 and 2)                | ) |                       |
|                               | ) | October 16, 1986      |

APPEARANCES

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Theodore G. Otto, III, Esq., Pennsylvania Department of Corrections, Camp Hill, Pennsylvania, for the Commonwealth of Pennsylvania.

Michael Hirsch, Esq., Office of the General Counsel, Federal Emergency Management Agency, Washington, D.C., for FEMA.

Angus R. Love, Esq., Montgomery County Legal Aid Service, Norristown, Pennsylvania for the Inmates of the State Correctional Institution at Graterford, Pennsylvania.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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I. SCOPE OF DECISION

This Supplement to the Fourth Partial Initial Decision (PID) addresses the remanded contention on manpower mobilization at the State Correctional Institution at Graterford (SCIG) in the event of the need for an evacuation because of an emergency at the Limerick Generating Station (LGS). On the basis of the record before it, the Board, in the context of the litigated contention, concludes that there is reasonable assurance that, in the event of a radiological emergency at the Limerick Generating Station that requires the evacuation of the SCIG, the call-up system will achieve its designated purpose to notify off-duty security personnel needed to implement the evacuation.

## II. BACKGROUND

On August 28, 1986, the Atomic Safety and Licensing Appeal Board (Appeal Board) issued ALAB-845. <sup>1/</sup> In ALAB-845, the Appeal Board decided the appeals of the Inmates from the Licensing Board's Fourth PID <sup>2/</sup> and the Licensing Board's earlier rejection of some of the Inmates proffered contentions. <sup>3/</sup> The Appeal Board affirmed the Fourth PID in all respects except for its rejection of the Inmates' contention concerning manpower mobilization. This one contention was reversed and remanded to the Licensing Board for further consideration. The Inmates revised manpower mobilization contention alleges that:

[t]here is no reasonable assurance that the call up system to be utilized in the event of a nuclear emergency in order to mobilize the entire work force of the State Correctional Institute [sic] at Graterford will achieve its designated purpose. Proposed Revised Contentions (May 13, 1985) at 2.

In the event of an emergency requiring evacuation, the SCIG Radiological Emergency Response Plan (RERP) provides for the mobilization of its off-duty employees through a pyramiding telephone call-up system. According to the Inmates' contention this plan could fail if the commercial telephone lines become overburdened during an emergency and thus limit the SCIG's ability to carry out its manpower mobilization plan. In support of their contention the Inmates noted the previous testimony of Richard T. Brown, Chairman, Lower Providence Township Board of Su-

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<sup>1/</sup> Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2), ALAB-845, 24 NRC \_\_\_\_ (August 28, 1986).

<sup>2/</sup> Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2), LBP-85-25, 22 NRC 101 (1985).

<sup>3/</sup> Licensing Board Order of June 12, 1985 (unpublished), reconsideration denied, Licensing Board Order of July 2, 1985 (unpublished).

pervisors, who stated that during a past emergency (Hurricane Agnes), the local commercial telephone network was overburdened and its service impaired. Tr. 18,149-150.

In the opinion of the Appeal Board:

The contention clearly raises an issue that can be the proper subject for litigation in an operating license proceeding -- the adequacy of the communications system to be used in the event of an emergency. (footnote omitted) ALAB-845 at 8.

The Appeal Board concluded that the overall adequacy of the public telephone network had not been directly addressed at the hearing, nor had Mr. Brown's testimony been refuted. ALAB-845 at 11. Therefore, the Appeal Board reversed the Licensing Board's rejection of this contention and remanded the matter for further action consistent with the Commission's Rules of Practice and its opinion. See, ALAB-845 at 12-13. In this regard, the Appeal Board noted that some means to notify the off-duty SCIG personnel in the event of an emergency did exist, i.e., the telephone call-up system. It was only the adequacy of this telephone call-up system in the event of an overload that was in question. The Appeal Board, in affirming the Licensing Board's decision as to the Estimated Time of Evacuation (ETE) for the SCIG issue, directed the Licensing Board and the parties in the course of their consideration on remand of the Inmates' manpower mobilization contention to determine what effect, if any, the resolution of that issue had on the ETE for the SCIG. ALAB-845 at 41.

In response to the Appeal Board's remand order, the Licensing Board held a conference call with the parties on September 3, 1986. During the conference call the Licensing Board sought the views of the parties and then advised that it would hold a hearing on the remanded

contention in Philadelphia, Pennsylvania on September 22, 1986. The Licensing Board also advised that no prefiled testimony would be ordered; that witness lists should be exchanged no later than September 12, 1986; and that discovery should begin immediately. <sup>4/</sup>

The hearing was held in Philadelphia, Pennsylvania on September 22, 1986, and pursuant to the Licensing Board's Order of September 4, no prefiled testimony was presented. A total of five witnesses presented "live" testimony at the hearing. Richard A. Buell, District Manager, Network Technical Services, Bell Telephone Company of Pennsylvania, and Charles A. Zimmerman, Superintendent of the State Correctional Institution at Graterford, testified on behalf of the Pennsylvania Department of Corrections. Richard T. Brown, Chairman of the Board of Supervisors, Lower Providence Township, and a Communications Technician, American Telephone and Telegraph Corporation, and William Miller, Manager, Switching Services, Bell Telephone Company of Pennsylvania, testified at the request of the Inmates. Mr. James R. Asher, Federal Emergency Management Agency (FEMA) testified on behalf of FEMA.

The Board has considered all of the proposed findings of fact and conclusions of law presented by the parties. Those not incorporated directly or inferentially in this Supplement to the Fourth PID are rejected as unsupported by the record of the case or as being unnecessary to the rendering of this Supplement to the Fourth PID. Therefore, as discussed below, this Licensing Board finds, in the context of the litigated contention, and, on the basis of the record before it that there is reasonable

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<sup>4/</sup> Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2), Order at 1, (September 4, 1986).



assurance that, in the event of a radiological emergency at the Limerick Generating Station that requires the evacuation of the State Correctional Institution at Graterford, the call-up system will achieve its designated purpose to notify any off-duty security personnel needed to implement the evacuation.

### III. FINDINGS OF FACT

1. The central office (switching station) that serves the SCIG is located at Collegeville, Pennsylvania. The switching system at Collegeville is called a No. 2 ESS, which is an electronic switching system. The Collegeville central office is presently scheduled to be upgraded to a more modern digital switching system in February, 1987. The new electronic digital system is called a remote No. 5 ESS from a Host USS. Buell, Tr. 21,388-389.

2. Bell of Pennsylvania (Bell) engineers its central offices, such as Collegeville, to provide a grade of service that it estimates will be required for a particular period. Each office is engineered to last approximately two to three years before it will have to be upgraded to handle additional load, if needed, and to utilize the most up-to-date telecommunications equipment. The line load is based on the number of customers Bell expects to be able to serve from a particular central office and the known load that those customers have placed on the switching system. Bell keeps track of the loads generated each year during the busy season of the year. Business customers generate a heavier calling demand during the business day than residential customers. Id. at 21,389-390. Telephone usage from 10:00 PM to 6:00 AM is never the busiest part of the day. In fact, there is minimal telephone use during



these hours. Id. at 21,409-410, Brown, Tr. 21,532, 21,532; Miller, Tr. 21,548, 21,551. The telephone system is designed for a busy hour on a busy day in the busy season, which is normally in the winter. Buell, Tr. 21,424.

3. Bell's engineered objective is to provide a dial tone within three seconds to ninety-seven percent of its customers. Therefore, a phone system overload situation occurs when the system cannot supply a dial tone to ninety-seven percent of its calling customers within three seconds. Id. at 21,432.

4. Bell also maintains an emergency service or Class A lines so that in the event of an overload it is possible to give Class A line customers priority on a dial tone. Such Class A lines are available at the Collegeville Station. Id. at 21,392-393. A Class A line gives priority for obtaining a dial tone; however, there is no way to guarantee a dial tone at all times. Id. at 21,428. Although Class A lines do not guarantee a dial tone, it does increase one's chances of getting a call through in an overload situation, because the Class A line will get service before the non-Class A lines. Id. at 21,459.

5. At the present time the SCIG does not have any Class A lines. Zimmerman, Tr. 21,458. Although the SCIG has not needed such a service in the past, after considering the testimony of Mr. Buell, Mr. Zimmerman indicated that he would be willing to get such service. Id.

6. At the time of Hurricane Agnes in 1972, there were dial tone delays. Brown, Tr. 21,518; Miller, Tr. 21,540. Although Mr. Brown testified that there were dial tone delays of up to one-half hour during Hurricane Agnes (Brown, Tr. 21,518), Mr. Miller, who was also in

Pottstown at the time of Hurricane Agnes, did not recall experiencing delays as long as one-half hour (Miller, Tr. 21,541). Mr. Miller stated that he never had to wait that long for a dial tone. Id.

7. Some of the delays in obtaining dial tones in the Pottstown area during Hurricane Agnes were caused by damaged equipment, shorted lines or lines under water. Brown, Tr. 21,535. The telephone switching equipment that was in use during Hurricane Agnes was a five cross bar electromagnetic arrangement. Today, digital remote computerized equipment is used. Id. at 21,532.

8. The time period from 10:00 PM to 6:00 AM has never been the busiest hour. Miller, Tr. 21,548. During Hurricane Agnes the resulting overload occurred in the daylight hours. Id. at 21,549. Telephone traffic between 10:00 PM and 6:00 AM is so negligible that you cannot compare telephone usage at this time and the daylight hours. Id. at 21,550.

9. There are presently ten lines working between the SCIG and the Collegeville Station. There are also ten additional lines from SCIG through Collegeville to Philadelphia, which is part of the Commonwealth of Pennsylvania network. Finally, there is a private line from SCIG to the State Police. The private line is not switched at Collegeville, but runs directly to the State Police and would not be affected by an overload. Similarly, the ten Commonwealth network lines that run through the Collegeville Station to Philadelphia would not be affected by an overload at Collegeville. Buell, Tr. 21,390-391, 21,440.

10. In conducting an evacuation of SCIG there is sufficient staff on duty to carry out the evacuation of the Inmates without the need for the additional call-up of off-duty personnel during the 6:00 AM to 10:00 PM time period. Only during the 10:00 PM to 6:00 AM shift would off-duty

Staff have to be called in to assist in the evacuation. Approximately fifteen percent of the off-duty Staff would have to be called during this period. Zimmerman, Tr. 21,451, 21,469.

11. All employees at SCIG are trained in Inmate custody, care and control. Id. at 21,453.

12. In the event it becomes necessary to call in off-duty personnel during the 10:00 PM to 6:00 AM shift, the SCIG could utilize the call-in system that is outlined in its Radiological Emergency Response Plan (RERP). Id. at 21,454. This pyramid call-up system is the same for all institutions in the Commonwealth and it is in place at the SCIG for the call up of administrative and management staff. Id. In addition, there is an in-house telephone system in the SCIG control center which is used for notifying the majority of off duty correctional officers. <sup>5/</sup> Id. Both systems have been utilized during incidents at the SCIG. Id. at 21,454, 21,473. The SCIG usually utilizes the in-house telephone system to call its administration and management people at home. In this manner the SCIG has direct communication with its administrative and management personnel. These people have telephone lists of their employees. In addition, and as a practical matter, SCIG found that, because the staff is scattered throughout several calling areas and because some of the calls are long distance calls and chargeable to the SCIG employee, the long

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<sup>5/</sup> By letter dated October 1, 1986, Theodore G. Otto, III, Chief Counsel to the Pennsylvania Department of Corrections, advised the Licensing Board and the parties that the SCIG Radiological Emergency Response Plan has been changed to reflect the manpower call-in procedure which were discussed at the hearing held on September 22, 1986.

distance calls should be and are in fact handled from the SCIG control center. Id. at 21,454.

13. At present, there are sixty-six telephone lines coming into the SCIG. Id. at 21,456, Commonwealth Ex. 1, p. 1. In addition to the foregoing and in the remote event the SCIG experienced telephone delays that prevented a timely call-up, SCIG management staff also have pagers. Id. at 21,459, Commonwealth Ex. 1, p. 2. Besides the dedicated line to the State Police, there is also a radio system that can be used to alert personnel. The SCIG could also utilize the personnel coming in on the evacuation buses because they are trained correctional officers from other state correctional institutions. The additional correctional personnel coming in on the buses, called up from other correctional institutions to assist in an evacuation at SCIG, could make up a large portion of the required off-duty personnel needed to evacuate the prison. Because these personnel would be called on the Commonwealth network, they would not be affected by any local telephone congestion at Collegeville Station. Finally, there is the combined law enforcement assistance network (CLEAN) that could be used to notify off-duty personnel. Zimmerman, Tr. 21,460-462.

14. The SCIG telephone call-up system is routinely tested. Id. at 21,462. However, because of incidents at the institution, the call-up system is also utilized and tested under real conditions. Id. During these actual call-ups there has never been any indication that the system would not operate as anticipated. Id. at 21,462-463.

15. In the opinion of Superintendent Zimmerman, the SCIG call-up system as planned and actually used meets the estimated evacuation time estimates of one-to-two hours for the calling of off-duty personnel and

two-to-three hours for the calling of off-duty personnel in adverse conditions. Id. at 21,468.

16. When the SCIG has a power outage, the in-house telephones sometimes fail to work and the institution relies on radio for internal communication. However, as the power failure does not affect outside telephone lines, the ability to call out from the institution is not impaired. Id. at 21,485-489.

17. Based upon his experience at SCIG and elsewhere, Superintendent Zimmerman is of the opinion that the SCIG telephone call-up system will work as planned, regardless of the potential for congestion at the local Collegeville switching station. Superintendent Zimmerman noted that the SCIG call-up system has worked well in other actual emergencies and that the lines that run to other areas on the Commonwealth network, the use of pagers and radios and the dedicated line to the State Police all tend to reinforce this opinion. Id. at 21,502-503. In addition, the off-duty personnel will be called in during the "alert" stage of an emergency, which is prior to the general emergency stage when sirens are sounded to warn the public of the emergency. Id. at 21,506. Finally, as noted earlier, telephone use from 10:00 PM to 6:00 AM, the only period when off-duty SCIG personnel will need to be called, is minimal.

18. Other nuclear power plant emergency plans utilize commercial phone lines in the same manner as they are utilized at SCIG. In fact, Mr. Asher, FEMA, is unaware of any nuclear plant that does not utilize commercial telephone lines as a means of notifying off-duty emergency workers. Asher, Tr. 21,554.

19. FEMA uses commercial telephone lines in a call down system very similar to what has been utilized at SCIG for the notification of

off-duty personnel and, in Mr. Asher's experience, there has never been an instance in which FEMA has been unable to notify its off-duty personnel by means of commercial telephone lines. Id. at 21,556-557.

20. The SCIG plans for the notification of off-duty personnel will be implemented at the "alert" stage of any emergency. At this particular time, the general public will not have been notified that there is a problem and the telephone lines should not be overburdened. Id. at 21,560.

21. Based upon his review of the testimony and knowledge of the SCIG plans, Mr. Asher is satisfied that there is reasonable assurance that in the event of a radiological emergency at Limerick any off-duty personnel needed to implement the plan can and will be notified. Id. at 21,555.

#### Conclusion

22. Based on the evidentiary record before us, this Licensing Board, in the context of the litigated contention, has reasonable assurance that, in the event of a radiological emergency at the Limerick Generating Station that requires the evacuation of the State Correctional Institution at Graterford, the call-up system will achieve its designated purpose to notify any off-duty security personnel needed to implement the evacuation. In addition, as a result of a review of the record developed in connection with the litigated contention, we see no reason to require any modification to the existing ETE for the SCIG.

#### IV. CONCLUSIONS OF LAW

In reaching this decision, the Board has considered all the evidence of the parties and the entire record of this proceeding of the remanded issue including all proposed findings of fact and conclusions of law presented by the parties. Based upon a review of that record and the



foregoing Findings of Fact, which are supported by reliable, probative and substantial evidence, the Board, with respect to the remanded contention in controversy before us, reaches the following conclusion pursuant to 10 C.F.R. § 2.760a:

In the event of a radiological emergency at the Limerick Generating Station that requires the evacuation of the State Correctional Institution at Graterford, there is reasonable assurance that the call-up system will achieve its designated purpose to notify any off-duty security personnel needed to implement the evacuation.

#### V. ORDER

WHEREFORE, in accordance with the Atomic Energy Act of 1954, as amended, and the Rules of Practice of the Commission, and based on the foregoing Findings of Fact and Conclusions of Law, IT IS ORDERED that:

Pursuant to 10 C.F.R. § 2.760(a) of the Commission's Rules of Practice, this Partial Initial Decision will constitute the final decision of the Commission forty-five (45) days from the date of issuance, unless an appeal is taken in accordance with 10 C.F.R. § 2.762 or the Commission directs otherwise. See also 10 C.F.R. §§ 2.764, 2.785 and 2.786.

Any party may take an appeal from this decision by filing a Notice of Appeal within ten (10) days after the service of this decision. Each appellant must file a brief supporting its position on appeal within thirty (30) days after filing its Notice of Appeal (forty (40) days if the Staff is the appellant). Within thirty (30) days after the period had expired for the filing and service of the briefs of all appellants (forty (40) days in the case of the Staff), a party who is not an appellant may file a brief in support of or in opposition to



the appeal of any other party. A responding party shall file a single, responsive brief regardless of the number of appellant briefs filed. See 10 C.F.R. § 2.762(c).

IT IS SO ORDERED.

THE ATOMIC SAFETY AND LICENSING BOARD

Helen F. Hoyt, Chairperson  
ADMINISTRATIVE JUDGE

Richard F. Cole  
ADMINISTRATIVE JUDGE

Jerry Harbour  
ADMINISTRATIVE JUDGE

Dated at Bethesda, Maryland  
this \_\_\_\_ day of \_\_\_\_\_, 1986

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'86 OCT 20 P4:17

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW IN THE FORM OF A SUPPLEMENT TO THE FOURTH PARTIAL INITIAL DECISION RELATING TO THE REMANDED CONTENTION REGARDING MANPOWER MOBILIZATION AT THE STATE CORRECTIONAL INSTITUTION AT GRATERFORD" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system this 16th day of October, 1986:

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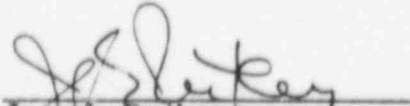
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