

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, 50-334 DEC -7 A10:31

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

TESTIMONY OF TIMOTHY R.S. CAMPBELL
ON LIMERICK ECOLOGY ACTION
DEFERRED AND RESPECIFIED OFFSITE EMERGENCY PLANNING CONTENTIONS

Introduction

The purpose of this testimony is to respond to Limerick Ecology Action (LEA) offsite emergency planning contentions admitted pursuant to the Licensing Board's Order dated October 26, 1984 relating to Chester County.

LEA-1

The Risk Counties, Municipalities, School Districts, and Institutions haven't promulgated or adopted final radiological emergency response plans, nor have they approved and adopted plans drawn up for them by Energy Consultants, Inc., a Harrisburg firm hired by Philadelphia Electric Company. There is no reasonable assurance that the present state of planning is predictive of final approval, or that the plans are capable of being implemented.

1. The Commissioners of Chester County are charged under the Pennsylvania Emergency Management Services Code ("P.L. 1332") with the response to and preparedness for emergencies. They have established the Department of Emergency Services as the lead agency for planning and response at the county level under the act. Chester County officials are now reviewing Draft 9 of the Chester County Radiological Emergency Response Plan for

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incidents at the Limerick Generating Station. This plan prepared by Department of Emergency Services staff, with assistance from Energy Consultants has incorporated Pennsylvania Emergency Management Agency (PEMA) and Federal Emergency Management Agency (FEMA) comments from plans review as well as the July 25, 1984 drill.

2. Subject to further changes resulting from observer comments on the July 25 drill and the November 20, 1984 scheduled supplemental drill, the plan represents the intended response of Chester County Government to Limerick Generating Station incidents. When appropriate, the final version will be presented to the County Commissioners, as was the Chester County Radiological Emergency Response Plan for incidents at the Peach Bottom Atomic Power Station in December of 1981.

3. The plan will be implementable in the final version which will be presented to the Board of Commissioners for adoption. It will outline the county role as the coordinating agency of the response of the schools, municipalities and health care agencies in the Emergency Planning Zone as well as the response of county government agencies.

4. In addition to passing unmet needs to PEMA, discussions and negotiations are underway with public private agencies, such as the Southeastern Pennsylvania Transportation Authority (SEPTA) and Philadelphia Electric Company pursuant to P.L. 1332 to obtain the resources needed for emergency response. As these resources become available they will be incorporated into the plans and exercised in the next drill. These negotiations include not only equipment but also assistance and training.

LEA-2

The unadopted RERP's fail to provide reasonable assurance that each principal response organization has sufficient staff to respond to and to augment its initial response on a 24-hour continual basis, or that the assigned staff can respond in a prompt manner in case of a radiological emergency at Limerick.

5. Chester County has sufficient staff for 24-hour response. The July 25, 1984 drill revealed some training needs, which are in the process of being addressed by Chester County Department of Emergency Services and Energy Consultants. The staff's July 25 experience, along with four partial ^{activations} ~~activities~~ over the past two years and three Peach Bottom Atomic Power Station drills since 1982, demonstrate that the staff can respond in an appropriate fashion.

LEA-5

The Emergency Response Organizations (including federal, state, and local governments and support organizations) have failed to fully document the existence of appropriate letters of agreement with support organizations and agencies. Thus, there is no reasonable assurance that the emergency plans can be implemented.

6. Although letters of agreement are not a requirement of P.L. 1332, and although many verbal commitments of aid have been made, Chester County Department of Emergency Services is continuing to attempt to obtain written commitments from support agencies and organizations. Where this does not occur, the need for support is being passed on to PEMA as an unmet need under P.L. 1332. Agreements are not required for agencies of the County or those charged by law or by contract with emergency responsibilities.

LEA-23

The draft county plans are deficient because they do not contain reliable evacuation time estimates.

7. The Chester County Radiological Emergency Response Plan contains evacuation time estimates by the Pennsylvania Department of Transportation and HMM Associates commissioned by Philadelphia Electric Company. Both of these estimates, along with information from the National Weather Service, PEMA, the Pennsylvania Bureau of Radiation Protection and Philadelphia Electric Company will be reviewed by Chester County officials if independent action is required. Normally guidance as to the choice of protective action will be given to Chester County by the Governor via PEMA.