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Federal Emergency Management Agency

Washington, D.C. 20472

JAN 23 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: Limerick Generating Station

This is in response to your memorandum of December 26, 1984, subject: FEMA Support for NRC Licensing of Limerick Generating Station, in which you request an interim finding by March 1, 1985, and as a follow-up to the conference call on January 9, 1985, with the Federal Emergency Management Agency (FEMA), the Nuclear Regulatory Commission (NRC), the Pennsylvania Emergency Management Agency (PEMA), and the Philadelphia Electric Company (PECO) regarding the Atomic Safety and Licensing Board Hearings and offsite emergency preparedness required for full power licensing of the Limerick Generating Station.

As you are aware, the offsite plans that were furnished to us in your transmittal of December 26, 1984, differ from the plans FEMA received earlier from PECO that were acknowledged by the State for review purposes by FEMA.

PEMA, in a letter dated January 14, 1985, to our Region III Office (attached), has stated that they do not object to a review by FEMA of the recently revised plans submitted to us under the Memorandum of Understanding between our respective offices. However, we are seeking clarification from PEMA as to the nature and scheduling of their review of the revised plans, including the review and acceptance of the counties, municipalities, and school districts involved. We will be in continued contact with PEMA through our Regional Office to ensure, if possible, a concurrent review of the revised plans by PEMA as FEMA reviews the revised plans with the Regional Assistance Committee.

It is imperative that FEMA Region III receive an index to the revised plans no later than February 1, 1985. This should allow FEMA to prepare a supplemental interim finding to NRC on the revised plans by May 1, 1985.

Attachment
As Stated

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



January 14, 1985

Mr. Paul P. Giordano
Director
Federal Emergency
Management Agency
Region III
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Dear Mr. Giordano:

I am aware that the Philadelphia Electric Company, in conjunction with its licensing application for the Limerick Generating Station, has provided the NRC with the latest draft copies of the offsite emergency response plans for the three risk counties, 43 municipalities, 13 school districts and two support counties that would be involved in the event of an incident at the plant.

In accordance with the November 1, 1980 Memorandum of Understanding Between NRC and FEMA Relating to Radiological Emergency Planning and Preparedness (45 Federal Register 82713, December 16, 1980), it is FEMA's responsibility "To make findings and determinations as to whether State and local emergency plans are adequate and capable of implementation...Notwithstanding the procedures which may be set forth in 44 CFR 350...findings and determinations...may be requested by the NRC...and provided by FEMA for use as needed in the NRC licensing process. These findings and determinations may be based upon plans currently available to FEMA or furnished to FEMA by the NRC."

It is my understanding that the NRC has forwarded the drafts specified in paragraph one to FEMA Region III and has requested the finding and determination authorized by the referenced Memorandum of Understanding. The Pennsylvania Emergency Management Agency, on behalf of the Commonwealth of Pennsylvania, has no objection to this review by FEMA providing that it is clearly understood and explicitly stated in the resultant finding that the effort is not to be considered as an informal review requested by FEMA and in no way comprises, or is related to, the formal review and approval process that will subsequently be requested by FEMA under the provisions of 44 CFR 350. It should also be recognized that the drafts in question were

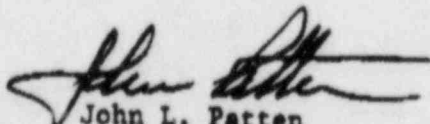
Mr. Paul P. Giordano
January 14, 1985
Page 2

primarily prepared by the Philadelphia Electric Company's consultant, and have neither been reviewed by PEMA nor, according to information provided to PEMA, have they been accepted by the counties, municipalities and school districts involved. Nonetheless, these plans would, in a practical sense, be the basis for the counties, municipalities and school districts responding should an accident occur at the Limerick Generating Station.

PEMA will not certify to the adequacy and implementation of the plans or submit them to FEMA for formal review and approval as required by 44 CFR 350 until the plans have been finalized, reviewed by PEMA and accepted by the counties, municipalities and school districts.

In April 1984 FEMA released its interim findings of adequacy based upon plans submitted for informal review by PEMA in December 1983. FEMA has also issued its report of deficiencies observed during the July 25, 1984 exercise, as well as for the November 20, 1984 supplemental exercise. Inasmuch as the Limerick Generating Station is now in a five percent, low-power test mode, PEMA would agree that it would be prudent for FEMA to conduct the review requested by the NRC to determine whether the deficiencies noted earlier by FEMA have indeed been corrected.

Sincerely,


John L. Patten
Director

JLP/ALB:ss (Tel: 717-783-8150)

cc: Honorable Dick Thornburgh
Governor of Pennsylvania
Robert L. Reber, Coordinator
Berks Co. Emergency Management Agency
A. Lindley Bigelow, Coordinator
Montgomery Co. Office of Emergency Preparedness
Timothy R. S. Campbell, Coordinator
Chester Co. Department of Emergency Services
Charles L. McGill, Coordinator
Bucks Co. Emergency Management Agency
Jerry Duckett, Coordinator
Lehigh County Civil Defense
John L. Shannon
Eastern Area Acting Director



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 26, 1984

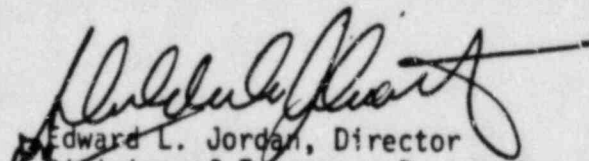
MEMORANDUM FOR: Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological Hazards
Federal Emergency Management Agency

FROM: Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

SUBJECT: FEMA SUPPORT FOR NRC LICENSING OF LIMERICK
GENERATING STATION

On May 8, 1984, the Federal Emergency Management Agency (FEMA) forwarded an interim finding report on the offsite radiological emergency response plans for the Limerick Generating Station. At that time, FEMA identified fifteen deficiencies in the plans and determined that the offsite emergency plans developed for incidents at Limerick were inadequate. Since that finding was submitted revised offsite emergency plans have been developed including plans for risk and support counties, municipalities and school districts. These plans have been entered into the record (following Tr 12,848) of the hearings on offsite emergency preparedness currently being conducted by the Atomic Safety and Licensing Board (ASLB) in Philadelphia, Pa. These same plans have also been provided to the NRC by the applicant in the course of preparing for the hearings.

In prefiled testimony submitted by FEMA to the Limerick ASLB, FEMA indicated that findings and determinations on the Limerick offsite plans would be provided in an expeditious manner upon request of the NRC. The purpose of this memorandum is to request FEMA to provide the NRC with findings and determinations as to whether the revised county and local emergency plans for Limerick are adequate and capable of implementation and whether the previously identified deficiencies are resolved by these plans. Although we understand FEMA may have already received copies of the referenced plans, a set of these plans is being furnished by the NRC for your convenience. A list of the plans being provided to FEMA is enclosed with this memorandum. Based on your December 26, 1984 telecon with Shelly Schwartz, I understand that FEMA has agreed to provide a supplemental interim finding for Limerick by March 1, 1985.


Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

Enclosure:
List of revised Offsite Plans
for Limerick

cc: See Attached
CONTACT: R. T. Hogan, IE
492-4866

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