

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

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

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Docket Nos. 50-352OL
50-353OL

OFFICE OF SECRETARY
DOCKETING & SERVICE
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COMMONWEALTH RESPONSE TO
PROPOSED REVISED CONTENTIONS OF THE
GRATERFORD INMATES

In accordance with 10 C.F.R. 2.714(c), the Commonwealth of Pennsylvania hereby responds to the Graterford inmates' May 13, 1985 proposed revised contentions with respect to radiological emergency planning.

For the reasons stated below, the Commonwealth believes these contentions lack the requisite specificity and bases under 10 C.F.R. 2.714(b) and should be rejected.

Background

In ALAB-806, 21 NRC ____ (May 1, 1985) the Appeal Board reversed this Board's March 22, 1985 oral ruling denying the request of the Graterford inmates to submit revised contentions, and its Memorandum and Order of April 12, 1985 dismissing the Graterford inmates' original proposed contentions. The Appeal Board ruled that the Graterford inmates be allowed to file revised emergency planning contentions supported by specific

bases. In ruling on the revised contentions, the Appeal Board directed this Board to "determine only whether <the revised contentions> have adequate bases and specificity." ALAB-806, 21 NRC at ____ (slip opinion at 18).

Discussion

Pursuant to 10 C.F.R. 2.714(b), an intervenor must file "a list of contentions which petitioner seeks to have litigated in the matter, and the bases for each contention set forth with reasonable specificity." 10 C.F.R. 2.714(b); Commonwealth Edison Co. (Byron Nuclear Power Station, Units 1 and 2), LBP-80-30, 12 NRC 683, 686 (1980); Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), LBP-84-18, 19 NRC 1020, 1028 (1984).

At the pleading stage of a proceeding, contentions need only identify the reasons for each contention. See Houston Lighting and Power Co. (Allens Creek Nuclear Generating Station, Unit 1), ALAB-590, 11 NRC 542, 548 (1980). Furthermore, the basis stated for each contention need not "detail the evidence which will be offered in support of each contention." Mississippi Power & Light Co. (Grand Gulf Nuclear Station, Units 1 and 2), ALAB-130, 6 AEC 423, 426 (1973). Nevertheless, the basis for contentions must be sufficiently detailed and specific (a) to demonstrate that the issues raised are admissible and further inquiry into the matter is warranted and (b) to put the parties

on notice as to what they will have to defend against or oppose. Cincinnati Gas & Electric Co. (William H. Zimmer Nuclear Power Station), ALAB-305, 3 NRC 8, 12 (1976); Gulf States Utilities Co. (River Bend, Units 1 and 2), ALAB-183, 7 AEC 222, 226 (1974).

The Graterford inmates' proposed revised contentions consist of a single "General Contention," accompanied by a number of proposed specific bases. With respect to the inmates' "General Contention," the Commonwealth notes that the contention should be dismissed insofar as it purports to challenge the adequacy of the Graterford plan to protect the staff of the Graterford institution. The Graterford inmates' interest in this proceeding, and accordingly their standing to raise issues of concern, is limited solely to that of the institution's inmates and does not include matters affecting the interests of the prison staff.

A. Manpower Mobilization

The inmates assert that "<t>here 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 designed purpose." In particular, the inmates assert that the call up system "could fail" if the commercial phone lines relied upon are "overburdened and unavailable." The inmates further contend that the Graterford plan provide for a back-up system in the event commercial phone lines are inoperable. Proposed Revised Contentions at 2-4.

Contrary to the inmates' assertion, there are adequate plans and procedures for notifying, alerting and mobilizing emergency response personnel for Graterford in accordance with 10 C.F.R. 50.47(b) and NUREG-0654. The record established through the prehearing conferences which inmates' counsel and expert attended indicates that four (4) commercial telephone lines are available at Graterford for notification of response personnel in a Limerick emergency. There is nothing in NRC regulations or guidance that suggests commercial telephone lines are not an acceptable means of contacting response personnel. See 10 C.F.R. 50.47(b)(5),(b); NUREG-0654, Criteria E, F. In addition, the institution is connected directly by dedicated telephone line with the Pennsylvania State Police. Tr. 20,629-30, 20,672 (Jeffes). If for any reason the commercial telephone lines are unavailable, the Pennsylvania State Police are reachable over the dedicated line and can undertake notification of additional manpower response. Tr. 20,627 (Jeffes). Security personnel who will be used in the Graterford evacuation are already available on-site. These employees can begin preparation for an emergency evacuation of Graterford; thus it is not necessary that all additional off-duty personnel be contacted immediately. Cf. LBP-85-14, 21 NRC ____ (May 2, 1985) (slip opinion at 271).

In addition, the sole factual basis cited by the inmates for this contention is the statement of a township supervisor to the effect that commercial phone systems have been unreliable in

emergencies. Proposed Revised Contentions at 2-3. This Board noted that testimony in its Partial Initial Decision on offsite emergency planning. The Board said that this concern would be resolved "once the underlying planning principles regarding alert and notification...become clear to township officials..." LBP-85-14, 21 NRC at _____ (slip opinion at 271). Thus, this testimony does not constitute a proper basis for inmates' concern with the function of the notification system in place for the Graterford institution.

B. Input of the Correctional Officers Union

The inmates offer as basis for their challenge to the adequacy of the Graterford plan the alleged necessity for the union organization of correctional officers to have input into the planning process. The inmates cite NUREG-0654, Criterion A as legal basis for requiring such input.

This contention is deficient on several grounds. First, the inmates have proffered no basis for any doubt that the prison guards will in fact perform their designated roles in a Limerick emergency. The correctional officers are employees of the Pennsylvania Department of Corrections and as such are obligated to perform their designated functions. Indeed, Department's "Code of Ethics," (provided here as Attachment A) states explicitly that, "in the event of an emergency, all correctional employees may be utilized for custodial

services..." Further, there is no requirement in NRC regulations or guidance that a union of State employees provide input into emergency planning.

C. Training

The inmates challenge the nature of the response training offered to bus companies that have agreed to provide busses and drivers to evacuate Graterford in a Limerick emergency. The inmates argue these drivers should receive the training "offered to the school bus drivers" in the Limerick EPZ. The inmates contend further that training should be extended to "other support personnel which will be involved in a possible evacuation such as the ambulance drivers, rescue squad operators, hospital personnel, <and> police and fire departments..." Proposed Revised Contentions at 6-7.

This contention should be dismissed. The Pennsylvania Emergency Management Agency (PEMA) has notified civilian bus companies who will participate in a Graterford evacuation that PEMA will provide their employees with instruction in use of dosimetry in a radiological emergency. See Commonwealth Answer to Proposed Contentions of the Graterford Inmates (Apr. 4, 1985), Exhibit "B". Notably, use of dosimetry is not required training for school bus drivers. Such individuals are not classified as emergency workers in the sense that plans call for this group to be evacuated prior to a radioactive release. Limerick, supra, LBP-85-14, 21 NRC at ____ (slip opinion at 146). The Commonwealth is certainly willing to discuss with the inmates'

representative the possibility of providing more expansive training for the civilian bus companies than that offered to date. That representation notwithstanding, inmates have not demonstrated a need for further inquiry into the nature of training available for these personnel. There is therefore no litigable issue presented here.

The Commonwealth is also willing to offer to train employees of private companies that will be providing ambulance services to Graterford in the event of a Limerick emergency. In contrast, the inmates' references to "rescue squad operators", and "hospital personnel" as persons who should receive training are vague and, more importantly, have no basis in the Graterford plan. The plan similarly does not rely upon "police and fire departments," other than the Pennsylvania State Police. The State Police are already trained in radiological emergency response. The inmates therefore have failed to state a viable contention with respect to training of these organizations or individuals.

D. Medical Services

This contention relates to the inmates' general concern about the adequacy of arrangements for medical services for contaminated injured individuals. Citing the April 4, 1985 Affidavit of Dr. Roger E. Linnemann supplied by Applicant with regard to the capability of Montgomery Hospital to care for such individuals, the inmates assert there is insufficient information

with respect to that hospital's "capacity", and equipment for treating such individuals, as well as means for transporting individuals to the hospital. The inmates also contend the Department of Corrections ("Department") has failed to designate a "back-up" facility for treatment of contaminated injured inmates. The inmates suggest treatment should be available "at the relocation centers." Proposed Revised Contentions at 10.

Again the inmates have not stated a litigable issue with requisite specificity. The inmates have been provided substantial information with respect to arrangements for medical services for contaminated injured inmates. This includes the Affidavit of Dr. Linnemann with respect to Montgomery Hospital. Moreover, the Commonwealth provided this Board and the parties information indicating that hospitals with which the Department has agreements to provide health care to its inmates meet the standard of the Joint Commission on the Accreditation of Hospitals as to the treatment of radioactively contaminated individuals. See Response of the Commonwealth, Department of Corrections to Requests for Information (Mar. 15, 1985) at 5, Exhibits "F", "G". There is no question, and inmates indeed do not challenge, the legal sufficiency of these arrangements as established by this Board's second partial initial decision. See LBP-84-31, 20 NRC 446, 531-36 (1984). Moreover, the agreements between the Department and various hospitals meet the terms of 10 C.F.R. 50.47(b)(12) as construed in the decision in Guard v. NRC, 753 F.2d 1144 (D.C. Cir. 1985). The inmates' assertion that a

"back-up" facility must be designated thus does not present a litigable issue.

The inmates' factual dispute with respect to the sufficiency of Dr. Linnemann's affidavit also does not constitute a sufficient basis. The inmates' inference that any one hospital must have capacity to treat 25 contaminated injured individuals is not supported by Commission precedent. See Southern California Edison Co. (San Onofre Nuclear Generating Station, Units 2 and 3), CLI-10, 17 NRC 528, 532, 535 n. 10 (1983). Further, the Affidavit of Dr. Linnemann specifically states (at 2) that Montgomery Hospital has "specific supplies and equipment set aside for" contaminated injured patients. Finally, the Graterford plan itself describes the ambulance service for transporting patients from Graterford. Ambulances will be equipped with dosimetry and KI for radiological protection.

E. Estimated Time of Evacuation

The inmates assert there is "no reasonable assurance that the estimated time of evacuation if six to ten hours can be achieved" for the Graterford institution. As basis, the inmates cite the lack of a statement of a specific evacuation time estimate in the Graterford plan, and contend that there must be a "breakdown of the various sequential events necessary to accomplish" the evacuation time. The inmates claim NUREG-0654, specifically Appendix 4, as the legal basis for their contention.

The inmates have failed to proffer litigable bases for this contention. The purpose of an evacuation time estimate is to provide emergency planning decision-makers with an idea of the range of times needed to evacuate the EPZ so as to provide a basis for deciding what protective action recommendations are appropriate. See LBP-85-14, 21 NRC at ____ (slip opinion at 32). NUREG-0654, Criterion J.10, subpart 1, states that an organization's plan shall include

Time estimates for evacuation of various sectors and distances based on a dynamic analysis for the plume exposure pathway emergency planning zone (See Appendix 4).

While Appendix 4 of NUREG-0654 refers to evacuation time estimates for special facility populations, it does not state that emergency plans must detail evacuation time estimates for each individual institution. The Graterford plan is thus not inconsistent with NUREG-0654.

Further, the inmates have failed to specify any reason to question the achievability of the evacuation time estimate for Graterford. The inmates indicate they wish to testify as to incidents at Graterford where "similar measures" were taken; however the inmates fail to note what it is about the "hostage siege of October 28, 1981" of the "power failure and resulting riot on C-Block in 1983" that resembles the events described in the radiological emergency evacuation plan for Graterford. The vague reference to a "lock up" procedure also does not fulfill the specificity requirement of Section 2.714(b).

F. Monitoring

The inmates indicate that they wish "one further assurance" with respect to monitoring activities at the Graterford facility. Inmates presumably refer here to the response of U.S. Department of Energy ("DOE") teams which will monitor the radioactive plume in the event sheltering is implemented as a protective action for Graterford, an issue which inmates admit was extensively discussed in the two prehearing conferences in this proceeding. Proposed Revised Contentions at 14. Inmates ask that "laboratories which are prepared to assist in the monitoring of the conditions surrounding" the Graterford facility be identified and their "capabilities be ascertained." Id.

The Commonwealth radiological emergency response plan ("Annex E") provides information with respect to field monitoring activities which are undertaken by various agencies, including capability of DOE support teams. See Annex E, pp. E-12-10, E-12-16 and E-12-43. A review of this information should allay the inmates' concerns on this matter. In any event, the inmates have not particularized any deficiency in existing plume monitoring capabilities for Graterford and therefore do not state a litigable issue.

G. Simulated Evacuation Plan Exercise

The inmates challenge the sufficiency of the March 7, 1985 "table-top" exercise of the Graterford plan with respect to the provisions of NUREG-0654, Criterion N. The inmates assert that the March 7 exercise was required to 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...

Exercise scenarios are to be developed by the NRC and by the Federal Emergency Management Agency (FEMA). The purpose of a plan exercise is "to evaluate major portions of emergency response capabilities." 10 C.F.R. 50.47(b)(14). Exercise scenarios need only "simulate an emergency that results in offsite radiological releases which would require response by offsite authorities." NUREG-0654, Criterion N.1.a. The March 7 exercise at Graterford included participation by the Department of Corrections and PEMA. These are the responsible state authorities which would respond to protect the Graterford inmates in a Limerick emergency. FEMA observed and graded the exercise, and found "the Graterford authorities adequately demonstrated an understanding of the emergency response procedures and the ability to adequately implement them..." Memorandum from Richard W. Krimm, FEMA to Edward L. Jordan, NRC (March 27, 1985). The March 7 exercise therefore fully satisfied applicable NRC regulations and guidance.

Further, the exercise specifically involved Graterford institutional staff responsible for emergency decision-making. FEMA's report states specifically (at 1) that the "Commissioner, Department of Corrections, coordinated the overall response while the Deputy Warden at Graterford was responsible for his

institution." The inmates have thus not stated a basis for this contention and it should be dismissed.

H. Panic Factor

The inmates contend that there is no reasonable assurance that the Graterford plan "will prevent a spontaneous evacuation on either the guards or inmates part, i.e. panic." In support of this contention the inmates cite statistical data and other information as to the size and nature of the Graterford population and previous incidents at the institution including a work storage, power failure, and an inmate escape. The inmates contend that these events suggest a potential for panic at the institution in a Limerick emergency.

The inmates' contention on this matter fails in several respects. The inmates do not point to any provision of the Graterford plan or any other document which suggests that Department authorities could not handle potential disturbances. Notably, the plan clearly contemplates that security measures will be taken in an evacuation will be tailored to the particular classification level of the inmates. The contention therefore is not sufficiently specific.

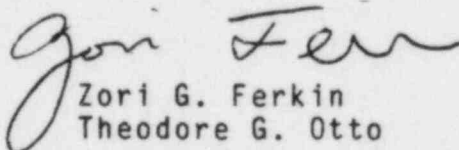
Further, the inmates ask for a "limited appearance" by this Board at Graterford to provide "further evidence" in support of this contention. In essence the inmates are asking to make this contention sufficiently specific through discovery. That is contrary to the requirement of Section 2.714 that a contention be sufficiently specific at the

outset. Duke Power Co. (Catawba Nuclear Station, Units 1 and 2),
ALAB-687, 16 NRC 460, 468 (1982).

Conclusion

For the foregoing reasons, the Commonwealth believes that
the May 13, 1985 Proposed Revised Contentions of the Graterford
inmates lack the requisite specificity and bases and should be
denied.

Respectfully submitted,


Zori G. Ferkin
Theodore G. Otto

Counsel for
Commonwealth of Pennsylvania

Dated: May 24, 1985

Commonwealth of Pennsylvania

Bureau of Correction



Code of Ethics

Ronald J. Marks
Commissioner

Erskind DeRamus
Deputy Commissioner

Foreword

The Pennsylvania Bureau of Correction is dedicated to achieve two basic goals: to assure the safety of the public by providing safe and secure facilities for the housing of the criminal offender and to encourage the emotional and intellectual maturity of inmates through realistic, responsible programs and policies.

As a correctional employee, your professional deportment and attitude demonstrated through the performance of your duties contributes greatly to the respect, trust and confidence afforded our agency by the public and by the inmates themselves.

Read in context, this handbook will provide you with the basic principles, rules and regulations by which you as an employee of the Bureau of Correction are to conduct yourself. To a large degree, the success of any program and all programs in the correctional system depends upon adherence to these standards.

With every confidence in your ability to do the job, I wish you success as a professional in the Bureau of Correction.

Sincerely,

Ronald J. Marks

Ronald J. Marks
Commissioner

May 1981

BUREAU OF CORRECTION CODE OF ETHICS

This handbook does not include every detail or situation involved in the operation of a Bureau facility. It aims at the presentation of overall policy guidelines. Facilities will issue more specific and detailed information as needs or circumstances dictate. In no instance, however, will facility rules and regulations take precedence over the policy contained herein.

A. General Responsibility of Bureau of Correction Employees

Consistent with the responsibility of all correctional employees in the Commonwealth of Pennsylvania to perform their duties with integrity and impartiality and to avoid situations whereby bias, prejudice, or personal gain could influence official decisions, the following code is being promulgated.

1. Discrimination

The responsibility of all Bureau of Correction employees is to act in relation to all citizens of the Commonwealth without regard to age, race, color, ancestry, creed, sex, marital status, national origin, or political beliefs. This necessarily includes the inmates whom we

supervise and fellow employees with whom we work.

2. Conflicts of Pecuniary Interest

No Bureau employee shall engage directly or indirectly in any personal business transaction or private arrangements for personal profit which accrues from or is based upon his/her official position or authority. The scope of this provision shall include prohibition against entering into any type of business transaction or private arrangement with inmates. Honorariums paid to Bureau officials for speaking on official topics shall be deposited in the Inmate General Welfare Fund.

3. Representation of Interests

No Bureau employee shall represent or act as an agent for any private interest, whether compensable or not, which could be reasonably expected to result in a conflict between the private interest of the employee and his official state responsibility. This includes but is not limited to representing the interest of inmates.

4. Gifts and Favors

Employees and their families shall not directly or indirectly solicit, accept, or agree to accept any gift of money or goods, loans or services for personal benefit which would influence the performance of their work duties or decision making. Correctional employees

shall not accept or distribute any gifts, money, loans to or from inmates.

5. Information

No Bureau employee shall, for personal gain or the gain of others, use information not available to the public at large, or divulge confidential information without its authorized release; nor shall the employee receive compensation for consultation which substantially draws upon official ideas or data which have not been disclosed to the public.

6. Private Employment

No Bureau employee shall engage in or accept private employment or render private services when such employment or service is incompatible or in conflict with the discharge of the employee's official duties or would tend to impair the employee's independent judgement or action in the performance of his/her official duties. Employees must report any employment which may involve a conflict of interest to their immediate supervisor.

B. Specific Rules and Regulations — Bureau of Correction

1. Each employee in the correctional system is expected to subscribe to the principle that something positive can be done for each inmate. This principle is to be applied without exception.

This involves an intelligent, humane and impartial treatment of inmates. Profanity

directed to inmates, or vengeful, brutal, or discriminatory treatment of inmates will not be tolerated. Corporal punishment shall not be utilized under any circumstances as a disciplinary measure.

2. Only the minimum amount of force necessary to defend oneself or others, to prevent escape, to prevent serious injury or damage to personal property or to quell a disturbance or riot will be used. Excessive force or violence will not be tolerated. Fighting or horseplay while on duty is prohibited.

3. In event of an emergency, all correctional employees may be utilized for custodial services under the direction of the superintendent or his designee.

4. Each employee is to assist in preventing an escape or in pursuing an escapee as directed by the superintendent or his designee.

5. In the event any official or employee has been seized, no employee or official shall disregard, alter, modify, or change in any manner the prescribed duties, responsibilities, or obligations on demand by the prisoner or plea between hostages, regardless of consequences, unless on orders from the commissioner or higher authority.

6. There shall be no fraternization or private relationship of staff with inmates. This includes,

but is not limited to, trading, bartering or receiving gifts, money and favors from either the inmate or the inmate's friends, relatives, or representatives.

7. The personal property of inmates will be handled with extreme care and disposed of only by properly designated authority in a manner designated by official Bureau of Correction policy. Similarly, no employee may assume the right of ownership of property owned by fellow employees or by the state; theft or abuse of property or equipment is prohibited.

8. No employee shall leave his assigned post or leave the institution or grounds without being properly relieved and receiving proper authorization from a supervisor. Proper relief involves communicating any special observations or orders to the relief personnel.

9. Lawful orders by a supervisor to a subordinate must be executed promptly and faithfully by the subordinate even though the employee may question the wisdom of such order. The privilege of formally appealing the order may be done at a later date through either the supervisory command structure, civil service appeal, or the grievance machinery.

10. All security keys issued to an officer or employee will remain in his possession at all times. Under no circumstances are keys ever to be unguarded, mislaid, unaccounted for, taken

from the institution, or turned over to an inmate.

11. Employees in uniform are required to keep said uniforms in a clean and neat condition, free from decoration, other than those officially prescribed. Non-uniformed employees will be required to meet the standards of neatness and grooming as established by their institution or facility.

12. Employees may use their identification as an employee of the Bureau of Correction only for identification in performing the duties and responsibilities required in the scope of their employment. Bureau identification will not be used where an employee may have other employment or in representing other interests.

13. Employees will promptly report to their supervisor any information which comes to their attention and indicates violation of the law, rules, and/or regulations of the Bureau of Correction by either an employee or an inmate, and will maintain familiarity with the provisions of such directives.

14. Alcoholic beverages and controlled substances shall not be carried, stored, or consumed in any state facility or vehicle. When a controlled substance or nonproprietary drug is prescribed by a physician, the employee shall notify his/her supervisor. An employee shall not report for duty under the influence of intoxicants.

15. Employees shall not testify in any civil case in which the Bureau of Correction may have an interest without informing the commissioner, unless under court order.

16. An employee shall not use a Commonwealth vehicle for personal business or for any other reason except as authorized. When involved in an accident while operating a state vehicle, all employees will promptly notify their supervisor, and follow the guidelines established in Governor's Office Administrative Circular 76-23, dated March 9, 1976.

17. Employees shall not read books, magazines, newspapers, or other non-job related printed material while on official duty. Employees are required to remain alert while on duty; sleeping or the appearance thereof is prohibited.

18. Whenever a supervisor has reasonable grounds to believe that a subordinate employee is being influenced by a medical or psychiatric condition, which is effecting or is likely to effect the employee's ability to perform assigned duties, the superintendent, division director, or regional director shall direct such employee to undergo reasonable examination, at the expense of the Bureau, to determine the employee's fitness for duty.

An employee who has sustained an injury, illness, or any other condition incurred in the line of duty, which could affect the employee's ability

to perform assigned duties may be required by the commissioner to undergo reasonable examination, at the expense of the Bureau, to determine the employee's fitness for duty.

An employee who has suffered an injury, illness, or any other debilitation condition not incurred in the line of duty which could affect his/her ability to perform required duty assignments, may be required by the commissioner to obtain and submit a complete medical report from his/her physician concerning his/her physical and/or mental condition. The report shall include a detailed diagnosis and prognosis of the employee's injury, illness, or condition and any other pertinent information which would aid the Bureau's medical officer in evaluating the situation prior to the employee's return to active duty.

19. An employee who knows that he/she will be unable to report for duty due to illness, emergency, or injury shall immediately notify his/her supervisor, advising the supervisor of the nature of the injury, emergency, or illness, where he/she will be recuperating, and the expected date of return to duty. The supervisor shall also be advised of a change in any conditions which may occur after the original notification was given. An employee injured while on duty shall report such injury to his/her supervisor as soon as possible and shall comply with the provisions of existing regulations pertaining to such

injuries. An employee who becomes ill while on duty and finds it necessary to be relieved from an assigned post or duty shall report this fact to his/her immediate supervisor; comply with #8 (above), and with established institutional procedures.

20. An employee shall submit any necessary and/or requested reports in a timely manner and in accordance with existing regulations. Reports submitted by employees shall be truthful and no employee shall knowingly enter or cause to be entered any inaccurate, false, or improper information or date, or misrepresent the facts in any Bureau record or report.

21. During off-duty hours, employees will conduct themselves in such a manner so as to demonstrate the public's trust and confidence inherent in their position as a public servant. Any conduct which brings discredit to their profession, responsibilities, the Bureau of Correction, or public service at large, shall be subject to immediate discipline.

22. All individuals, including employees, are subject to search upon entrance or egress from a state facility or at any time while on state property owned by the Bureau of Correction.

23. All employees shall participate in training that is mandated or required by the Bureau of Correction.

24. Gambling on official duty is strictly prohibited.

25. All employees have the responsibility to provide their supervisor with their current address and telephone number.

26. All employees shall comply and cooperate with internal investigations conducted under the authority of the Bureau of Correction, and respond to questions completely and truthfully. Procedure in cases that may result in criminal prosecution will include those rights accorded to all citizens of the Commonwealth.

27. No employee shall permit an inmate to be in control or exercise authority over other inmates.

C. Enforcement

These rules and regulations have been written in the best interest of the Bureau of Correction, its employees, and the public which we serve and protect. In event of a conflict involved in interpretation, the best interest of public policy shall be served.

Any employee who violates the provisions of this code shall be subject to immediate disciplinary action by the appointing authority. Nothing herein shall abridge the remedies or responsibilities of employees covered under the *Civil Service Act*, applicable *Collective Bargaining Agreements*, *Governor's Code of Conduct #1980-18*, or the laws of the Commonwealth.