

234
SERVED MAY 31 1985

R.D. 2, Box 46
Newtown, Pa. 18940

January 28, 1985

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

Administrative Judges Helen F. Hoyt,
Dr. Richard F. Cole, and
Dr. Jerry Harbour

'85 MAY 31 P1:31

Re: Limerick Nuclear Generating
Station, Docket Nos. 50-352;
50-353 **OL**

Dear Administrative Judges:

The attached newspaper clipping from the Bucks County Courier-Times, January 27, 1985, illustrates the degree to which relevant information bearing on the adequacy of evacuation planning and support planning for the counties around Limerick has been excluded from the record in the fact-finding hearing before you.

In my attendance at sessions of this hearing, I discovered that the recalcitrance of the applicant, Philadelphia Electric Company, and the operation of your own rules, resulted in omission of a great part of the facts concerning whether the plans are adequate and workable. Virtually the only testimony admitted has been whether there are plans, no matter how foolish, incompetent, and ill-conceived they may be.

I do not believe that a Federal panel, selected for its achievements in law and science, would wish to be denied access to solid facts in the real-world matter which you are considering. I therefore respectfully give you the following background of the attached clipping.

1. At a Bucks County Commissioners' Meeting early last July, prior to the evacuation drill, I called the Commissioners' attention to the listing of a mass care center at the old Delhaas High School, as it appeared in the Support Plan, Draft 4, October, 1983. To my certain knowledge, Delhaas was no longer a part of the Bristol Township Schools; its abandonment had, in fact, been the subject of considerable front-page public protest.
2. Throughout this hearing, reference was made by witnesses to the "updating" and "revision" of evacuation and support plans. The document entered into your official exhibits, I believe, as E-4, purported to be a Final Plan for Bucks as a support county. Although it is dated October, 1984, it still lists Delhaas High School (complete with a Fire Department monitoring/decontamination assignment) as a mass care center.
3. In that same month, October, 1984, I examined the former Delhaas High School myself. One wing contained offices, equipped with normal office furniture and files; another wing was piled almost to the ceiling with stored foodstuffs in cartons; the third wing was filled with plaster, rubble, ladders, and construction materials. It was entirely unsuitable as a mass care center, except possibly for rats.
4. The Bristol Township School District superintendent's office informed me that Delhaas is no longer their property. (They also tell me that another school listed as a mass care center has been rented to a private organization and is also, presumably, not available.)

8506030459 850128
PDR ADOCK 05000352
G PDR

DS02

The significance of the Delhaas High School "goof", extreme and ridiculous as the example is, lies in much more than its own specifics. What really matters is that, if so simple and obvious a defect in the plans does not appear in the record (as far as I am aware, it does not), then many more flaws of concept and implementation must also have failed to come to the notice of this Board.

The clipping is only the visual tip of the proverbial iceberg. Another issue that did not surface is the conflict between support plan assumptions of early dismissal and the emergency retention procedures of various Bucks school districts. Not to mention actual available space at mass care centers, as compared with the plan's schedule for the number of evacuees to be dispatched from the reception centers; little verification of estimates seems to have taken place. And, of course, the discrepancy between FEMA's methodology and PEMA's directives on decontamination at mass care centers, a matter which may appear obliquely in the testimony by now.

Although I have not always categorically opposed nuclear power, I now hesitate to entrust health, safety, and the economy of my neighbors and myself to the competence of people who cannot discover in well over a year's time that they have listed for emergency use a non-existent institution. And who testify under oath before a Federal agency that their plans are updated, revised, and, yes, even Final!

In short, more of the information needed in your fact-finding process may lie outside the record than in it. I call this one item to your attention now, hoping that, by demonstrating what has not been said, it may help you in deliberating over what has been said.

Respectfully yours,

Margaret M. Dardis
Margaret M. Dardis

(See Appendix 4-C-1 of Bucks County...Support Plan...LGS, Draft 4, Oct. 1983 for listing of Delhaas High School as Mass Care Center 14, accepting 475 persons. See also the same entry on the same-numbered page of the October, 1984 unnumbered ("Final") draft of the same essential document. Also see Appendix 5-E-1 of both documents where the Bristol 3rd Dist. Fire Company is shown as being assigned to Delhaas High School.

This building is listed as Mass Care Center Public School in Oct. 1984 Bucks Plan ("Final") Unemployment office 'illegal'

By Patricia Wandling
Courier Times Staff Writer

Although the state plans to move its Levittown unemployment office to new quarters in Bristol Township on Monday, local officials said they never approved plans or permits for the renovation of the former Delhaas High School building on Route 413.

The state Bureau of Employment Security will join three other businesses in the old school building turned office complex — a move the township's building inspector said will be illegal.

According to John P. Boyle, director of the township department of licenses and inspections, he has never reviewed an application for a permit for occupancy of the building. Therefore, Boyle said, "They will be in there illegally."

The building was purchased for \$1.35 million in November by Norman Weiss, head of Weiss Development Corp., of Kingston, Pa., who told school officials he planned to renovate the grounds and building at an approximate \$6 million cost. Weiss could not be reached by telephone Saturday.

Township Fire Marshal William Jones said he inspected the building on Friday and found the partially revamped interior undergoing construction. Jones also said the sprinkler system was not connected to the water supply.

Jones said, however, he did not intend to close the offices because of the problem.

Although the fire marshal said he did not intend to take punitive action against the owners, township Manager Stanley Gawel was



(file photo)

No permits for Delhaas renovation were issued, officials say

Indignant over the development that came to his attention late in the week, Gawel told Jones he should close the building if he considered it unsafe for occupancy.

"It's up to you," Gawel said.

Jones admitted the "place is a shambles," but added, "They're working like crazy. I suppose they'll have it operational Monday."

The fire marshal said the owner is supposed to submit design plans for such renovations to the township. The owner also is obligated to obtain plumbing, electrical and occupancy permits.

None of the businesses leasing space at Delhaas were aware they had to have such permits, Jones said. The state also was unaware of the responsibility, said a bureau spokesman.

On another matter, the owner promised to install a road around the back and side of the building, leading to Route 413 and facing Rockview Drive. No plans for the

tion since he wants to "connect with the traffic light on Rockview."

Boyle said he believed the owner has a permit for part of the building, although he was not sure. The director was sure of one thing, however. "I know I never reviewed an application from them."

One of the problems the Bureau of Employment Security experienced at its former Tullytown office was a lack of parking. While the Delhaas building has ample parking, police believe a light and access road are needed.

Another township employee, who preferred to remain anonymous, said he was not surprised by the turn of events. "They think they're in the sticks up here and can do anything they want."

Delhaas closed in 1980 because of declining student enrollment.