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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Supplemental information on LEA Off-site Emergency
Planning Contentions requested at the Pre-hearing Conference

According to the request made by the Limerick Atomic Safety and Licensing Board at the Pre-hearing Conference on the admissibility of LEA's Off-site Emergency Planning Contentions, LEA hereby submits supplemental information relating to contentions LEA-3 (VIII-23), LEA-4 (VII. 24), LEA-13 (VIII-33), LEA-20 (VIII-41), LEA-17 (VIII-37), and LEA-28 (VIII-53).

LEA-13 (VIII-33) LEA has attached a listing of day care (including pre-school programs), day and overnight camps in the Limerick EPZ as requested at the Pre-hearing Conference on Off-site Emergency Planning contentions. Sources and references are listed. Additional information may become available to provide further listings. In this case, LEA will try to bring these to the attention of State, County and local officials.

LEA-20 (VIII-41) LEA has contacted Charlestown, South Coventry, and New Hanover Twps., which had not designated Municipal EOC's in Draft #4 of their respective Draft RERP's. Information provided to LEA on March 12, 1984 still indicates that Charlestown and South Coventry Townships in Chester County have not yet designated Municipal EOC's, although sites are still being reviewed.

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Berks County Day Care

- 1) St. John's Pre-Kindergarten School
St. John's Lutheran Church
45 North Reading Ave.
Boyertown, Pa. 19512 (369-1024)
(ages 3 & 4)
- 2) St. Paul's Christian Pre-School
Morlatton and Old Swede Roads
Douglassville, Pa. 19518 (689-5090)
- 3) Toddler Time and Kinder Gym
St. Andrews United Methodist Church
RD#1, Swamp Creek Road
Bechtelsville, Pa. 19505 (369-1011)
(all year, ages 1 to 5)
- 4) Captain Kid's Pre-school Learning Center
Swinehart & Second Streets
Boyertown, Pa. 19512 (369-0770)
- 5) St. Gabriel's Episcopal, Hickory, Dickory Dock
Rt. 422
Douglassville, Pa. 19518 (385-3710)

SOURCES USED FOR COMPILATION OF DAY SCHOOL LISTINGS

Pre-school information booklet for the greater Pottstown area
American Association of University Women (1980)

Pottstown/ Perkiomen Valley Phone Book

Montgomery County Intermediate Unit Listing of Day Care Centers (1980)

"Where to Turn Directory", Community Planning Council(Montg. Co.)

NOTE: Chester County Intermediate Unit has just revised its Day Care Center Handbook, which is currently at the printers. Rose Middleton(383-3300) informed us that it will contain additional NEW listings for Chester County. It is expected to be available within a week.

Montgomery County Day Care

- 1) Little People Day Care School
1561 Medical Drive
Pottstown, Pa. 19464 (326-0554)
(120 children, infant to pre-kindergarten, up to age 10 after school and during summer)
- 2) Emmanuel Lutheran Church Pre-school
Hanover & Walnut Streets
Pottstown, Pa. 19464 (323-0835)
(ages 3 & up, in operation 7:00 am to 5:30 pm)
- 3) Pottstown Day Care Center
Beech & Warren Streets
Pottstown, Pa. 19464 (327-1884)
(3 months to 3 years)
- 4) Fellowship House Farm, Helping Hands Program (679-8885)
Sanatoga Rd., RD#
Pottstown, Pa. 19464 (60 physically and mentally handicapped)
(60 children/ 60 adults, summer day camp)
- 5) Creative Play, Pottstown YWCA
315 King Street
Pottstown, Pa. 19464 (323-1888)
(Sept. - Dec., and Feb. - May, ages 3-5)
- 6) Episcopal Nursery School
Church of the Epiphany
3rd. Ave. and Washington Street
Royersford, Pa. 19468 (948-7737)
(Sept. - May, ages 3 & 4)
- 7) Faulkner Swamp Nursery School & Kindergarten
Faulkner Swamp United Church of Christ
RD#1, Swamp Pike, Box 165A
Gilbertsville, Pa. 19525 (369-0474)
(Sept. to May, ages 3 & 4)
- 8) Grace Assembly Day Care and Kindergarten
Route 23 and Bridge St.
Spring City, Pa. 19475 (495-5279)
(year round, ages 1-5; Sept. to May, pre-kindergarten)
- 9) Grace Lutheran Nursery and Pre-Kindergarten
Grace Lutheran Church
660 North Charlotte Street
Pottstown, Pa. 19464 (323-9320)
(Sept. to May, ages 3-5)
- 10) Hickory Dickory Dock Nursery School
St. Peter's Lutheran Church
Walnut & Glasgow Streets
Stowe, Pa. 19464 (385-6125)
(ages 3-5)
- 11) First United Presbyterian Weekday Nursery School
First United Presbyterian Church
750 North Evans Street, Pottstown, Pa. 19464 (326-4999)
(ages 2½ to 4)

- 12) Roversford Baptist Church Nursery School
452 South Lewis Road
Roversford, Pa. 19468 (948-5023)
(Sept. to May, ages 2½ to 5)
- 13) Skippack Church of the Brethren Nursery School
Collegeville & Mill Roads
Collegeville, Pa. 19426 (489-3855)
(ages 2½ to 4)
- 14) Swamp Creek Nursery School (Cooperative)
Gilbertsville Area
Post Office Box 201
Frederick, Pa. 19435 (754-7674)
(Sept. to May, ages 3 & 4)
- 15) Pottstown YMCA, P.A.L.S. Program
Pottstown YMCA
Adams and Jackson Streets
Pottstown, Pa. 19464 (323-7300)
(ages 3 to 5) (also pre-school programs year-round, ages 3 mo. to 7 yrs.)
- 16) St. Andrew's Nursery School
Egypt & Crawford Roads
Audubon, Pa. 19407 (666-0426)
- 17) St. John's Nursery School
1802 Skippack Pike
Center Square, Pa. 19422 (272-7163)

Chester County Day Care

- 1) Phoenixville Day Care Center
310 Main Street, Phoenixville, Pa. 19460 (933-7717)
65 children enrolled, ages 3-6, Title XX Program
- 2) Phoenixville Day Care Center
412 Fairville St., Phoenixville, Pa. 19460 (935-1390)
- 3) Wooden Shoe Day School
Phoenixville Area YMCA (933-5861)
Pothouse Road, Phoenixville, Pa. 19460
(children ages 3-5 years)
- 4) Gingerbread House Day School
Phoenixville Civic Center (933-7728)
123 Main Street
Phoenixville, Pa. 19460
- 5) St. John's Preschool Kindergarten ($\frac{1}{2}$ day program)
St. John's Circle (933-3947)
Phoenixville, Pa. 19460
- 6) Coventry Church of the Brethren (326-5426)
939 E. Cedarville Rd. (Coventry Nursery School)
Pottstown, Pa. 19464 (326-3938)
(children ages 3-4)
- 7) Cedarville Nursery School
Cedarville United Methodist Church
1092 Laurelwood Rd. Pottstown, Pa. 19464 (323-8651)
(Sept. to May, ages 3 and 4)
- 8) Charlestown Play House, Inc.
RD#2, Phoenixville, Pa. 19460 (933-2762)
(October to July, ages $2\frac{1}{2}$ to 5)
- 9) Children's House of Northern Chester County (AMI Montessori Academy)
St. Andrew's Lane
Glenmoore, Pa. 19343 (458-8922)
(ages $2\frac{1}{2}$ to 5)
- 10) Congregation B'Nai Jacob
Starr and Manavon Streets
Phoenixville, Pa. 19460 (933-6467)
(Sept. to June, ages 3-5 years)
- 11) Coventryville United Methodist Church Nursery School
RD#2, Old Rt. 23 (S. Coventry Twp.)
Pottstown, Pa. 19464 (326-8533)
(ages 3-5)
- 12) Little People's Pre-school of Pughtown Baptist Church
Pughtown Road RD#1
Box 340, Spring City, Pa. 19475 (326-1439)
(ages 3 & 4)

- 13) Twin Gables Nursery School
Shankel United Church of Christ
Shenkel and Unionville Roads
Pottstown, Pa. 19464 (326-0589)
(Sept. to May, ages 3 to 5)
- 14) St. Andrews Church Nursery School
St. Andrews Church
Ludwigs Corner (Glenmoore) (458-5277)
- 15) Little School House Pre-school
St. Peter's United Church of Christ
Rt. 23, Knauertown, Pa. (469-9961) (469-9105)
- 16) Kids 'R Us Pre-school
St. Peter's Village (469-6669)
(Warwick Twp.)
- (**) 17) Camp Hill Village Special Schools (W. Vincent Twp)
Box 155
Kimberton, Pa. 19442
- (**) 18) Camp Hill Special Schools (E. Nantmeal Twp.)
RD#1, Glenmoore, Pa. 19343 (469-9236)

(**) These are residential schools for the mentally retarded, which are not currently included in any plans reviewed by LEA

<u>Bakar Park Day Camp</u> (1) (operated by Phoenix- ville YMCA)	Pothouse Road Phoenixville Pa. 1946 ⁿ	150 (**)
<u>Hideaway, Inc. Day Camp</u> (2)	Box 96 Arcola, Pa. 19420	150 (**) (June-Aug.)
<u>Camp Yomeca</u> (3)	75 Hill School Rd. Douglassville, Pa. 19518	100 (**) (June-Aug.)
<u>Camp Yomechas</u> (2)	Park & Cedar Rds. Schwenksville, Pa. 19473	(287-9564)
<u>Camp Sankanac</u> (1)	Bertolet School Road Pughtown (469-6320)	
<u>Camp Richard</u> (2)	451 Indian Crest Dr. Harleysville, Pa. 19438	(256-0161)
<u>Camp Kelton Woods</u> (1)	Birchrunville (827-9407) Pa. 19425	
<u>Camp Firefly</u> (2) (for diabetic children)	Spring Mount, Pa. 19478	(287-7675)
<u>SGF Vacation Camp</u> (2) (operated by Federation of Jewish Agencies)	Collegeville, Pa. 19426	(275-3066) Capacity 150 (**)

Depending on what portions of Worcester Twp. are added to the EPZ,
there may be additions:

<u>Variety Club Camp</u> (2) (operated by Variety Club of Phila. - for physically handicapped children)	Valley Forge & Potshop Rds. Worcester, Pa. 19490	Capacity 140 (**) (summer)
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(*) Due to time constraints, LEA was not able to confirm whether or not all of this list is day or overnight camping, but will work with PEMA as necessary to insure that these groups of children are included in the planning process.

Sources: Pottstown/Upper Perkiomen Valley Phone Book, Aug. 1983

1981 Parents' Guide to Accredited Camps, Northeast U.S.
American Camping Assoc. (**)

National Directory of Accredited Camps for Boys & Girls, 1974
American Camping Assoc. (***)

County designations: (1) Chester County
(2) Montgomery County
(3) Berks County

Overnight Camps in the EPZ

<u>Camp Council, Inc.</u> (1) (operated by Camp Council, Inc., Phila.)	119 Camp Council Rd. Phoenixville, Pa. 19460	160 (**) (summer)
<u>Camp Green Lane</u> (2)	RD#1, Green Lane, Pa. 18054	250 (**) (summer)
<u>Camp Indian Run</u> (1) (operated by Girl Scouts of Greater Phila.)	RD#2, Glenmoore, Pa. 19343	120 (**)
<u>Camp Innabah</u> (1) (operated by United Methodist Church - camping facilities available for year round use)	RD#1, Pughtown Rd. Spring City, Pa. 19475	100 (**) (winter) 110 (summer)
<u>JYC Camps Arthur Reeta Beker</u> (2) (Director, Harry Schwatz)	Zieglerville, Pa. 19492	400 (**) (July-Aug.) 700 (***) (summer) 150 (***) (winter)
<u>Camp Kiwanis</u> (2) (operated by Freedom Valley Girl Scouts)	RD#2, Swamp Creek Rd. Schwenksville, Pa. 19473	97 (**) (summer, but available year round)
<u>Camp Kweebec</u> (2) (operated by Les Weiser, Director)	Game Farm Rd. Schwenksville, Pa. 19473)	300 (**) (June-Aug.)
<u>Camp Laughing Waters</u> (2) (operated by Girl Scouts of Greater Phila.)	RD#1, Gilbertsville Pa. 19525	120 (**)
<u>Fellowship House Farm</u> (2) (overnight conference center)	Sanatoga Rd., Pottstown (326-3008) also <u>Woodrock Project</u> , Sanatoga Rd., Fagleysville (323-9045) year round overnight camp	

Sources: Pottstown/Upper Perkiomen Valley Phone Book, Aug. 1983

1981 Parents' Guide to Accredited Camps, Northeast U.S.
American Camping Assoc. (**)

National Directory of Accredited Camps for Boys & Girls, 1974
American Camping Assoc. (***)

County designations: (1) Chester County
(2) Montgomery County
(3) Berks County

LEA-28 (VIII-53) LEA has discussed this contention with PEMA, as requested by the Board. Mr. Hippert informed us that upon reviewing the arrangements in the County Plans, it was felt that the Battalion assigned to Berks County should be changed from Philadelphia to the 109th. Battalion in the Scranton-Wilkes-Barre area, to avoid delays resulting from traveling through the EFZ to get to Berks County.

LEA remains concerned about the time factors involved in mobilizing the National Guard. Mr. Hippert further explained that the National Guard has 1 wrecker, several trucks, and 1 1200 gallon tanker at the Phoenixville (Chester Co.), Norristown (Montg. Co.), and Scranton area (assigned to Berks Co.) Battalion locations.

LEA believes that Mr. Hippert agreed with our concern about provisions for towing, gasoline supplies, and snow removal on "non-state" roads; since most of this information is still marked TBD in the local municipal plans.

Although Mr. Hippert seemed confident that the National Guard had the necessary equipment to provide for towing on State Roads (with 1 wrecker assigned per County, and back-up equipment available outside of Harrisburg), LEA remains concerned about the time necessary for mobilization, and adequate provisions for snow removal. It is possible that additional information will be available in the next revisions of the County and Municipal plans, and that continued discussions with PEMA may satisfy our concerns. However, at the present time this is not yet the case.

LEA-17 (VIII-37) As requested, LEA has reviewed the Sample Tables originally submitted with this contention, and has resubmitted examples that are typical of the kinds of errors and omissions LEA has found in the Draft Municipal RERP's. The cumulative effect of these kinds of deficiencies results in lack of reasonable assurance that the plans can and will be implemented in the event of a radiological emergency. We have attached examples from Schuylkill and West Vincent Twps.

SAMPLE OF MUNICIPAL RERP DEFICIENCIES (Municipality)
West Vincent (Chester Co.) Draft 4

PAGE

- 9 We are confused by the organization chart with respect to police duties. Why has the Police Chief been assigned other duties and police functions made the responsibility of the EMC?
- 9 (B-1) Mr. G. Burnley is out of the area during most of the day at his place of employment. How can he have an essential job in the plan?
- 9, 15(k) The EMC (David Monteith) is also the snow removal contractor. How can he do both jobs in this type of a crisis situation? We feel all essential positions must be filled with people who are in the area most of the time and must have a deputy for each job with the same criterion to be available in the absence of anyone on the organization chart.
- (EP map)
15(k) We do not feel that Crawford's Towing is a practical choice for towing disabled vehicles from West Vincent Township. He is located on the evacuation route and would not be able to back track into our area.
- 21 (3g) Many teenagers and other children are left at home alone during some part of the day while their parents or parent are at work. How do you plan to handle their transportation? It would be silly to ask them to call the EOC as that phone will be jammed. If they could find a ride, where would they be taken? How could their parents find them?
- 21 (4e)
- 14 (e2)
- 15(k) In the event of a major snowfall, we doubt the ability of state and local forces to handle the situation of snow removal and evacuation. It is not unusual to be snowed in for six to eighteen hours in the township. Many older people are not capable of driving in heavy snow conditions. How would people who are snowed in their long driveways and private lanes be able to get out?
- If this question is not effectively answered, then the whole plan is almost worthless.
- Would supervisors be willing to say that people with long drives and lanes, who are snowed in, would be left to their own devices?

SAMPLE OF RERP DEFICIENCIES (Municipality)
West Vincent (Chester Co.) Draft 4 (contd.)

PAGE
(P-1)

The police department is part-time. How can two cars, a Chief and four officers be available? They are not available twenty-four hours a day, seven days a week.

(Attach F)
(F-1) The plans for the hearing impaired, disabled, etc. are being developed from information from the Chester

County Survey. This survey is faulty, as many residents did not receive the questionnaire.

(F-1) Since West Vincent is served by Phoenixville and Uwchlan

14 (e6)

for ambulance service,

we doubt they will have units available to serve us as they will be swamped in their own areas.

Schuylkill Township

Page i The promulgation should state that the plan coordinates with other Township emergency plans.

Page iii Reviewer for annual review and certification is not clear. On Page 8, it appears to be the Emergency Management Coordinator Responsibility for distribution of changed pages is not clear.

Page 1 A. Purpose

The type of incident and the anticipated perils to the Township are not stated. A clear statement of purpose is needed, and should state more specifics than "...an incident at the Limerick Generating Station."

Page 3 In items "a" through "c" the potential perils and their anticipated duration should be clearly stated. In item "d" no mention is made of incidents from mishandling of spent radioactive fuel or similar hazardous material.

Page 4 Definition 16 should state the radiation dose value which warrants action. Is it the 25 rem and 75 rem levels?

Page 6

In F. Objectives the first item should define the hazards and perils being planned for.

In F.2 the planned actions should be effective and workable as well as current and in consonance.

In F.4 we need more than a "basis" for functional implementing procedures. We need the actual procedures to implement in the face of an emergency.

In F.5 it is not possible to "Ensure that the population of Schuylkill Township is informed..." with the total lack of any description in this plan of the type of hazards anticipated and the rapidity of their development and duration of their existence.

Page 7

A. General should list all the local government jurisdictions impacted by Limerick. The plan draft shows no evidence that consideration was given to Phoenixville residents passing through Schuylkill Township in their evacuation. There is no evidence in the draft plan that the concluding sentence has been considered.

In B.2.c another statement of the "Route Alert" system Considerations should be given to a telephone network for alerting to save time, fuel, and avoid traffic congestion.

In B.2.f the whole traffic flow plan for the township and its neighbors should be stated. The flow of Phoenixville residents through the Township must be identified and made realistic with existing road capacities.

If B.3.a (2) is in fact what P.L. 11332 says, then P.L.1332 is seriously flawed. Our situation with shared fire and ambulance services does not fully qualify us to direct emergency services not normally administered by the Township.

Figure 2-2 should show five supervisors, should show who has route alert responsibilities, how three fire companies fit in the "Fire and Radiological" box. The "Medical and Transportation" box is logically an area function - not a Township function.

B.3.a (4) Outside forces on loan to the Township should be under Township supervision to assure coordination. Two police forces in the same geographic area working under different commands is an invitation for trouble.

In B.3.a (6) what are the "normal dispatch and operational procedures" to be used?

Page 9

In B.3.b.(3)(a) it would be wise to state that normal areas of coverage in the Township will prevail throughout any emergency.

B.3.b.(4)(a) through (d) recognition must be given to the fact that no one single entity covers the Township for Medical/Ambulance Services. It would be logical for normal area coverages to prevail through any emergency.

- Page 10 In B.3.b.(5)(c) who identifies what roads are to be cleared? Who is allowed use and who is prevented from use?
- Page 10a In B.3.b.(6) no consideration is shown for the three fire services that cross Township lines. This needs much better coordination for the plan.
- In B.3.b.(7) no consideration is given to the fact that the Township has no explicit "Ambulance Service" function.
- In B.3.b.(8) is it intended for the Emergency Management Coordinator to be the communicator (telephone operator) also? Better planning is needed for the mechanics of communications and logging them in and the overall Emergency Management decision making process.
- Page 10b In B.4.c.(3) and (4) the Township does not have a "Fire Services Officer" and a "Medical/Transportation Services Officer" let alone a department for each. The plan as drafted for us does not recognize our situation. All staff should be designated by name also.
- Page 11 In B.4.e. back-up personnel for 24-hour staffing are mentioned but not listed. The plan should indicate all those persons to be of use.
- In C.1 the EOC telephone numbers should be listed. Also
- In C.3. the ARES operator and his back-up should be identified. Physical room, power requirements, and antennae requirement at the EOC should be stated.
- Page 12 In D.2.b. the details of "Route Alerting" must be spelled out. This plan should set all the advance work out of the way so when an emergency arises, action can be taken without agonizing over decisions about routes, methods, etc. No Attachment E.
- In D.2.c an initial list of the known Township hearing impaired should be included. Who is the "Municipal EMA" who will dispatch?
- Page 13 In E.2.d. the evacuation routes require much elaboration. Also, Welsh Valley Road and Diamond Rock Hill are omitted - why?
- Page 14 Detailed evacuation routes, drain areas, flow capacities, surge durations and similar data need to be shown. The influences of neighboring evacuation traffic sources (Phoenixville) should be clearly shown. Schuylkill Township is not an isolated island. E.2.f reference Attachment D is incomplete, virtually blank.
- Page 14-15 In E.2.g. separate school plans are again mentioned. Logically several evacuation plans are needed to accomodate the very different situations arising in:
- (i) normal weekday incident
 - (ii) late night incident
 - (iii) weekend or holiday incident

Page 19 In I.2.e. it is not clear who contacts non-ambulatory residents.

Page 22 In J.2.e. no recognition is made for our several fire departments.

In J.2.f. no recognition is made of our local Medical/Ambulance conditions.

Pages E-1

through E-3 The 21 hearing impaired individuals should be listed. Sectors and team locations should be listed. Are eight sectors adequate for our Township?

Page F-1 The actual residents needing special help should be listed in the draft. Use of estimates based on U.S. Dept. of Health and Human Services statistics is unprofessional.

Page G-1 Specifics must be listed in the draft plan. Estimates based on 1980 Census Data are not worthy of inclusion. Compilation of the name and address list should be part of the plan preparation.

The exclusion of schools is ill-advised. A basic flaw is that the plan does not recognize major differences between weekday, weekend, and late night evacuation situations.

Page I-1 To be of any use the draft plan should include all names, addresses, and telephone numbers so that a correctness check can be done as part of the review.

IMPLEMENTING PROCEDURES

Item 16 - who decides if the EOC must be evacuated?

Page P-1 List the names and telephone numbers for the 25 Fire Police.

Page 14
ATTACH D The logic and function of the traffic control and access control points must be developed.

Page 15 The "Public Works Resource Inventory"
Does this list include only the Township's lone dump truck?

Page 16 The local situation of three fire companies covering the Township is not covered.

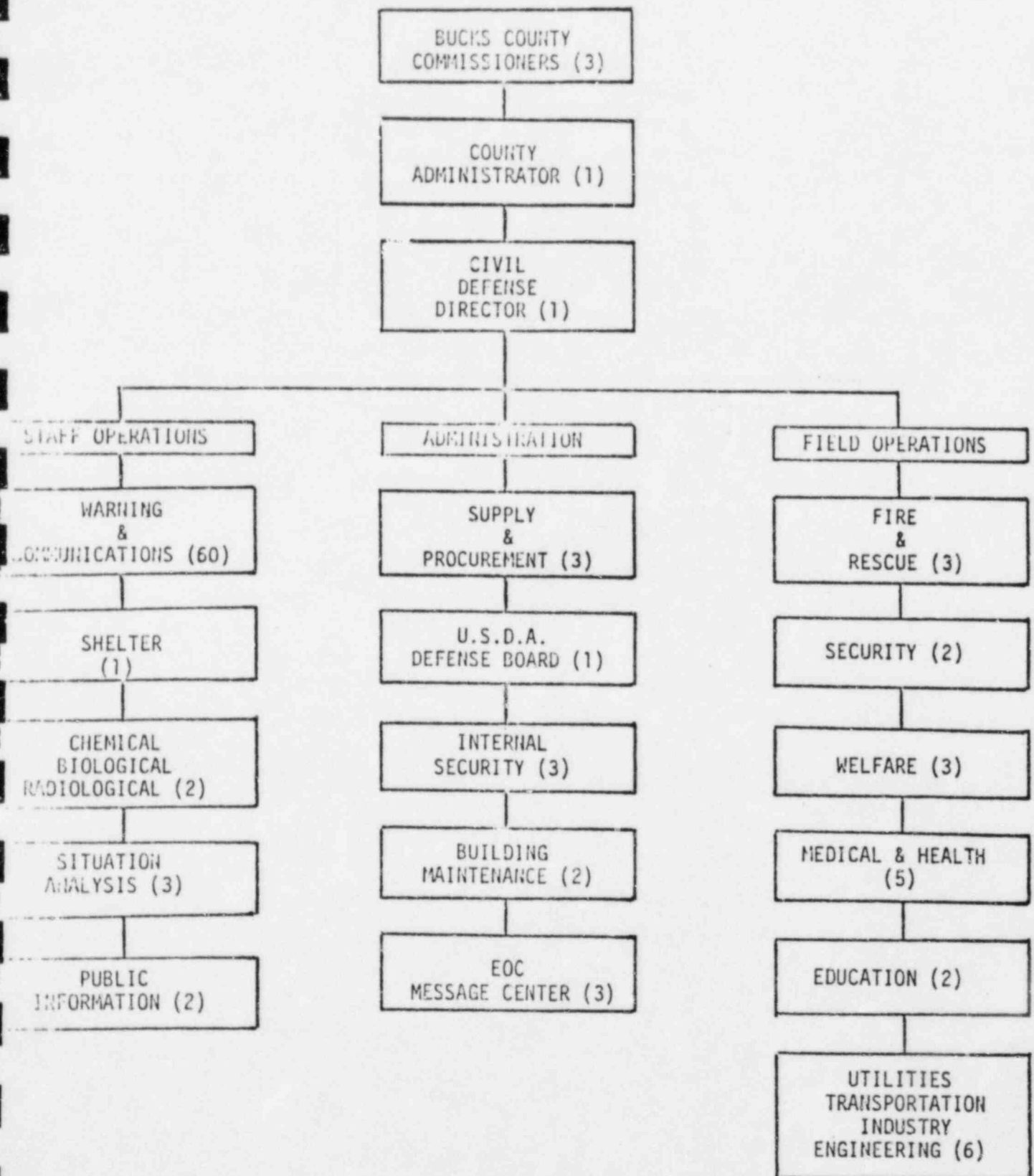
LEA-3 (VIII-23) LEA has attached material to show the essential links between the draft Bucks County Support Plan and the draft Montgomery County RERP. We have taken excerpts from the plan itself to more clearly describe the role of the support county.

The support County Emergency Management Agency (EMA) is the lead agency in alerting, notifying, mobilizing, and coordinating emergency response organizations and resources needed to support the Montgomery County plan. The organizational chart (App. 2, Att. B) shows the staffing strength of the county office which is intended to be assigned to support an evacuation from Montgomery County. However, if for any reason this staff is unavailable for the tasks detailed in the draft support plan, some other provisions must be made to fulfill these roles. These functions are itemized starting on page 7, Section V.(Responsibilities) and are included under descriptions of the responsibilities of Bucks County Emergency Staff assignments, starting on page 9 (Item B. "Bucks County Emergency Management Staff"). Particularly important to the workability of the Montgomery County plan and necessary to provide reasonable assurance that the plan can and will be implemented are the following highlighted (and circled) functions:

APPENDIX 2

ATTACHMENT E

BUCKS COUNTY EMERGENCY MANAGEMENT AGENCY
EMERGENCY OPERATIONS ORGANIZATION



BUCKS COUNTY

FIXED NUCLEAR FACILITY INCIDENT SUPPORT PLAN
FOR INCIDENTS AT THE LIMERICK GENERATING STATION

I. SCOPE AND AUTHORITY

A. Scope

This Fixed Nuclear Facility Support Plan:

3. Assures appropriate responses to protect the affected evacuated population from Montgomery County including mobilization of County forces to support necessary actions.

- G. Mobilize - The act of bringing a staff, department, or agency to the strength required to accomplish its mission, including the pre-positioning or movement of equipment or personnel.

- M. Radio Amateur Civil Emergency Services (RACES) and Amateur Radio Emergency Services (ARES) - Licensed volunteer radio amateur (HAM) communications personnel, equipped and affiliated with the County Emergency Management Agency.

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V. RESPONSIBILITIES

A. County Emergency Management Agency

1. In coordination with the Red Cross, develop and maintain a comprehensive plan for support of Montgomery County in the event of an incident at the Limerick Generating Station.
4. Develop a system for alerting county and municipal government heads, emergency management agency staff, emergency forces, volunteer organizations, schools, hospitals, nursing homes, and business and industry involved in the county support plan.
5. Assure that the alert system is operable on a 24-hour basis.

6. Identify and coordinate with Montgomery County and PEMA:

- a. Traffic control points
- b. Reception centers
- c. Mass care facilities
- d. Central resource receiving point(s)

7. Coordinate the release of information to the news media with the PEMA Public Information Officer.

8. Coordinate recommendations for changes in main evacuation routes and traffic control points with PEMA, risk counties, the PSP and the Department of Transportation.

9. Establish and train a requisite number of radiological decontamination monitoring teams for mass care centers within the county.

10. Register and provide radiological monitoring of evacuees at mass care center locations within the county.

11. Maintain plans for the decontamination of evacuees at mass care centers.

12. Designate and be prepared to operate a central resource receiving point.

13. In conjunction with PEMA, coordinate plans with designated risk counties for the movement and reception of evacuees.

14. Maintain a current listing, with copy to PEMA, of any unmet personnel and equipment needs.

16. Coordinate the reentry of evacuees with PEMA, and the risk counties.

18. Participate with risk counties in exercises conducted by PEMA.

B. Bucks County Emergency Management Staff

The responsibilities required during emergency operations, planning, and activities have been assigned to the following members of the Bucks County Emergency Operation staff. A detailed description of each staff position responsibility may be found in the Bucks County Disaster Operation Plan (DOP 1980) or the referenced SOP.

1. Board of County Commissioners

In the event that a State of Disaster Emergency is declared, the Bucks County Commissioners will assume the emergency authority outlined in state laws. They will direct and control all resources and actions required by emergency management operations. The Chairman of the Commissioners will be responsible for making all official announcements.

4. Mass Care Coordinator (Welfare Division)

The Mass Care Coordinator (Welfare Division) is responsible for coordination with Red Cross personnel in the establishment of mass care centers and for reception center operations. The Mass Care Coordinator will coordinate mass care activities with the Medical Health Group and the Fire and Rescue Group for support. (See Bucks County SOP, "Emergency Activation and Operation of Mass Care Center.")

5. Security Division Chief

The Security Division Chief is responsible for the coordination of all county police organizations and operations. He is responsible for maintaining liaison with local, state, and military authorities in order to affect his duties. (See Bucks County SOP, "Security Police Service.")

6. Fire and Rescue Division Chief

The Fire and Rescue Division Chief is responsible for the coordination, and if necessary, deployment of all county fire and rescue personnel and equipment. (See Bucks County SOP, "Fire, Rescue, and Ambulance Services.")

7. The Medical/Health Division Chief

The Medical/Health Division Chief will coordinate all county, and relocated medical personnel resources, to provide primary and emergency care to evacuated persons. He will also assist risk county staff and agencies in the relocation of patients, staff, and equipment from risk area hospitals, nursing homes, and other health care facilities. (See Bucks County SOP, "Emergency Casualty Care.")

8. The Public Information Officer

The Public Information Officer (PIO) is responsible for the dissemination of emergency information at the direction of the County Director. (See Annex F, Bucks County Disaster Operations Plan.)

9. The Transportation Division Deputy Chief

The Transportation Division Deputy Chief is responsible for coordinating all transportation resources within the county that will provide for the movement of people and supplies. (See Bucks County SOP, "Emergency Mobilization of Transportation Resources.")

10. The Technical Division Chief (RADEF)

The Technical Division Chief (RADEF) will coordinate and establish monitoring and decontamination points at each designated mass care center. He will also provide technical evaluation for situation analysis and public information dissemination. (See Bucks County SOP, "Radiological Defense Operations" and Attachments I and J of this plan.)

11. The Warning and Communications Division Chief

The Warning and Communications Chief is responsible for evaluating the receipt of all warnings and the issuance of said warnings upon coordination with the County Emergency Management Director. He also will initiate all notification, as required, of County Disaster Operations personnel and County Communica-

tions in line of succession. He is also responsible for initiating necessary actions to establish communication between county and state resources, as required.

12. County Agricultural Agent

The County Agricultural Agent will be responsible for supplying information and advice on agricultural matters. He will coordinate with State personnel on the effects of any radio-contaminants within the County's portion of the ingestion exposure pathway EPZ (50-mile radius from Limerick).

13. Trained personnel from all available resources will be utilized by the Bucks County Emergency Operations staff to the fullest extent. Trained auxiliaries and volunteer organizations will be used to augment normal government service personnel.

VI. CONCEPT OF OPERATIONS

- A. Bucks County has agreed to provide reception and mass care center support for a maximum of 24,440 evacuees from Montgomery County.

B. Evacuation

Evacuees from Montgomery County will be entering Bucks County via the following routes:

<u>Route</u>	<u>Total Number of People*</u>	<u>Number of Vehicles</u>
1. Route 113 North	9,392	3,131
2. Route 202 East	10,990	3,663
3. Pennsylvania Turnpike East	28,496	9,499



E. Transportation

Transportation of evacuees, if necessary, from the reception center to the designated mass care center will be provided in the form of busses and vans. The Bucks County Emergency Management Agency will coordinate the support of transportation requirements with appropriate risk counties. Transportation staging areas will be established in Montgomery County at (1) the North Penn School District Bus Garage in Landsdale, (2) Fort Washington Industrial Park, and (3) King of Prussia Plaza, to provide bus and ambulance support to Montgomery County*. These facilities will be operated by Montgomery County. Bucks County will dispatch available transportation resources to each of these sites as requested by Montgomery County. (See Annex K, Bucks County Disaster Operations Plan and Bucks County SOP, "Emergency Mobilization of Transportation Resources.")

F. Mass Care Support

A listing of mass care facilities is contained in Appendix 4. Bucks County will accept a maximum of 24,440 evacuees from Montgomery County. The Bucks County Emergency Management Agency will notify schools designated as mass care centers of emergency action levels as per Section I below. The Bucks County Emergency Management Agency will also coordinate American Red Cross support of the designated mass care centers with the school administration for management of the mass care centers.

For sanitary reasons, pets will not be allowed inside mass care centers. Owners are responsible for arranging for their care. A listing of kennel and veterinary facilities are listed in Appendix 4, Attachment H. The Red Cross will also activate agreements with the local Humane Society, as necessary, in order to assist pet owners to the extent possible.

* These transportation-staging areas are "proposed" at this time. Formal agreements are under development.

G. Decontamination Monitoring

The Bucks County Technical Division/RADEF will establish monitoring and decontamination points at mass care centers. Decontamination monitoring is required only at the direction of the Bureau of Radiation Protection (BRP). Otherwise, decontamination monitoring teams will be available to perform monitoring upon request by any evacuee. When monitoring is directed by BRP, it shall be performed before registration or admittance to the general living quarters area of the mass care center. A list of decontamination monitoring assignments and procedures for distribution of dosimetry, KI, and survey meters and other radiological exposure control procedures are located in Appendix 5.

H. Medical Support



The Bucks County Emergency Management Agency is responsible for providing appropriate medical support for the evacuees. A Medical Health Group Chief has been appointed to assist the Bucks County Emergency Management Agency with medical support of evacuees. The Medical Health Group Chief will coordinate with the Rescue and Transportation Services for transportation of evacuees requiring treatment. (See Annex H, Bucks County Disaster Operations Plan, and Bucks County SOP, "Emergency Casualty Care.")

Medical support service information is contained in Appendix 6 of this plan. It is planned to relocate some residents of the Frederick Mennonite Nursing Home in Montgomery County to Rockhill Mennonite Community Home in Bucks County, and some of the residents of the Montco Geriatric Center to Neshaminy Manor.



A listing of Bucks County ambulance services is provided in Appendix 6, Attachment B. These services will be notified at the time of an incident to determine the number of units available to support Montgomery County in a radiological emergency. Package Disaster Hospitals in the county will be made available to support health care facilities relocated to Bucks County.

J. Student Pick-Up Points/Host Schools

The Bucks County Emergency Management Agency and Bucks County have not been tasked with the reception of evacuated students from Montgomery County risk schools.

VII. DIRECTION AND CONTROL

- A. The overall direction and control of emergency operations will be coordinated from the Bucks County Emergency Operations Center, (EOC), located at Broad and Court Streets, Doylestown, phone (215) 348-9401.
- B. Key operations personnel will be notified by the Bucks County EMA Coordinator in the event of an incident at the Limerick Generating Station which could affect Bucks County operations.
- C. Communications between the respective county emergency operations centers (EOC's), local emergency management coordinators, and reception/mass care centers, will be by telephone, RACES/ARES, and through the Bucks County Communications Center via the County police and fire radio net.

VIII. PUBLIC INFORMATION

All public announcements will be those authorized by PEMA and made by the County Commissioners. All EBS and commercial radio and TV stations as well as newspapers will be alerted for these announcements. Facilities will be provided at the County EOC for representatives of all news media. A media listing and pre-written public information announcements are provided in Appendix 7.

IX. CENTRAL RESOURCE RECEIVING POINT

A Central Resource Receiving Point and distribution center for food, bulk supply, and medical supplies will be established at the Doylestown Airport, Old Route 611, Doylestown.

The Bucks County EMA has appointed a Public Works Director who will coordinate with appropriate staff to operate this facility.

APPENDIX 4

ATTACHMENT D

ACTIVATION OF RECEPTION CENTERS

I. ACTIVATION



The order to activate reception centers is issued by the Coordinator of the Bucks County Emergency Management Agency or his designee. Once the order to activate is issued the Mass Care Officer is notified to contact reception center managers (see Appendix 4, Attachment F). Reception center managers are responsible for notifying and activating their respective staffs.

II. CONCEPT OF OPERATIONS

A. UNUSUAL EVENT:

No action required.

B. ALERT:

1. County Coordinator notifies the Mass Care Coordinator.
2. Mass Care Coordinator notifies Reception Center Managers informing them of the emergency status and instructing them to contact their respective staffs assuring availability.
3. Reception Center Managers notify staff and make preliminary assignments.
4. Mass Care Coordinator coordinates with County Warning and Communications Division Chief and Security Division Chief on assignment of a RACES team and traffic control personnel at reception centers.

APPENDIX 4

ATTACHMENT E

ACTIVATION OF MASS CARE CENTERS

I. ACTIVATION ORDER



The order to activate one or more mass care centers is issued by the County Emergency Management Agency Coordinator or his designate in his absence. Once the order to activate is issued, the Mass Care Officer or designated alternate is notified, who in turn notifies the appropriate Mass Care Center Managers.

APPENDIX 4

ATTACHMENT F

II. RECEPTION CENTER STAFF

Reception centers will be manned by Bucks County Deputy Sheriffs. All deputies will be trained in the operation of such a facility.

- III. The reception center team, in addition to the manager, should include at least four individuals for distribution of maps and internal traffic flow. Arrangements for barricades, traffic cones, signs, flashlights, etc., should be made by the reception center manager through appropriate municipal government sources and/or the county EMA.

I. Emergency Action Level Operations

1. When an Unusual Event is declared, no actions are necessary. The County will receive no notification.
2. When an Alert emergency classification is declared, PEMA Eastern Area Headquarters will notify the County Emergency Management Agency (EMA), and the following actions will be taken:
 - a. Officially log message.
 - b. The County Communications Center notifies the County Emergency Management Coordinator or his assistant if he is not available.
 - c. Notify the Chairman of the County Commissioners.
 - d. Alert key personnel of the County EOC staff and the County American Red Cross Chapters. Selected key personnel designated by the Emergency Management Coordinator report to the EOC.
 - e. Alert Radio Amateur Civil Emergency Service (RACES).
 - f. Open radio communications nets with Montgomery County.
 - g. Establish EOC security.
3. When a Site Emergency classification is declared, PEMA Eastern Area Headquarters will notify the County EMA. Upon notification, the following actions will be taken:
 - a. Same action as for Alert.
 - b. Mobilize the County EOC staff.

- c. Mobilize appropriate fire, police, and ambulance services throughout the county.
- d. Mobilize the County Red Cross staff and alert volunteers.
- e. Place reception centers and primary mass care centers on standby status. The Mass Care Center Manager is responsible for mass care operations including the assignment of space and facilities for Decontamination Monitoring Teams and the reception center team in the event the mass care center also serves as a reception center.
- f. Distribute survey meters, dosimeters, and KI to decontamination monitoring teams.
- g. Mobilize decontamination teams and have them report to assigned locations. (Mass Care Centers include decontamination teams whether or not radiological monitoring is required.)
- h. Open RACES communications nets among the County EOC, American Red Cross, primary mass care centers and reception centers.
- i. Issue public information statements to inform the public about the situation. PEMA will coordinate information releases with the nuclear facility, Governor's Press Office, and risk and support county Public Information Officers.
- j. Notify School Districts providing mass care facilities of the emergency and reception center facility owners.
- k. Notify police to make traffic control assignments in the event of evacuation.

4. When a General Emergency classification is declared, PEMA Eastern Area Headquarters notifies the County EMA. Upon notification, the following action will be taken:
 - a. Same action as for Site Emergency.
 - b. Active County reception and primary mass care centers and place remaining mass care centers in standby status.
 - c. Man traffic control points in preparation for receipt of evacuees.
 - d. As each primary mass care center is filled, sequentially upon remaining centers.
 - e. Notify School District Superintendents of the need to utilize school facilities for mass care.
 - f. If applicable, activate the Emergency Broadcast System and make appropriate announcements.
5. Upon recommendation to initiate reentry, the following actions will be taken:
 - a. Activate traffic control points.
 - b. Announce reentry plans to evacuees in mass care centers and release appropriate public information announcements (Appendix 7, Attachment D).
 - c. Report any damages caused by the evacuation and reentry, and any extraordinary costs of operations, to the County Emergency Management Coordinator who in turn will report to the PEMA Eastern Area Headquarters.

APPENDIX 5

ATTACHMENT B

DOSIMETRY AND POTASSIUM IODIDE (KI)

II. DISTRIBUTION OF DOSIMETRY, POTASSIUM IODIDE AND RELATED PROCEDURES

A. Distribution

At the ALERT stage, the County Technical Division Chief (RADEF) will report to the EOC to prepare dosimetry, survey meters, KI, and necessary report forms for distribution to decontamination monitoring teams (generally fire services personnel). At SITE EMERGENCY, the Technical Division Chief (RADEF) will contact the County Fire Marshall's Office for assistance in distribution of the dosimetry and other radiological equipment resources to decontamination monitoring teams throughout the County. Upon receipt, each organization shall distribute to individual team members and mobilize teams to their assigned locations.

To facilitate this distribution, a "Dosimetry, KI, Survey Meter Distribution List" is contained in Attachment D to this Appendix. The list indicates the receiving organizations and the required number of each item.

APPENDIX 7

ATTACHMENT A

- V. A Rumor Control Center (RCC) will be established by the County EMA whenever the EOC is activated in support of this plan. The PIO is responsible for the staffing and operation of the rumor control telephone. The rumor control telephone number for Bucks County is 215-348-9401.

LEA-4 (VIII-24) The Lehigh County Support Plan parallels the Bucks County Support Plan as previously discussed in LEA-3, in addition to the responsibility of coordinating the host schools for evacuated students from Montgomery and Berks Counties. (page 15, Lehigh County Support Plan). Exerpts follow.

The Medical Health Group Chief will coordinate with the Rescue and Transportation Services Group Chiefs for transportation of evacuees requiring treatment. Medical support service information is contained in Appendix 6 of this plan.

The primary facility for treatment of irradiated individuals in Lehigh County will be the Lehigh Valley Hospital Center.

13. Trained personnel from all available resources will be utilized by the Lehigh County Emergency Operations staff to the fullest extent. Trained auxiliaries and volunteer organizations will be used to augment normal government service personnel.

VI. CONCEPT OF OPERATIONS

- A. Lehigh County has agreed to provide reception and mass care center support for approximately 17,000 evacuees from Montgomery and Berks Counties.

It is planned to relocate residents of the Pottstown Leader Nursing Home in Montgomery County to the Bethlehem/Easton Leader Centers and a portion of the Montco Geriatric Center to the Cedarbrook Facility. The County may be requested to provide ambulance support in this regard.

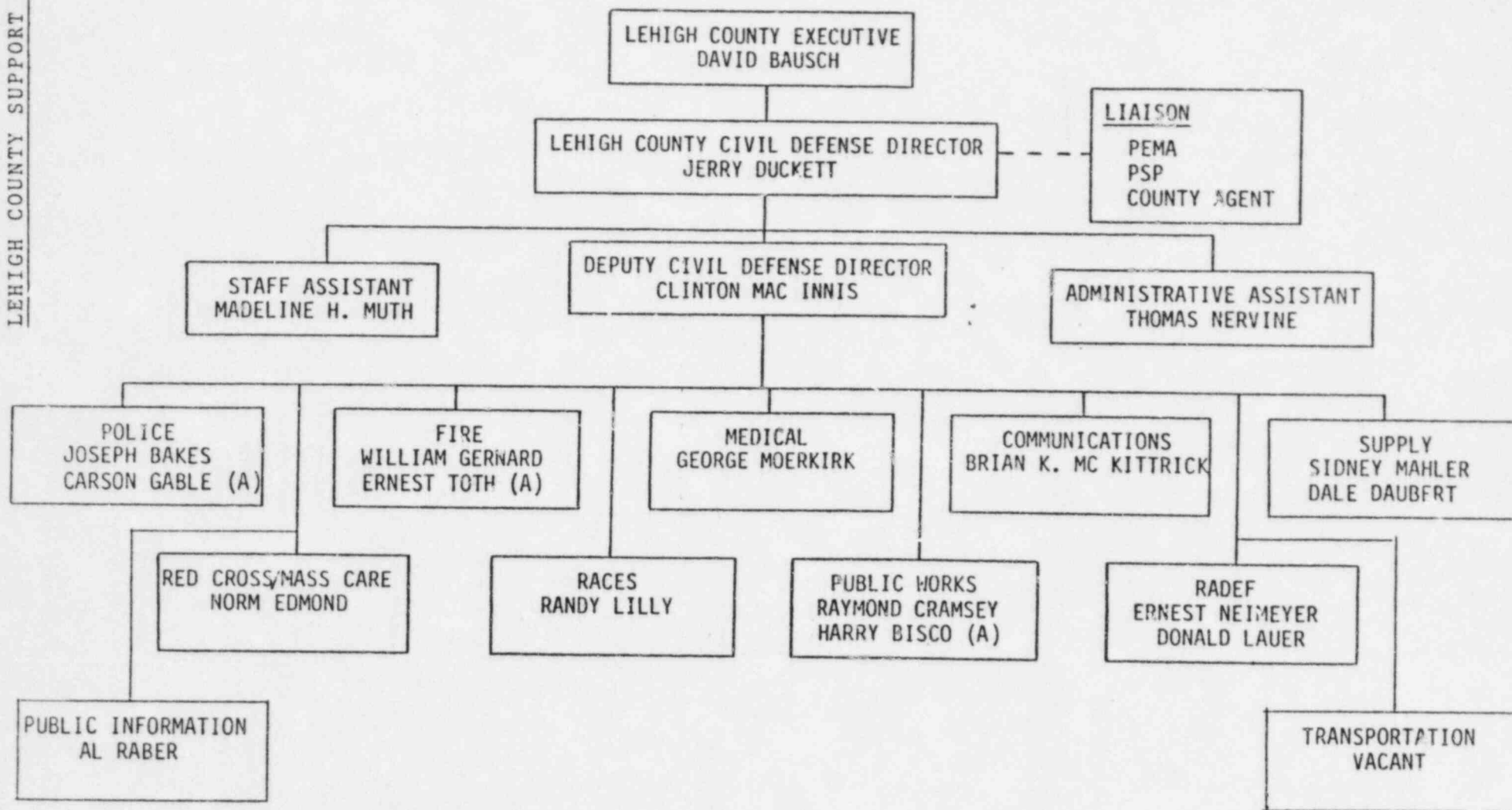
A listing of Lehigh County ambulance services is provided in Appendix 6, Attachment B. These services will be notified at the time of an incident to determine the number of units available to support Montgomery County in a radiological emergency.

I. Student Pick-up Points/Host Schools

Lehigh County will receive approximately 8,200 school students from Montgomery and Berks Counties should an evacuation be required at a time when school is in session. Appendix 8 lists those schools planning to evacuate to Lehigh County, the designated host schools (student pick-up points), and policy relevant to school evacuation.

ATTACHMENT B

LEHIGH COUNTY CIVIL DEFENSE ORGANIZATIONAL CHART



CERTIFICATE OF SERVICE

DOCKETED
USABC

I hereby certify that the foregoing additional information⁸⁴ MAR 15 A10:29
Off-site Emergency Planning contentions sponsored by Limerick
Ecology Action was hand-delivered to the following parties
marked (*) on March 13, 1984. The remainder of the parties were
served by first class class mail, postage pre-paid on March 13, 1984.
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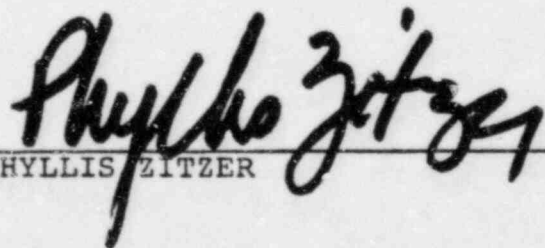
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