

DOCKETED  
USNAC

'85 JUL -8 P12:07

Docket Nos. 50-352-0L  
50-353-0L

ASLBP No. 81-465-07-0L

OFFICE OF THE  
CLERK OF THE  
COURT

### C. Training

Planning Standard 0. of NUREG-0654/FEMA-REP-1, Rev. 1 and 50.47(b)(15) call for radiological emergency response training to be "provided to those who may be called on to assist in an emergency." In addition, element 0.1 states that "each organization shall assure the training of appropriate individuals." As Appendix 19 (page E-19-1) to Annex E, Fixed Nuclear Facility Incidents, to the Commonwealth of Pennsylvania Disaster Operations Plan, dated November 1981 states: "The Pennsylvania Emergency Management Agency (PEMA) has the overall responsibility for providing radiological response training programs in the Commonwealth."

8507090322 850705  
PDR ADOCK 05000352  
T PDR

DS03

Based upon the information supplied in Attachment 1, it is FEMA's understanding that Mr. Taylor wrote to the six (6) bus companies that will transport inmates from Graterford in the event of a radiological emergency, offering training to bus drivers. Mr. Taylor has not received a response to his offer, to date. A document entitled "PLAN OF INSTRUCTION, NUMBER SEVEN, DOSIMETRY AND DECONTAMINATION SEMINAR FOR EMERGENCY PERSONNEL, Office of Training and Education, Pennsylvania Emergency Management Agency, January 1985," (Attachment 2) has been forwarded to FEMA by Mr. Taylor. Besides the information provided in the above-referenced lesson plan, Mr. Taylor has stated (in a telephone conversation on July 2, 1985) that PEMA would also be responsive to address other interests raised by the bus companies or drivers as part of the training process.

Mr. Taylor plans to personally visit the aforementioned six (6) bus companies to urge them to participate in a training session. The bus companies will be informed that the training will be conducted at a location and at a time that is convenient to the bus drivers.

PEMA has also committed to providing the same training to ambulance drivers expected to be part of an emergency response that will be given to the bus drivers.

Based upon the fact that this training has been given at other sites in Pennsylvania in the vicinity of commercial nuclear power plants and based upon the information supplied by PEMA which is site-specific to the State Correctional Institution, Graterford and the Limerick Generating Station, FEMA feels that there is reasonable assurance that emergency response training will be offered to civilian personnel expected to be involved in the implementation of the Pennsylvania Department of Correction's Radiological Emergency Response Plan.

STD-961 1-84

COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
June 28, 1985

ATTENTION: JIM ASHER

SUBJECT: Proposed Testimony

TO: Eori Perkin  
Legal Counsel  
Governor's Energy CouncilFROM: Donald F. Taylor *dfx*  
Director  
Office of Training and Education

The following items are topics on which I am prepared to testify at the re-opened hearings concerning the evacuation of prisoners from the State Correctional Institution at Graterford.

Please contact me at your convenience if you have any questions concerning this testimony.

1. Letters from me to the six bus companies that will transport prisoners from Graterford in the event of an evacuation caused by an accident at the Limerick Generating Station were mailed on April 4, 1985. These letters offered dosimetry training to the bus drivers who will be employed in this endeavor. To date, no responses from these six bus companies have been received.

2. The dosimetry training that will be provided to these bus drivers is outlined in the attached plan of instruction. Decontamination monitoring procedures will also be examined as there is a remote possibility that, if dosimetry is utilized by these bus drivers, they will also be involved in some manner with decontamination monitoring. This training will ensure their knowledge of that process.

3. The dosimetry training will be conducted by FEMA. Any such training that will be required is for the direct benefit of another Commonwealth Agency. Thus, it is FEMA's responsibility to do the training. The training that has been performed for local municipalities (cities, boroughs, townships), school bus drivers, fire fighters, etc. should have been performed by the appropriate county. P.L. 1332 places that responsibility on the county. However, due to their inability and/or unwillingness to conduct this training, Philadelphia Electric Company employed a consulting firm to fulfill the training responsibilities of the involved counties.

Eori Perkin  
June 28, 1985  
Page Two

4. A program designed to persuade the aforementioned six bus companies to accept this dosimetry training will be implemented in late July and early August, 1985. This implementation will involve personal visits by PERA personnel (me) to each of these bus companies so as to personally urge them to accept this training.

5. Any training sessions that are conducted will be scheduled in a place and at a time convenient to the bus drivers themselves. It is presumed that such training will be conducted at, or near, the bus company headquarters.

6. No attempt will be made by PERA personnel (me) to contact individual bus drivers for such training in the event the bus companies reject it. Such an attempt is not ethical and, certainly, is not within our purview. However, every effort will be made by me to persuade the bus companies to accept such training.

7. This training and refresher training will be made available yearly to the drivers of each bus company that accepts it.

DFT:tjl (Tel: 3-8150)

cc: John L. Patten  
Ralph Hippert

PLAN OF INSTRUCTION  
NUMBER SEVEN

DOSIMETRY AND DECONTAMINATION SEMINAR  
FOR EMERGENCY PERSONNEL

Office of Training and Education  
Pennsylvania Emergency Management Agency  
January, 1985

PLAN OF INSTRUCTION  
NUMBER SEVEN

DOSIMETRY AND DECONTAMINATION SEMINAR  
FOR EMERGENCY PERSONNEL

Rationale

Despite the extraordinary precautions and safeguards in effect, there remains the possibility of unplanned radiological releases from the nuclear-powered generating plants located within the Commonwealth of Pennsylvania. In minimizing the risk to emergency response personnel who may be required to function in a potentially hazardous environment, there is a need for such personnel to know how to monitor their personal exposure to radiation, monitor exposure of other persons, and conduct proper decontamination monitoring procedures.

Purpose

This seminar is designed to provide emergency personnel with the knowledge and skills that will permit them to monitor their personal exposure to radiation and to conduct decontamination monitoring procedures that will be employed in appropriate locales in proximity to nuclear-powered generating plants.

Objectives

Upon completion of this seminar, participants should be able to do the following:

1. Develop an understanding of the government response to disasters.
2. Demonstrate an ability to properly utilize the designated dosimetry.
3. Know the acceptable levels of radiation during an incident at a fixed nuclear facility.

4. Demonstrate an understanding of maintaining appropriate records.
5. Understand reception centers, mass care centers, and where decontamination monitoring procedures are utilized.
6. Demonstrate the proper use of a survey meter.

#### Qualifications for Attendance

All county emergency management coordinators, members of the county emergency management organizations, municipal emergency management coordinators as recommended by their county coordinators, and any other person approved by the Pennsylvania Emergency Management Agency are eligible to attend this seminar.

#### Summary of Subject Areas

<u>Subjects</u>	<u>Hours</u>
1. Introduction and Overview	0.1
2. Government Response to Disasters	0.5
3. Dosimetry	0.9
4. Decontamination	0.9
5. Summary and Conclusion	<u>0.1</u>
Total	2.5

#### Units of Instruction

1. Introduction and Overview 0.1 hours

The instructor will introduce all those persons who should be made known to the students. Then, through a brief lecture, the instructor will explain the purpose of this seminar and briefly review the subjects that will be discussed.



2. Government Response to Disasters

0.5 hours

- Reference:
- a. Federal Civil Defense Act of 1950, P.L. 81-920.
  - b. Pennsylvania Emergency Management Services Act of 1978, P.L. 1332.
  - c. "The Pennsylvania Emergency Management Agency," a brochure.

Presentation: The instructor will lecture on the development of civil defense in the United States with an emphasis on Pennsylvania. The involvement into emergency management will be explained and its present mission described. The involvement of emergency management in planning for incidents at fixed nuclear facilities will be described. The PEMA brochure will be utilized as a hand-out.

3. Dosimetry

0.9 hours

- Reference: Commonwealth of Pennsylvania; Disaster Operations Plan, Annex E ("Fixed Nuclear Facility Incidents"); November, 1981; Appendix 16 ("Radiological Exposure Control").

- Presentation:
- a. Through lecture and discussion, the instructor will demonstrate the proper use of the three dosimeters and the charger.
    - (1) CD V-730 (or DCA 622)
    - (2) CD V-742
    - (3) TLD (thermoluminescent dosimeter badge)
    - (4) CD V-750
  - b. Through lecture and discussion, the instructor will explain the following acceptable levels of radiation concerning fixed nuclear facility incidents.
    - (1) 25 R
    - (2) 15-20 R
    - (3) 5 R



- c. Through lecture and discussion, the instructor will explain the proper record forms and how they should be maintained.

#### 4. Decontamination

0.9 hours

Reference: Commonwealth of Pennsylvania; Disaster Operations Plan, Annex E ("Fixed Nuclear Facility Incidents"); November, 1981; Appendix 16 ("Radiological Exposure Control").

Presentation: The instructor, through lecture and discussion, will examine reception centers and mass care centers. Then, decontamination monitoring procedures will be identified and demonstrated. The proper use of a CD V-700 will be explained and demonstrated. The following will then be discussed and explained:

- a. Background radiation (usually .03 mr).
- b. Radiation above background of .05 mr or more will be referred to a physician.
- c. Thyroid must not exceed .1 mr.
- d. Appropriate record keeping.

#### 5. Summary and Conclusion

0.1 hours

The instructor will briefly summarize the content of this seminar and then bring it to a conclusion.

#### Evaluation

All participants will be requested to complete the evaluation form that is marked "Attachment A."

#### Deployment

This seminar will be presented in each county within the Commonwealth that is involved with nuclear-powered generating plants.

PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
OFFICE OF TRAINING AND EDUCATION

Course Evaluation  
for  
Dosimetry and Decontamination Seminar

I. General - Check space preceding most appropriate answer

1. My reaction to this seminar can best be described as:

- ☐ a. The seminar met my needs far beyond my expectations.
- ☐ b. The seminar met my needs in an adequate manner.
- ☐ c. The seminar did not meet all my needs.
- ☐ d. The seminar did not meet my needs at all.

2. My estimate of the instructor's capabilities can best be described as:

- ☐ a. The instructor was excellent.
- ☐ b. The instructor was good.
- ☐ c. The instructor met most of my needs, but some needs were not addressed.
- ☐ d. The instructor failed to meet my needs.

3. The room in which the instruction was conducted can best be described as:

- ☐ a. The room was excellent.
- ☐ b. The room was good.
- ☐ c. The room was not quite adequate.
- ☐ d. The room was totally inadequate.

II. Meeting Objectives

1. My understanding of the government response to disasters can best be described as:

- ☐ a. I fully understand the government response to disasters.
- ☐ b. I understand generally the government response to disasters.
- ☐ c. I do not understand the government response to disasters.

- (
2. My knowledge of the proper use of dosimetry can be described as:
- ( ) a. I fully understand the proper use of dosimetry.
  - ( ) b. I understand generally the proper use of dosimetry.
  - ( ) c. I do not understand the proper use of dosimetry.
3. My knowledge of the acceptable levels of radiation during an incident at a fixed nuclear facility can best be described as:
- ( ) a. I fully understand the acceptable levels of radiation.
  - ( ) b. I understand generally the acceptable levels of radiation.
  - ( ) c. I do not understand the acceptable levels of radiation.
4. My understanding of the proper maintenance of appropriate records can best be described as:
- ( ) a. I understand completely the appropriate records and how they are to be maintained.
  - ( ) b. I understand generally the appropriate records and how they are to be maintained.
  - ( ) c. I do not understand the appropriate records or how they are to be maintained.
- (
5. My knowledge of reception centers, mass care centers, and where decontamination monitoring procedures are to be utilized can best be described as:
- ( ) a. I fully understand reception centers, mass care centers, and where decontamination monitoring procedures are to be utilized.
  - ( ) b. I generally understand reception centers, mass care centers, and where decontamination monitoring procedures are to be utilized.
  - ( ) c. I do not understand reception centers, mass care centers, or where decontamination monitoring procedures are to be utilized.
6. My knowledge and understanding of the effective use of a survey meter can best be described as:
- ( ) a. I understand completely the use of a survey meter.
  - ( ) b. I understand the proper use of a survey meter, but have some questions about such use.
  - ( ) c. I do not understand how to use a survey meter.
- (

III. Recommendations

In the space below, please submit any recommendations you may have regarding this seminar.

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'85 JUL -8 P12:07

In the Matter of  
  
Philadelphia Electric Company  
  
(Limerick Generating Station,  
Units 1 and 2)

)  
)  
)  
)  
)  
)

Docket Nos. 50-352  
50-353

OFFICE OF SERVICE  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of the Federal Emergency Management Agency's Testimony (of Richard Kinard and James Asher) on Certain Revised Contentions of the Graterford Inmates in the captioned matter have been served upon the following by deposit in the United States mail this 5th day of July, 1985.

Helen F. Hoyt, Esq.  
Chairperson  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Richard F. Cole  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Jerry Harbour  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Docketing and Service  
Section  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Ann P. Hodgdon, Esq.  
Counsel for NRC Staff  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Philadelphia Electric Company  
ATTN: Edward G. Bauer, Jr.  
Vice President &  
General Counsel  
2301 Market Street  
Philadelphia, PA 19101

Mr. Frank R. Romano  
61 Forest Avenue  
Ambler, Pennsylvania 19002

Mr. Robert L. Anthony  
Friends of the Earth in  
the Delaware Valley  
106 Vernon Lane, Box 186  
Moylan, PA 19065

Charles W. Elliot, Esq.  
325 N. 10th Street  
Easton, PA 18064

Miss Phyllis Zitzer  
Limerick Ecology Action  
P.O. Box 761  
762 Queen Street  
Pottstown, PA 19464

Zori G. Ferkin, Esq.  
Assistant Counsel  
Commonwealth of Pennsylvania  
Governor's Energy Council  
1625 N. Front Street  
Harrisburg, PA 17102

Angus Love, Esq.  
107 East Main Street  
Norristown, PA 19401

Robert J. Sugarman, Esq.  
Sugarman, Denworth &  
Hellegers  
16th Floor, Center  
101 North Broad Street  
Philadelphia, PA 19107

John L. Patten, director  
Pennsylvania Emergency  
Management Agency  
Room B-151  
Transportation and  
Safety Building  
Harrisburg, PA 17120

Kathryn S. Lewis, Esq.  
City of Philadelphia  
Municipal Services Bldg.  
15th and JFK Blvd.  
Philadelphia, PA 19107

Thomas Gerusky, Director  
Bureau of Radiation  
Protection  
Department of Environmental  
Resources  
5th Floor  
Fulton Bank Bldg.  
Third and Locust Streets  
Harrisburg, PA 17120

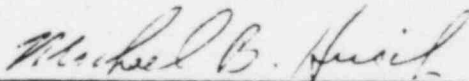
Jay M. Gutierrez, Esq.  
U.S. Nuclear Regulatory  
Commission  
631 Park Avenue  
King of Prussia, PA 19406

James Wiggins  
Senior Resident Inspector  
U.S. Nuclear Regulatory  
Commissin  
P.O. Box 47  
Sanatoga, PA 19464

Timothy R.S. Campbell, Esq.  
Director  
Department of Emergency  
Services  
14 East Biddle Street  
West Chester, PA 19380

Mr. Ralph Hippert  
Pennsylvania Emergency  
Management Agency  
B151 - Transportation and  
Safety Building  
Harrisburg, PA 17120

Theodore G. Otto, Esq.  
Department of Corrections  
Office of Chief Counsel  
P.O. Box 598  
Lisburn Road  
Camp Hill, PA 17011

  
Michael B. Hirsch