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THE  
CAMPBELL  
SPECIAL  
SCHOOLS,  
INC.

BEAVER RUN, R.D. 1, GLENMOORE, PA. 19343

DOCKETED  
USNRC

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October 1, 1984

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Director  
Atomic Safety & Licensing Board  
NRC  
Washington, DC 20555

DOCKET NUMBER

50-352 0L  
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Re: Off-site emergency response  
plans, Limerick Nuclear  
Station

Dear Sir:

I am writing to inform you that to the best of my knowledge no radiological response plan for accidents at Limerick exists for our facility for the mentally retarded. No staff at our school has ever seen such a plan, nor have our staff or Board of Directors approved such a plan.

I am enclosing my statement of July 10, 1984, which describes this situation in detail.

Please consider the seriousness of this omission before the plant is issued a low-level testing license or a full operation license.

Most sincerely,

*Bernard Wolf*

Bernard Wolf  
Director of Programs

jad  
Enclosure

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rec'd 10/5/84

# THE CAMPHILL SPECIAL SCHOOLS, INC.

BEAVER RUN, R.D. 1, GLENMOORE, PA. 19343

July 10, 1984

TO WHOM IT MAY CONCERN:

## I. INTRODUCTION

### A. Incorporation and Licensure

Camphill Special Schools, Inc., located in E. Nantmeal Township is a non-profit corporation which provides education and residential living for mentally retarded children. To do so it is licensed by the Pa. Dept. of Education as a school for the mentally retarded and by the Pa. Dept. of Public Welfare as a community residential facility for the mentally retarded. In school year 1983-84 the placements of 9 children were approved by the Pa. Dept. of Education and its Intermediate Units and school districts for public educational funding. The placements of 4 children were approved by MH/MR Boards and their Base Service Units for public welfare funding. For brevity, Camphill Special Schools, Inc., will be referred to as "the School" in the rest of this letter.

### B. Population

The population of the School varies from year to year. The residential population usually lies within these parameters: 62-72 mentally retarded children; 55-65 staff members of which 30-35 are permanent and 20-25 are in training; and 20-30 staff children. Day-time population can also include 1-10 day students (mentally retarded), and 2-12 employees.

## II. RESOLUTION OF THE BOARD

On June 23, 1984, the Board of Directors of the School passed a resolution concerning its position in regards to the proposed Limerick Nuclear Plant. The resolution stated that until such time as the Philadelphia Electric Company or its agents produces an adequate radiological emergency plan for the School, the Board is opposed to the licensing of the Limerick Nuclear Plant.

This position is taken because the Board is concerned for the safety and welfare of the School, and at this time no written plan at any stage of development exists for the School. Some specifics as to the planning process and the necessary provisions for an adequate plan follows.

### III. SHELTERING

No agency has discussed with the School the problem of sheltering. There have been no evaluations of buildings to determine their feasibility and time-relevance for sheltering. There are no plans for building improvements or additions to allow for sheltering for the necessary periods of time. The School's buildings are of unconventional architectural design and will need careful study to evaluate and modify sheltering.

### IV. EVACUATION PLANS

Except for an initial interview in January of 1983 with Energy Consultants, Inc., and Chester Co. DES, the School has not been formally involved in the development of any plans. No written plan or draft exists at this time.

#### A. Chester Co. Needs Survey

Forms were received in the fall of 1983 addressed to several of the School's electric meters! This form was a generic listing of possible special needs a household may have during an evacuation. A form was completed for each of the School's 10 residences and returned to Chester Co. DES. The responses, tailored to the form, showed some of the kinds of problems each household might have. However, no specific census information was contained or submitted. The specific needs of each household in terms of actual numbers of people, including specific problems or complexes of problems, was not asked for on the form, and was not submitted.

To date there has been no follow-up to these forms to further clarify and specify the needs. As the actual census of the School and its residences changes from time to time, such information would have to be up-dated at regular intervals, say every three-months. No communication to up-date the information submitted in fall 1983 has been received by the School.

#### B. Transportation

The School maintains a fleet of family-type vehicles (a van, a pick-up truck, several station wagons, sedans, etc.) for both School functions and also staff needs. The School owns or operates no school busses.

The School's fleet could not evacuate the entire population, even if all vehicles were available and operational. It has not been determined if any of the vehicles owned by the School are available for an evacuation. It must now be assumed that none are. No alternative vehicles have yet been assigned to the School.

It has not been determined if any of the School staff are available for driving evacuation vehicles. It must now be assumed that none are. Besides, no current staff person has a Class 4 (school bus) license to drive large school busses. No alternative drivers have yet been assigned to the School.



Furthermore, it is the opinion of School staff that evacuation by ground transportation is not an adequate plan. It is believed that evacuation by air lift (helicopters) would be an adequate plan. No helicopters or trained crew have yet been assigned to the School.

C. Staff Coverage of Students

In an emergency situation, staff-student ratios would have to be 1:3, 1:2, and 1:1 depending on which students are to be covered. Groupings have not been worked out. Those supervising the students would have to have adequate experience and training with children of this kind. Certified special education teachers or mental health professionals would in most cases be needed. It has not yet been determined if any of the School staff are available to accompany the students during an evacuation. It must now be assumed that none are available. No alternative staff have been assigned to accompany the students.

Among the special needs of this student population are some problems that would necessitate ancillary personnel. Particularly, the conditions of those children with convulsive disorders and behavioral problems can be expected to be exasperated during an evacuation. Intervention by medical personnel will be necessary. Such personnel would have to accompany the evacuation and be available during the internment. No such ancillary personnel have been identified or assigned to the School.

D. Medical Supplies and Equipment

The special needs of the population of the School would necessitate an evaluation of actual and potential medical needs existing prior to and precipitated by an evacuation. The necessary supplies and equipment would have to be stored ready to go with the evacuation. Such supplies and equipment would have to be renewed and also updated periodically. No such inventory has been compiled, nor has someone been assigned to this responsibility.

E. Telephone and Radio Communication

No assessment of the telephone and radio communications needed by the School during a radiological emergency has been made. No one is responsible for procuring such equipment. No one has been assigned to be trained and to man such equipment, during a radiological emergency. No arrangements have been made or personnel assigned even to ensure that the telephone will be answered.

F. Host Facility

The School has recently been told over the telephone by Energy Consultants, Inc., and Chester Co. DES that the Devereux Foundation has agreed to host this School's population. No agreement has been seen in writing. Nothing of the details of the agreement has been

conveyed. Exact location, details of the facility, staff available, services available, other organizations which will be also hosted there, and so on are all unknown. The School is thereby unable to assess the appropriateness of the proposed host site.

Furthermore, it is the opinion of the staff of the School that a host site can only be considered appropriate if it is located beyond the Ingestion Zone of the plume.

Very Sincerely,

Bernard Wolf  
Director of Programs

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MAY 14 1974