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Helen Hoyt, Chairperson  
U.S. Nuclear Regulatory Commission (#50-352)  
Washington, D.C. 20555

Dear Judge Hoyt:

I am sending you the testimony I would have given at the hearings which were held in Pottstown, Pa. on November 15th and 16th on the evacuation plans in the event of a nuclear accident at the Limerick Power Plant.

In the Report to the Congress by the Comptroller General, August 1, 1984 entitled "Further Actions Needed to Improve Emergency Preparedness around Nuclear Power Plants" it states "The NRC is reluctant to prevent plants from operating due to inadequate offsite preparedness because it does not want to penalize utilities for factors beyond their control". ( iii)

I submit for your consideration that the Limerick Nuclear Power Plant does not operate in isolation. It is not an island. It will play a significant part in all of the communities that surround it. If it goes on line it will intrude into all of our lives; economically, emotionally and physically.

The NRC is charged with protecting the health and safety of those who live in this area. It cannot, in my opinion, look only at the technical efficiency of the plant and the purported safety of its physical structure. The plant impinges on the lives of the community in which it is located. People who live here must grapple with factors that would not otherwise affect their lives, the lives of their children, their land, and their animals.

One of the factors that is being considered by the NRC is the adequacy of the evacuation plans in the event of an accident. I have been a citizen volunteer in Schuylkill Township reading the various drafts of the plans prepared primarily by Energy Consultants. I am concerned about many aspects of the plans and I will attempt to identify some of these.

First and foremost is the lack of any overall coordination of the plans. The primary coordinating body is Energy Consultants who can scarcely be described as objective. Some 60 different entities, schools, parochial schools, day care centers, hospitals, communities such as Camp Hill, are all

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groping and struggling to develop plans. There is much duplication of effort, and considerable confusion. The day to day problems of the municipalities preclude adequate time and attention to the difficulties of evacuation. Very little information has been communicated to township residents. The majority of people in my neighborhood know nothing about them, think the plant is already operating because of the low power license, and feel resigned to its inevitability. Parents in Schuylkill Township are not informed about what is being planned for their children. This lack of coordination among federal, state and local agencies is cited over and over again in the Comptroller General's Report.

A second aspect of my concern with evacuation is the traffic situation out of Valley Forge Park on Route 23. The road is one of the widest in the area, but is still only 2 lanes wide. On any given morning traffic through the park is backed up 2-3 miles. Part way through the Park is the end of the 10 mile zone. But the road does not suddenly open up to 4 lane escape routes. The roads wind through the park, to King of Prussia, one of the most highly traveled and densely concentrated areas of executive office buildings and work places for people all over the Delaware Valley. The corridor on Route 292 is no better. Hundreds of people coming into the area to work would seriously affect the ability of those leaving the EIZ zone in an attempt to get out. Imagine for a moment the compounding of the problems during a snow storm. The road through the park is hilly and slippery. Route 29, another evacuation route, leads to the Great Valley Corporate Center, another huge complex of executive offices with hundreds of people arriving there to work. Congestion occurs every morning and evening.

The Superintendent of the Phoenixville Area School District, Mr. Murray, has told me that since there are not enough busses to evacuate all the children, one option is to march them on foot 2½ miles to Great Valley where they could be sheltered without food till 8:00 p.m. No one has any guarantee that teachers or volunteers will stay there to take care of children for hours in what would become overcrowded conditions. You are aware of the Pennsylvania Education Association's position that teachers are not under obligation to assume this role unless it has been bargained for in their contracts. Many teachers have told me privately that they would not stay.

In no aspect of the evacuation plans is adequate attention being given to family day care centers, private nursery schools, and to facilities to house the retarded such as Camp Hill.

Imagine for a moment, if you will, the plight of the woman who takes care of several infants or toddlers in her home. Is she to get all of the infants or toddlers into her car, all with infant seats or restraints and drive out of the area. How would she be able to meet their needs for food or clean diapers, let alone drive with them in her car?

Or consider the Parent Cooperative Nursery School. I taught 2 year olds at the Charlestown Playschool, within the EPZ zone. It is a Parent Cooperative

school where the children are brought by parents in car pools. They range in age from 2-5 years. There are no busses and they are not part of the system for general pick-up. The route out is over narrow, rural, country roads and parents would have to come back into the EPZ zone to get them.

Or another instance: I taught at a pre-school for handicapped children outside the EPZ zone. However they lived within the 10 mile area. What would happen to them when it was time to go home? They could not be bussed back to the EPZ zone and no provision is being made for them to go to Mass Evacuation Centers or for School personnel to take care of them where they are. Many have special needs and diets or wheel-chairs and the like.

Another concern of mine is the Mass Evacuation Centers. For Schuylkill Township the parking lot at West Goshen Shopping center has been designated. Does anyone there know that hundreds of people may be descending on it who may be contaminated? Who is going to man the center? What building would be used? Where is food/water coming from? Where are sanitary facilities located? How many are there for how many people? In my opinion it seems irresponsible to even contemplate.

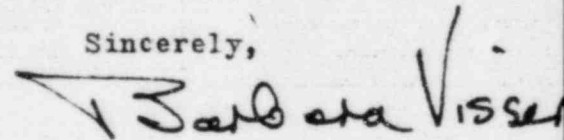
A 5th concern is possible distribution of potassium iodide. How could distribution possibly be monitored or controlled? How is the general public, school children, to be informed about its use and possible hazards or the consequences of not taking it? There appears to be much controversy among professionals about its use.

My concerns cover these practical aspects of overall coordination of evacuation planning, traffic, evacuation routes, day care centers, nursery schools, mass care centers and distribution of potassium iodide.

However I share the wider concerns stated so eloquently on November 15th by the lady from Camp Hill community about the integrity of the land, the disposal of nuclear waste, and the protection of the environment for generations to come.

I do not believe the evacuation plans are workable, practical, or able to provide for our health and safety. They do not reflect the informed consent of the populace. The plant has been built in an unfortunate area and should not be licensed. I urge you to act with courage and with the concerns of those who live here uppermost in your minds.

Sincerely,



Barbara Visser