



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 23, 1992

Mr. Robert Gary
Pennsylvania Institute for Clean Air
P.O. Box 1637
Harrisburg, PA 17105-1637

Dear Mr. Gary:

I am answering the letter you sent me on December 2, 1992, on behalf of the Pennsylvania Institute for Clean Air. In your letter, you commented on the role of the Pennsylvania National Guard in assisting Dauphin County, Pennsylvania, to respond to a radiological emergency. As I noted in my letter to you on November 24, 1992, both the Commonwealth of Pennsylvania and Dauphin County Radiological Emergency Response Plans (RERPs) include provisions for deploying Pennsylvania National Guard vehicles and personnel to Dauphin County, as necessary, in the event of an emergency. I also noted that the Federal Emergency Management Agency (FEMA) has requested additional information regarding the types and amounts of resources available from the National Guard and the radiological training provided to the personnel subject to call.

Accordingly, your additional comments and questions have been forwarded to FEMA for consideration in the review FEMA has undertaken in response to your 10 CFR 2.206 petition dated July 10, 1992. In my response to your petition, I will consider any additional information made available to me as a result of FEMA's review.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas E. Murley", with a stylized flourish at the end.

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

cc: See next page



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

EDO Principal Correspondence Control

ACTION

FROM:

DUE: 02/16/93

EDO CONTROL: 0008520
DOC DT: 01/12/93
FINAL REPLY:

Sen. Harris Wofford

TO:

Chairman Selin

FOR SIGNATURE OF:

** GRN **

CRC NO: 93-0075

Murley

DESC:

ROUTING:

ENCLOSES LETTER FROM ROBERT GARY, THE PENNSYLVANIA
INSTITUTE FOR CLEAN AIR (PICA) RE EVACUATION
PLANS FOR DAUPHIN COUNTY VIS A VIS TMI

Taylor
Sniezek
Thompson
Blaha
Knubel
TMMartin, RI

DATE: 01/29/93

ASSIGNED TO:

CONTACT:

NRR

Murley

SPECIAL INSTRUCTIONS OR REMARKS:
REPLY DIRECT TO CONSTITUENT W/CC TO SEN. WOFFORD
AT HARRISBURG OFFICE & MARK ENVELOPE
ATTN: HELEN NORTON

NKK Kee'd 2/1/93

NKR Action: DRPE/Varga

*NKR Routing: Murley
Miraglia
Russell
Pantlow*

Gody (Gillespie)

Crutchfield

Mail Room 12B18

ACTION

DUE TO NRR DIRECTOR'S OFFICE

BY 2/11/93

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-93-0075 LOGGING DATE: Jan 29 93
ACTION OFFICE: EDO
AUTHOR: Harris Wofford
AFFILIATION: U.S. SENATE
ADDRESSEE: Chairman Selin
LETTER DATE: Jan 12 93 FILE CODE:
SUBJECT: Evacuation plans for Dauphin County vis a vis TMI
ACTION: Direct Reply
DISTRIBUTION: DSB, JCA to Ack.
SPECIAL HANDLING: None
CONSTITUENT: Robert Gary
NOTES:
DATE DUE: Feb 15 93
SIGNATURE: DATE SIGNED:
AFFILIATION:

Rec'd Off. EDO

Date 1-29-93

Time 3:00

EDO -- 008520
93-07715-A-00

United States Senate

WASHINGTON, DC 20510-3803

January 12, 1993

Ivan Sellin, Chairman
Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

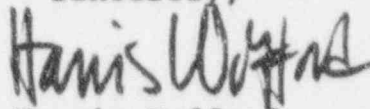
Dear Mr. Sellin:

I am forwarding to you a letter and materials from Robert Gary, President of the Pennsylvania Institute for Clean Air. His correspondence details his concern about emergency preparedness and evacuation plans for Dauphin County vis a vis the Three Mile Island nuclear power plant.

Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested.

I will appreciate your review of this matter and responding directly to Mr. Gary. Please also inform Helen Norton, Staff Assistant in my Harrisburg office, of your response and of actions taken in this matter.

Sincerely,


Harris Wofford

HW/hfn/hbg
enclosure

9302230197

PICA

The Pennsylvania Institute for Clean Air

OFFICE OF THE PRESIDENT

Thomas E. Murley
Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington DC 20555

December 2, 1992

Dear Mr Murley,

Mr. Frank Miraglia has sent PICA a letter dated November 24, 1992 in your name. We are, in the main, pleased with the content of the letter, but we have some exceptions, and they are as follows.

I, Robert Gary, Senior Researcher for PICA, made several visits to PEMA in the summer months of 1992. I spoke to Mark Goodwin the Chief Counsel in his office, and later on a subsequent visit met with Mr. Jerry Lambert who is a technical person in charge of radiological preparedness and planning in Dauphin County as well as other duties. I asked Mr. Lambert directly about the subject of ways and means for the evacuation of Harrisburg, because at that time I was thinking in terms of possibilities for the use of trains, airlift, or military trucks from New Cumberland and Indiantown Gap. Mr. Lambert told me specifically that the evacuation plan was based entirely and exclusively on privately owned vehicles and schoolbuses. Now, half a year later, Mr. Dennis Kwiatkowski, Asst. Assoc. Director in the Office of Technological Hazards at FEMA, whose office is in Washington DC, says that, "Both the State and Dauphin County RERP's contain provisions for the deployment of Pennsylvania National Guard to Dauphin County, if necessary, during a radiological emergency."

Well this is very ambiguous. Are these Guardsmen to prevent rioting and looting and assist in maintaining order? If that's what they are for, if that's what the word "deployment" means in the above quote from Mr. Kwiatkowski, then such a deployment really doesn't touch on the issue of evacuation.

On the other hand, if there is a plan for the Guard to come and evacuate the people using military trucks, why didn't Mr. Lambert tell me about it last summer? Where is the plan? I didn't see it

P.O. BOX 1637 HARRISBURG PENNSYLVANIA 17105-1637 TELEPHONE (717) 236-8888

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in the Dauphin County RERP? Let's see if we can answer a few basic questions about the plan, and if we can't, we might decide there is no plan.

(1) What are the telephone numbers of the Commanding Officers of Duty Officers who would be called to activate the evacuation trucks from New Cumberland and Indiantown Gap? On what page of the Dauphin County RERP can that information be found?

(2) What military units are tasked with responding to an evacuation need involving those trucks? Are there designated drivers? Are there designated company commanders? What kind of briefings have these people had? Where's a list of their names?

(3) Are there any particular trucks that have been designated for the task of evacuating Harrisburg, or any other place in Dauphin County?

(4) What about routes and staging areas for these trucks? Do we have maps to indicate that the word "deployment" as Mr. Kwiatkowski uses it does intend an evacuation procedure rather than a law and order keeping mission?

(5) How about coordination with local officials. PICA hasn't checked with every local official in Dauphin County, but Chief Conckle of the Harrisburg Fire Department, doesn't recall any coordination program with New Cumberland or Indiantown Gap in this regard. In fact he has sent a letter requesting same, and PICA has sent a letter to Secretary Cheney requesting cooperation at the DOD end.

These are the kinds of things that PICA would hope that you Dr. Murley would ask in your efforts to verify the meaning and the factual correctness of the remarks made by Mr. Kwiatkowski from his office in Washington. It may turn out that the extent of the planning is that the Governor knows that the National Guard is out there, and if there's a meltdown, he knows he could call on them to provide some help. That kind of awareness would probably be adequate to justify mentioning deployments by the National Guard in the State and Dauphin County plans, but clearly it is not a plan -- it's not even part of a plan. It is simply a statement that we'll figure it out in the midst of the emergency and maybe we can get some National Guard in here to help us out.

PICA has no desire to put blame on anybody for not having a plan to use National Guard trucks, which is substantive enough to provide answers to the questions listed above, at the point prior to the transactions surrounding PICA's 10 CFR 2.206 Request. If at the end of NRC's resolution of that 2.206 Request there still is no plan to use these trucks, the situation will be different, and PICA will not be reticent about placing responsibility where it belongs for this lack of planning and preparedness.

Sincerely,
Robert Gary





UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 24, 1992

Mr. Robert Gary
Pennsylvania Institute for Clean Air
P.O. Box 1637
Harrisburg, Pennsylvania 17105-1637

Dear Mr. Gary:

I am writing to inform you of the status of actions taken and in progress in response to your letter of July 10, 1992, on behalf of the Pennsylvania Institute for Clean Air. In your letter, you requested that the Federal Emergency Management Agency (FEMA) examine certain transportation-related discrepancies you alleged with respect to the Dauphin County (Pennsylvania) Radiological Emergency Response Plan (RERP). The Three Mile Island Nuclear Station, Unit 1 (TMI-1), is located within Dauphin County. You requested pursuant to 10 CFR 2.206 that, once the discrepancies are verified by FEMA, the U.S. Nuclear Regulatory Commission (NRC) order GPU Nuclear Corporation to "power down" the TMI-1 plant and not permit the plant to generate commercial power until the discrepancies are corrected and until a valid, workable, operational emergency evacuation plan is produced.

In my letter of August 5, 1992, I acknowledged receipt of your petition and informed you that we had requested assistance from FEMA by letter dated July 22, 1992. Enclosed, for your information, is FEMA's initial (interim) response to our request. Representatives of FEMA met with appropriate personnel from the Pennsylvania Emergency Management Agency (PEMA) and Dauphin County Emergency Management Agency on September 4, 1992, to discuss the concerns raised in your letter. The outcome of that meeting was as follows:

- Dauphin County had sent out new letters of intent to transportation providers in early August. FEMA reviewed the letters and identified a deficiency regarding the number and capacity of vehicles needed for evacuation. Dauphin County issued amended letters and is awaiting the return of the signed letters.
- The RERP properly identifies all groups of people requiring transportation during an emergency. However, FEMA noted that there are some discrepancies within the plan regarding the number of buses available for evacuating the general population. PEMA and Dauphin County are correcting these discrepancies.
- FEMA noted that both the Commonwealth of Pennsylvania and Dauphin County RERPs include provisions for deploying Pennsylvania National Guard vehicles and personnel to Dauphin County in the event of an emergency,

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Mr. Robert Gary

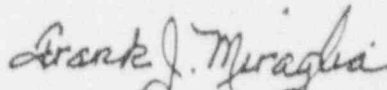
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if necessary. FEMA has requested additional information regarding the types and amounts of resources available from the National Guard and the radiological training provided to the personnel subject to call.

As indicated in the enclosed report, FEMA requires additional time to review the improvements being made to the Pennsylvania and Dauphin County emergency plans and to prepare a final report to document its findings and conclusions, as well as improvements made to emergency planning in this area in response to all the concerns you have raised.

The NRC will, therefore, require additional time to review the FEMA findings, as well as your request to take action with respect to the TMI-1 facility. On the basis of present schedules, I anticipate that my decision will be finalized and reported to you during February 1993.

Sincerely,



Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Enclosure:
FEMA Interim Report dated
October 27, 1992

cc w/enclosure:
See next page



Federal Emergency Management Agency

Washington, D.C. 20472

OCT 27 1992

Mr. Frank J. Congel, Director
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Congel:

In a memorandum dated July 22, 1992, the U.S. Nuclear Regulatory Commission (NRC) requested the Federal Emergency Management Agency's (FEMA) assistance in responding to the concerns expressed in Mr. Robert Gary's July 10, 1992, letter to the Chairman of the NRC regarding the adequacy of offsite emergency planning and preparedness in the Dauphin County portion of the Three Mile Island emergency planning zone. The purpose of this letter is to provide an interim report on the actions which FEMA has taken to date in response to the NRC's request.

On September 4, 1992, FEMA Region III met with representatives of the Pennsylvania Emergency Management Agency (PEMA) and the Dauphin County Emergency Management Agency in order to discuss the issues raised in Mr. Gary's letter. The results of this meeting and follow-up information received by FEMA are summarized below.

- o The letters of intent at the Dauphin County Emergency Operations Center were not current. However, in early August, Dauphin County sent out new letters of intent to the county transportation providers for their signature. FEMA reviewed the content of these letters and determined that they did not include pertinent information on the number and capacity of transportation vehicles available. Amended letters requesting the number and capacity of vehicles have been sent to these transportation providers, but the letters have not yet been signed and returned.
- o A review of the Dauphin County Radiological Emergency Response Plan (RERP) indicates that all groups (general and special populations) requiring transportation have been identified and are current as of September 1992. However, there are discrepancies between sections of the Dauphin County RERP which are concerned with the number of buses available for general population evacuation. PEMA and Dauphin County are revising the Dauphin County RERP to include more accurate, up-to-date numbers.

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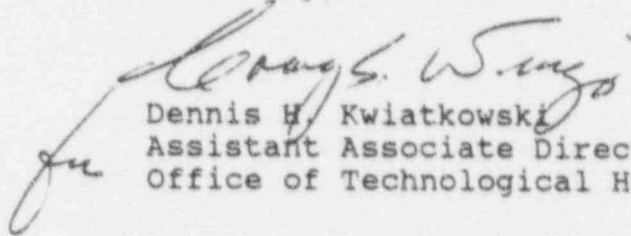
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- o Both the State and Dauphin County RERPs contain provisions for the deployment of the Pennsylvania National Guard to Dauphin County, if necessary, during a radiological emergency. However, FEMA has requested further information regarding (1) the general type and amount of resources which are available to the county through the Pennsylvania National Guard during such an emergency and (2) the extent to which National Guard personnel have been trained and exercised in responding to radiological emergencies.

Although FEMA has initiated the activities necessary to respond to the NRC's request, additional time is required to (1) give the Commonwealth of Pennsylvania and Dauphin County adequate time to complete the activities which have been undertaken to address Mr. Gary's concerns and (2) allow FEMA time to review the plan revisions, signed letters of intent, and other materials provided to ensure that Mr. Gary's concerns have been adequately addressed and alleviated. FEMA will provide its findings and conclusions, including any corrective actions taken, to the NRC by December 31, 1992.

Should you have any questions or require further information, please call Mr. Craig S. Wingo, Chief, Radiological Preparedness Division, at (202) 646-3026.

Sincerely,


Dennis H. Kwiatkowski
Assistant Associate Director
Office of Technological Hazards

*Information Copy for
Dr. Murley (NRC)
in connection with PICA's
10 CFR 2.206 request
forwarded with cover
letter 2 DEC 92 2100 hrs.*

Chief Conckle
Harrisburg Fire Bureau
McCormick Public Services Center
123 Walnut Street
Harrisburg, PA 17101-1681

July 14, 1992

Dear Chief Conckle,

Thank you for meeting with me today in your office.

As you know I am concerned about the effectiveness of the evacuation preparedness and planning in the event of an emergency evacuation of Harrisburg.

You have a copy of my recent 10 CFR section 2.206 petition to the NRC outlining some of the basis for my concerns about the County-level preparedness status. There is reason to believe that things might go less than smoothly in terms of getting school buses, CAT buses and other privately owned buses in position to do any good in an emergency.

Now there are trucks at Cumberland Army Depot and at the Naval Facility at Mechanicsburg. The only impediment to the inclusion of these trucks in your emergency evacuation plan for Harrisburg seems to be red tape. Maybe the County has jurisdiction, or maybe the State, or maybe PEMA. Maybe someone else has a prior claim on these trucks. Maybe the military is not ready to make them available. All of these red tape factors are preventing the trucks from being included in evacuation plans for Harrisburg.

If these trucks were to be used, they might report to two staging areas. Trucks from Mechanicsburg could report to Harrisburg Community College, and trucks from the Cumberland Army Depot could report to City Island. This might be done the other way around if that is more logistically sound. If they were used they would not interfere with any of the equipment or staging areas specified in the County Emergency Evacuation Plan.

Ltr. to Chief Conckle, dtd. July 14, 1992, Page 2.

Right now the question is, "Can the red tape be cut?"

The state or PEMA could only preempt arrangements that Harrisburg might seek to make with the CO's of those bases if the state or PEMA had some plan of their own to use those trucks. I have asked to see PEMA's plan, and specifically Annex E, and I looked at what they showed me. I've also looked at the FARP on file at the Dauphin EOC. I don't see any reference to the use of those trucks. I see no letters of intent at PEMA or at Dauphin County with the CO's of those bases. As a practical matter there is no conflict. Neither the State nor the County is planning to use those trucks.

Those bases can only stay open as long as they are of some value. There is no reason to try to minimize the value that those bases or the equipment on them provide to the citizens of this country. On the contrary, it makes sense to try to maximize the services that those bases can provide to the country as a whole, to the states in which they are located, and to the communities which are their neighbors. Perhaps one form that the "peace dividend" could take would be to permit military resources to be called upon in a multi-task environment, and in this case to bolster and support a local emergency evacuation plan.

Accordingly, I am requesting Congressman Gekas, Senator Specter, and Senator Wofford, to raise this matter with Hon. Richard Cheney, the U.S. Secretary of Defense.

If DOD issues a directive permitting and encouraging this kind of direct cooperation with municipal agencies, such as the Harrisburg Fire Department, the Secretaries of the respective services will pass that information along to Commanding Officers on bases and posts in the United States, including the Cumberland Army Depot and the Navy facility at Mechanicsburg.

A stated willingness to offer community service in a catastrophic emergency, would not necessarily be a bad thing for DOD. From a training perspective there's plenty of motivation as well. Exercises based on community service in catastrophic situations can be very credible reinforcers of the need to maintain readiness in our armed services, manpower levels, and equipment reserves. Such exercises can have a very positive institutional effect as well as being totally valid professional training for military personnel in today's world. Didn't Desert Shield contain a very large component of community service in catastrophic situations? Remember the camps for the Kurds? Isn't this one of the kinds of things we can expect our military to be doing more of in the 21st century? If so, such manoeuvres at home are very closely related to part of the probable mission.

Ltr. to Chief Conckle, dtd. July 14, 1992, Page 3.

I am very hopeful that as a society we have the flexibility to begin thinking in new ways and using the resources available through our Federal public expenditures in a way that maximizes their utility. We face threats from chemical spills or nuclear accidents that are very serious. It is not reasonable that front line people cannot directly make arrangements with willing Commanding Officers to meet those threats to the lives of Americans because everyone's hands are tied in red tape. We started out as a country of ingenuity and resourcefulness, and that's how we've gotten this far. Let's continue to use our main strength as a country and as a military force -- our flexibility.

Sincerely,

/s/

Robert Gary
Lt. JAGC, USNR, (Ret.)
for PICA

Copies to: Hon. Steven Reed, Mayor of Harrisburg
Sen. Arlen Specter
Sen. Harris Wofford
Rep. George Gekas

Rep. George Gekas
1519 Longworth House Office Building
Washington, DC 20515

July 14, 1992

Re: Use of DOD Equipment for Emergency Preparedness

Dear Congressman Gekas,

I am one of your constituents in Harrisburg.

The enclosed letter to our Fire Chief in Harrisburg contains an idea that may require the support and approval of Mr. Cheney, the Secretary of Defense and which I hope you will forward to him for consideration. In brief, it creates a basis for grassroots cooperation between Fire Chiefs, and other Municipal public officials and the local Commanding Officers of Military installations.

This lateral, or working-level, or grassroots cooperation is to be distinguished from the chain of command or trickle down cooperation which is sometimes so fraught with red tape as to be unmanageable. Lateral cooperation would be completely voluntary on both sides, and is suggested only in cases such as Harrisburg where there is clearly no conflict with emergency planning by higher level agencies in the state.

Sincerely,

/s/

Robert Gary, Esq.
for
PICA

Encl: Ltr. to Chief Conckle of July 14, 1992

PICA

The Pennsylvania Institute for Clean Air

OFFICE OF THE PRESIDENT

Under 10 CFR section 2.206 I formally request that the NRC take action as specified hereunder. This document is being mailed by first class mail on July 10, 1992 to the following persons:

Mr. Ivan Sellin
Chairman, Nuclear Regulatory Commission
Washington D.C. 20555

Mr. Richard Cooper
NRC Director of Division of Radiation Safety and Safeguards
475 Allentown Road
King of Prussia, PA 19406

Mr. Craig Gordon
NRC
475 Allentown Road
King of Prussia, PA 19406

The following points factual points are presented in support of the request for action.

(1) On June 30, 1992, I, Robert Gary, a resident of Dauphin County, went to PEMA Headquarters in Harrisburg and requested to see the letters of intent from private transportation companies that the Chief Counsel had told me were on file there. There was no file only a list of letters of intent that were supposedly held at the Emergency Operations Center of Dauphin County. I immediately proceeded to that location and requested that Director Wertz show me the file. It contained a single letter dated 1985 from Mr. Gerald Smith at Capitol Area Transit (CAT). That letter cited a statute as the sole source of payment, which has since been repealed and superseded by another law. At that time I suspected that emergency preparedness in Dauphin County was substandard.

(2) On July 10, 1992 (today), I returned to the Dauphin County Emergency Operations Center (EOC) to examine the RERP which is the book that would be used in a radiological emergency by the EOC staff. The first page of the book said, "Completely Reprinted with Change 1 in 1991" or words to that effect. I then examined page E-9-5 which contained information on busses from private companies in Dauphin County. Approximately 450 buses were accounted for, but the first two listings, the one with Capitol Area Transit for approximately 70 buses, and the one with Capitol Trailways Penn Central Station for approximately 320 buses constituted the greatest proportion of the total, i.e. 390 out of 450 or about 87%. I decided to call the executives listed in the book to determine the up-to-dateness of that page of the RERP.

(3) At about 4:00 P.M. I made the calls in the presence of the staff on duty at the Dauphin County EOC. First I called Mr. Weeks at Capitol Area Transit (CAT). The person answering the phone informed me that hadn't been with the company since 1984! Next, I called Mr. Miller at Capitol Trailways Penn Central Station. The person answering the phone told me that Mr. Miller hadn't been with the company since 1987.

(4) There were no "after hours" telephone numbers listed in the RERP, which is the book that the staff on hand at the EOC would refer to in a radiological emergency. Even if there had been after hours numbers listed, in the case of Mr. Weeks, the number would have been non-operational for the past eight years, and in the case of Mr. Miller, for the past five years.

(5) The staff members at the Dauphin County Emergency Operations Center reported to me today, I think truthfully, that they have no authority to request military vehicles from the National Guard, Mechanicsburg, or Indiantown Gap. That would have to be done by the state -- presumably by PEMA. PEMA, over the past month, has represented to me that their responsibility lies in communications and coordination. They have shown me Annex E to the Dauphin County Plan which contains no reference to the use of military vehicles. PEMA has no plan to call for the use of military vehicles because they feel that their responsibility is in the area of communications and coordination. Dauphin County has no such plan because they feel that the State has exclusive jurisdiction in that area and that the County cannot call for such vehicles. Therefore, although there are acres of trucks capable of carrying people within 15 miles of Harrisburg neither the State nor the County has any references in the written plans they showed me to use any of them.

(6) The sum total of these facts taken together leads me to the belief that the Dauphin County Emergency Evacuation Plan in the

event of a radiological emergency is essentially non-operational.

(7) The permission that the NRC extends to the power company at Three Mile Island to operate nuclear reactors there for commercial power generation is premised on the existence and the continued maintenance of an operational radiological emergency evacuation plan for Dauphin County. When and if this plan becomes so substandard that it is for all practical purposes non-operational, it is completely appropriate for the NRC to direct the power company to power down those reactors until such time as a satisfactory plan is in place and workable.

(8) I request that the discrepancies that are mentioned in this letter be checked out by a FEMA official as soon as possible, preferably within 5 working days. If the official finds that the discrepancies are verified, then I request that the Three Mile Island licensee be ordered by the NRC to power down until the discrepancies can be corrected.

(9) During the time, after the discrepancies have been verified, and before they are corrected, while FEMA and PEMA and NRC are working to generate an operational emergency evacuation plan for Dauphin County, it is fully justified that the power reactors at Three Mile Island be in a power down mode. The license to power up that reactor was legally premised on a valid workable evacuation plan for Dauphin County. During times when such a plan does not exist, neither should the license to operate for power generation. Recognizing, as I do, that paperwork takes time and there are many administrative processes and considerations, I request that, once the discrepancies are officially verified, and during the pendency of the process of correcting them, the power up license be suspended. I believe that such a suspension will cause the discrepancies in this case to be corrected fairly quickly, but in the absence of such a suspension, the corrective process might take several years or might never occur. I believe that such a suspension would send a message to: (1) other operators, (2) other Counties in Pennsylvania, and (3) Emergency Management Agencies in other states. This message would be the precisely correct message that NRC should be sending in its fulfillment of its legal, professional, and moral duties to the American people.

Sincerely,

/s/

Robert Gary
for
PICA