

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. 50-35234 50-353

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USNRC

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OFFICE OF SECRETARY
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TESTIMONY OF ROBERT L. REBER
ON LIMERICK ECOLOGY ACTION
DEFERRED AND RE SPECIFIED 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 Berks 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 Berks County Radiological Emergency Response Plan (RERP) for the Limerick Generating Station has not been approved by the County Commissioners because it has not yet been completed and submitted for approval. There is no reason to believe that it will not be accepted and approved when it is submitted by the Director of the County Emergency Management Agency and the Director recommends approval.

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.

2. Berks County municipalities continue to recruit personnel to staff their Emergency Operations Centers (EOC) and are making progress. As of November 20, 1984, municipal deficiencies are as follows:

Amity Township:	Deputy Coordinator
Boyertown:	Deputy Transport Officer
Douglas Township:	none
Earl Township:	none
Colebrookdale Township:	Deputy Radiological Officer
Washington Township:	none
Union Township:	Transportation Officer
	Deputy Transportation Officer
	Deputy Communications Officer
	Deputy Radiological Officer
	Deputy Fire/Rescue Officer
	Deputy Police Service Officer

RACES operators are furnished by the county and are not part of the municipal staff. All municipalities are continuing to recruit and train staff personnel.

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.

3. Berks County RERP, Draft 6, October 1984 Annex T contains copies of agreements with all the bus providers. Ambulances, public service organizations do not require written agreements.

4. Berks County RERP, Draft 6, Annex T contains letters of agreement with RACES organization.

5. Arrangements are complete for 24-hour Emergency Broadcast System (EBS) coverage with all five (5) county radio stations.

6. As outlined in response to LEA-28(b), the Berks County RERP, Draft 6, October 1984, Annex K, p. K-3-1 states, "a current list of wrecker/tow operators is maintained on file in the Berks County Communications Center." This facility is fully staffed 24 hours per day, 7 days per week and dispatching wreckers/tow trucks is a routine operation. If one is not available, another is called. There has never been a shortage of resources.

7. Annex K, p. K-3-1 also contains a list of service stations/operators who have agreed to stay open or open in emergencies. They have all furnished 24-hour telephone numbers for contact. There is no requirement for written agreements.

8. Host school agreements have been completed.

9. The Berks County RERP, Draft 6, October 1984, Annex I contains agreements for mass care centers. Agreements are confirmed for a decontamination center at Oley High School. The center at Daniel Boone High School is covered by verbal agreement, which is in the process of being confirmed.

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