

RELATED CORRESPONDENCE
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))

TESTIMONY OF
COLONEL EUGENE P. KLYNOOT
FOR THE COMMONWEALTH OF PENNSYLVANIA
REGARDING LIMERICK ECOLOGY ACTION
CONTENTION LEA-28(a)

Q.1. Please state your full name and business address.

A.1. My name is Colonel Eugene P. Klynoot. My business address is Director of Plans, Operations and Training, Pennsylvania Army National Guard, Department of Military Affairs, Fort Indiantown Gap, Annville, Pennsylvania.

Q.2. How long have you served as Director of Plans, Operations and Training for the Pennsylvania Army National Guard?

A.2. I have served in my present position since January 1, 1984. My career in the Pennsylvania Army National Guard spans more than 20 years of service; I have been assigned to State Headquarters since December 1976.

Q.3. Please describe your education, background and experience.

A.3. My education, background and experience are described in my biographical sketch, which is submitted with this testimony.

Q.4. What is the mission of the Pennsylvania Army National Guard?

A.4. The Pennsylvania Army National Guard is a military force consisting of about 17,322 officers and enlisted personnel, with responsibilities to both the federal and Commonwealth governments. As a reserve component of the U.S. Army, the Pennsylvania Army National Guard trains and prepares to fulfill its federal mission as part of the Total Force of the Army in the event it is called or ordered into federal service by the President. As the organized, federally-recognized and equipped state militia of Pennsylvania, the Pennsylvania National Guard is ready to respond to the orders of the Governor placing it on state active duty in the event of emergencies or potential emergencies within the Commonwealth.

Q.5. Please describe the state active duty mission of the Pennsylvania National Guard.

A.5. The Military Code empowers the Governor to order all or part of the Pennsylvania National Guard to state active duty when an emergency occurs or is threatened or when tumult, riot or disasters occur or are imminent. The Pennsylvania National Guard has proudly and effectively

performed its state active duty mission in a wide-variety of state emergencies, including the Johnstown Flood, the Agnes floods, other floods, major snow emergencies, trucker strikes, and other similar situations.

Q.6. What are your responsibilities as Director of Plans, Operations and Training with regard to the state active duty mission?

A.6. My Directorate is responsible for plans, operations and training of the Pennsylvania Army National Guard in its Federal and State missions. As part of that responsibility my directorate prepares plans for National Guard involvement in state emergencies. Additionally, we review plans prepared by subordinate units. Within my directorate is the Office of Military Support for Civilian Authorities. We provide the point of contact between the National Guard and the Pennsylvania Emergency Management Agency (PEMA). My directorate prepared the National Guard annexes to PEMA's disaster operations plans.

Q.7. How does the state active duty mission relate to possible nuclear emergencies at nuclear power stations in Pennsylvania?

A.7. The Pennsylvania National Guard is an important asset available to the Governor and PEMA in any state emergency, including an emergency at a nuclear power station. The National Guard is involved in planning for

nuclear emergencies, and we have prepared annexes to PEMA's plans in this area and our own state-wide and unit plans.

Q.8. Are you familiar with the planning for the National Guard's mission with regard to any possible emergency situation at the Limerick Nuclear Generating Station in Montgomery County, Pennsylvania?

A.8. Yes I am. I have reviewed these plans. As director of operations, plans and training, these plans are prepared within my directorate and we review the subordinate unit's plans. In addition, in coordination with PEMA, we contributed to Annex E of the state disaster operations plan and prepared Appendix 14 to that plan.

Q.9. Please describe, in general terms, the responsibilities of the Pennsylvania National Guard with regard to a possible emergency at a Nuclear power station.

A.9. My directorate has developed plans to support county and municipal governments within the plume exposure pathway for Limerick and the other nuclear plants in Pennsylvania. We have planned for the employment of designated National Guard units to support risk counties, upon request, with security, traffic control, evacuation and logistical assistance. We are prepared to commit additional National Guard forces to augment the designated units if necessary in support of the risk counties. We will, upon order of the Governor, in coordination with PEMA, commence

operations of a National Guard Emergency Operations Center (EOC) at Fort Indiantown Gap, and will send representatives to the State EOC and EOCs located in risk counties. With regard to Limerick, the risk counties are Montgomery, Chester, and Berks Counties. We have planned for access and exit control and security of designated areas within the plume exposure pathway in conjunction with PEMA, the State Police and the risk counties. The Guard is prepared to provide air and ground transportation assets to supplement county and municipal resources to assist in evacuation. We will, upon request, augment the State Police with traffic control functions. The Guard is prepared, in coordination with the Pennsylvania Department of Transportation, to establish emergency fuel distribution points and provide equipment and manpower for road clearance on main evacuation routes. We have the capability to augment communications equipment and systems upon request and assist in medical evacuations. The National Guard can, upon request, provide assets to airlift key personnel to field emergency operations centers at incident sites.

Q.10. What National Guard units have been assigned responsibility for duties in connection with any possible emergency at Limerick?

A.10. The 1st Battalion, 111th Infantry, of Norristown, has been designated the primary response unit for

Montgomery County. The 2nd Battalion, 111th Infantry, (Phoenixville) serves the same function for Chester County, while the 1st Battalion, 109th Field Artillery (Wilkes-Barre) is the primary response unit for Berks County.

Q.11. Are there backup units for the three risk counties and what are their missions?

A.11. Yes. The backup unit for Montgomery County is the 2nd Battalion, 109th Infantry from Scranton; for Chester County, it is the 1st Battalion, 109th Infantry from Scranton; and, for Berks County, it is the 3rd Battalion, 109th Infantry from Milton. The backup units are designated to fill in for the primary units in the event the primary unit is unavailable for a state active duty mission due to being away for annual training, for example. If the primary unit is available, it would be mobilized first, but if it were outside the Commonwealth, then the backup would be called. The backup unit is also available as additional National Guard troops to augment the primary unit in the event that became necessary.

Q.12. Describe the chain of command for these units if they are mobilized in an emergency at Limerick.

A.12. Each unit would send a liaison to the county EOC of the risk county to which it is assigned. The National Guard would send a liaison to the State EOC at Harrisburg,

and we would establish our own EOC at FIG. The units involved would be under the general military control of the Adjutant General whose directions would flow through the Commander of Task Force 56, to the battalions concerned. Various missions would be assigned to the units by PEMA or the county emergency management agencies and the units would perform them. We strive to maintain command and control in a state active duty situation with the flexibility to get the job done in the locality where the emergency exists.

Q.13. Have you reviewed the operations plans for the three primary units that would be involved in an emergency at Limerick?

A.13. Yes I have.

Q.14. Describe the plans for each unit in terms of its response time.

A.14. The 1st Battalion, 111th Infantry from Norristown is responsible for Montgomery County. When the unit is alerted it will assemble at its home armories, which are located at Norristown, Philadelphia, Doylestown, and Kutztown, and will then prepare to move to support Montgomery County Emergency Management officials at forward assembly areas. We generally assume that the main body of a unit will be prepared to move out of an armory when about 75% of the soldiers are assembled. The 1st Battalion,

111th Infantry estimates that it will take 12 hours for the units to deploy. This time period represents a worst case scenario. A good deal of the strength of some of the companies in the 1/111th comes from the Philadelphia metropolitan area and depends on public transportation. It is likely that, depending on the immediate needs, alternate transportation could be procured by activating another Guard unit, the 103rd Engineer Battalion, which has the rolling stock necessary to pick up personnel. My personal view is that, if it was necessary, this unit could mobilize and be ready to deploy in 6 hours. The needs at the time of the incident would dictate whether we would pursue an accelerated mobilization. Task Force 56 is making plans for this action should it be necessary.

The 2nd Battalion, 111th Infantry, would assemble at its home armories in Phoenixville, Chester, West Chester and Media, and deploy to forward assembly areas in Chester County in support of emergency management agency officials. This unit estimates that it will be ready to deploy in 6 hours after it receives notification, and I believe that is a realistic estimate.

The 1st Battalion, 109th Field Artillery would, upon notification, assemble at its home armories in Wilkes-Barre and Nanticoke. The units would be able to assemble at their armories within 6 hours, which we consider normal for such mobilizations, and motor march to Berks County for deployment in about two additional hours. Unlike the other

units, whose armories are located within or close to the risk counties, the 1/109th Field Artillery will be travelling some distance from home station and has designated specific school sites at which to deploy its units once it arrives in Berks County. This possible deployment has been coordinated with the appropriate school officials.

Q.15. Are you saying that the first National Guard assets that would be available in the risk counties would not arrive for 6 to 8 hours after alert?

A.15. Not at all. It depends on the needs. I would fully expect National Guard liaison personnel to be in place at the EOCs within an hour or two after notification. Advance parties would be dispatched from the units to the forward areas where they would deploy as soon as they were mobilized if there were a need. For example, one of the Guard's possible missions is to assist in emergency fuel distribution. If it were indicated by the situation, I am certain any of our units could dispatch its gasoline tanker truck to a point designated by emergency management officials and the State Police within an hour, or at most, an hour and a half, after notification. Similarly, if the wrecker truck were needed before the main body of the unit was ready to deploy, it could be dispatched with appropriate manpower support within a very short time after notification. Furthermore, although the primary units have

major responsibilities, we could and would deploy other National Guard assets on an as needed basis. If Army Aviation support were required, we could deploy it from Fort Indiantown Gap in a short time after we received the mission.

Q.16. What about radiation?

A.16. The National Guard has appropriate radiological monitoring equipment and is prepared to operate in any environment that would be likely to result from an emergency at a nuclear facility, such as Limerick.

Q.17. Have you reviewed the missions that might be asked of the National Guard in an emergency at Limerick and do you believe the units involved could perform those missions?

A.17. I have carefully reviewed the missions and have described them in my previous answers. I am confident, knowing the professionalism and effectiveness of our soldiers, that the missions assigned can and will be performed as needed. Our job is mainly to supplement the State Police and other assets. We're trained to do so and we're ready to respond.

Biographical Sketch

1. Date: 21 October 1984
2. Name: Klynoot, Eugene P.
3. SSAN: 196-34-5848
4. Branch: Field Artillery
5. Grade: Colonel
6. Date of Federal recognition in present grade: 7 April 1984
7. Present duty assignment and date assigned: Director of Plans, Operations, Training and Military Support, HQ STARC, PAARNG, 1 January 1984.
8. Duty position specialty skill identifier: 54A00. Designated Specialties: 13 - Field Artillery and 40 -
9. Additional Skill Identifier awarded - 5H - Nuclear/Chemical Target Analysis.
10. Total length of commissioned service: 18 years.
11. Marital status: Married. Wife - Jean, 2 children - Jeffrey - age 15 and Raymond - age 9.
12. Place of birth: Wilkes-Barre, PA.
13. Date of birth: 8 May 1944.
14. Source of Commission: PAARNG OCS.
15. Mandatory removal in present grade: 17 October 1995.
16. Home address: 6 Swatara Drive, Lebanon, PA 17042.
17. Business address: The Adjutant General of Pennsylvania, Department of Military Affairs, ATTN: DPOTMS, Annville, PA 17003-5002.
18. Home telephone: (717) 865-3058.
19. Business telephone: (717) 787-4504, AUTOVON 235-2628.

20. Civilian education:

BA - English, 1967, Wilkes College, Wilkes-Barre, PA.

Evening graduate courses - English, 1968, Montclair State College, Montclair, NJ.

Evening graduate courses - English, 1969, 1970, Scranton University, Scranton, PA.

Masters Degree - Public Administration, 1983, The Pennsylvania State University.

Doctoral courses - Political Science/Public Administration, The Pennsylvania State University

21. Civilian experience:

June 1967 - April 69, Pharmaceutical representative, Burroughs Wellcome and Co. Promoted the use of ethical drugs.

April 1969 - June 1976, National Guard technician, Training officer, Hq 1st Bn 109th FA, 28th Inf Div, PAARNG. Responsible for the training of a 155/203 mm composite artillery battalion.

July 1976 - December 1983, National Guard technician, Officer Personnel Readiness Manager, Pennsylvania Department of Military Affairs. Responsible for implementation and management of the Officer Personnel Management System, development of officer personnel policy, officer personnel actions, warrant officer professional development, officer counseling, ROTC and officer procurement programs and state tuition credit program.

December 1983 - Present, National Guard technician, Plans, Operations and Training Officer, Pennsylvania Department of Military Affairs.

22. Military education:

OCS, 1965, Pennsylvania Military Academy.

Field Artillery Officer Basic Course (resident), 1966, U.S. Army Artillery and Missile School.

Airmobile Training (resident), 1972, U.S. Army Infantry School.

Field Artillery Course Advanced Course (non-resident), 1974, U.S. Army Field Artillery School.

Adjutant General Officer Advanced Course (non-resident), 1976, U.S. Army Institute of Administration.

Nuclear and Chemical Target Analysis Course (resident and non-resident phases), 1976, U.S. Army Field Artillery School.

Command and General Staff College (correspondence and USAR School), Commandant's List, 1978, U.S. Army Command and General Staff College.

Army War College (resident course), 1983.

23. Awards, decorations and citations:

Army Meritorious Service Medal.

Army Commendation Medal - 2 awards.

Army Forces Reserve Medal.

Army Reserve Components Achievement Medal with 2 OLC.

Army Service ribbon.

Pennsylvania Meritorious Service Medal.

Pennsylvania 20 year Service Medal.

Pennsylvania Service Ribbon with 4 silver stars.

Major General Thomas R. White, Jr., Medal (PA).

General Thomas J. Stewart Medal (PA).

The Adjutant General's Staff Identification Badge.

ARNG Recruiter Badge.

24. Military Service:

5 Sep 63 - 17 Sep 65, Cannoneer, Btry C, 1st Bn 109th FA PAARNG.

18 Sep 65 - 29 Oct 67, 2LT, Asst XO, Btry B, 1st Bn 109th FA.

30 Oct 67 - 16 Sep 68, 2LT, Asst Communications Officer, HHS Btry, 1st Bn 109th FA.

17 Sep 68 - 16 Apr 69, 1LT, Communications Officer, HHS Btry, 1st Bn 109th FA.

17 Apr 69 - 31 Jan 71, 1LT, Asst S-3, HHS Btry, 1st Bn 109th FA.
 1 Feb 71 - 18 Nov 71, 1LT, Btry Cdr, HHS Btry, 1st Bn 109th FA.
 19 Nov 71 - 31 Mar 72, CPT, Btry Cdr, HHS Btry, 1st Bn 109th FA.
 1 Apr 72 - 12 Dec 76, CPT, Btry Cdr, HHS Btry, 1st Bn 109th FA.
 13 Dec 76 - 6 Apr 77, CPT, Admin. Officer, HHD PAARNG.
 7 Apr 77 - 30 Nov 87, MAJ, Admin. Officer, HHD PAARNG.
 1 Dec 78 - 6 Apr 81, MAJ, Personnel Officer, HHD PAARNG.
 7 Apr 81 - 24 Jan 82, LTC, Personnel Officer, HHD PAARNG.
 25 Jan 82 - 2 Aug 82, LTC, Dep. Director of Pers/Administration, HHD PAARNG.
 3 Aug 82 - 20 Jun 83, LTC, student, U.S. Army War College.
 21 Jun 83 - 31 Dec 83, LTC, Dep. Director of Personnel, HQ STARC, PAARNG.
 1 Jan 84 - Present, COL, Dir. of Plans, Ops, Tng & Mil Spt, HQ STARC, PAARNG.

25. Affiliations:

American Society for Public Administration - Member
 Pennsylvania National Guard Scholarship Fund - board member.
 Alumni Association of the U.S. Army War College - Member.
 National Guard Association of the United States.
 National Guard Association of Pennsylvania.
 Jorestom Lions Club - Past president and member.
 Active participant in non-political civic affairs.

26. Additional remarks:

Primary interests: government, management and administration.
 Other interests: national and international affairs.
 Leisure activities: Reading, music, jogging and skiing.