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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
DOCKETING

Before The Atomic Safety And Licensing Board

In the Matter of)

Philadelphia Electric Company)
(Limerick Generating Station,)
Units 1 and 2))

Docket Nos. 50-352
50-353

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COMMONWEALTH OF PENNSYLVANIA'S COMMENTS ON
LICENSEE'S PROPOSAL TO USE MONTGOMERY HOSPITAL AS
A BACKUP FACILITY TO TREAT CONTAMINATED
INJURED ONSITE PERSONNEL

In ALAB-819, the Atomic Safety and Licensing Appeal Board (Appeal Board) remanded for further disposition the matter of a backup hospital to receive contaminated and injured onsite personnel. In accordance with the remand, the Licensing Board issued an Order, dated October 28, 1985, which directed Philadelphia Electric Company (PECo) to submit its proposal for resolution of the remanded issue within 20 days. The Board provided other interested parties, including the Commonwealth of Pennsylvania, an opportunity to comment on PECO's proposal.

PECo submitted its proposal for resolution of the remanded issue on November 18, 1985. The Commonwealth has reviewed the proposal and provides the following comments.

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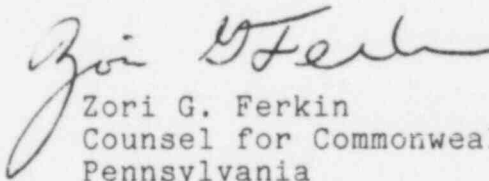
PECo has chosen Montgomery Hospital, located in Norristown, Pennsylvania, as a backup facility for treatment of onsite contaminated injured personnel. PECO encloses a letter dated November 14, 1985 from the President, Montgomery Hospital to the Medical Director, PECO which states in pertinent part that Montgomery Hospital agrees "to respond to PECO requests to provide hospital treatment for victims of radiological accidents, including contaminated individuals from the Limerick Generating Station." The letter states further that Montgomery Hospital agrees "to maintain its capacity to respond to these incidents, making appropriate personnel available for training and participation in emergency medical drills, and to fulfill its responsibilities delineated in its protocol for handling radiation accidents." The letter indicates that PECO has agreed to provide Montgomery Hospital with personnel training, equipment and supplies, procedures for handling treatment and decontamination of an injured or ill patient from Limerick, and other services related to the care of contaminated injured individuals.

The Commonwealth notes that Montgomery Hospital lies outside the plume exposure pathway emergency planning zone for the Limerick Station but closer to the Limerick Station than the Hospital of the University of Pennsylvania. See Comm. Ex. E-9; Licensee's Proposal (Map Attachment and Chart). The capabilities

of Montgomery Hospital have also been reviewed by PECO's consultant, Dr. Roger E. Linnemann, who concluded that the hospital is adequately prepared to handle contaminated and injured patients. Licensee Proposal at 5; Affidavit of Roger E. Linnemann, M.D. (April 4, 1985).

The Commonwealth is of the view that the materials submitted by PECO are responsive to the Board's Order of October 28, 1985 and that Montgomery Hospital is an appropriate facility for treatment of contaminated injured onsite personnel.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Zori G. Ferkin".

Zori G. Ferkin
Counsel for Commonwealth of
Pennsylvania

Dated: December 2, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

CERTIFICATE OF SERVICE

In the Matter of)
)
PHILADELPHIA ELECTRIC COMPANY) Docket Nos. 50-352
) 50-353
(Limerick Generating Station,)
Units 1 and 2))

I hereby certify that I have this 2nd day of December, 1985 served copies of "Commonwealth of Pennsylvania's Comments on Licensee's Proposal to Use Montgomery Hospital as a Backup Facility To Treat Contaminated Injured Onsite Personnel" the above-captioned matter upon the following by deposit in the United States mail, postage paid:

Helen F. Hoyt
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry Harbour
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Troy B. Conner, Esq.
Conner and Wetterhahn, P.C.
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Benjamin H. Vogler, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Robert L. Anthony
Friends of the Earth of the
Delaware Valley
P.O. Box 186
103 Vernon Lane
Moylan, PA. 19065

Joseph H. White, III
234 Edgemont Avenue
Ardmore, PA. 19003

Charles W. Elliott, Esq.
Brose and Postwistilo
325 N. 10th Street
Easton, PA. 18042

Thomas Gerusky, Director
Bureau of Radiation Protection
Department of Environmental
Resources
5th Floor, Fulton Bank Building
Third and Locust Streets
Harrisburg, PA. 17120

Ann Hodgdon, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U. S. Nuclear Regulatory
Commission
Washington, DC 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Timothy R.S. Campbell
Director
Department of Emergency Services
14 East Biddle Street
West Chester, Pennsylvania 19380

Philadelphia Electric Company
ATTN: Edward G. Bauer, Jr.
Vice President & General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Angus Love, Esq.
101 East Main Street
Norristown, Pennsylvania 19404

David Wersan, Esq.
Assistant Consumer Advocate
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Christine N. Kohl
Atomic Safety and Licensing
Appeal Board
U.S. NRC
Washington, D.C. 20555

Gary J. Edles
Atomic Safety and Licensing
Appeal Board
Washington, D.C. 20555

Frank Romano
61 Forest Avenue
Ambler, PA 19002

Phyllis Zitzer
Limerick Ecology Action
P.O. Box 761
Pottstown, PA. 19464

Steven P. Hershey, Esq.
Community Legal Services, Inc.
Law Center West
5219 Chestnut Street
Philadelphia, PA. 19139

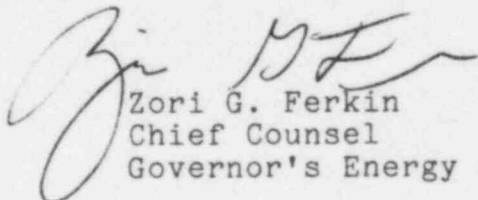
Kathryn S. Lewis, Esq.
City of Philadelphia
Municipal Services Building
15th and JFK Boulevard
Philadelphia, PA. 19107

Director, Pennsylvania Emergency
Management Agency
B-151 Transportation and Safety
Building
Harrisburg, PA. 17120

Spence W. Perry, Esq.
Associate General Counsel
Federal Emergency Management Agency
500 C. Street, S.W., Room 840
Washington, D.C. 20472

Jay Gutierrez, Esq.
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

Reginald L. Gotchy
Atomic Safety and Licensing
Appeal Board
U.S. NRC
Washington, D.C. 20555


Zori G. Ferkin
Chief Counsel
Governor's Energy Council