

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
Philadelphia Electric Company) Docket Nos. 50-352
) 50-353
(Limerick Generating Station,)
Units 1 and 2))

RESPONSE OF THE COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF CORRECTIONS TO REQUESTS FOR INFORMATION
RAISED AT THE FEBRUARY 27, 1985 ATOMIC SAFETY
AND LICENSING BOARD CONFERENCE

I. BACKGROUND

On February 27, 1985, a conference was held pursuant to the language in the Order of the Atomic Safety and Licensing Appeal Panel denying the appeal filed by counsel for the Graterford inmates. At that conference, counsel for the Graterford inmates, and his expert, made representations as to what information they needed so that they would have reasonable assurances that the inmates' health and safety would be protected in the event of an incident at the Limerick Generating Station. Below are the representations of the Department of Corrections in response to those requests for information.

II. DISCUSSION

The discussions at the February 27, 1985 conference followed the order of the proposed contentions that were filed by counsel for the inmates. In order to maintain a semblance of order, the responses in this document will also follow the order of the proposed contentions.

TRANSPORTATION

The buses used to transport the inmates will come from outside the 10 mile EPZ. This is because sufficient numbers of buses could not be located inside the 10 mile EPZ. The plan calls for the use of 58 buses. For planning purposes, we have assigned 40 inmates per bus, although the buses have a rated adult capacity of between 46 to 48 individuals. (These are the same type school buses that have a school children rated capacity of between 66 and 72 school children.) Attached as Exhibit A through C are three representative samples of the assurances given by our bus providers. The exhibits represent assurances for 71 buses. These exhibits represent less than half of the bus providers and give assurances for 13 more buses than are needed for the entire plan. The number of inmates that can be carried by these 71 buses (at 40 per bus) is 2,840 inmates, which is in excess of the entire inmate population at the institution.

The sources for bus drivers are two-fold. The first source is the bus providers. They have given us assurances the drivers will be available in the event of an evacuation to drive the buses. In the operation of the plan, we expect to use only a small number of a bus providers total compliment of buses and, therefore, it is reasonable to believe that they could provide us with bus drivers for the buses, even if some of the bus drivers refused to drive.

The second source for bus drivers will be the Department of Corrections. At the support institutions, we currently have at least 110 employees with a Class II driver's license. According to the Commonwealth of Pennsylvania Motor Vehicle Code, a Class II driver's license permits an individual to operate a bus on Pennsylvania highways. At the suggestion of some of our bus providers, and to further ensure the competence of the selected bus drivers, we are planning to have them receive further training. We estimate that the training will be completed by the end of 1985.

Regarding inmates scheduled to be transferred in Department of Corrections vans, the Department of Corrections maintains a fleet of 15 vans. If necessary, all of these vans would be available for an evacuation, although the plan calls for the use of substantially less than entire fleet. The combined capacity of these vans is 216 inmates. We are also currently in the process of bidding for a new 32-passenger van. For planning purposes, we believe about five percent of the total inmate population would be moved in these vans. If, for some unexpected reason, insufficient vans were available, Department of Corrections vehicles (station wagons, cars, etc.) would be utilized to move these inmates.

With regard to the location of ambulance resources, attached as Exhibit D is a written assurance that we could get at least 15 ambulances from our selected provider. The number of ambulances used for planning purposes is in the range of two to three ambulances, although we obviously have substantial excess capacity if further ambulances were needed.

MANPOWER

As a part of the SCI-Graterford Emergency Plan for any type of emergency, there is a call-up system in place. This system is available to notify additional manpower if they were needed during a radiological emergency.

The plan uses management individuals to call the staff. Each individual has less than 10 other persons to call. Furthermore, the callers are of sufficient rank to give orders to the person receiving the call to report to work.

The system was tested as of January, 1985. The institution passed the test.

The Department of Corrections maintains a compliment of approximately 700 employes at the State Correctional Institution at Graterford. Approximately 400 of these employes are Correctional Officers. If necessary, many of the remaining 300 employes could be of assistance since they have received basic training in inmate custody and control. If, for some reason, further manpower was required, officers from other department resources or the Pennsylvania State Police would be utilized. As a last resort, the Pennsylvania National Guard could be used. Thus, the reference by counsel for the inmates in his proposed contentions to the necessity for a battalion of the National Guard to be used in the Graterford evacuation is incorrect. To evacuate the State Correctional Institution at Graterford, the Pennsylvania National Guard is the source to be used only after the Department's own resources and the Pennsylvania State Police resources are exhausted.

SECURITY EQUIPMENT

Although the numbers and types of security equipment to be used in the Graterford evacuation is of such a sensitive matter that the Department of Corrections is not disclosing that information, we will disclose that we are expecting delivery of the required equipment within 90 days.

COMMUNICATIONS EQUIPMENT

As part of its ongoing operation, the Department of Corrections has substantial radio resources with base units, mobile units (in cars and other vehicles) and hand-held units. To supplement this existing capacity, we have received 68 additional hand-held units. These units were in Harrisburg as of March 8, 1985, and are awaiting distribution. These radios are the same type radios we use in our daily operation, so we can attest to their quality. Little, if any, formal training will be required since we will be authorized to use them on a daily basis (see letter from Vincent S. Boyer, Sr. Vice President, Nuclear Power, Philadelphia Electric Company, attached hereto as Exhibit E).

RADIOLOGICAL EQUIPMENT

According to PEMA Representative, Ralph Hippert, the CD V-750 and the CD V-700 are currently in stock. The DCA-622's are due to start coming in about March 10, 1985. The KI is due April 1, 1985. We are waiting until the DCA-622's and the KI are in stock to distribute these materials all at once. The TLD's are in the bidding process. Once they are received, they will be distributed as well.

According to Mr. Hippert, if an incident would occur before the delivery of these items, there are sufficient stock piles of this equipment available in the Three-Mile Island EPZ counties to cover the evacuation of the Limerick EPZ including the inmates at Graterford.

MEDICAL SERVICES

As a part of its ongoing operation, the Department of Corrections has agreements with local hospitals to give health care to our inmates. Attached as Exhibit F is a copy of an addendum to these agreements we have had our hospitals execute to evidence their ability to take care of inmates injured by radioactivity. Also attached as Exhibit G is the JCAH Standard to which the addendum refers.

MONITORING

The Department of Corrections will use the same standards for the inmates as are being used for the general public with regard to sheltering, evacuation and the general operation of this plan, with one exception. In the event that sheltering is ordered for the entire EPZ during the summer, and the temperatures and humidity are such that the institution would become uncomfortable, a DOE plume-monitoring team will be requested by the State Correctional Institution at Graterford. This will allow us to keep the windows open if only background levels of radiation are detectable. If the team indicates that a radioactive plume is coming, the information will be relayed to PEMA. PEMA will consult with the BRP and PEMA will issue instructions for the institution to follow, and these will be the official actions which the institution will implement. In the interim period between the time the DOE indicates that a plume is heading towards the State Correctional Institution at Graterford and the State Correctional Institution at Graterford receives word from PEMA, the Superintendent will take interim actions as per his best judgment. This information is contained in the plan on Page E-1, D-1 and E-1 (9).

It should be emphasized that this action is the only action that is different than the actions taken by the general public, and this only happens in the situation where the temperatures and humidity are such that the institution would become uncomfortable.

SIMULATED EVACUATION PLAN EXERCISE

A "tabletop" exercise of the plan was conducted on March 7, 1985. FEMA, PEMA and DOC were in attendance. Upon receipt of the FEMA report, the DOC will provide information as to whether the plan was found by FEMA to be adequate.

TRAINING

The training for the decision-makers in the plan is completed. These are the people that have the responsibility to control the actions of their staff at Graterford and the other support institutions and relocation centers. These individuals are fully aware of the components and operation of the plan. The training they received was tested during the tabletop exercise. During that exercise, the decision-making and communication parts of the plan were tested. These are the people who will be giving orders to the staff regarding care, custody and control of the inmates and receiving information from the Department of Corrections Central Office regarding actions to be taken at their institutions.

To provide training for our decontamination monitoring teams, we are utilizing a train-the-trainers approach. By using this approach, certain individuals are being qualified to go back to their support institutions and train the decontamination monitoring teams. The training for the trainers is completed and was conducted by PEMA. As soon as the additional radiological equipment is received by the Department of Corrections, the trainers can give training as to the actual use of the equipment. We estimate that the training process will be completed three months following the receipt of the equipment by the Department of Corrections.

RECOVERY AND RE-ENTRY

The recovery and re-entry will essentially be a reverse of the evacuation. Re-entry will only be initiated when the Department of Corrections is advised by PEMA that it is safe to return.

SHELTERING

The Department of Corrections will rely on the determination by PEMA requiring sheltering. If PEMA suggests sheltering, we will shelter with the limitation more fully explained under monitoring in this response. The E-1-10 (8) referral to "institutional climate" does not refer to any sheltering decision but only to one of the elements of a report the Department of Correction will provide to PEMA regarding the progress of an evacuation.

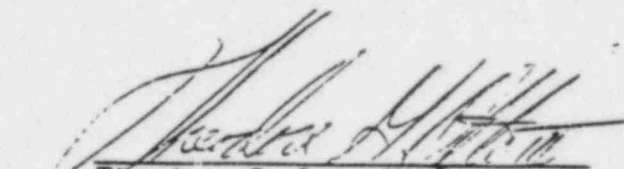
GENERAL CONCEPT OF EVACUATION

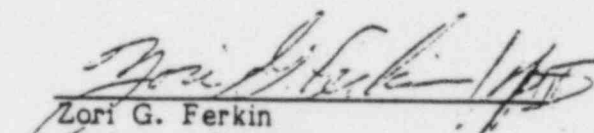
The counsel for inmates has been afforded the opportunity to review a substantially less sanitized version of the plan than he had viewed at the time of filing the proposed contentions. The plan that he has seen under protective order and an affidavit of non-disclosure is complete with the exceptions of the destinations, routes, specific numbers of manpower and inmates, restraints, and radio frequencies. This information was deleted due to the security concerns of the Department of Corrections. The information, in our opinion, could also be classified as the "gory details" which are not subject to disclosure. With the information that has been provided to the counsel for the inmates, as well as his expert, we believe that they will agree there is a reasonable assurance that the evacuation would provide for the safety and security of the inmates during the evacuation.

CONCLUSION

The above information represents what the Department of Corrections understood Counsel for the inmates needed to complete his review and for the consideration of the Atomic Safety and Licensing Board.

Respectfully submitted,


Theodore G. Otto, III
Assistant Counsel
Department of Corrections


Zori G. Ferkin
Assistant Counsel
Governor's Energy Council

[REDACTED] BUS [REDACTED]

Inc. [REDACTED]

MEMBERS
CHAPTER
GROUP PLANNING

Pa. [REDACTED]

March 4, 1985

Superintendent [REDACTED]
State Correctional Institution [REDACTED]

Dear Superintendent [REDACTED]

This letter confirms previous verbal assurances made by this company to the Department of Corrections. We understand you need this letter as proof of these assurances for the Nuclear Regulatory Commission, showing that you have located so of buses for emergency use. This letter is not a contract but serves as a statement of the interest this company has expressed in providing buses to the maximum extent possible for use during an emergency including the evacuation of SCI Graterford if there is an incident at the Limmerick Generating Station.

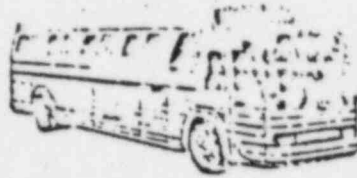
To permit the Department of Corrections to adequately plan for the possible evacuation, the company can give reasonable assurances that they can provide at least 30 buses with a capacity of 72 school-children or 48 adults per bus within two hours.

[REDACTED] Bus [REDACTED] Inc.

[REDACTED]
Vice President [REDACTED]

[REDACTED] EXHIBIT "A" [REDACTED]

[REDACTED]
[REDACTED]
BUS COMPANY, INC.
[REDACTED] P.O. [REDACTED]



PLANNED CHARTERS AND LUXURY TOURS IN U.S.A. AND CANADA

[REDACTED] Bus Co. [REDACTED]

March 4, 1985

Superintendent [REDACTED]
State Correctional Institution
[REDACTED]

Dear Superintendent [REDACTED]

This letter confirms previous verbal assurances made by this company to the Department of Corrections. We understand you need this letter as proof of these assurances for the Nuclear Regulatory Commission, showing that you have located sources of buses for emergency use. This letter is not a contract but serves as a statement of the interest this company has expressed in providing buses to the maximum extent possible for use during an emergency including the evacuation of SCI Graterford if there is an incident at the Limerick Generating Station.

To permit the Department of Corrections to adequately plan for the possible evacuation, the company can give reasonable assurances that they can provide at least 20 school buses and 10 charter buses with a capacity of 46 per bus within 2 hours.

Sincerely,
[REDACTED]

Vice President J

24 Hour Phone Contact:
[REDACTED]

EXHIBIT "B"

Mailing Address

[REDACTED]

March 4, 1985

Superintendent: [REDACTED]
State Correctional Institution [REDACTED]

Dear Superintendent [REDACTED]

This letter confirms previous verbal assurances made by this company to the Department of Corrections. We understand you need this letter as proof of these assurances for the Nuclear Regulatory Commission, showing that you have located sources of buses for emergency use. This letter is not a contract but serves as a statement of the interest this company has expressed in providing buses to the maximum extent possible for use during an emergency including the evacuation of SCI Graterford if there is an incident at the Limerick Generating Station.

To permit the Department of Corrections to adequately plan for the possible evacuation, the company can give reasonable assurances that they can provide at least 11 buses with a capacity of 66-72 per bus within 1-3 hours.

[REDACTED]
Your Bus Service

[REDACTED]
Contact Person

[REDACTED]
24 Hour Phone Number

EXHIBIT "C"

[REDACTED]
[REDACTED]
[REDACTED] PENNSYLVANIA [REDACTED] TELEPHONE [REDACTED]
[REDACTED]

March 5, 1985

Superintendent [REDACTED]
State Correction Institution,
[REDACTED] PA [REDACTED]

Dear Superintendent [REDACTED]

This letter confirms previous verbal assurances made by this agency to the Department of Corrections. We understand you need this letter as proof of these assurances for the Nuclear Regulatory Commission, showing that you have located sources of ambulances for emergency use. This letter is not a contract but serves as a statement of the interest this agency has expressed in providing ambulances to the maximum extent possible for use during an emergency including the evacuation of SCI Graterford if there is an incident at the Limerick Generating Station.

To permit the Department of Corrections to adequately plan for the possible evacuation, the agency can give reasonable assurances that they can provide at least 15 ambulances with a capacity of 2 per ambulance within one hour.

[REDACTED]
Agency [REDACTED]

[REDACTED]
Contact Person [REDACTED]

[REDACTED]
24 Hour Phone Number [REDACTED]

EXHIBIT "D"
[REDACTED]

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8099

PHILADELPHIA, PA. 19101

(215) 841-4500

RECEIVED

NOV 6 1984

Operations Division

V. S. EDYER
V. S. VICE PRESIDENT
NUCLEAR POWER

November 6, 1984

Mr. L. P. Benning, Chief
Security/Safety
Pennsylvania Bureau of Correction
P. O. Box 598
Camp Hill, PA 17011

Dear Mr. Benning:

In October at a meeting I attended with you and your associates at the Pennsylvania Bureau of Correction as well as with John Patten and Ralph Hippert of PEMA, you proposed the training program and list of equipment developed by the Bureau of Correction for the radiological emergency response plan of the Graterford Prison. Since that date, we have had discussions with you relative to various aspects of your requested program.

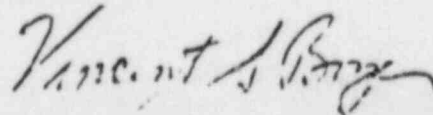
With regard to the training plans, we understand that PEMA will either conduct or review the program to assure that the training material is adequate for the intended purpose. Philadelphia Electric Company agrees to reimburse the Bureau of Correction for incremental costs associated with the training program beyond that provided by the State of Pennsylvania under Act 147, the Pennsylvania Radiation Protection Act. We expect that training will be accomplished as part of the normal work week in so far as possible. Invoices for the incremental training costs may be directed to my attention.

We have reviewed the equipment listed in the Pennsylvania Bureau of Correction equipment cost projection and find the quantity and type of equipment listed to be reasonable for the purposes intended. We plan on initiating the purchase orders for hardware and having it delivered to your attention.

Items 6, 7 and 8 of the equipment list covers the furnishing of radios and associated equipment. We intend to purchase and furnish this equipment to you, but as I discussed with you on the phone, we are formulating a proposal which, while making the equipment available to you when needed, will enable it to be utilized rather than gathering dust in a storage cabinet.

We are pleased to work with you in the finalization of the emergency planning needs for the Graterford Prison.

Sincerely,



cc: John Patten

EXHIBIT "E"

[REDACTED]

HOSPITAL

APPENDIX

TO

Statement Of Understanding
State Correctional Institution at [REDACTED]

March 4, 1985

Dear Superintendent [REDACTED]

This is to certify that [REDACTED] Hospital complies with the provisions of the Joint Commission on the Accreditation of Hospitals Standard #V, Emergency Services dealing with the treatment of radioactively contaminated wounded.

Sincerely,

[REDACTED]

Administrator

EXHIBIT "F"

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERPRETATION

Orientation Program A planned, formal training program shall be required for all registered and licensed nurses, and for specified professional personnel who provide patient care in the emergency department/service. When there is no in-house capability of providing this training, a qualified outside source of instruction shall be substituted. The program shall be acceptable to the physician director of the emergency department/service, or to the committee of the medical staff when there is no director, and to the director of the nursing department/service. The orientation program shall be of sufficient duration and substance to cover all patient care responsibilities related to each individual's level of participation in the emergency department/service. The program shall include training in:

- recognition, interpretation, and recording of patients' signs and symptoms, particularly those that require notification of a physician;
- initiation of cardiopulmonary resuscitation and other related life-support procedures;
- parenteral administration of electrolytes, fluids, blood, and blood components;
- wound care and management of sepsis;
- initial burn care;
- initial management of injuries to the extremities and central nervous system;
- effective and safe use of electrical and electronic life-support and other equipment used in the emergency department/service;
- prevention of contamination and cross infection; and
- recognition of, and attention to, the psychological and social needs of patients and their families.

Continuing Education Program All emergency department/service personnel shall participate in relevant in-service education programs. The director or his qualified designees shall contribute to the in-service education of emergency department/service personnel. In-service education shall include the safety and infection control requirements described in this *Manual*. Cardiopulmonary resuscitation training shall be conducted as often as necessary for all physicians, nurses, and specified professional personnel who work in the emergency care area.

The hospital administration shall assure that there are opportunities for physicians, nurses, and, as required, other personnel to participate in emergency department/service continuing education programs outside the hospital, as needed. Education programs for emergency department/service personnel shall be based at least in part on the results of the review and evaluation of the quality and appropriateness of emergency care. The extent of participation shall be documented and shall be realistically related to the size of the staff and to the scope and complexity of the emergency care services provided.

Standard V Emergency patient care shall be guided by written policies and procedures.

INTERPRETATION

There shall be written policies and procedures specifying the scope and conduct of patient care to be rendered in the emergency department/service. Such policies and procedures must be approved by the medical staff and

TEP -
JCAH
Manual
Emergency
Services
Standard II
@ line 43
on page 29.

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hospital administration, and shall be reviewed at least annually, revised as necessary, dated to indicate the time of the last review, and enforced. The policies and procedures in Level I, Level II, and Level III emergency departments/services and, as appropriate, in Level IV emergency departments/services, shall relate to at least the following:

- Location, storage, and procurement of medications, blood, supplies, and equipment at all times.
- Provision of care to an unemancipated minor not accompanied by parent or guardian, or to an unaccompanied unconscious patient.
- Circumstances under which the patient's personal physician is to be notified or given reports. 10
- Confidentiality of patient information and the safeguarding of records.
- Release of authorized information and materials to police or health authorities.
- Transfer and discharge of patients. 15
- The emergency medical record, including any consent for treatment.
- Infection control measures, including procedures designed to eliminate the possibility of contamination and cross infection.
- Procedures to be followed in the event of equipment failure.
- Pertinent safety practices. 20
- Control of traffic, including visitors.
- Dispensing of medications in accordance with the requirements of the Pharmaceutical Services section of this *Manual*.
- The handling and safekeeping of patients' valuables.
- The role of the emergency department/service in the hospital disaster plans. 25
- Specification of the scope of treatment allowed, including the general and specific procedures that may not be performed by medical staff members in the emergency department service, and the use of anesthesia. 30
- Who, other than physicians, may perform special procedures, under what circumstances, and under what degree of supervision. Such procedures include, but are not limited to, cardiopulmonary resuscitation, including cardiac defibrillation; endotracheal intubation; tracheostomy or cricothyrotomy; respiratory care, including assisted ventilation and humidification; the administration of parenteral antiarrhythmic and other specified medications; and the obtaining of arterial and venous blood samples and other laboratory specimens. 35
- The use of standing orders.
- The property exchange system, when necessitated by the transportation and transfer of patients. 40
- Circumstances that require the patient to return to the emergency department/service for treatment.
- The emergency management of individuals who have actual or suspected exposure to radiation or who are radioactively contaminated. Such action may include radioactivity monitoring and measurement; designation and any required preparation of space for evaluation of the patient, including, as required, discontinuation of the air circulation system to prevent the spread of contamination; decontamination of the patient through an appropriate cleansing mechanism; and containment, labeling, and disposition of contaminated materials. The individual responsible for radiation safety should be notified. 45 50

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Response of the Commonwealth of Pennsylvania, Department of Corrections to Requests for Information Raised at the February 27, 1985 Atomic Safety and Licensing Board Conference" in the captioned matter have been served upon the following by deposit in the United States Mail this 15th day of March, 1985:

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

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

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

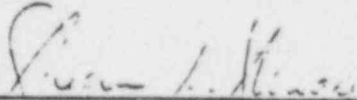
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Legal Director
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Norristown, PA 19401

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U.S. Nuclear Regulatory
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Pennsylvania Emergency
Management Agency
Room B-151
Transportation and
Safety Building
Harrisburg, PA 17120



Sherree L. Sturgis
Chief Counsel

* Hand Delivery

10 **I** **FT**
MONTGOMERY COUNTY LEGAL AID SERVICE

HARVEY F. STRAUSS
EXECUTIVE DIRECTOR

Reply Due 4/15/85

MAIN OFFICE

NORRISTOWN OFFICE
107 E. MAIN STREET
NORRISTOWN, PENNSYLVANIA 19401
(215) 278-8400

POTTSTOWN OFFICE
248 KING STREET
POTTSTOWN, PENNSYLVANIA 19464
(215) 326-8280

PLEASE REPLY TO: Norristown

Regular Mail

855581

March 26, 1985

Booklet and Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C.

RE: In the Matter of Philadelphia Electric Company
Limerick Generating Stations Units 1 and 2
NRC. 50-352 and 50-353

Dear Sir:

Enclosed please find the original and two (2) copies of the Supplemental Motion of the Grateford Inmates in Opposition to the Applicant's Request for an Exemption under 10 C.F.R. 50.10(a) and (b), in reference to the above-captioned matter.

Sincerely,

Angus R. Love, Esquire

ARL/mf
Encls.

85-4-2-146 (1p)

FOIA-85-304

A-21