

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
PHILADELPHIA ELECTRIC COMPANY)	Docket Nos. 50-352
)	50-353
(Limerick Generating Station,)	
Units 1 and 2))	

ANSWER OF THE COMMONWEALTH OF PENNSYLVANIA
TO PROPOSED CONTENTIONS OF THE GRATERFORD
INMATES WITH REGARD TO THE EVACUATION PLAN

I. INTRODUCTION

On April 20, 1984, the Atomic Safety and Licensing Board ordered the Graterford inmates to submit specific contentions within 20 days following the receipt of the evacuation plan for Graterford. On December 13, 1984, counsel for the inmates received a "sanitized" version of the evacuation plan for Graterford. On December 19, 1984, the Graterford inmates moved for full disclosure of the Graterford plan, as well as asking for additional time in which to file their contentions. On January 29, 1985, the Board denied the inmates' motion for full disclosure and ordered them to submit their contentions within 20 days. Counsel for the inmates filed proposed contentions on February 15, 1985.

In response to the January 29, 1985 order of the Board denying any further disclosure, counsel for the inmates filed an appeal with the Atomic Safety and Licensing Appeal Board on February 8, 1985. Although the Appeal Board dismissed the appeal of

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the inmates', the Appeal Board also expressed its opinion that the parties should attempt to find a middle ground with regard to the disclosure issue.

In response to the language in the Appeal Board order, this Board held a hearing on February 27, 1985, between the parties to try and find a middle ground. Using the proposed contentions of the inmates as a structure for the hearing, the Board reviewed each contention with all the parties and had counsel for the inmates specify what information would satisfy him. As a result of that hearing, the Commonwealth of Pennsylvania (hereinafter Commonwealth) filed a Response of the Commonwealth of Pennsylvania, Department of Corrections to Request for Information Raised at the February 27, 1985 Atomic Safety and Licensing Board Conference. Furthermore, the Commonwealth made available to counsel for the inmates, as well as other interested parties, a substantially less sanitized version of the plan under the aegis of a protective order and affidavits of non-disclosure. On March 22, 1985, another hearing was held with the interested parties present. At the conclusion of that hearing, counsel for the inmates had not withdrawn all of his proposed contentions, and had raised some new "concerns".¹ This is the Answer of the Commonwealth to the remaining contentions and new "concerns". Our answer will use the same format as the proposed contentions of the Graterford inmates, including answers to the new "concerns" where appropriate.

II. GENERAL CONTENTIONS

A. Counsel for the inmates has not withdrawn his proposed contention. The Department of Corrections objects to the language in the proposed contention that refers to the staff of the State Correctional Institution at Graterford since counsel for the inmates only has standing to represent the Graterford inmates pursuant to the

1. The term "concerns" is used to describe the new matters raised by counsel for the inmates at the March 22, 1985 Hearing. The Board correctly viewed the actions of counsel for the inmates as attempts to amend or add to his original proposed contentions. The Commonwealth agrees with the Board but addresses the new concerns here to ensure our position is clear.

Atomic Safety and Licensing Board Order in this case at Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2), LBP-83-39, 15 NRC 1423 (1982). Furthermore, the Commonwealth objects to the proposed contention because it is not reasonably specific and is unsupported by specific bases.

B. Counsel for the inmates has not withdrawn this proposed contention. The Commonwealth objects to this contention since it is again not specific and raises no litigable issue in itself. It also is overly broad in that it is not limited to representing the interests of the inmates.

C. Counsel for the Graterford inmates withdrew this proposed contention at the March 22, 1985 Hearing at Transcript Pages 20,677-20,678.

III. SPECIFIC BASES FOR CONTENTIONS

A. Transportation

At the March 22, 1985 Hearing, Mr. Love was satisfied that there would be a sufficient number of buses, vans, ambulances and drivers available to complete the evacuation. His satisfaction was indicated at the March 22, 1985 Hearing at Transcript Pages 20,678 through 20,681. Therefore, the transportation issue is resolved.

B. Preparation for Evacuation

1. Manpower

At the February 27, 1985 Hearing before the Atomic Safety and Licensing Board, Mr. Love was asked what concerns he had regarding the manpower issue. At that time, he requested information regarding the call-up procedure and was given that information. Furthermore, Mr. Love requested information regarding whether the system worked. He also requested information regarding the number of officers in the compliment at the State Correctional Institution at Graterford and explained that the National Guard was not a necessary part of the evacuation plan, as they were only being used for back-up (see Tr. 20533 through 20537).

In the Response of the Department of Corrections to the Request for Information, the Department of Corrections indicated the specifics of the call-up system. Furthermore, we provided the information that the system was tested as of January, 1985, and the system worked. We also provided information regarding the number of officers and other employees available to conduct the evacuation.

At the March 22, 1985 Hearing, counsel for the inmates indicated he was satisfied with the amount of manpower (see Tr. 20,681). However, counsel for the inmates then raised new "concerns" regarding the manpower issue. One concern was with the use of commercial telephone lines in the call-up system and the second was with regard to the lack of correctional officer union participation in the hearings before the board.

With regard to the commercial telephone line issue, the Department of Corrections objects to what would result in a new contention. Counsel for the inmates has not shown any good cause for his failure to include this with his original proposed contentions and to fully litigate this issue would significantly delay the proceedings. Counsel for the inmates can protect the interests of his clients with regard to the commercial telephone line issue by expressing his concerns to either the Federal Emergency Management Agency (FEMA) or the Pennsylvania Emergency Management Agency (PEMA). He has offered no information regarding any possible testimony that would help this board in developing a sound record. With regard to this issue, the counsel for the inmates has not shown how the inmates' interests are any different than other individuals with regard to the evacuation and, therefore, the inmates' interests were represented by other intervenors. For all the reasons referred to above, we would suggest that this new "concern" should not be admitted due to its lateness in filing.

The Commonwealth further objects to this concern due to counsel for the inmates having no basis for his contention. Furthermore, it lacks specificity

and, thus, fails to meet the requirements of 10 C.F.R. § 2.714(b). We also suggest that this is not a litigable issue and should be dismissed for that reason.

The other new "concern" that counsel for the inmates raised was with regard to the participation of the correctional officers at the State Correctional Institution at Graterford in the evacuation plan. Again, counsel for the inmates has not offered any reason for the lateness of this contention and has certainly not met the good cause standard in 10 C.F.R. § 2.714(a). It is clear, even in the sanitized version of the evacuation plan filed with this Board on December 13, 1984, that the correctional officers would play a significant part in the evacuation. It is clear that any additional testimony on this issue would broaden the issues and delay this proceeding. Therefore, we request that the contention not be admitted due to its lateness.

The Commonwealth also objects to the proposed contention because counsel for the inmates has expressed no basis for his contention. Additionally, it is not reasonably specific and, thus, fails the requirement of 10 C.F.R. § 2.714(b). Finally, since the correctional officers are employees of the Commonwealth of Pennsylvania, Department of Corrections, they are subject to discipline for failure to obey direct orders. The Commonwealth of Pennsylvania, Department of Corrections would be the party to provide testimony with regard to the officers participation in the plan.

2. Security Equipment

Counsel for the inmates was satisfied with the provision of security equipment for the evacuation. This is indicated on Transcript Page 20,681 of the March 22, 1985 Hearing.

3. Communications Equipment

Counsel for the inmates was satisfied with the provision of communications equipment. This is indicated on Transcript Pages 20,681-2 of the March 22, 1985 Hearing.

4. Radiological Equipment

Counsel for the inmates was satisfied with the provision being made for radiological equipment. This satisfaction is indicated on Transcript Page 20,682 of the March 22, 1985 Hearing.

C. Notification to the Public

Counsel for the inmates was satisfied with the notification system in place. This satisfaction is indicated on Transcript Page 20,682 of the March 22, 1985 Hearing.

D. Medical Services

The Commonwealth would object to the proposed contention on this subject since it refers to individuals contaminated by radiation and not solely to inmates (see Inmates' Proposed Contention at Page 8). Counsel for the inmates only has standing to raise issues on behalf of the inmates, and, therefore, the contention, if admitted, must be limited to medical services for the inmates.

At the February 27, 1985 Hearing, counsel for the inmates was requested to specify what information he required on this issue. The relevant responses by counsel for the inmates were "...we just think there should be some mention of what medical services could be provided if someone were seriously contaminated", Tr. at 20,555. Furthermore, beginning on Tr. Page 20,557 and continuing onto Tr. Page 20,558, the following exchange took place:

Mr. Otto: I think we could offer this at this point: At our support correctional institutions, we obviously have contracts — I don't know if it's obvious or not. We have contracts with local hospitals to take care of our inmates when they have serious medical needs, because we really don't run our own hospitals inside of our institutions. And I see no reason why those hospitals couldn't be used for decontamination.

Judge Hoyt: If, in fact, those institutions, those medical institutions would have that capability, Mr. Otto, that's the kicker.

Judge Cole: Don't we have evidence in our record that indicates that certified hospitals, by virtue of their certification, are qualified to handle contaminated inmate personnel?

Ms. Ferkin: There is some testimony, and I believe it was addressed in one of the initial decisions, that that was a finding by the Brenner Board.

Judge Hoyt: I think we had better revise that particular piece of information also, and be certain that we have it.

Now that, Mr. Love, would appear to me that what you're after, and what the D.C. Circuit opinion seems to indicate we need to have.

Mr. Love: Certainly; just an assurance that there is provision for radiological, not just any kind of -- Because I assume it's a whole different type of medication (sic).

During further testimony on the medical service issue, the following exchange took place at Tr. Pages 20,561 through 20,562:

Ms. Ferkin: I think what Judge Cole is referring to -- and correct me if I'm wrong -- is the Joint Committee on Hospital Accreditation, am I correct?

Judge Cole: Yes.

Ms. Ferkin: There is also a certification procedure for hospitals by the Pennsylvania Department of Health which, frankly, I am completely unversed with. I'm not sure how that fits in with what Judge Cole is referring to, but I do recall very clearly the findings that Judge Cole is referring to.

Judge Cole: And I believe it's a national accreditation.

Judge Hoyt: Anything else, Mr. Love, that you need on the medical services?

Mr. Love: Nothing, just so it's something from the Bureau. Because I don't agree with Mr. Rader that the assurances for the public are sufficient for the inmates, because the inmates are in the custody of the Bureau, and

anyone that wants to treat the inmates would have to go through the Bureau first.

So, I think something has to come forth from the Bureau.

Pursuant to that testimony, the Commonwealth had executed, by each of the hospitals for the Department of Corrections support institutions, an addendum to the hospitals statement of understanding with the institution. That addendum indicated that the hospital complied with the provisions of the Joint Commission on the Accreditation of Hospitals, Standard 5, which deals with the treatment of radioactively contaminated wounded. Furthermore, the Commonwealth attached to our response to the request for information the Joint Commission on the Accreditation of Hospitals Standard No. 5, which indicated the requirements of that standard.

At the March 22, 1985 Hearing, counsel for the inmates was not satisfied with what he had originally indicated would be satisfactory and expressed new "concerns". His concerns were expressed on Pages 20,665 through 20,671 of the Transcript and centered around his belief that the JCAH Accreditation was not sufficient to give him a reasonable assurance that adequate medical services were available for the inmates.

The Commonwealth objects to the new "concern" of counsel for the inmates. He has not established good cause as to why this late-filed contention is so late. He has also not shown that there are not other means to protect the interests of the inmates with regard to this issue. Furthermore, this Board has heard substantial testimony with regard to the sufficiency of medical services for the general public and what the standards for the medical care should be. Thus, the inmates' interests as to the standards to be used to measure the hospitals have already been represented by existing parties. Any additional testimony on this issue would be cumulative and would certainly delay the proceedings. For the above reasons, we request that this new "concern" not be admitted since it was late-filed.

The Commonwealth would also argue that this issue has already been litigated in this proceeding. This Board has clearly held in its second partial initial decision that the accreditation by the Joint Committee on Hospital Accreditation indicates that these hospitals have plans for treating contaminated, injured patients. See Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2) LBP-84-31, 20 NRC 446 (1984). The decision by this Board is not affected by the recent District Court opinion in the case of Guard v. NRC, since the Guard opinion only held that a mere list of hospitals for the radiation exposed public was insufficient. In the case presently before the Board, the Department of Corrections has existing agreements with our support institution hospitals, all of which are JCAH accredited.

E. Monitoring

Counsel for the inmates was satisfied with the information provided regarding monitoring. This satisfaction is indicated on Transcript Page 20,683 of the March 22, 1985 Hearing.

F. Simulated Evacuation Plan Exercise

Counsel for the inmates indicated that he would be satisfied with regard to this proposed contention upon receipt and review of the FEMA evaluation of the Table Top Exercise conducted by FEMA, PEMA and the Department of Corrections on March 7, 1985 with the reservation that the FEMA Report would indicate that "[the exercise] is fine, then that would end my concern". Tr. 20,684. Attached as Exhibit A is the FEMA Report on the March 7, 1985 Table Top Exercise which states "the Graterford authorities adequately demonstrated an understanding of the emergency response procedures and the ability to adequately implement them...".

G. Training

The concerns of the counsel for the inmates were satisfied. To satisfy counsel for the inmates, PEMA agreed to offer emergency response training to civilian

bus drivers. Counsel for the inmates recognized that we could not force the people to attend this training, but stated he would be satisfied if PEMA sent a letter to the bus providers offering the training. This satisfaction was indicated on Transcript Pages 20,684 through 20,691 of the March 22, 1985 Hearing. A copy of the letter that was sent by PEMA is attached hereto as Exhibit B.

H. Recovery and Reentry

Counsel for the inmates was satisfied with the information provided on the recovery and reentry procedures. This is indicated on Transcript Page 20,691 of the March 22, 1985 Hearing.

I. Sheltering

Counsel for the inmates was satisfied with the information provided regarding sheltering in the plan. This is indicated on Transcript Page 20,691 of the March 22, 1985 Hearing.

J. General Concept of Evacuation

The Commonwealth objects to this contention since it is lacking in specificity or bases. It appears to be a "catch-all" contention which raises no litigable issues.

At the March 22, 1985 Hearing, Mr. Love raised new "concerns" under this heading (See Tr. 20,693 through 20,694). The one concern was with regard to the estimated time of evacuation and the second was with regard to the possible panic at the institution during evacuation.

The Commonwealth objects to the "concerns" of counsel for the inmates new concern with regard to the ETE. At the time he filed his original proposed contentions, he was very much aware that it would take six to ten hours to evacuate the institution. (See Inmates' Proposed Contentions, Page 5.) At the February 27, 1985 Hearing, he was given an opportunity to raise any concerns he had with regard to the six to ten hour evacuation estimate. Therefore, it is patently obvious that counsel for the inmates has not shown good cause for this late-filed contention. To pursue this issue any

further would certainly broaden the issues and delay the proceeding. Therefore, we ask that the Board not admit this proposed contention.

The Commonwealth also objects to the admission of this contention since it is not reasonably specific and has no basis. NUREG-0654 does not specify a minimum or maximum evacuation time. Furthermore, counsel for the inmates own expert, Mr. Case, indicated that he had no problem with the ETE (See Tr. 20,665). Therefore, the Commonwealth submits that this is not a litigable issue.

Counsel for the inmates' second new "concern" under this heading is a concern that an evacuation would cause a panic. This concern was raised at the March 22, 1985 Hearing.

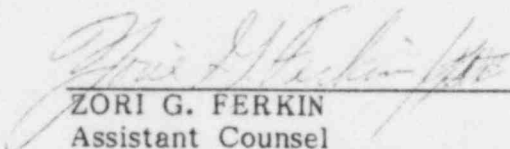
The Commonwealth requests that this proposed contention not be admitted since it is late-filed, and counsel for the inmates has not shown good cause for the late filing nor has he shown any of the other requirements for permitting late-filed contentions in 10 C.F.R. § 2.714(a).

The Commonwealth objects to this contention since it is not reasonably specific and lacks a basis. Counsel for the inmates' alleged basis for this proposed contention is Louisiana Power and Light Company (Waterford Steam Electric Station, Unit 3), LBP-82-100 16 NRC 1550 (1982). From Page 1562 of that case, he stated "the Board recognized that excessive anxiety on the part of the public could result in an overreaction and possible disruption of the plans for protective action. It would most likely take the form of spontaneous evacuation". The Board in the Louisiana Power case also held later on in that same subheading that "we conclude that public overreaction to a nuclear accident is likely to be minimized provided the guidance in NUREG-0654 is followed, and we conclude that no additional measure need be taken to cope with the public safety."

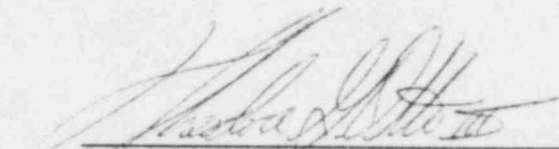
IV. CONCLUSION

For the reasons discussed above, the Commonwealth respectfully submits that the Graterford inmates have failed to raise an admissable contention and that, therefore, we request that they be dismissed from this proceeding.

Respectfully submitted,



ZORI G. FERKIN
Assistant Counsel
Governor's Energy Council



THEODORE G. OTTO, III
Assistant Counsel
Department of Corrections

Dated: April 4, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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PHILADELPHIA ELECTRIC COMPANY)
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(Limerick Generating Station,)
Units 1 and 2))

Docket Nos. 50-352
50-353

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of "Answer of the Commonwealth of Pennsylvania to Proposed Contentions of the Graterford Inmates with Regard to the Evacuation Plan" in the captioned matter have been served upon the following by deposit in the United States Mail this 4th day of April, 1985, except as indicated:

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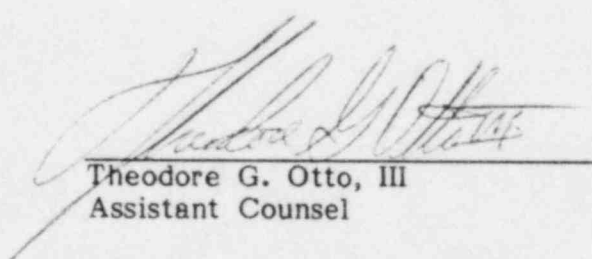
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Federal Emergency Management Agency

Washington, D.C. 20472

MAR 27 1985

MEMORANDUM FOR: Edward L. Jordan
Director, Division of Emergency
Preparedness and Engineering
Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Remedial Exercise at Graterford State Correctional
Institution in Support of the Limerick Generating
Station

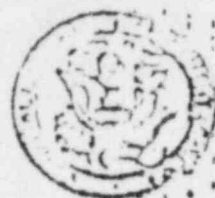
On March 7, 1985, a remedial exercise was conducted at the State Correctional Institution, Graterford, to demonstrate that a portion of one of the Category A deficiencies cited at the July 25, 1984, Limerick Offsite Radiological Emergency Preparedness Exercise has been corrected. The report on the July 25, 1984, exercise was forwarded to you on September 25, 1984.

The remedial exercise was conducted to more fully exercise the emergency response procedures at the State Correctional Institution, Graterford, including simulated evacuation of inmates. During the exercise the Graterford authorities adequately demonstrated an understanding of the emergency response procedures and the ability to adequately implement them, therefore, this portion of Category A deficiency number 2 has been corrected.

As additional Category A and B deficiencies are corrected, we will notify you. If you have any questions, please contact Robert S. Wilkerson, Chief, Technological Hazards Division, at 287-0200.

Attachment
As Stated

"EXHIBIT A"



Federal Emergency Management Agency

Region III 105 South 7th Street Philadelphia, Pennsylvania 19106

March 14, 1985

MEMORANDUM FOR: Robert E. Wilkerson, Chief
Technological Emergency Division

ATTENTION: Gloria Joyner

FROM:

Richard L. Korman
for: L. Korman, Chairman
Regional Disaster Committee

SUBJECT: Graterford State Correctional Institution Exercise

Attached is a copy of a report on the March 7, 1985 radiological emergency preparedness exercise held in conjunction with the Pennsylvania Department of Corrections, the State Correctional Institution at Graterford and FEMA. As you can see from the report, we feel that the results of the exercise were very positive and that it resolved one of the problems identified in Category "A" Deficiency #2, as noted in the September 19, 1984 Exercise Evaluation Report of the July 25, 1984 Liverick EEP exercise.

A copy of this report will be provided to the Pennsylvania Emergency Management Agency.

Attachment: 1

On Thursday, March 7, 1985, a tabletop exercise was held to test emergency response procedures at the State Correctional Institution, Graterford, in the event of an accident at the Limerick Generating Station. Participating in the exercise were the Pennsylvania Department of Corrections (including Graterford and the support institutions [redacted] and the Pennsylvania Emergency Management Agency (PEMA).

At 1115, notification of an alert at Limerick was received by the Department of Corrections from PEMA via commercial telephone. The contents of the message were forwarded by the Department to Graterford and the support institutions, by telephone, taking approximately 10 minutes to complete the notification of the various institutions. Redundant communications took place through the use of the Commonwealth Law Enforcement Assistance Network; a teletype system tied into all the various institutions from the department's central office.

At 1245, the tabletop exercise commenced with the attached objectives being implemented. The Department of Corrections and each institution established a command post from which they ran their respective emergency responses. Emergency teams were in attendance, utilizing facilities that provided adequate space, lighting and telephones. Excellent status boards were on hand and kept up-to-date throughout the exercise.

The Commissioner, Department of Corrections, coordinated the overall response while the Deputy Warden at Graterford was responsible for his institution.

Copies of the plans were available and consulted on a regular basis. It was evident that the various participants were very knowledgeable concerning their duties and performed their roles in a most conscientious and professional manner. Continuous coordination took place between the department and Graterford and the department and the support institutions. The Alert was received at 1254, the Site Emergency at 1329 and the General Emergency at 1436.

Good coordination took place between the Graterford Public Information Officer, the Department of Corrections and PEMA. The Graterford PIO simulated monitoring the local radio and television stations, especially KYW, Montgomery County's EIS station. The inmates were informed about the situation at Limerick and received updates on an hourly basis.

Personnel were placed on 12-hour shifts, which loading teams were assembled, inmate and medical records and food were packed. An advance team was sent from Graterford to [redacted] to prepare for inmate relocation. The Department of Corrections instructed Graterford to issue KI and docuentry to staff personnel. When relaying the information to Graterford the term KI, rather than KI was utilized causing some initial confusion. A lock-down of the inmates occurred at 1330 and, upon direction of the Governor, evacuation commenced as called for in the Graterford ERP.

The various support institutions simulated arranging for the necessary buses, security vans, drivers and other equipment, and having it sent to Graterford. Preparations were made to house arriving inmates. Average travel time from the support institutions to Graterford is approximately 2 - 2 1/2 hours.

During the exercise, at the Alert stage, Graterford informed the Department of Corrections of certain uncertainties in the area of ambulances. The department informed Graterford that the ambulances had been dispatched at this Emergency. However, this is in variance with the department's EERP (page 1-1-7) which does not call for the dispatch of ambulances until notification of evacuation.

The exercise concluded at approximately 1600 upon the simulated relocation of inmates to support institutions and [REDACTED]

Category "B" Recommendations:

1. Personnel involved in radiological emergency response activities should become totally familiar with the terminology used during an emergency to avoid confusion.
2. Ambulances should be dispatched to Graterford at an early stage (as was done during the exercise) to avoid long delays, potentially 2 hours or more, if an evacuation is ordered.

OBJECTIVES

1. To demonstrate the ability to alert and mobilize personnel and resources in a timely manner.
2. To demonstrate the adequacy of the decisionmaking process at the Department and institution levels.
3. To demonstrate the adequacy of communication systems within the Department of Corrections and among designated facilities and field activities.
4. To demonstrate that internal message and information flow (collection, analysis, and dissemination) is effective and timely.
5. To demonstrate the capability to relocate select categories of inmates to support institutions, if the situation so dictates.
6. To demonstrate the operational knowledge and support from elected or appointed public officials regarding plan familiarity, operations process and decisionmaking.
7. To demonstrate the capabilities of the Department of Corrections and the risk institution to implement emergency response plans to protect the health and safety of employees and inmates.
8. To demonstrate the abilities of the Department of Corrections, the risk institution and the support facilities to effectively utilize external resources when local capabilities and resources have been exceeded.



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
P.O. BOX 3321
HARRISBURG, PENNSYLVANIA 17105-3321



THIS LETTER IS ONE SENT TO ALL BUS COMPANIES PROVIDING THE
DEPARTMENT OF CORRECTIONS WITH BUSES.

Gentlemen:

Some of your employees may be involved in driving buses carrying inmates from the State Correctional Institution at Graterford in the event of an accident at the nuclear generating plant located in Limerick, Montgomery County. Because of this possibility, these drivers may want to take some training regarding the proper use of dosimetry.

The Pennsylvania Emergency Management Agency (PEMA) hereby offers to you and your employees a 2-hour course explaining the proper use of dosimetry. We are prepared to conduct this course at a location and time to be selected by you and your employees. We ask only that you coordinate this scheduling with us to avoid any conflicts with our regular schedule of activities.

You may write to me at the address listed above, or you may telephone me at 717-783-8150.

With kind regards, I am

Sincerely,

Donald F. Taylor
Director
Office of Training and Education

DFT:tjl (Tel: 717-783-8150)

"Exhibit B"