

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board <sup>85 JUL 8 P1:49</sup>

In the Matter of

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

: OFFICE OF SECRETARY  
: DOCKETING & SERVICE  
: BRANCH  
: Dockets No. 50-352, 50-353

STATEMENT OF MAJOR JOHN D. CASE

I. QUALIFICATIONS

Major John D. Case hereby incorporates by reference his curriculum vitae, which has been marked as applicant's Exhibit "1" during his deposition of July 1, 1985. I would also like to stress the fact that I have served as Brig Commander of LeJeune, North Carolina, and as the custody officer of the Naval Prison in Port Smouth, New Hampshire during my service in the United States Marine Corps. Both of these jobs are similar to the civilian position of a prison warden. I would also like to stress that I was both warden and director of the Department of Corrections of Bucks County after I was released from the service. As Director of the Department of Corrections, I was in charge of the adult jail facility, the Bucks County Rehabilitation Center, one juvenile home, and three half-way houses. I would also like to note for the record that I do have prior experience in moving large numbers of individuals as I was in charge of the planning and the eventual evacuation of 3,000 troops during the Korean Conflict

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from the front lines of that conflict to the rear. My plans called for an evacuation within 4 hours, and this was in fact achieved despite adverse weather conditions which prevailed at the time. I concluded that my original estimates were conservative in that they were met despite the adverse conditions. I also note for the record that I am currently the Field Director of the Pennsylvania Prison Society, which was founded in 1787 by Dr. Benjamin Rush. I also note that I have been a trainer and trainee on numerous occasions throughout my career, which are listed in greater detail in my curriculum vitae.

## II. ESTIMATED TIME OF EVACUTION

It is my opinion that the overall plan is speculative based upon a number of contingencies. These contingencies include the inmate knowledge and education of the plan, time of day of the accident, weather conditions, correctional officer training, inmate response, bus driver training, traffic patterns, ability to conduct simultaneous tasks mentioned in the flow chart, and the availability of the necessary resources. It is my opinion that an equally realistic estimate of the estimated time of evacuation as it has been presented to me and with the information currently available

is 12 to 20 hours. I am also concerned about certain specific items mentioned in the sequential analysis. Initially, I would like to discuss the estimated lock down time which is given as 30 minutes in the flow chart. Given the current knowledge of the inmate population with respect to the plan, it is unrealistic to assume a 30 minute lock down time could be achieved. This time is estimated during the best of conditions during the normal operation of the facility. If the inmate population hears of a nuclear accident through radio or other means at Limerick and has no concept of the evacuation plan, the lock down could go as long as 4 or 5 hours. Past incidents such as the power outage and subsequent riot on C Block on 9/12/83 suggests this time frame to be appropriate. This incident occurred at 5:15 P.M. and D Block was not secured until 10:05 P.M. The lock down time for the hostage siege in October of 1981 also took over 2 hours to complete. Based upon my experience being involved in past lock downs and the data regarding prior emergency situations at S.C.I.G. leads me to believe that a lock down could take as long as 5 hours to complete.

With respect to the portion of the sequential analysis dealing with the arrival of the buses and other vehicles

at the Institution within 2 to 4 hours, I believe this estimate may also be too conservative. If the buses are coming from up to 190 miles away during a simultaneous evacuation of the general public, I do not know if the 2 to 4 hour estimate can be achieved. The factors that contributed include the distance the buses will be required to travel, the training the bus drivers have received, the weather conditions and the time of day, the congestion of the roadways, the ability to use main roads as opposed to secondary roads, potential bottle necks, the possibility of spontaneous evacuations by individuals not conforming to traffic signals and evacuation plans, and the type of buses to be utilized.

I have also some concerns as to the ability to conduct the other activities mentioned such as the mobilization of manpower, assembly of loading teams, securing and loading inmates, and vehicle exit times; within the suggested time frames. Due to the obvious need to conduct many of these activities simultaneously, the time estimates are speculative.

With a more thorough knowledge of the mechanics of the plan by someone such as Superintendent Zimmerman or another individual who has knowledge of the development of the time frames, it may be possible to achieve these tasks within the required time. Today, however, without any additional knowledge, I

cannot state that these tasks can be performed with any reasonable certainty within the time frame suggested.

### III. BUS DRIVER TRAINING

With respect to bus driver training, my concern is to the guarantee that such training will in fact be offered to the drivers and other civilian personnel. I believe there is a need for an incentive to be offered in order to guarantee participation of the civilian personnel in said training. To date, no such incentive has been offered. Such possible incentives should include primarily financial inducement such as overtime or extra pay for participation in the training. This would insure that all training would in fact occur. I also believe that whatever type of training should also be offered on an ongoing basis and not as a once-only event.

  
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MAJOR JOHN CASE