

January 30, 2003

Mr. James Lee Witt Associates
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REGION 1
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Well written
we

Mr. Witt;

I am providing feedback on your report for Emergency Planning at the Indian Point Site. While I do applaud your effort to evaluate our preparedness in this area and agree improvements in the area of Emergency Planning are warranted, I do disagree with your conclusion based on the following constructive observations concerning this report:

Feedback concerning the Major Findings Page vi:

1. **The plans are built on compliance with regulations, rather than a strategy that leads to a structure and system to protect from radiation exposure.**

This is inaccurate. While the regulations covering Public Protection from Radiation are 10CFR20 and 10CFR100 are in place this forms the foundation to provide public protection. Without regulation, we would not have any standard to enforce. Additionally we have structures and systems in place that would minimize if not eliminate the potential for a release. These are in fact regulatory based, and form a foundation of safety.

2. **The plans appear based on the premise that people will comply with official government direction rather than acting in accordance with what they perceive to be their best interest.**

History has demonstrated that people do comply with government recommendations in the event of emergencies. My personnel experience at many Hazardous material events in Westchester County, the emergency response on 9/11, and many natural events form a basis for this.

3. **The plans do not consider the possible additional ramifications of a terrorist caused release**

The response to a symptom is far more conservative and accurate than an event based action. Please refer to the New York Times Article January 21, 2003, B-5. This report again does not take into account the present emergency planning action levels in place for terrorism. Also the bottom line is why a release of radiation occurs is not important, actions to protect will be the same.

B-2

4. **The plan does not consider the reality and impact of spontaneous evacuation.**

Moving people outside the area can be addressed by the following analogies: During Hurricanes we have seen many times that high density areas can be moved expeditiously. Additionally, 9/11 this shadow or spontaneous evacuation did happen and people did get out safely. This report does not reference these types of real life events.

5. **Response exercise designated to test the plans are of limited use in identifying inadequacies and improving subsequent response.**

This last finding is interesting and can have merit depending on how broad an actual response test needs to be. WE do not burn down live buildings to see how fast people will leave but we do conduct fire drills. We know the behavior of people change from a drill to an actual fire.

General Comments:

1. **Your report is detailed in some area; in the area of plume modeling you are specific to a concern, and abbreviated in others information on potential types of events. In some cases there are inconsistencies. The most obvious one is the lack of input from the on-site and off-site Emergency planning representatives from Indian Point and the surrounding areas.**
2. **The report places a disclaimer to the use of the CRAC-2 report citing obvious concerns, however the report does call out "fast breaking events." This for sure will be a contested area for the following reasons:**
 - a. **Whatever causes the event or release; the meteorological conditions are the delivery mechanism to the public.**
 - b. **We are in a "Catch-22" in this area for the following; for low or no wind, the plume can concentrate out the highest, but the actual exposure to the public is low because of the time of travel, for higher winds, the plum is dissipated quicker actually exposing a lower dose to the public.**
3. **Concerning public protective actions, this report concludes the public cannot be protected. The report alludes to injury and death – immediate. The guidelines that you reference in your report do not include what actions would prompt protective actions. If you look at the EPA guidelines, the limit established for public exposure is One (1) REM. This dose is about 50 times below where any potential**

health effects could even be seen in the general population. If this were applied as the yard stick and the exposure was 1Rem/hr, simple math would tell you would have 50 hours before an effect could be presented, and this is based on science. The scientific levels where we could see death LD50 is set at 350 REM. If you put that at 200 REM, this is still well above expected exposures.

4. If history is to be our teacher, and there is much in this area both from the effects of Radiation and Emergency Planning then I offer the following. The worst public exposure to a Hazardous material involving an industrial setting occurred in December 1984, Bhopal India. Thousands of people died within the first week, and hundreds of thousands were injured. Comparing that to the Chernobyl Accident, and this was a fast moving event, less than 50 were killed; most of those were emergency responders – Fire Fighters. The subsequent latent effects are still being evaluated but these numbers are around 1400 cases of cancer. While I use this as a comparison, it is important to note that most of the people that were exposed were not protected for up to One week after the Chernobyl accident.
5. This report could be a user-friendly document if we had a section with the assumptions and definitions provided.
6. As The Chair Person for the Westchester County Local Emergency Planning Committee (LEPC). Our group was never contacted nor comments sought in this very important area. Federal Mandates –SARA Title III require this be done in the area of Hazardous Materials.
7. As an emergency responder and Rad Worker Instructor for the Fire Service, this report does not acknowledge the ongoing training being provided. I personally have provided training to six fire departments in Westchester County, and training to dozen others have been provided, many during the scope of this report investigation. In my personnel experience, I never saw one Witt consultant at my training classes that could have provide positive feedback or areas for improvement.
8. Feedback from many workers in the Westchester County Office of Emergency Management indicates the Witt Consultants did not interview them.
9. Reference was made to a large-scale evacuation in 1979 in Canada, it is inferred that a plan was in place. However it is not clear if a formal plan was actually in place at that event.

10. This important report makes no reference to the evacuation of lower Manhattan on September 11, 2001. I am sure hundreds of thousands of people were evacuated.

As a final comment, as previously stated I am involved in the Emergency Service in Westchester County. I have actually been at several events where public protective actions were made including evacuation. Granted they were not on the scale of what could be postulated at Indian Point the events point out that we can move people out of danger safely and effectively. I was also involved in the mobilization to support the City of New York during the 9/11 attacks. What I saw there was nothing but a professional response from the Fire Service, Police and EMS. The events on 9/11 saw the complete and total mobilization of all Fire departments in Westchester County. We responded into a City under attack without hesitation. Again this is not reflective of what your report concludes.

Thank you for your attention to this response and I look forward to hearing your response.

Very Truly Yours


Vincent R. Coulehan

Major Regulations:

10CFR20 is the Standards for protecting against Radiation
Sub Part D Rad dose limits to the public
Sub Part F Survey and monitoring
10CFR100 is the Reactor Site Criteria

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