

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED  
USNRC

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station,  
Units 1 and 2)

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Docket Nos. 50-352  
50-353  
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TESTIMONY OF  
DONALD F. TAYLOR  
FOR THE COMMONWEALTH OF PENNSYLVANIA  
ON GRATERFORD INMATES CONTENTION REGARDING  
TRAINING OF CIVILIAN RESPONSE PERSONNEL

Q.1. Please state your name and business address.

A.1. My name is Donald F. Taylor. I am Director of Training and Education for the Pennsylvania Emergency Management Agency (PEMA). My business address is Transportation and Safety Building, Room B-151, Harrisburg, PA 17120.

Q.2. Mr. Taylor, have you prepared a statement of your professional qualifications?

A.2. Yes. A copy of my biography was admitted in evidence in this proceeding fol. Tr. 19498.

Q.3. Mr. Taylor, what is the purpose of your testimony?

A.3. The purpose of my testimony is to respond to the admitted contention of the Graterford inmates regarding training for civilian personnel who may be called on to participate in

the radiological emergency response plan for the State Correctional Institution at Grateford in the event of an emergency at the Limerick Generating Station.

Q.4. Mr. Taylor, could you define what you mean by "civilian personnel?"

A.4. When I refer to "civilian personnel," I use the same definition as that stated by the Atomic Safety and Licensing Board in its Order of June 12, 1985 admitting this contention. The Licensing Board (at p. 6) defined "civilian personnel" as "those non-state employees identified in Plan 2 of the RERP for the State Correctional Institute at Graterford as having a role in the emergency response in the event of a radiological emergency at Limerick." Such employees are bus and ambulance drivers employed by civilian bus and ambulance companies.

Q.5. What does the training you offer encompass?

A.5. The dosimetry training that will be provided to these bus and ambulance drivers is outlined in the plan of instruction attached to this testimony and incorporated herein by reference. Decontamination monitoring procedures will also be examined as there is a remote possibility that, if dosimetry is utilized by these bus and ambulance drivers, they will also be involved in some manner with decontamination monitoring. This training will ensure their knowledge of that process.

Q.6. Who will conduct training for the civilian bus and ambulance companies?

A.6. The training described here will be conducted by PEMA. Any such training that will be required is for the direct benefit of another Commonwealth agency. Thus, it is PEMA's responsibility under Annex E of the Commonwealth Disaster Operations Plan to do the training. The training that has been performed for local municipalities (cities, boroughs, townships), school bus drivers, fire fighters, and other personnel should have been performed by the appropriate county. P.L. 1332 places that responsibility on the county. However, due to the inability and/or unwillingness of the various counties to conduct this training, Philadelphia Electric Company employed a consulting firm to fulfill the training responsibilities of the involved counties.

Q.7. How will the bus companies be made aware of the availability of the training you are offering?

A.7. On April 4, 1985, I wrote a personal letter to each of 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. 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.

A program designed to encourage the aforementioned six bus companies to accept this training will be implemented in late July and early August, 1985. This implementation will involve personal visits by me to each of these bus companies so as to personally urge them to take advantage of this offer of training.

Q.8. How will the ambulance companies be informed of the availability of PEMA training?

A.8. The ambulance companies will be offered training in the same manner as that described in my previous response with respect to the bus companies. I will contact the ambulance companies that would be called upon in an evacuation of Graterford in a radiological emergency at Limerick by letter, as I have already done with the bus companies. Thereafter, in late July and early August I will visit each company to encourage the company to accept the training offer, if the company has not already done so.

Q.9. When and where will bus and ambulance driver training be conducted?

A.9. Any training sessions that are conducted will be scheduled in a place and at a time convenient to the drivers themselves. It is presumed that such training will be conducted at, or near, the bus or ambulance company headquarters.

Q.10. Will PEMA attempt to contact individual drivers to encourage them to accept the training program?

A.10. No. It is not within the purview of PEMA to contact individual drivers in the event a bus or ambulance company does not accept training. However, I intend to make every effort to persuade the bus and ambulance companies to accept such training.

Q.11. Will there be training offered to the bus and ambulance companies in subsequent years, after Limerick goes into commercial operation?

A.11. Yes. This training and/or refresher training will be made available annually to the drivers of each bus and ambulance company.

Q.12. The inmates contend that the training course offered by PEMA is inadequate because it is "not as comprehensive as the one offered to the bus drivers of school children" as described in the Licensing Board's Third Partial Initial Decision. Do you have a response to this contention?

A.12. Yes. First of all, the training program for school bus drivers provided by Energy Consultants (EC) through the auspices of the Applicant, Philadelphia Electric Company, was approved by me prior to its implementation in the various counties in the Limerick EPZ. It should also be noted that PEMA certifies the EC instructors as qualified

to give such instruction. I am therefore in a position to compare the EC course to that being offered by PEMA in this instance.

As may be seen in the PEMA lesson plan, the plan of instruction for these bus and ambulance drivers covers a full spectrum of topics, including government response to disasters, levels of radiation during an incident at a fixed nuclear facility, proper use of dosimetry, and decontamination monitoring procedures. The only significant difference between this course and the EC program is that the latter provides what I term a "public relations" lesson. This explains how a nuclear generating plan operates and the safety of such a facility.

In my opinion, the PEMA-offered training will adequately prepare these bus and ambulance drivers to respond to the Graterford facility in a radiological emergency at Limerick. Further, to the extent drivers attending a training session raise questions that are not covered within the precise scope of the course, the PEMA instructor will respond to the question to the best of his ability, and direct the questioner to other sources if need be.

Q.13. Does this conclude your testimony?

A.13. Yes.