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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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USNRC

'84 MAR 29 P3:01

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,)	
Unit 1 and 2))	

Response of the Commonwealth of Pennsylvania to Limerick Ecology Action's "Supplemental Information on LEA Off-site Emergency Planning Contentions"

In accordance with the Licensing Board's oral directive at the prehearing conference held March 5-8, 1984, the Commonwealth of Pennsylvania hereby responds to additional information filed by intervenor Limerick Ecology Action (LEA) with regard to several of LEA's off-site emergency planning contentions. Parties were directed to serve the Board with their responses to LEA's supplemental filing at the prehearing conference held March 19-20, 1984. Tr. 7987. Because LEA did not serve its filing on the Commonwealth either by express mail or hand delivery, counsel was unable to provide the state's response at that time. At the March 20, 1984 prehearing conference, the Board orally granted the Commonwealth leave to file its response by Monday, March 26, 1984.

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LEA-13 (VIII-33): LEA's additional filing provides a list of day care centers, pre-school programs, and day and overnight camps located within each Risk County. The staff of the Pennsylvania Emergency Management Agency (PEMA) is reviewing this list to determine whether these facilities are identified and accounted for in the municipal plans. Without further information than LEA has provided to date, the Commonwealth cannot determine whether, with regard to day care and pre-school programs, such facilities are the type of private school that must be included in school district plans. See Annex E at E-31. Day and overnight camps are considered private enterprises and thus are responsible for developing their own plans. To the extent any of the identified facilities have or are in the process of developing their own emergency plans, the municipal emergency management coordinator should be provided with a copy of such plans for review to ensure consonance with the municipal, and ultimately the county plan. PEMA also has provided this list to the applicant's consultant for use in preparation of the evacuation time estimate study.

LEA-20 (VIII-41): LEA states that as of March 12, 1984, Charlestown and South Coventry townships located in Chester County have not designated Municipal Emergency Operations Centers (EOC). These EOCs must be designated and identified in the respective municipal plans prior to the full-scale exercise scheduled for July 1984. Further, applicant's statement in its response to LEA's supplemental filing (at

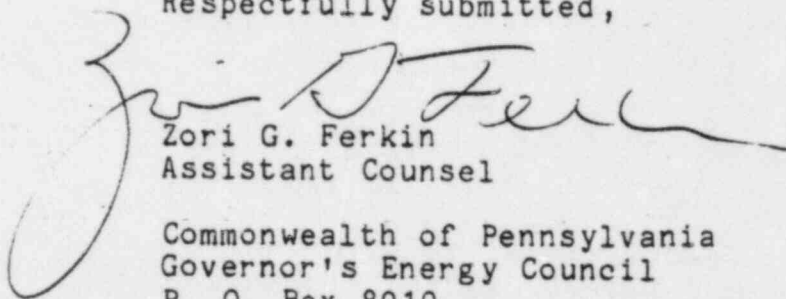
p.4) that municipalities may share a combined EOC with an adjacent municipality is correct only in the circumstance where the municipalities involved develop a common emergency response plan which describes actions that will be taken in the combined EOC and provides for a single, combined EOC staff.

LEA-28 (VIII-53): LEA correctly characterizes the information provided by PEMA with regard to the response capabilities of the Pennsylvania National Guard. LEA also accurately states that the Commonwealth supports that portion of LEA-28 that questions the availability of non-state provisions for towing, gasoline supplies and snow removal. It should be noted with regard to applicant's response to LEA's filing (at p. 5) that the Pennsylvania National Guard neither has resources for snow removal nor has responsibility for the activity under the state plan. See Annex E at E-24.

LEA-17 (VIII-37): LEA here lists numerous asserted deficiencies in two township plans as "examples" of the basis for its allegation that the municipal plans are not adequate. PEMA's preliminary review of the listed items indicates that LEA has identified many aspects of the plans that are significant when considered in their totality and must be resolved before these plans can be implemented. Nevertheless, in its present form LEA-17 does not constitute a litigable contention.

LEA-3 (VIII-23) and LEA-4 (VIII-24): LEA identifies portions of the two support county (Bucks and Lehigh) plans that it believes are crucial to implementation of the Risk County plan for Montgomery County. LEA does not identify any "gaps" in the support county plans; rather, LEA simply points out portions of those plans that interrelate with planning for Montgomery County. Because LEA presents no basis for its implicit assertion that Bucks and Lehigh Counties will not eventually adopt their plans, LEA-3 and LEA-4 do not present litigable issues. The Commonwealth would note, however, that the counties must adopt their plans before PEMA will submit them to the Federal Emergency Management Agency (FEMA) for approval.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of "Response of the Commonwealth of Pennsylvania to Limerick Ecology Action's Supplemental Information on LEA Off-site Emergency Planning Contentions" 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 Commonwealth of Pennsylvania's internal mail system, this 23rd day of March 1984:

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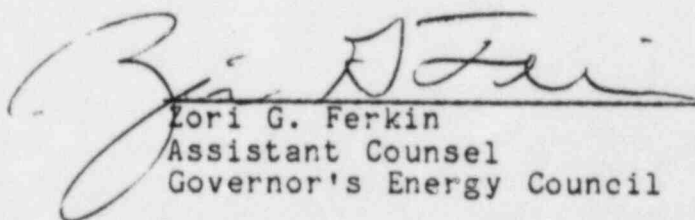
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Date: March 23, 1984