

# AIR and WATER Pollution Patrol

BROAD AXE, PA.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

August 8, 1984  
DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 AGO 13 A11:58

In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station  
Units 1 and 2)

Docket Nos. 50-352-06  
and 50-353-06

## AWPP (ROMANO) NEW CONTENTION RE EVACUATION

AWPP (Romano) contends that it is now known that neither the Staff nor the Applicant has realistically submitted an evacuation plan that would insure complete capability to safely, under conditions known to exist in the Montgomery County area, evacuate all people and livestock in case of an accident at Limerick. Neither Applicant nor Staff has adequately tested such a plan. AWPP contends Applicant must be made to provide a truly realistic plan, and must be required to test its required capability\* before receiving a license to operate or risk the public.

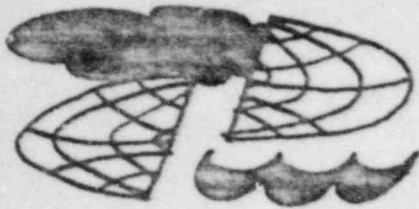
Stated another way, AWPP, contends the Applicant and Staff, singly or together, must provide a plan that passes the Limerick Test of Evacuation Capability. That test, unlike the not-successful, boycotted\*\* July 25 so-called evacuation drill, is to prove via a complete, live evacuation exercise,\*\*\* that the Applicant has devised a plan which would guarantee all people and livestock within ten miles, or more if necessary, can be moved without injury or death under the highly probable, non-controllable factor of "worst weather" condition. AWPP is referring to such weather as occurs two or more times a year in the Limerick area, namely, a raging night blizzard easily possible in November and March, but surely to occur every December, January or February.

\* That capability having such inherent guarantees of safety that people in authority at schools, townships and boroughs will embrace the plan.

\*\* Boycott by officials of Townships and others (Phoenixville) because the plan is known not to guarantee safety.

\*\*\* How else can an emergency evacuation plan for the consequences of such a lethal activity in the midst of high population density be evaluated?

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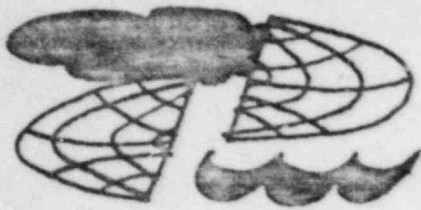
AWPP (Romano) New Contention Re Evacuation continued:

It goes without saying that under such conditions with power lines down and with roads drifted shut, it must be the burden of Philadelphia Electric to re-submit a sophisticated, staffed, organization with redundant capabilities that guarantee the safety of the public in any direction out of the EPZ.

The degree to which the Applicant's plan can not work was made evident in the fact that floods, just one week before the July 25 drill, at one of the Limerick reactor area's main escape routes, e.g. the junction of 422 and 29 at Collegeville became impassable which would prevent evacuation. No drill or plan should qualify Applicant for having performed a pre-requisite for licensing unless it establishes without a doubt that it fulfills the purpose, namely, to save people from injury or death. The Limerick Test of Evacuation Capability must be the Applicant's burden to assure the highly probable adverse weather conditions stated above, or other concomitant disaster, does not become a death trap for thousands and thousands trying to escape an ill-timed accident at Limerick.

AWPP's (Romano) Contention is timely filed and meets the 10C.F.R. 2.714 (a)(1) criterion for determining the admissability of proposed contentions. This contention results from the recent observed shortcomings of the so-called drill, and could not have been entered until now. In case of an accident which liberated lethal doses of radioactive material and/or high intensity radiation, any actions taken on the experience of July 25th drill would result in too many people within the EPZ, and beyond being injured or killed with an accident in worst-condition weather.

Further, there are no other practicle means to protect me, my property within 10 miles of Limerick, my family, members of AWPP, and the public, than an effective, worst-condition-capable evacuation plan as embodied in the Limerck Test of Evacuation Capability which AWPP



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AWPP (Romano) New Contention Re Evacuation continued:

(Romano) now enters.

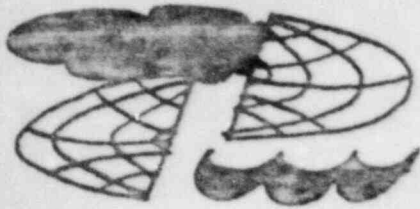
AWPP's participation as an observer in the July 25th drill, and a meeting that night where eye-witness accounts of unbelievable blunders made by those officially part of the drill, were laughable if it wasn't that it could be tragic.

AWPP's verbalizing, and effort to have the Board require the Limerick Test of Evacuation Capability will contribute to saving lives and insuring that "worst condition" becomes an indispensable part of the exercise whose purpose is to determine capability of any plan to prevent death and injury from a nuclear accident which can happen any minute of any night or day.

AWPP disagrees that an intervenor cannot adversely criticize an action of the Applicant unless the intervenor can describe how to do it better or proffer an alternative. For example if I buy a new car and it bucks and stalls, I know the car does not run properly, and can criticize the auto dealer who sold it to me. I would not be required to know how to make the car perform properly. That is the obligation of the person who subjects me to the particular automobile, just as it is the Applicant's obligation of burden to provide what is due the public and what the public wants.

In the case of the July 25th drill which AWPP states had many flaws which we will detail to the best of our knowledge in view of the fact it was kept from, or made very difficult, for the public to observe properly as will be affirmed by various groups and individuals including LEA. AWPP states the plan was deficient enough to have approximately 25% of the population not represented just as P.E. knows of the many Townships who refused to take part, including Phoenixville Borough (see letter enclosed).

To supply Applicant with the answer as to how AWPP would have a proper, capable, evacuation package that solves the deficiencies of P.E.'s



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AWPP (Romano) New Contention Rd. Evacuation continued:

evacuation plan, even before Applicant asks, AWPP informs the Applicant it will provide the proper evacuation plan when it accomplishes the AWPP full Limerick Test of Evacuation Capability, so that the assurance of safety and consent of the people is obtained...as was not the case with the paper charade drill, a poor reflection of the Applicant's evacuation plan.

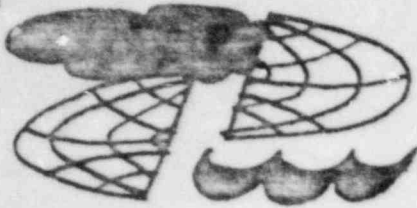
The Applicant, as well as the NRC, and FEMA, and PEMA know of unmet needs, courageously stated by Dr. Claypool of Owen J. Roberts High School; knows about insufficient busses and insufficient ambulances; not just physically insufficient, but not even sufficiently present on paper.

The emergency response capability was not at all tested because those who took part, too often being too many Philadelphia Electric employees who knew when and what was coming. As a result the element of surprise was not tested--and, therefore, the most critical and crucial aspect of the drill, namely, the time factor of response, was made totally invalid for extrapolation or calculation re performance versus time upon which the very lives of people would depend.

Further the Tim Campbell of Chester County, July 20 letter revealed that the sirens would sound between 7:30 and 8:30p.m. invalidating the surprise effect on response and preparation for the response as it affects quality of performance and as it affects time of response completion.

Also, the May 25, 1984 District of Columbia Circuit Court of Appeals ruled contentions can be entered for litigation re nuclear reactor evacuation plans.

While LEA has contentions involving evacuation, the aspect is different in that LEA is showing short comings of the Applicant's present escape scheme, AWPP contends neither Staff nor Applicant has come up with a plan (and they must now that the July 25 drill was a failure) that passes



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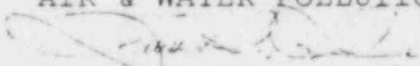
AWPP (Romano) New Contention Re Evacuation continued:

Limerick Test Of Evacuation Capability... the only assurance there will be nor injury or death to the people or livestock in the EPZ and beyond.

The AWPP (Romano) New Evacuation Contention has to do with insuring the saving of thousands and thousands of lives that would have been in jeopardy because of the highly unready, unwanted, unworkable, failed escape "plan" which the Applicant has erroneously called sucessful.

Delay of the proceeding is, of course, secondary to the lives of people. However, if the ASLB rules the Applicant must take the essential responsibility to pass the Limerick Test of Evacuation Capability before Applicant receives a license to operate, the only delay AWPP can possibly cause is the time to deliver such order...one or two days at the most. Further, the contention could not have been brought earlier, so as not to delay the proceeding, since the Staff and Applicant were involved in the July 25th drill date...with the gross inadequacies it brought to light.

Respectfully submitted,  
AIR & WATER POLLUTION PATROL

  
Frank R. Romano, Chairman  
61 Forest Ave.  
Ambler, PA. 19002