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Nuclear Regulatory Commission
Docket #50-352
Washington DC 20555

Dear Commissioners,

Since I most likely will be unable to attend the upcoming public hearings wherein you will consider the public's comments on whether Emergency Evacuation Plans are "adequate" and whether they will work to protect the citizens in the event of a nuclear accident at Limerick Nuclear Power Plant in Limerick, Pennsylvania, I have decided to send my comments to you instead. I do hope that you will listen to, consider and act on comments submitted in letters (and not throw them out as my husband has suggested) just as you will at the hearings? I have a number of comments and questions regarding differing, yet important aspects of the Emergency Evacuation Plans, and the question as to whether such plans are feasible or not.

1) School Evacuation Plans, especially in "risk" school districts: I am extremely concerned about these plans since children are particularly sensitive to radiation. Philadelphia Electric Company's proposed school plans have been submitted to the Nuclear Regulatory Commission as if they were written and prepared by the schools themselves, but that is not the case. Present plans include instructions for students to place wet cloths over their mouths and noses if "sheltering" or staying inside school buildings is recommended during an accident at Limerick. Such action would take place if bad weather or slow arrival of transportation were to take place and prevent a prompt response. If such sheltering were to occur, for how long would this sheltering be necessary? How long can one reasonably expect students (especially young ones, Kindergarten age) to place wet cloths over their mouths and keep them there? And who, really, is going to take care of these students be it for sheltering, or transport? I know that in the plans teachers and school staff are expected to remain with students during sheltering, or if an evacuation were to occur, teachers are expected to accompany children on buses to the host schools where they must remain until children are picked up by their parents. What kind of guarantee is there that teachers will in fact abide by these plans? I know several teachers who teach in "risk" schools who, in such an emergency, would put the welfare of their own families first, not that of their students. It is the position of Pennsylvania State Education Association lawyers that any unilateral acceptance of these school plans without involving teachers in their development and discussing it with the union is an unfair labor practice in violation of the law. How can school evacuation plans be accepted as "adequate" if there is no guarantee #1) that teachers will stay with their students #2) that even if they do remain that they would be able to enforce the recommended practice of keeping wet cloths over students mouths and #3) that this second practice would even really help?

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Yet another topic to consider when deciding whether the school evacuation plans are "adequate" is the question of busing. In most cases school bus drivers haven't even been asked to volunteer ahead of time for evacuation duty. It is assumed by the Philadelphia Electric Company and by the Pennsylvania Management Agency that a contract with a bus company alone will guarantee that bus drivers will show up. But, the contracts with the bus company are not legally binding and are written to provide buses "to the maximum extent possible." How can the school evacuation plans be approved as "adequate" when no minimum guaranteed number of buses has even been agreed to by the bus companies? For that matter, school districts just outside the ten-mile Emergency Zone are in many cases not inclined to give up their buses for evacuation inside the EPZ when they have their own students to transport. In a letter dated March 5, 1984, Tredyffrin/Easttown School District made the point that should they give up their own buses, "we would not be able to safely and expeditiously deliver students to their homes." The danger and the desire of parents to get their children out of the area in case of a serious accident at Limerick does not stop at ten miles.

I have yet other questions about the school plans which I think should be answered before the plans are deemed "adequate". Will high school students with cars be allowed to drive their cars? Who will be responsible for their safety? Is the Philadelphia Electric Company responsible for any injuries to the students or damage to the buses if an accident or accidents should occur during an evacuation? Who will pay for the implementation of school evacuations or sheltering?

#2) Day Care Centers: Since children are particularly sensitive to radiation, I am concerned not only with whether evacuation plans are adequate for schools, but also for day care centers. Do the evacuation plans currently in existence take care of the evacuation of children, even younger than Kindergarten age, in day care centers? Who is responsible for their care and evacuation? Are buses and drivers (provided they are found) expected to help with private day care centers? If not, and parents are supposed to (and would of course want to) pick up their children, this would no doubt create traffic problems, especially when parents had to go "the wrong way" on routes designated as evacuation routes. Parents would have to do this to reach day care centers nearby. And remember, the parents would not be coming from a nearby residence (otherwise the child would most likely be home to begin with) but from the place of work, no doubt a farther location, hence prolonged traffic problems... Unless workable plans are drawn up which deal with these very tiny special children (the number of which is increasing due to the increase of both parents working), how can any evacuation plans be approved as "adequate?"

#3) Traffic and the evacuation routes: I have a number of questions regarding the topic of traffic routes and whether they are workable or not. Such need to be examined and resolved before it should be decided whether the evacuation plans are "adequate". For the plans to even begin to "work" depends upon each driver in the EPZ knowing not one

route (for instance the route going from one's home out of the EPZ to a Mass Care Center), but all of the different routes, and for that matter, all of the roads in the county to enable one to get to those routes. For instance, I have no knowledge of the roads in Spring City (the towers of Limerick are within sight of this town) with the exception of the ones which take me from my home or place of work, to a printer with whom my company does business. If I were there and the alarms sounded (provided there were no failures in the public alert system, a different topic again), I would not know to where I was supposed to drive to evacuate. This is a frightening thought. How can the evacuation routes be deemed "adequate" when they unrealistically rely upon one's having knowledge of all of the roads in the EPZ and all of the evacuation routes? If the traffic plans are not to rely upon individuals' total knowledge of the area, since this is rather unfeasible, how is a driver going to know how to leave? Are the radio stations to which one is supposed to turn (and how is one to know what station that is in a vehicle?) going to go road by road to tell drivers where to go? How are the numerous persons from outside the county (salespersons, delivery persons, tourists, person simply driving through) who find themselves in the EPZ during an emergency, know what to do or where to go? Having officers at designated points along escape routes only is not going to help those persons in the EPZ, not familiar with the roads or the evacuation routes, who are not on the evacuation routes.

Closer to my home, the Pennsylvania Emergency Management Agency (on its Evacuation Plan Map dated June '83) estimated that approximately 1478 automobiles from four townships would travel over Route 100 in the period of two hours on their way to the intersection with Route 113, and then Downingtown. As it is now, without any sort of emergency, traffic on Route 100 during rush hour is almost always backed up on Rt. 100 from the intersection of Rt. 100 and Rt. 113, to the PA Turnpike entrance (and sometimes beyond). How realistic is it to say that 1478 vehicles from four townships could travel over Rt. 100 in the period of two hours when it takes 10-15 minutes during rush-hour for only a fraction of that number to pass through? Is it possible in two hours time (providing that the two hours is realistic, and it is not) to escape radioactive gases or particles that are being blown by the wind from a source only about twelve miles away?

With such a mass of vehicles traveling one way out of the EPZ, will other necessary vehicles such as the school buses, police, fire vehicles, tow trucks, snow plows if necessary, volunteers (provided there are willing drivers and volunteers), be able to travel into the EPZ on these most direct routes? Are gasoline dealers really going to remain open for business in the face of advancing radioactivity? Does the public have some sort of guarantee about that? Are there enough tow trucks and volunteer operators to keep the roads clear? Until these problems are resolved how can evacuation plans be called "adequate?"

In their report written after the July 25th test evacuation drill, the Federal Emergency Management Agency concluded that the current Radiological Emergency Plans are not adequate to protect the public. They cited

the following Class "A" deficiencies:

- a lack of 24 hour emergency response capability in nineteen (!) emergency operations centers, including the Pennsylvania Emergency Management Agency's communications office in Harrisburg and the Montgomery County emergency operations center in Eagleville, Lower Providence.

- insufficient means to evacuate "mobility impaired and transit dependent residents" in the ten-mile EPZ. In the same category, FEMA criticized the failure of officials of the State Corrections Institute at Graterford and of various school districts to participate in the drill.

- insufficient radiation detection equipment for inspections of victims and of air and water.

- the elapse of 25 minutes between the time the governor declared a hypothetical evacuation of the EPZ and the time the alert sirens surrounding the plant were activated.

- the non-participation of townships and municipalities that represented 25% of the population of the EPZ.

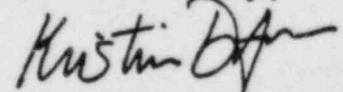
Who is going to pay for the correction of these deficiencies (if they can be corrected) and what sort of guarantee does the public have that the "corrections" will be maintained?

Since there are so very many unresolved, definite problems with the emergency evacuation plans (and in this long letter I regret I have had the time to mention only a few), and absolutely no at this time "reasonable assurance" that workable evacuation plans are in place, I do hope that the NRC will decide not to issue a Full Power Operating License for the Limerick plant.

Since it is my (as a resident and business owner within the EPZ) and of course many others' possible futures for which you are directly responsible with regard to your decision as to whether Philadelphia Electric Company should be granted a Full Power Operating License, I do hope that you will examine all of the problems with the emergency evacuation plans, and make sure that all of them are resolved before making a final decision.

I thank you for taking the time to read and listen to one citizen's comments. I look forward to hearing your response.

Most sincerely,



Kristin Dufour