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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE
ATTORNEY GENERAL
WASHINGTON, D.C.

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

LIMERICK ECOLOGY ACTION'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE PENNSYLVANIA EMERGENCY
MANAGEMENT AGENCY ON LEA'S ADMITTED "OFF-SITE" EMERGENCY PLANNING CONTENTIONS

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission (N.R.C.), 10 C.F.R. § 2.740 (b), and the Orders of the Atomic Safety and Licensing Board in this proceeding, Limerick Ecology Action hereby propounds the following interrogatories to the Pennsylvania Emergency Management Agency, ("PEMA"), to be answered fully in writing, under oath, in accordance with the definitions and instructions set forth below. Additionally, pursuant to 10 C.F.R. § 2.741, Limerick Ecology Action requests that PEMA produce copies of those documents designated by it in its respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.
2. The following definitions shall apply:
 - a. "PEMA" shall refer to the Pennsylvania Emergency Management Agency, or any official, officer, member, employee, or consultant thereof and shall include

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any other related agencies of the Commonwealth, upon which PEMA will rely, particularly the Pa. Bureau of Radiation Protection in the Pa. Dept. of Environmental Resources, and the Governor's Energy Council representatives participating in this proceeding on behalf of PEMA.

b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, computer tapes or other electronically stored or generated material, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of PEMA, or which PEMA has knowledge thereof, and intends to rely upon in this proceeding.

c. "Date" shall mean the exact day, month and year if ascertainable, or if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).

d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.

e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number, relevant date, and any other descriptive information appropriate to the request.

f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and if a corporation or other entity, its principal place of business, or if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in an answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in PEMA's possession and/or knowledge and information in the possession of PEMA officials, officers, agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of PEMA's assertion, contention, view or opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

INTERROGATORIES

1. State whether or not PEMA intends to present any expert witnesses on the subject matter at issue in the contentions and issues sponsored by Limerick Ecology Action, admitted by the Atomic Safety and Licensing Board in this proceeding by order of April 20, 1984 on the issues of "off-site" emergency planning for the Plume Exposure EPZ for Limerick. The contentions referred to are: LEA-11, LEA-12, LEA-13, LEA-14, LEA-15, LEA-22, LEA-26, LEA-27, LEA-28, and LEA-24 (includes FOE-1).

2. State whether PEMA intends to present any factual witnesses on the subject matters at issue in LEA's admitted contentions (as listed above). If so, please identify each such factual witness and further state (a) his/her professional qualifications; (b) the contention and subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

3. Identify by title, author, publisher and date of issuance or publication, all documents that PEMA relies upon as a basis for its position or that PEMA intends to use (by way of reference or evidentiary proffer) in presenting its case or position, to be used for cross-examining other witnesses on "off-site" emergency planning contentions, and all documents which PEMA intends to refer to in conducting cross-examination of other witnesses who may testify in connection with any such contention.

4. To the extent that PEMA's answer to any of the interrogatories is based upon one or more documents, (a) identify each such document on which the answer is based; (b) identify the specific information in such document upon which PEMA relies; (c) explain how the information provides a basis for PEMA's answer or position.

5. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, or research, or analysis; (d) describe the results of such study, calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for PEMA's answer.

6. To the extent that your answer is based upon conversations, consultations, or correspondence or other communications with one or more individuals or entities, (a) please identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

7. To the extent that PEMA possesses information or documents expressing facts or opinions which are relevant to the specific interrogatories below, but which do not support PEMA or the Applicant's position, or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

WITH REGARD TO CONTENTION LEA-11:

8. Supply any and all information currently available to PEMA regarding the arrangements made for the number and assignment of buses to evacuate school children in private and public schools in Chester, Berks, and Montgomery Counties within the Limerick Plume EPZ.
9. Provide a list of the bus companies willing to make buses available for evacuation of Chester, Berks, and Montgomery County public and private schools in the event of a radiological emergency at Limerick. Provide addresses of each company and the location from where the buses will be dispatched.
10. Have formal letters of agreement been completed for all bus companies expected to provide buses for use in Chester, Berks, and Montgomery Counties? If not, why not? Provide a list of the agreements still to be completed, and any information available to PEMA regarding when such agreements are expected to be completed. (please include any information to support the basis for PEMA's answer.) If yes, provide a copy of all completed letters of agreement.
11. Indicate by company the number of buses available from each company that are expected to be available in the event of a radiological emergency at Limerick.
12. Who is responsible at PEMA for evaluating the "Risk" and "Support" Counties "unmet needs" regarding the sufficiency of buses and bus drivers? Please supply the name, title, and description of the designated person(s) position. Who in PEMA is responsible for securing the necessary buses and drivers in the event that any of the "Risk" or "Support" Counties are unable to provide them?
13. For each bus company expected to provide buses, please provide any information available to PEMA, or any information that PEMA has knowledge thereof, regarding the time lapse from the notice of dispatch until buses and bus drivers reach their assigned destination.
14. How many buses will be responding from within the 10 mile radius? How many

buses and drivers will be responding from outside of the 10 mile radius (Plume EPZ) to evacuate persons from within the Plume EPZ? How far must these buses travel to reach their assigned school destinations?

15. Who is responsible for contacting the bus companies during a radiological emergency at Limerick?

16. What information is available to PEMA to indicate the amount of response time involved before buses can be expected to arrive at their designated schools during a radiological emergency? Please indicate all information that will be relied upon by PEMA, or that PEMA has knowledge of.

FOR THE FOLLOWING, PLEASE PROVIDE ANY INFORMATION AVAILABLE TO PEMA OR THAT PEMA HAS KNOWLEDGE THEREOF:

17. How will each bus company be contacted in the event of a radiological emergency at Limerick? Be specific.

18. How will each individual bus driver be contacted during any period of time covering a 24 hour period. Be specific. What provisions are made for notification of drivers off-duty or enroute?

19. Are each of the buses that will be used equipped with 2-way radio equipment? If PEMA has knowledge of details about the kind of equipment involved, please provide any kind of information that PEMA is aware of.

20. Are buses pre-assigned to specific schools? If not, how and when will those assignments be made in the event of a radiological emergency? How will this information be communicated? By whom? If assignments have been made, provide all details available.

21. WITH REGARD TO CONTENTION LEA-15, PLEASE PROVIDE ANSWERS TO THE FOLLOWING QUESTIONS ABOVE AS THEY WOULD PERTAIN TO "BUS DRIVERS":

8, 10, 11, 20, and 9. (For number 9, in the event that buses are available but there are insufficient bus drivers, provide information available about the number, location, status, and source of such persons that would be used to drive buses in the event of a radiological emergency.)

22. Has PEMA collated any data, or does PEMA have in its possession any materials, surveys or lists regarding the number of bus drivers from each company that would participate during a radiological emergency? If yes, attach the materials, lists, data or surveys, by company, indicating the dates and results.

23. If PEMA does not have the information referred to in interrogatory number 22 above, what is the basis for the assumption that a sufficient number of bus drivers will be available? How will PEMA respond to this "unmet" need?

24. Have all bus drivers expected to participate received "training" for a radiological emergency?

25. Please describe the "training" received. Where, when, and by whom have the training sessions been conducted?

26. Provide the dates of training sessions and the number of participants, identifying the bus company involved.

27. If any of the arrangements for buses are being made by anyone other than PECO or Energy Consultants, Inc., please provide the basis for the assumption that all unmet needs have been or will be satisfied. Answer the same question with regard to arrangements for bus drivers.

28. Provide copies of correspondence relating to the securing and commitment of bus drivers and buses in emergency response planning for a radiological emergency at Limerick.

29. Provide any written or oral information available to PEMA that currently outlines the legal responsibilities of the bus companies and their bus drivers, to PECO, the "Risk" and "Support" counties, and to PEMA during a radiological emergency at Limerick. If none exist, please explain how PEMA has evaluated and discussed PECO's response to such an emergency and any agreement

or plans for the provision of buses and drivers. If someone other than PECO or Energy Consultants Inc. has made these arrangements (such as a county office of emergency preparedness) please identify the parties to the arrangements as well as all data demonstrating that there are sufficient buses and bus drivers willing to respond to local, county, and school district emergency response plans.

30. Provide a summary of any "verbal understandings" that PEMA has knowledge of or will rely upon as assurance that individual bus drivers will respond when contacted in the event of a radiological emergency. Provide copies of any letters, contracts or written agreements to support this.

31. Have bus drivers, school staff, any other emergency workers been informed of the "risks" associated with remaining in or entering the Plume EPZ during a radiological emergency requiring sheltering or evacuation as a protective measure? If not, why not? If yes, provide details about the information that has been provided to them. How and when was this information presented?

32. Have promises, inducements, or incentives of any kind in writing or verbally been made to bus companies, individual bus drivers or "volunteers" to obtain their services, or to obtain their commitment to provide services or participation? (An example of this would be the offering made by PECO to provide equipment necessary for the municipal EOC's.) If so, please specify. If not, please state whether PEMA will provide any communications equipment for any of the bus companies, their drivers, or any public or private schools. Please provide any written agreements or summaries or any verbal agreements which encompass these understandings.

33. Do any such written or oral agreements for bus services with individuals or companies contain penalty clauses for failure to comply? Do any such agreements contain incentive clauses for willingness to comply? Does PEMA have any knowledge whether or not such agreement provisions are part of the general

employment contracts for bus drivers?

34. Has PEMA collated any data from any source on whether school staff will remain on duty during a radiological emergency? Supply the basis for this information, and its timeliness. Provide any information, contract terms, informal agreements or verbal understandings which support the position that sufficient school staff are available and willing to remain with students during a radiological emergency. Provide specific information available for each school involved.

35. Have bus companies been informed of any potential legal liability for failure to respond or for inadequate response of its drivers during an emergency? How does a bus company guarantee the availability of drivers during a radiological emergency? Does PEMA have any knowledge of verbal, contractual or written agreements between drivers and bus companies?

36. Do bus companies have commitments to provide services for more than one school district, municipality or other facility during a radiological emergency? If so, please provide a listing of all commitments that PEMA has knowledge of.

36. Have bus drivers and their companies been informed about the need for buses and drivers to remain at host schools to subsequently provide transportation to mass care centers? If so, has the matter been arranged in written or verbal agreements? If not, why not? Please provide any information that PEMA is aware of.

37. Does PEMA have any knowledge of bus drivers or companies unwilling or unable to provide bus drivers for transportation from host schools to mass care centers? If yes, what arrangements have been or will be made to provide transportation from host schools to mass care centers.

WITH REGARD TO LEA-13:

38. What provisions have been made to provide transportation for pre-school and day care children out of the EPZ? Provide any information that supports the position that these transportation needs have been identified and will be met. (This refers to children within the EPZ at the time of an emergency.)

39. If local municipalities are making these arrangements, provide all information that PEMA has knowledge of regarding these arrangements. If PEMA or a county have made any such agreements attach all letters of agreement developed to insure that adequate transportation will be available. Provide copies of any other written agreements or summaries of any verbal agreements which encompass same.

40. What priority, if any, has been given to the transportation needs of pre-school/day care children among the "pool" of transportation needy people, which includes the elderly, handicapped, or those otherwise without transportation means to evacuate?

41. Will buses or private emergency vehicles be used to evacuate pre-school/day care children? Have they been numbered and identified? Have they been assigned? If so, please specify. If no, why not?

42. What information does PEMA have regarding the response time of bus drivers or other emergency volunteers to arrive at a designated day care center after notification has been made? How will drivers be dispatched?

43. How many buses or emergency vehicles will be needed to evacuate the identified pre-school/day care centers? Have agreements been reached with bus drivers or "volunteer" drivers to evacuate these children? If yes, please provide a copy of any such written agreement or a summary of any verbal understanding. If not, when are these arrangements expected to be completed? If such agreements are not contemplated, why not?

44. Are pre-school/day care staff expected to remain with children until parents arrive? If yes, upon what is this assumption based? If not, what arrangements have been made to supervise, transport and care for these children until their parents pick them up during a radiological emergency.

45. Has PEMA any information, data or studies on the effect that the use of "stranger" volunteers will have on the transportation of pre-school and day care children? Will parents be asked to authorize the release of their pre-school or

day care children to the care of unidentified, unnamed people in the event of a radiological emergency? What special training, if any, will such volunteers or emergency workers receive in dealing with pre-school evacuees?

46. How will parents be notified of their children's whereabouts? Will parents be allowed to enter the EPZ to pick up their children during a radiological emergency? Will parents otherwise be permitted to pick up their children at school before they are evacuated from the EPZ? Has this factor been considered by PEMA in traffic congestion studies (especially for the larger day care centers)? For example, has the effect on road access been considered? Will additional traffic control points be necessary? Has the additional stress on existing traffic control points been considered?

47. Will pre-schoolers be evacuated as efficiently and effectively as other school district pupils? What is the status of emergency response planning for day care and pre-school children in Chester, Berks, and Montgomery Counties? Please provide any information PEMA has on the current status of local and county plans for pre-school children, as well as any "unmet needs" that PEMA will be addressing in this regard.

48. What consideration has been given to the capability of day care and pre-school buildings in the event that sheltering is the protective measure that is recommended? How will the adequacy of these buildings for sheltering purposes be determined? What information is available to determine if sheltering is an acceptable protective measure in the event that there is not sufficient time to evacuate during a radiological emergency?

49. What measures will be or have been taken to insure that such centers (day care & pre-school) have adequate radio/TV/phone communications for receiving information to determine appropriate response during a radiological emergency?

50. Who is the designated official from PEMA that is responsible for reviewing "unmet needs" on the issue of emergency response planning for children in pre-school and day care programs?

51. WITH REGARD TO CONTENTION LEA-24/FOE-1, PLEASE PROVIDE ANSWERS TO ANY OF THE FOLLOWING QUESTIONS THAT PEMA HAS KNOWLEDGE OF:

1. A part of Upper Merion Township is within the 10 mile zone. Was Upper Merion offered an opportunity to be included in Emergency Planning for the township? County?
2. If not, why not? Will Upper Merion be included in EM.PL. now? How soon?
3. Has there been contact with U.M.'s township Mgr.? The Emerg.Planning officer?
4. If there has not been contact, how soon will this be initiated.?
5. Has the present traffic study by U.M. been considered in evacuation plans?
6. How many vehicles daily travel into the King of Prussia area.?
7. How many vehicles(& people) terminate there for work, school, etc.?
8. How many commuting vehicles travel through K.of P. daily?
9. What are the peak travel hours? What are the times and peak # vehicles?
10. What are the peak shopping days and hours for K.of P.? # of vehicles, people?
11. What is the peak # of vehicles and people to be evacuated on max.shopping/work day?
12. Since U.M. is partly in the 10 mile zone will Em.Pl. be made for these people?
13. Will Em.Pl. be made for all the residents of U.M.?
14. Is the Schuylkill Expressway partly closed for repairs? For how many years,
15. What is the record of blocked traffic on Sch.Exp.? Daily? How long? #vehicles months?
16. PEMA 6/83 Evac.Map shows no evacuation south on the Sch.Exp. Will it be blocked?
17. Evac. Route south on # 363 is routed to #202 and # 76 onto the TPK.(276) east. How will this traffic enter the TPK, through the toll booths? /or Will all vehicles pick up cards? Will there be detours through and around booth?
18. Why no evacuation east on #202.? Will it be blocked?
19. Why no evacuation west on PA.TPK (76)? Will it be blocked?
20. How often are there blockages at Valley Forge exit of TPK? For how long?
21. How often are there commuter blockages on # 202, # 252? daily slow-down hours? What are
22. Evac.plan from Valley Forge Park on the map is via #252 and # 202 to W.Goshen. How will parents of school children in the Park be notified of whereabouts.?
23. Map shows 4222 autos in (4) hours passing a point on # 252. Is this auto total derived from PennDot average traffic counts? Are these counts based on normal mph rate rather than the estimated passing of 4222 autos in (4) hours in evac.?
24. How does the estimate of 9499 autos passing on # 363 in (6) hours contrast with normal rate?
25. Is there an evacuation plan for Valley Forge Park?
26. Have Park officials been consulted? If not, when will they be? If there is no present evac. pl. for the Park, when will there be one?
27. Has a U.S. Dept. of Commerce Nov.'84 report " Industrial Impacts of Hypothetical Accidents at the Limerick Nuclear Reactor " been used in Emer.Pl.?
27. Have industries in K.of P. area been consulted on Emer.Pl.? Industries in 10 mile zone?
28. How will gasoline/diesel fuel supply be assured for evacuation?
29. Will gas stations on evacuation routes be designated for evac. emergency?
30. Have any shopping malls and centers in K.of P. been consulted re.evac.pl.?
31. If not, when will they be?

CERTIFICATE OF SERVICE

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I hereby certify that the following information was served upon the following parties by first class mail, postage prepaid, with Express Mail Service to those on the service list beside whose name appears an asterick (*):

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LEA's First Set of Interrogatories on "Off-site" Emergency Planning Contentions to PEMA

Transmittal of "missing" page 7 from LEA Findings of Fact and Conclusions of Law on Contention I-42

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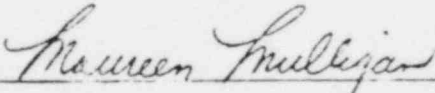
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June 22, 1984


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