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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board ¹⁹⁸⁵ MAY 14 A10:37

In the Matter of

PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Units 1 and 2)

:
: OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

: Docket Nos. 50-352, 50-353

PROPOSED REVISED CONTENTIONS OF THE GRATERFORD INMATES
WITH REGARD TO THE RADIOLOGICAL EMERGENCY RESPONSE PLAN

I. INTRODUCTION

Pursuant to the decision rendered by the Atomic Safety and Licensing Appeal Board on May 1, 1985 (see In the Matter of Philadelphia Electric Company, Limerick Generating Station, Units 1 and 2, Docket Nos. 50-352 and 50-353 ALAB-806), the inmates at the State Correctional Institute at Graterford, Pennsylvania submit the following contentions for the Board's consideration. These contentions are based upon a review of the initial Radiological Emergency Response Plan (Plan 1) and the second Radiological Emergency Response Plan (Plan 2) by the Plaintiffs' counsel, Angus R. Love, and the Plaintiffs' expert, Major John Case, field director of the Pennsylvania Prison Society. These contentions are also based in part upon discussions held during two closed conferences in Harrisburg, Pennsylvania on February 27, 1985 and on March 22, 1985. Pursuant to the Atomic Safety and Licensing Appeal Board's decision of May 1, 1985, the inmates have been reinstated as a party to this proceeding and have been given until May 15, 1985 to revise emergency planning contentions with specific bases.

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II. GENERAL CONTENTION - There is no reasonable assurance that the Radiological Emergency Response Plans for the State Correctional Institute at Graterford will protect the staff and inmates at said institution in the event of a nuclear emergency at the Limerick Generating Station.

III. SPECIFIC BASES FOR THE CONTENTION

A. Manpower Mobilization- There is no reasonable assurance that the call up system to be utilized in the event of a nuclear emergency in order to mobilize the entire work force of the State Correctional Institute at Graterford will achieve its designated purpose.

A review of the second Radiological Emergency Response Plan indicated that the Bureau of Corrections would use a call up system in order to mobilize the manpower necessary to conduct the appropriate response to an emergency at the Limerick Generating Station. It further detailed how the 700 employees of the State Correctional Institute at Graterford would be mobilized. The mobilization would occur through a call up system in which one individual would call ten other individuals who would in turn each call ten additional individuals until all persons were notified. The method utilized in making the calls would be use of the commercial telephone lines. The inmates cite two potential problems in the use of this system. Initially, reliance upon the commercial phone lines as the exclusive method for mobilization could fail if the telephone lines are overburdened and unavailable. On January 14, 1985, Richard T. Brown, chairman of the Lower Providence Township Board of Supervisors testified before this Board that "Emergency conditions such as a natural disaster or man made one are not engineered into service provisioning. One need

only look back to the Agnes flood of 1972 to see what havoc it plays on the telephone network. During the flood, dial tone delay was up to one-half hour in duration." Thus, the inmates contend that an emergency at the Limerick Generating Station would most probably overburden the phone system as to render it inoperable for the type of call up system envisioned by the Bureau of Corrections.

The inmates' second concern with regard to this issue is the lack of a viable back-up system. In light of the potential for havoc with regard to the commercial phone lines, the inmates believe a second system which could act as a back-up in the event of inoperable commercial phone lines should be in place. The inmates contend that the call up system fails to meet the standards prescribed by 10 C.F.R. 50.47(b)6, which calls for "provisions exist for prompt communications among principal response organizations to emergency personnel and to the public." The inmates also cite 10 C.F.R. 50.47(b)5, "Procedures have been established for notification ... of emergency personnel by all organizations; ...". The inmates draw the Board's attention to the Nureg-0654 criterion E, Notification Methods and Procedures. Subsection 2 of criterion E reads, "Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel." The inmates contend that this subsection charges the Department of Corrections with the responsibility of alerting the personnel that will be utilized in responding to a nuclear emergency. The inmates further draw the Board's attention to criterion F of the Nureg-0654 document which reads, "Provisions exist for prompt

communications among principal response organizations to emergency personnel and to the public." Subsection 1 of criterion E reads, "The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and back-up means of communications for licensees, local, and state response organizations. Such systems shall be selected to be compatible with one another. Each plan shall include: (a) provisions for 24 hour per day notification to an activation of the state/local emergency response network; and at a minimum, a telephone link and alternative, including 24 hour per day manning of communications links that initiate emergency response actions." As previously stated, the inmates contend that reliance upon commercial phone lines and commercial phone lines only will not guarantee that the call up system will effectively mobilize the personnel necessary to respond to such an emergency and that an alternative to the commercial phone lines should be developed.

B. Input of the Correctional Officers Union (AFSME) - There is no reasonable assurance that the correctional officers union is aware of the Bureau of Corrections concept of operations and its relationship to the total effort.

After a review of the Radiological Emergency Response Plans, it becomes quite evident that the correctional officers at SCIG will play a major role in responding to a nuclear emergency at LGS. Currently, there are approximately 400 correctional officers employed at the SCIG. Correctional officers are unionized under the banner of the American Federation of State, County and Municipal Employees. To date, the inmates have no knowledge that

anyone in said organization has reviewed the Radiological Emergency Response Plan or that they are in agreement with the concept and understand their relationship to the entire operation. The inmates have repeatedly requested that said organization be provided an opportunity to testify in response to their role in the event of a nuclear accident.

The inmates cite as authority for this contention Nureg 0654 criterion A - Assignment of Responsibility. This criterion reads in part, "...the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis." The criterion goes on to suggest in subsection 1, paragraph A, "Each plan shall identify...private sector organizations that are intended to be part of the overall response organization for emergency planning zones." Subparagraph B suggests, "Each organization and suborganization having an operational role shall specify its concept of operations, and its relationship to the total effort." Subparagraph 3 also states, "Each plan shall include written agreements referring to the concept of operations developed between federal, state, local and other support organizations having an emergency response role within the EPZ. ... The signature page format is appropriate for organizations where response functions are covered by law...". The inmates also draw the Board's attention to Appendix 5 of Nureg 0654, subsection entitled Suborganizations, which reads, "Any organization such as agencies, departments, offices, or local jurisdictions having a supportive role to the principal or

lead organizations in emergency planning and preparedness." Also, the definition of the private sector which reads, "Industry, volunteer, quasi-governmental unit having a role in emergency planning and preparedness." The inmates contend that the correctional officers' union must be described as either a suborganization or a private sector under the terms of Appendix 5, thus warranting consideration under criterion A regarding assignment of responsibility. The inmates contend that criterion A calls for some type of input from all supportive organizations such as the guards' union. To date, there has been no reasonable assurance that the guards' union will participate as expected by the Department of Corrections. The inmates contend that at the very least the signature page format suggested in criterion O, section 3 would be appropriate in this instance.

C. Training - There is no reasonable assurance that emergency response training will be offered to civilian personnel who will be involved in the emergency response plans, such as civilian bus and ambulance drivers, rescue squads, and any other such personnel.

As mentioned previously in the inmates' initial proposed contentions, the inmates contend that emergency response training be offered to civilian personnel who will be assisting the Bureau of Corrections, the state police, and the National Guard in the appropriate response to an accident at LGS. Pursuant to further discussions, held during the closed conferences in Harrisburg, the Commonwealth of Pennsylvania has attempted to address the inmates' concern by the offering of said emergency response training to civilian

bus drivers. The method by which the Commonwealth has suggested to achieve this purpose is a letter to all bus providers which is attached to the Commonwealth's "Answer of the Commonwealth of Pennsylvania to Proposed Contentions of the Graterford Inmates with Regard to the Evacuation Plan" dated April 4, 1985 as Exhibit B. This letter, addressed to the employers of the bus drivers, offers a two hour course explaining the proper use of disseymmetry by the Pennsylvania Emergency Management Agency. The inmates find this letter inadequate in several respects. Initially, there is no guarantee that the employees will ever receive any notice of the opportunity to avail themselves of this training program. Furthermore, the training envisioned by the inmates was a broader, more comprehensive program, such as the training offered to the school bus drivers. See the third partial initial decision on offsite emergency planning by the Licensing Board, section 333, page 155, which reads, "The training program for bus drivers offers a general orientation and overview of radiation principles, emergency management principles, susceptibility of children to radiation and additional background information." The inmates contend that the two hour course offered by PEMA is not as comprehensive as the one offered to the bus drivers of school children and is therefore inadequate in this respect. The inmates further contend that a training program should be extended not only to the civilian bus drivers, but to other support personnel which will be involved in a possible evacuation such as the ambulance drivers, rescue squad operators, hospital personnel, police and fire departments, if they have not already received such.

The inmates cite as authority for this contention 10 C.F.R. 50.47(b) 15 and Nureg 0654 criterion O, Radiological Emergency Response Training. This section calls for "Radiological emergency response training is provided to those who may be called on to assist in an emergency." Subsection 1 reads, "Each organization shall assure the training of appropriate individuals." And subsection 1 (b) states, "Each offsite response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies, such as fire, police and ambulance/rescue, the training shall also be offered to the other departments who are members of the mutual aid district." Thus, the inmates contend that all such individuals should be given the opportunity to receive the training as contemplated in the third partial initial decision with respect to the civilian school bus drivers. The inmates also draw the Board's attention to Footnote 1 of criterion O which reads, "Training for hospital personnel, ambulance/rescue, police and fire departments shall include the procedures for notification, basic radiation protection, and their expected roles. ... Offsite emergency response support personnel should be provided with appropriate identification cards where required." Thus, the inmates contend that the issuance of such identification cards should also be given consideration.

D. Medical Services - There is no reasonable assurance that adequate medical services will be provided to those contaminated and/or injured individuals in the event of a nuclear emergency at LGS.

This contention which was raised in the inmates' initial proposed contentions and which has been discussed at length during the two closed conferences, remains unresolved. Since the last closed conference and accompanying discussions, the applicant has provided the inmates' counsel with an affidavit from Roger E. Lennemann, M.D., which reviews the radiological capabilities of Montgomery County Hospital in Norristown, Pennsylvania. While the inmates believe that this affidavit does alleviate certain fears, it does not address the entire issue as presented by inmates' counsel. Initially, the inmates point out that Dr. Lennemann's affidavit does not address the capacity that exists at Montgomery Hospital for treating such contaminated individuals. It has been held in the partial dissent of Judge Brenner regarding emergency hospital care for the contaminated injured (see LEA Contention VIII-12(a) which reads "Thus, the regulations and guidance envision the possibility of evacuation of an area up to about ten miles in radius.") Planning for medical care for even a small number of contaminated injured persons up to about twenty-five should be consistent with this possibility. (Per San Onofre, supra, ALAB-680, 16 NRC at 137 and CLI-83-10, 17 NRC at 532.) Therefore, Dr. Lennemann's failure to ascertain the capacity at Montgomery Hospital renders his affidavit insufficient on this issue. Furthermore, Dr. Lennemann's affidavit does not go into nearly as much detail as his prior testimony regarding the various types of

equipment necessary to prepare for the type of treatment contemplated. (See TR. 9813-15.) The affidavit also lacks any discussion regarding transportation to the Montgomery Hospital and the necessity of monitoring for radiation in the ambulances which will do the transportation.

The inmates also contend that the Bureau of Corrections has failed to designate a back-up facility as prescribed by the regulations in the event that Montgomery Hospital proves to be unavailable or over capacity. The inmates further contend that such services as mandated by 10 C.F.R. 50.47(b) 12 should include the provision of such at the relocation centers. To date, this issue has not been addressed. Thus, the inmates request that the Bureau of Corrections designate a facility and a back-up which would be able to provide such services at the relocation destination

As authority for this contention, the inmates cite the emergency planning mandate of 10 C.F.R. 50.47(b) 12. They further cite the Nureg 0654 criterion L 1, which states, "Each organization shall arrange for local and back-up hospital and medical services having capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals." Thus, it is clear that a back-up hospital has been contemplated by the regulations. As further authority for this contention, the inmates cite Guard vs. NRC, 753 F.2d, 1144 (1985). This case indicates that the medical services must be pre-event arrangements. Thus, these arrangements with said hospitals must be made prior to the issuance of a full power license.

E. Estimated Time of Evacuation - There is no reasonable assurance that the estimated time of evacuation of six to ten hours can be achieved.

Neither of the two Radiological Emergency Response Plans for the State Correctional Institute at Graterford mention anything about an estimated time of evacuation. The plan, however, does state that "Due to safety and security considerations associated with moving a large inmate population, the time allocated for clearing the institution of all inmates will probably take a significantly longer period of time than it is expected for the general public to evacuate." (See Plan 2, page E-1-D-1 enclosed in Attachment D.) The only mention of an estimated time of evacuation to the inmates' knowledge is enclosed in the applicant's request for an exemption from the planning requirements regarding the State Correctional Institute at Graterford. This comes in the form of an affidavit attached as an exhibit to the applicant's request which is authored by E. Robert Schmidt and Jeffrey D. Kaiser. Section 13 of said affidavit states, "Once notification to evacuate the prisoners has been given, it is expected that it will take six to ten hours before the last prisoner is ready to leave. (Private communication between Theodore G. Otto, III, Commonwealth of Pennsylvania assistant counsel, Department of Corrections, and G. D. Kaiser, NUS Corporation, 1/31/85)." The inmates contend that the plan's failure to include an estimated time of evacuation renders said plan deficient. They further contend that the mention of the six to ten hour time frame in the affidavit of Mr. Kaiser does not remedy this deficiency. The reasons for this are as follows:

As authority for this contention, the inmates draw the Board's attention to Nureg 0654 criterion J, entitled Protective Response. Section 10 of criterion J indicates "The organization's plans to implement protective measures for the plume exposure pathway shall include: subsection D: Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement." Thus, the inmates at Graterford are entitled to a protective response. Subsection L of Section 10 further states, "Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone." The inmates contend that this subsection requires the Department of Corrections to indicate an estimated time of evacuation. Appendix 4 of Nureg 0654 provides further details regarding evacuation time estimates within the plume exposure pathway. II. C. Special Facility Populations states, "An estimate for this special population group shall usually be done on an institution by institution basis. The means of transportation are also highly individualized and shall be described." IV. of Appendix D, B. entitled Methodology states, "The method for computing total evacuation time shall be specified. Two approaches are acceptable. The simplest approach is to assume that events are sequential. That is to say, for example, that no one begins to move until all persons are warned and prepared to leave before anyone starts moving. The time is estimated by simply adding the maximum time for each component. This approach tends to overestimate the evacuation time. The second approach, which is more complex and will be

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discussed further, is to combine the distribution functions for the various evacuation time components. This second approach may result in reduced time estimates due to a more realistic assumption." The inmates contend that the failure to specifically address this estimated time of evacuation in the plan and the mere mention in a footnote of the applicant's request for an exemption fails to meet the criteria as suggested by Appendix 4. In particular, the inmates are concerned that the six to ten hour estimate does not include a breakdown of the various sequential events necessary to accomplish the task. The inmates contend that such a breakdown is necessary prior to their ability to ascertain whether the plan can be accomplished in the estimated time frame. The inmates request the opportunity to present evidence on this issue of prior incidents at the SCIG facility where similar measures had to be taken. Such incidents include the hostage siege of October 28, 1981 and the power failure and resulting riot on C-Block in 1983. The inmates contend that through the discovery process they will be able to ascertain exactly how long it took the institution to lock down in similar emergencies. This information could then be measured against the methodology used by the Bureau of Corrections in determining their six to ten hour estimated time of evacuation.

F. Monitoring - There is no reasonable assurance that adequate monitoring will be conducted in the event of a nuclear emergency at the Limerick Generating Station.

Although this issue has been discussed at the prior closed conferences which were held in Harrisburg, Pennsylvania, the inmates would like one further assurance with regard to the issue of monitoring. This assurance involves the identification of radiological laboratories which are prepared to assist in the monitoring of the conditions surrounding the State Correctional Institute at Graterford in the event of a nuclear emergency at the LGS. As authority for this contention, the inmates cite 10 C.F.R. 50.47(b) 9-11 and criterion C of Nureg 0654. Subsection 3 of criterion O reads, "Each organization shall identify radiological laboratories and their general capabilities and the expected availability to provide radiological monitoring and analysis services which can be used in an emergency. Although the Department of Corrections has assured the inmates that there will be monitoring teams at the facility, there has been no mention or identification of what laboratories and what capabilities exist in order to carry out this function in the manner contemplated by the Nureg 0654 provisions. Thus, the inmates request that said laboratories be identified and their capabilities be ascertained prior to the completion of this issue.

G. Simulated Evacuation Plan Exercise - There is no reasonable assurance that the table top exercise of the evacuation plan which was conducted on March 7, 1985 was adequate in terms of 10 C.F.R. 50.4714(b) and criterion N of Nureg 0654.

As this issue was also previously discussed in the prior meetings held between all participants in Harrisburg, Pennsylvania, the inmates would like to make one further point on this issue. The inmates have received on March 20, 1985, a copy of the Federal Emergency Management Agency's report regarding the table top exercise which was held on March 7, 1985 as to the evacuation plan for Graterford. After a review of said plan, the inmates would point out the following. According to Nureg 0654 criterion N, subsection E, "Each exercise or drill should include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities." A review of the table top exercise fails to mention any of the aforementioned simulated possibilities. The inmates also point out that the review of the plan fails to mention anyone by name who is in fact employed by the State Correctional Institute at Graterford. Thus, the inmates contend that the plan is deficient in that it failed to consider the various possible scenarios which may exist during an emergency at LGS and it fails to indicate the appropriate staff at SCIG who would in fact be involved in the decision making process. The inmates contend that said review may have omitted such scenarios and would request that the review be updated to include mention of

whether or not such scenarios were considered during the table top exercise of March 7, 1985.

H. Panic Factor - There is no reasonable assurance that the Radiological Emergency Response Plan for SCIG will prevent a spontaneous evacuation on either the guards or inmates part, i.e. panic.

The inmates contend that given the unique nature of the juxtapositioning of the Limerick Generating Station and the State Correctional Institute at Graterford, that a review of the potential for panic is necessary in order to assure the safety of all concerned. To date, the inmates are unaware of any other situation which involves the positioning of two such facilities within close proximity to one another. Following the nuclear accident which occurred at the Three Mile Island nuclear reactor in Harrisburg, Pennsylvania in 1979, the United States Government published additional regulations that must be complied with prior to the issuance of a full power license for a nuclear facility. See 10 C.F.R. 50.47(a) and (b) regarding offsite emergency planning. In essence, these plans call for a safe and thorough evacuation of all persons located within a ten mile radius of a nuclear power plant. Prior to the issuance of a license, there must be a showing of a reasonable assurance that such plans would in fact succeed. Located 8.3 miles from the Limerick Generating facility is the State Correctional Institute at Graterford.

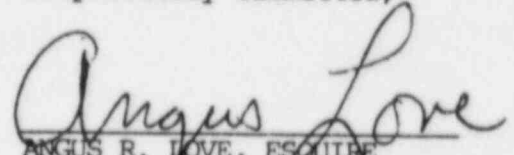
The State Correctional Institute at Graterford is a maximum security facility under the auspices of the Pennsylvania Department of

Corrections. It currently houses over 2,500 individuals in a facility originally designed to hold 2,000 persons. Included in this population are 15 people currently awaiting execution, 400 persons serving life sentences, 31 persons serving sentences of twenty years or more, 118 persons serving sentences of ten to twenty years, and 410 persons serving sentences over five years. (See Pennsylvania Bureau of Corrections 1983 Annual Statistical Report.) These figures represent an unprecedented growth period in the incarcerated populations of this and other states. From 1979 to 1984 the population in the State Correctional System grew from 7,851 to 12,532, an increase of 60%. (See Report of the Pennsylvania Commission on Crime and Delinquency's Prison and Jail Overcrowding Task Force, February 12, 1985.) Correctional experts have long recognized the fact that a rise in the incarcerated population results in a corresponding increase in the potential for institutional assaults and violence. A recent study of the Pennsylvania overcrowding situation states that "the potential for a major incident continues to exist, and the overcrowding handicaps efforts to control and manage the inmate population in our institutions. Overcrowding not only affects the management of the correctional facilities, but also places great burdens on available resources. Classification procedures become a matter of space availability rather than placement in the best security and program slot. Staff overtime becomes commonplace, compounding stress problems already associated with working in a correctional facility." (See a report on the Pennsylvania Commission on Crime and Delinquency's Prison and Jail Overcrowding Task Force, February 12, 1985 at

page 6. Furthermore, the inmates would point out the following incidents which have occurred in the past five years. In May of 1980 an institution-wide work stoppage was called in response to pending cutbacks in vocational and educational services. The work stoppage resulted in an institution-wide lockdown and declaration of emergency which lasted for approximately eight days. In October of 1981, four gun wielding inmates took six civilian hostages at the SCIG facility and held them for four days at gunpoint, along with numerous other inmate hostages. (See the Report of the Governor's Panel to Investigate the Recent Hostage Incident at SCIG, August 1982, Commonwealth of Pennsylvania.) In 1983 a power failure resulted in a riot on C-Block which required the hospitalization of numerous guards and inmates before the situation was brought under control. In 1984, an inmate with a gun escaped while being transported from SCIG to a court hearing in Philadelphia. Again in late 1984, Kathleen Martin was arrested at the front gate at SCIG for possession of eleven rounds of ammunition which she was attempting to smuggle into the facility. The inmates contend that in light of these numerous disruptions and the ever increasing population, that the potential for panic at the facility during an attempted evacuation is real. The Licensing Board has previously considered this issue and has stated that Graterford is no different than any other such facility and should therefore not be accorded any special considerations. The inmates contend that Graterford is one of only 140 such facilities housed throughout the United States. (See Prison Facility Characteristics, March 1978, American Prisons and Jails, Volume 3-1980.) The inmates further point out that of those

facilities only 75 house 1,000 or more inmates. They also point out that the facility is over fifty years of age and is far from the modern penal correctional institute. As further evidence of this contention, it is the inmates' intention to request a limited appearance of the Licensing Board at SCIG in order for them to better understand the unique nature of the institution and to listen to testimony from inmates and guards alike concerning the daily operations of SCIG.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I, Angus R. Love, attorney for the Inmates at the State Correctional Institute at Graterford, hereby certify that a true and accurate copy of the Proposed Revised Contentions of the Graterford Inmates with Regard to the Radiological Emergency Response Plan was mailed to the following list on Monday, May 13, 1985, by first class mail, postage prepaid. Overnight delivery to Docket & Service Section only.

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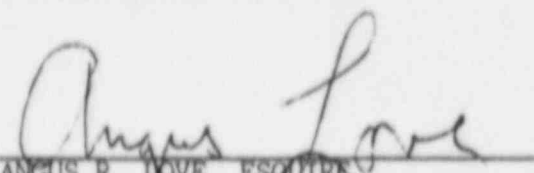
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