

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

DOCKETED
USNRC

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Lawrence Brenner, Chairman
Dr. Richard F. Cole
Dr. Peter A. Morris

In the Matter of

PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Units 1 & 2)

DOCKET NOS. 50-353-OL
50-352-OL

REPLY OF THE CITY OF PHILADELPHIA TO SEPARATE ANSWERS OF THE
COMMONWEALTH OF PENNSYLVANIA, APPLICANT AND STAFF
TO THE CITY'S REVISED ISSUES IN THE AREA
OF EMERGENCY PLANNING

Pursuant to Board Order dated June 5, 1984, the City of Philadelphia (City) hereby files its Reply to the separate Answers of the Commonwealth of Pennsylvania (Commonwealth or State), Applicant and Staff to the City's issues in the area of emergency planning.

CITY - 1 In reliance upon the assurances set forth in the Commonwealth's Response dated June 4, 1984 to the City's revised and restated issues of concern, as well as those set forth in the Commonwealth's letters dated April 13, 1984 (page 4, item 7) and May 17, 1984 (page 1, item (2)), inter alia, the City hereby withdraws this issue. True and correct copies of said letters are hereto attached, made part hereof, and are marked Appendices A & B respectively.

CITY - 3 Upon further analysis of the document containing an analysis of the effect of a liquid release from the Limerick Generating Station provided by Applicant to City on May 15, 1984, and in reliance thereon;

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and in reliance upon the assurances of the Commonwealth set forth in its Response of June 4, 1984, as well as those contained in Appendix A (letter of April 13, 1984, pages 1-2, Water Department) attached hereto; and in further reliance upon Applicant's written assurance dated May 30, 1984 confirming that a Philadelphia Water Department and a Health Department representative will be provided space and communications access at the Limerick Generating Station Emergency Operations Facility, the City of Philadelphia hereby withdraws the issues contained in City - 3 only insofar as they relate to water transport model and time of commencement of water sampling. A true and correct copy of the above-mentioned letter dated May 30, 1984 is attached hereto, made a part hereof and is marked Appendix C.

It must be emphasized that the City continues to be genuinely and seriously concerned regarding the lack of an alternate water supply and the lack of planning therefor. More specifically, the Philadelphia Water Department operates three water treatment plants. The Belmont Plant supplies water to an area of the City west of the Schuylkill River. The Queen Lane Plant, in general, supplies water to the area west of Broad Street and east of the Schuylkill River. Both of those plants utilize the Schuylkill River as the raw water source.

In the event of an emergency requiring the cessation of raw water flow from the Schuylkill to the City's Queen Lane and Belmont Water Treatment Plants, finished water can be supplied from the Baxter Water Treatment Plant, which utilizes the Delaware River as a supply source, with the exception of the Belmont High Service District which has no interconnection with the Baxter distribution system. The area served by the

Belmont High Service District borders City Line Avenue and Montgomery County and serves a population of approximately 100,000 people.

The Belmont High Service flow is approximately 15 million gallons per day and the two raw water storage basins at Belmont have a combined useable capacity of about 50 million gallons. Thus, assuming average flows, non-contamination of the basins, and that the emergency occurs when both basins are in service, the Belmont High Service District can be provided water for approximately 3 days. If one of the raw water basins is out of service, provision for water will be only 1-1/2 days. After that period of time, if raw water cannot be withdrawn from the Schuylkill River, water cannot be provided to this area of the City.

In addition, the assumption that the Baxter plant can serve the remainder of the City depends upon the further assumptions that no major components of the Baxter Plant are out of service for maintenance, no major mains, valves or pumping stations needed for the interconnections between the Baxter and Queen Lane and Belmont systems are out of service, and that the average daily flows are not exceeded. Thus, there is the possibility that other areas of the City also could not be served with water in the event of an emergency requiring dependence upon the Delaware River as a sole supply source.

There is no existing plan for provision of alternate water supplies. Since there is no plan, it is not known what the cost will be and/or whether resources are available to provide an alternate water supply to those areas of the City where the regular water supply is unavailable.

The State's response appears to dwell upon avoidance of the need for an alternate water supply through avoidance of contamination by "curtailment of intake during the course of the passage of the contaminated water".

While this is certainly an important measure to prevent water contamination, it is this very preventive measure which gives rise to the need for an alternate water supply. If the Schuylkill River intakes are closed, then as aforesaid, the Belmont High Service District will be without an available water supply, and possibly other areas of the City will be without water if components of the Baxter Plant are out of service. Even utilizing conservation measures, an alternate water supply and implementable plan is required in order to provide assurance that the public will be protected.

Staff does not object to admission of the issue (Staff Answer, page 4).

Applicant, on the other hand, boldly maintains that "... there is no legal basis under NRC's regulations of NUREG-0654 for requiring contingency plans to protect existing water supplies from contamination or to provide alternative sources of water for downstream users." (Applicant's Answer, p. 11). NUREG-0654, Section II., J. 11, page 64 specifically states,-

Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs. ... The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation. Maps for recording survey and monitoring data, key land use data (e.g., farming), dairies, food processing plants, water sheds, water supply intake and treatment plants and resevoirs shall be maintained. (Emphasis supplied)

It is incomprehensible that Applicant should maintain a position that there is no requirement to protect existing supplies or to provide alternate sources of water for downstream users. Moreover, NUREG-0654, Section II,

J, 9 (p. 61) states that

Each State... shall establish a capability
for implementing protective measures based
upon protective action guides and other
criteria...

In view of the fact that the State contemplates protective actions to prevent contamination of water by issuing timely advisories to close the water intakes, and by reason of the fact that in such event, certain areas of the City may be deprived of a water supply after a period of time, as aforesaid, and in view of the further fact that NUREG-0654, Section II, J. 9 (p. 61) requires the State to establish a capability for implementing protective measures based upon protective action guides, and in view of the additional fact that the PAGs at page 1.30 recommend, inter alia, action to provide alternative sources, it is clear that the State Plan is inadequate in failing to provide an implementable plan for an alternative water supply. It is not enough to tell a downstream water user such as Philadelphia with its vast population to "hook up" or "obtain" an alternate water source. That is not an implementable plan. "Implementability" clearly includes within its definition, consideration of the "ability" to implement, which involves consideration of resources. In the instant matter, not only is there not a plan to provide an alternate source of water, but consideration of ability to implement is also wholly lacking.

It is significant to note that FEMA, in its May 8, 1984 Interim Finding on the Offsite Radiological Emergency Response Plans (RERP) for the Limerick Generating Station, served on the City by the NRC Staff on May 15, 1984, specifically includes, inter alia, the availability of resources in the consideration of "ability to implement" protective measures. (Page 9 of FEMA Interim Finding) This lack of ability to

implement and lack of resources was one of the factors in FEMA's interim finding that the Protective Response planning standard is incomplete at present. (Page 11 of FEMA's Interim Finding).

Applicant alleges (p. 11 of its Answer) that "the protective actions for water can be either to prevent contamination or decontamination or condemn the use of water for consumption. If contamination is prevented by shutting off water intakes, then an alternative water supply must be planned for. Although Applicant cites decontamination as a recommended PAG planning option, it objects to decontamination planning. In essence, what Applicant appears to be saying is that: if you shut-off water intakes to prevent contamination, you don't need an implementable alternative source of water plan. This has been demonstrated to be fallacious. Moreover, if contamination is through airborne particulate, and/or failure of notice to close intakes, and/or due to run-off, then obviously an implementable decontamination plan is needed. Applicant's position is clearly untenable.

Since there is no implementable alternate water supply plan, protective actions appropriate for the Philadelphia Ingestion Exposure Pathway have not been developed, as required by NUREG-0654, and the PAGs, and there can be no reasonable assurance that the State Plan can be implemented (there being none as to an alternate water supply), and thus there can be no assurance that adequate protective actions can and will be taken.

(10 CFR §50.47 (a)(1), (2); (b) (10); (c)(2))

CITY - 7 The City's concern here is that the State Plan is inadequate in that it fails to provide a water supply and water system decontamination plan that is implementable.

In objecting to the Board's consideration of the issue of the lack of

a water supply and water system decontamination plan, Applicant states, inter alia, that it is unaware of an NUREG-0654 requirement for same. (Applicant's Answer, page 12) Applicant further asserts that such action involves long-range considerations. Indeed it does, but the State Plan gives no consideration to it whatsoever, despite the mandate of NUREG-0654, Section II., J. 11 (p. 64). Moreover, Applicant's position is clearly inconsistent: on the one hand, it maintains that long-range considerations are involved, while on the other hand, it also asserts that ad-hoc decisionmaking is necessary on the issue. To decontaminate the City's water supply and water distribution system is clearly not an ad-hoc decisionmaking process. There must be planning appropriate for the locale. There is absolutely none.

Staff takes the position, as does Applicant, that there is no basis for requiring a decontamination plan. It bears repeating that NUREG-0654, Section II., J.11 (p. 64) specifically requires that the State Plan contain planning and procedures for decontamination and processing. A full reading of this section clearly indicates that water supply intakes, treatment plants and reservoirs are included. The PAGs Manual not only lists decontamination as a protective action (PAGs Manual, page 1.30) but also as a restorative action (PAGs Manual, pages 1.49-1.50). Applicant's position therefore that "recovery and reentry" actions only concern the plume EPZ is clearly contradicted by the PAGs Manual designation of decontamination of water as a restorative action.

The Commonwealth responds by averring that its plan is adequate to determine when controls on water may be lifted. Clearly, this does not address the issue of the lack of a decontamination plan. The Commonwealth further states that it has provided technical reference material to the

City (one such document) and that the subject, to the State's knowledge, has not received extensive treatment; and finally, admits that is the reason for the paucity in the Commonwealth's emergency plan on the topic. That the State has provided the City with all relevant information known to it, does not meet the standard of an implementable plan appropriate to the locale. As aforesaid, "implementability" clearly includes within its definition, consideration of the "ability" to implement, which involves consideration of resources. In the instant matter, not only has "implementability" been overlooked, but in fact, there is no State plan for decontamination of the water supply and water distribution system. An implementable decontamination plan is a vital concern to the City.

It is clear that since there is no implementable water supply and water distribution system decontamination plan, protective actions and recovery and restorative actions appropriate to the Philadelphia Ingestion Exposure Pathway have not been developed as required by NUREG-0654, the PAGs and 10 CFR § 50.47, and there can be no reasonable assurance that the State Plan can be implemented (there being none relating to decontamination of water supply and distribution system), and thus there can be no assurance that adequate protective actions can and will be taken. (10 CFR § 50.47 (a)(1), (2); (b)(10); (c)(2)).

CITY - 9 Withdrawn. In withdrawing this issue, it must be noted that although Applicant asserts that the City "has evidently overlooked" an existing Letter of Agreement dated February 29, 1984, this Letter-Agreement was apparently executed by Applicant on March 16, 1984, but never was supplied to the City until the City, on July 7, 1984, received the

Commonwealth's response to the City's revised issues. It must also be noted that the lack of such an agreement was an issue raised by the City in its initial filing of issues dated February 1, 1984 and referred to again in the City's Reply dated February 28, 1984. The City did not "overlook" the letter-agreement. It was never informed of it. It may be that the City's concern voiced on February 1, 1984 and February 29, 1984 regarding the lack of such an agreement prompted the parties to expedite its execution.

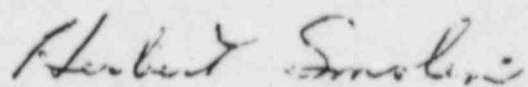
Respectfully submitted,

BARBARA W. MATHER
City Solicitor

MARTHA W. BUSH
Deputy City Solicitor

HERBERT SMOLEN
Deputy City Solicitor

BY:


HERBERT SMOLEN

Attorneys for the City of Philadelphia

Dated: June 12, 1984



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S ENERGY COUNCIL
1825 N. FRONT STREET
HARRISBURG, PENNSYLVANIA 17102

EXECUTIVE OFFICE
783-9983

April 13, 1984

Herbert Smolen
Deputy City Solicitor
City of Philadelphia
Law Department
15th Floor, Municipal Services Bldg.
Philadelphia, Pa. 19102

Re: City of Commonwealth 4/11/84 meeting on City's Limerick
offsite emergency planning contentions

Dear Herb,

The following is my understanding of the status of the City's issues as a result of last Wednesday's meeting. References are to "Items for Discussion with the Commonwealth" first presented at 3/22/84 City-Commonwealth meeting.

Water Department

1. State agrees to analyze for radioactivity two samples per month of sludges in Belmont water treatment plant.

Sample 1: river silt settling in raw water basin

Sample 2: chemically-enhanced sludge from Belmont settling tanks

Samples to be analyzed and reported to City at same time and in addition to existing reports.

See also written State response to #1.

2. See written State response to #2.

3. See written State response to #3. Concerning surveillance during a nuclear incident involving a liquid discharge, BRP will develop a working definition of a "non-routine" discharge. BRP shall review the proposed definition with City officials. Once such a definition is agreed upon, it shall constitute the basis for water sample analysis by BRP.

Concerning duration and nature of sampling after a nuclear incident, sampling other than routine analysis continues as is appropriate based upon a professional health physics judgment.

4. PEMA will now notify the City of Philadelphia according to established emergency notification procedures. The City will be added to the list of counties notified by PEMA. PEMA contact will be with the City O.E.P.

If the nuclear incident involves a discharge into the Schuylkill River, PEMA shall include in its notification the name and phone number of BRP individual available for additional water quality information.

Site emergency - PECO has promised to invite representatives of City Water and Health Departments to the LGS EOF. PECO is expected to provide written confirmation to B. Aptowicz, Water Department.

See also written State response to #4.

5. See State response to Water Department Item #3. The City is satisfied that during a nuclear incident the State has sufficient resources to track radioactive contaminant on the Schuylkill from LGS to Philadelphia, and that BRP can analyze water samples and report ~~results~~ to the City expeditiously.

6. See written State response to #6.

7. The State has not prepared a water transport model of the impact of a nuclear incident on the Schuylkill and Delaware Rivers. PECO's Environmental report, OL for LGS indicates PECO has developed such a model. See LGS EROL 5.2.2.2.1, p. 5.2.9. State and City efforts to obtain this model from PECO have thus far been unsuccessful.

Further Action:

A. Informal

1. State (Hippert, PEMA) to contact V. Boyer, PECO.
2. State (Levin, BRP) to contact R. Kankus, PECO.
3. Based on (1) and (2), State, City, PECO to meet to review water transportation model.

B. Formal

City (Bush) to request model in discovery regarding City DES contentions.

8. See written State response and response to Water Department Item #1.

9. The State (DER) shall provide the City Water Department with references and recommended procedures (the latter if appropriate) for removing levels of radioactive contamination in reservoirs by conventional water treatment plants such as are located in Philadelphia.

See also written State response to #9.

10. Further exploration of alternate water supply issue is necessary. State will set up meeting with DER Bureau of Resources Management, State Water Plan Division and City Water, Health and O.E.P. officials to discuss State and City planning for short-term water supply alternatives.

11. State (PEMA) shall ensure that City officials receive training concerning water and air impacts of a nuclear incident in accordance with the ~~Outline~~ in Aptowicz to Hippert correspondence dated 4/11/84. ~~BRP~~ shall provide instruction described in paragraphs 3(a)-(c) and (e) (with regard to 3(b), assuming model can be obtained from PECO); PECO shall provide instruction regarding paragraph 3(d). PEMA will ensure PECO will provide the training requested. The program will be presented at a time mutually agreeable to State, City and PECO participants.

Training for City Health Department officials in interpretation of data from air quality samples with regard to radiological releases shall be provided either by PECO in conjunction with existing plans for training of state officials, or by the State following the State's receipt of training from PECO.

12. The State (BRP) will inform the City Water Department of contaminants that are of concern in the event of a nuclear incident. City Health Department will assess its ability to analyze water and air samples for those contaminants - City Water and Health officials will then determine whether the City

requires additional analytic equipment.

The State (BRP) will investigate whether analytic equipment has been provided from any source (e.g., state, utility) with regard to emergency planning for any other Pennsylvania Nuclear facility.

13. See Health Department Item #1.

Health Department

1. This item remains unresolved. City has contracted for a health impacts analysis that can be compared with the NRC's (DES) and PECO's (SARA) conclusions regarding worst case impact on Philadelphia. State does not have resources to perform independent environmental assessment of worst case scenario.

2-3 No discussion.

4-6. Regarding availability of hospitals in Philadelphia, the State Health Department has identified 22 hospitals in the City capable of treating contaminated patients - The City's understanding however is that contaminated persons will be taken to the Hospital of the University of Pennsylvania, which has a letter of agreement with PECO to treat such individuals.

Need for further discussion of these items depends on results of health impacts analysis of City. -

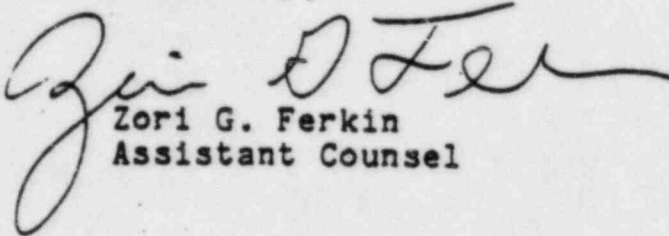
7. State (PEMA) will incorporate in state plan, county plans, and operating procedures for state police that personnel manning access control points surrounding plume exposure pathway EPZ will stop all open trucks containing raw agricultural products from leaving the plume EPZ. State personnel will contact the State Agriculture Department, which will sample products for radioactivity and dispose of products in accordance with established State and Agriculture Department plans.

Fire Department

The City Fire Department is satisfied with the State's responses regarding City Health and Water Department concerns. No further Fire Department - specific issues to be resolved.

Please call me when you have reviewed this summary so we can coordinate our report to the Licensing Board.

Sincerely,



Zori G. Ferkin
Assistant Counsel



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S ENERGY COUNCIL

P.O. BOX 8010
1625 N. FRONT STREET
HARRISBURG, PENNSYLVANIA 17105

May 17, 1984

OFFICE OF
POLICY & PLANNING
783-0220

Herbert J. Smolen
Deputy City Solicitor
City of Philadelphia
Law Department
Municipal Services Building, 15th Floor
Philadelphia, Pa. 19102

Re: Limerick Generating Station, Docket Nos. 50-352,
50-353

Dear Herb:

The following constitute the Commonwealth's response regarding four issues you and I discussed following our meeting on Monday, May 14:

(1) In the event the City develops concerns regarding the Commonwealth's emergency plan as a result of the radiological emergency response exercise for the Limerick Generating Station scheduled for July 25, 1984, City and Commonwealth representatives shall discuss whether modifications to the Commonwealth's plan are warranted, and shall agree on such modifications as appropriate. In the event the parties are unable to reach agreement, the City may pursue outstanding issues as it sees fit. See City-8; Tr. 9891-93.

(2) Access control points for the Limerick Generating Station plume exposure pathway emergency planning zone will be set forth in the emergency response plans developed by the risk counties. The counties are currently revising their plans based on, inter alia, comments by PEMA provided to the counties in late 1983. The counties will submit their plans to PEMA for review. Such review will include the access control points designated by the counties.

As a general matter, access control points are located on main evacuation routes. Access control points on main evacuation routes are manned by Pennsylvania State Police. Access control points not on main evacuation routes, to the extent they are designated for a particular plume EPZ, are staffed by the appropriate municipal police. In the July 25, 1984 Limerick exercise, some, if not all, of the access control points for the Limerick plume EPZ will be activated.

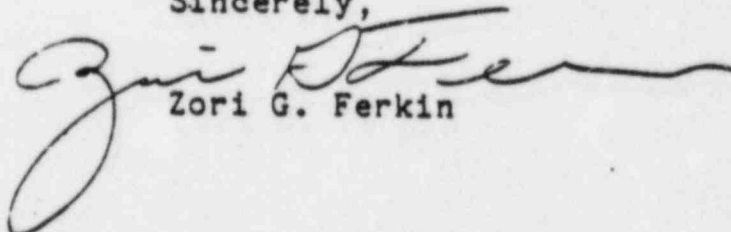
Letter to Herbert Smolen
Page two

(3) Twenty-two support hospitals in Philadelphia are to be listed in the Commonwealth's emergency response plan. These hospitals are equipped to handle radiologically contaminated patients on the basis that they are "comprehensive" hospitals -- that is, they have the capability to provide "total emergency care." The Commonwealth Department of Health has designated these hospitals based on its knowledge that these hospitals are capable of providing service to radiologically contaminated individuals. No agreements are currently in place between the Commonwealth and any one of these hospitals that pertains specifically to that hospital's response in the event it is asked to provide emergency care to patients contaminated in a nuclear incident at Limerick.

(4) As previously discussed and agreed to by the Commonwealth, PEMA shall now include Philadelphia in the list of counties that PEMA notifies in the event of an incident at Limerick. PEMA shall provide initial notification to the City as well as notification of change(s) in the classification level of the nuclear incident, as appropriate. Notification will include information as to recommended protective actions; in accordance with NRC guidance, the Commonwealth's plan ~~provides~~ for recommendation of protective actions by the public within ~~the~~ plume exposure pathway-planning zone. Notification to Philadelphia shall include any information that could directly impact on the City.

I trust this information corresponds to our discussion. .
Please let me know if I can be of further assistance.

Sincerely,



Zori G. Ferkin

cc: Adolph Belser
Julia Cox
Margaret Reilly

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4500

V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

May 30, 1984

Bruce S. Aptowicz
Manager, Water Operations
City of Philadelphia
Water Department
1180 Municipal Services Building
Philadelphia, Pa. 19107

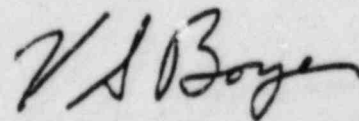
Dear Bruce:

This letter confirms that a Philadelphia Water Department and a Health Department representative will be provided space and communications access at the LGS Emergency Operations Facility located at the Plymouth Service Building.

To facilitate your participation at this facility, please provide us the names, positions and 24 hour telephone numbers of the representatives so they may be included on a notification list. We would expect your representatives to participate in one or more of the scheduled practice drills.

If you have any questions regarding the facility or the information needed, please contact Roberta A. Kankus at 215-841-5432.

Sincerely,



APPENDIX C

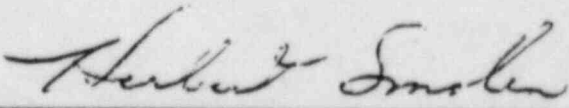
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD
BEFORE THE ADMINISTRATIVE JUDGES

Lawrence Brenner, Chairman
Dr. Richard F. Cole
Dr. Peter A. Morris

In the Matter of: :
PHILADELPHIA ELECTRIC COMPANY : DOCKET NOS. 50-353-OL
(Limerick Generating Station, : 50-352-OL
Units 1 & 2) :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Reply of the City of Philadelphia to Separate Answers of the Commonwealth of Pennsylvania, Applicant and Staff to the City's Revised Issues in the Area of Emergency Planning, in the above-captioned proceeding have been served on the following persons named on the attached service list by hand delivery or by Federal Express Mail, or by causing the same to be deposited in envelopes addressed to said persons, first class, postage prepaid, and deposited with the United States Postal Service at Philadelphia, Pennsylvania.


HERBERT SMOLEN
Deputy City Solicitor

Dated: June 12, 1984

SERVICE LIST

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Atomic Safety & Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555