

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PHILADELPHIA ELECTRIC COMPANY)

(Limerick Generating Station,)

Units 1 and 2))

Docket Nos. 50-352

November 2, 1984

MOTION ON BEHALF OF LIMERICK ECOLOGY ACTION REQUESTING
THE ATOMIC SAFETY AND LICENSING BOARD TO ISSUE A SUBPOENA
TO ROBERT FETERS, JR. TO ATTEND AND GIVE TESTIMONY AT
EVIDENTIARY HEARINGS ON OFF-SITE EMERGENCY PLANNING
CONTENTIONS ON THE ISSUES OF TRAFFIC CONGESTION IN THE
VICINITY OF MARSH CREEK STATE PARK AND ROUTE 100 SOUTH
IN UPPER UWCHLAN AND UWCHLAN TOWNSHIPS, CHESTER COUNTY & THE
AVAILABILITY OF BUS DRIVERS DURING A RADIOLOGICAL EMERGENCY

(Contentions LEA-15 and LEA-24/FOE-1)

Pursuant to 10.CFR §2.720, Limerick Ecology Action hereby respectfully
requests the Atomic Safety and Licensing Board in the above captioned
proceeding to issue a subpoena to:

Robert Feters, Jr.

RD#2

Downingtown, Pa. 19335 (home phone 215-458-5201)

requesting Mr. Feters to appear at the U.S. Customs Court House,
Second and Chestnut Streets (Room 300) in Philadelphia on November
27th., 1984 at 9:00 a.m. and to be on 24 hour phone alert standby
every day thereafter until called to testify on behalf on Limerick
Ecology Action on the subject matter of contentions LEA-15 and
LEA-24/FOE-1.

LEA OFFERING OF PROOF

Mr. Feters is the owner/operator of Robert Feters, Inc., a contracting
company which owns and operates 28 school buses in Chester County.
When contacted by LEA representative David Stone about the availability

of his drivers in the event of a radiological emergency, Mr. Feters stated that it was his experience indicated that bus drivers should not be assumed to be available when the safety of their own families might be at risk. His testimony would help to develop the record on contention LEA-15.

Mr. Feters is also the Emergency Management Coordinator of Upper Uwchlan Township, the municipality which includes Marsh Creek State Park. Route 100, a major north-south evacuation route passes through the middle of the township. Mr. Feters has informed Dave Stone that he is concerned about the adequacy of plans for traffic control around Marsh Creek State Park, as well as the road capacity of back roads onto which traffic from the park would be directed according to the latest draft Radiological Emergency Response Plan for Upper Uwchlan Township.

LEA was unable to obtain written testimony from Mr. Feters and believes that his testimony would assist in the development of the record on these issues in this proceeding.

David Stone

David Stone

LEA representative for LEA-24

cc: Service List

Subpoena Forms sent to Board only

Respectfully submitted,

Phyllis Zitzer

Phyllis Zitzer, President

LEA-24/FOE-1
(Lead Intervenor: LEA)

There is no assurance that plans for evacuation of the ten mile radius will not be impeded by traffic congestion in the vicinity of Marsh Creek State Park, Exton area (involving Route 100) and Valley Forge Park, King of Prussia area.

These areas should either be included in the Emergency Planning Zone or adequate plans for traffic control and direction should be made to avoid adverse effects on EPZ evacuation.

UWCHLAN TOWNSHIP
RESOLUTION NO. 84-17

LEA Exhibit

A RESOLUTION ADOPTING THE TRAFFIC MASTER PLAN
AND ENGINEERING STUDY, PENNSYLVANIA ROUTES 100
AND 113 CORRIDORS

WHEREAS, considerable development activity has already taken place and much more is anticipated throughout the Township during the next ten (10) years; and

WHEREAS, the Board of Supervisors of Uwchlan Township, foreseeing major traffic problems in the future without improvements to the existing road system in the northeastern portion of the Township, commissioned a comprehensive traffic engineering/master plan study; and

WHEREAS, said study was recently completed by Orth-Rodgers and Associates, Inc., Philadelphia, which firm developed various recommendations for solving the anticipated traffic problems; and

WHEREAS, said Board of Supervisors deems that the cost of the traffic recommendations as outlined in the attached document should be borne equally by the parties creating the demand for traffic improvements, with payments for same to be made in accordance with the schedule contained therein,

NOW, THEREFORE, it is hereby Resolved by the Board of Supervisors of Uwchlan Township, Chester County, Pennsylvania, that the Traffic Master Plan and Engineering Study attached to this Resolution is hereby adopted as the Township's official Traffic Plan.

This Plan may be amended, from time to time, by Resolution of this Board of Supervisors.

RESOLVED AND ENACTED this 12th day of March, 1984.

UWCHLAN TOWNSHIP BOARD OF SUPERVISORS

Harry W. Rauch, Jr.
Chairman

Steven P. Henry

Samuel R. Matthews

Attest:

Patricia A. Amosca
Secretary

TRAFFIC ENGINEERING MASTER PLAN STUDY

PA. ROUTE 100 AND PA. ROUTE 113 CORRIDORS

UWCHLAN TOWNSHIP,

CHESTER COUNTY, PENNSYLVANIA

PREPARED BY:

ORTH-RODGERS & ASSOCIATES, INC.

FEBRUARY, 1984

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