

**SUBJECT: SUBMITTAL OF PETITION FOR RULEMAKING TO  
EXTEND THE MINIMUM DISTANCE FROM FIVE TO TEN MILES  
FOR HOST SCHOOL PICK-UP POINTS BEYOND PLUME  
EXPOSURE BOUNDARY LINES**

April 11, 2007

PRM-50-85

Secretary  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555-0001.

DOCKETED  
USNRC

April 17, 2007 (8:08am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Secretary:

The enclosed Petition for Rulemaking ("the Petition") seeks to codify and clarify Nuclear Regulatory Commission ("NRC") and Department of Homeland Security ("DHS") and the Federal Emergency Management Agency ("FEMA") relocation requirements by clearly mandating the extension of ALL host school pick-up centers to be at **a minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone** to properly ensure **ALL school children** (1) are protected in the event of a **radiological emergency** (2).

<sup>1</sup> For purposes of this Petition, "**school children**" refers to the definition provided by the Nuclear Regulatory Commission in the Federal Register, Vol. 70, No 242, on Monday, December 19, 2005, pp. 75085-75086:

"Emergency plans for all nuclear power reactors are required under Part 50, as amplified by NUREG-0654/FEMA-REP-1 and applicable FEMA guidance documents, to have specific provisions for all 'special facility populations,' which refers not only to pre-schools, nursery schools, and daycare centers, but all kindergarten through twelfth grade (K-12) students, nursing homes, group homes for physically and mentally challenged individuals and those who are mobility challenged, as well as those in correctional facilities. FEMA GM 24, 'Radiological Emergency Preparedness for handicapped persons,' dated April 5, 1984, and GM-EV-2, 'Protective Actions for School Children,' dated November 13, 1986 provide further guidance."

<sup>2</sup> Any reference to **emergencies, emergency evacuations, or radiological incidents, radiological emergencies** are referring to any radiological condition that occurs (at any of the licensed nuclear power stations located under the control of the U.S. Nuclear Regulatory Commission) that poses a general threat to the public located within the established evacuation zones.

Template = SECY-051

SECY-02

There is a regulatory gap, and an absence of minimum distance requirements for host school pick-up centers in relation to radiation plume exposure boundary lines. Host-schools are the destination points that children are transported to for “safe keeping” until their parents, guardians or primary caregivers arrive. (3)

Yet according to the NRC regulations listed in NUREG-0654r1, general population relocation centers are required to be at least 5 miles beyond the radiation plume exposure boundary zone.

*“Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone”*

*– Page 63 from NUREG-0654r1*

Current NRC and DHS/FEMA planning requirements fail to meet the safety needs of all school children (4), and do not establish a reasonable standard for the offsite relocation distances to adequately protect the public’s health and safety.

---

3 Any reference to **host school pick-up centers** is referring to the designated relocation centers ALL school children, attending school (as defined in Footnotes 1 & 3) within the established evacuation zones around any of the licensed nuclear power station located around the nation under the control of the U.S. Nuclear Regulatory Commission, would be relocated to during a radiological emergency so parents or alternates could pick them up.

4 The adverse health effects of exposure to ionizing radiation has conclusively demonstrated that children, adolescents and pregnant women are the most vulnerable populations to radiation exposure.

### **Aren't children more sensitive to radiation than adults?**

“Yes, because children are growing more rapidly, there are more cells dividing and a greater opportunity for radiation to disrupt the process. EPA's radiation protection standards take into account the differences in the sensitivity due to age and gender. Fetuses are also highly sensitive to radiation. The resulting effects depend on which systems are developing at the time of exposure.”

[http://www.epa.gov/radiation/understand/health\\_effects.htm](http://www.epa.gov/radiation/understand/health_effects.htm)

Without updated NRC and DHS/FEMA requirements designed to relocate all host school pick-up centers to safe distances beyond the radiation plume exposure boundary zone, school children will continue to have inadequate protective measures that fail to ensure their safety during a radiological emergency.

Sincerely,

Eric Epstein, Chairman,  
Three Mile Island Alert, Inc.  
4100 Hillsdale Road  
Harrisburg, PA 17112

*Three Mile Island Alert , Inc., is a safe-energy organization based in Harrisburg, Pennsylvania and founded in 1977. TMLA monitors Peach Bottom, Susquehanna, and Three Mile Island nuclear generating stations.*

**Enclosures:**

- *Petition for Rulemaking to Extend the Minimum Distance from Five to Ten Miles for Host School Pick-up Points Beyond Plume Exposure Boundary Lines*
- STATEMENTS IN SUPPORT: A, B, C & D
- ATTACHED SUPPORT MATERIALS: Exhibits 1, 2, 3, 4, 5 & 5b, 6 & 7

***SUBJECT: SUBMITTAL OF PETITION FOR RULEMAKING TO  
EXTEND THE MINIMUM DISTANCE FROM FIVE TO TEN MILES  
FOR HOST SCHOOL PICK-UP POINTS BEYOND PLUME  
EXPOSURE BOUNDARY LINES (5)***

**PETITION GUIDELINES**

According to the guidelines posted on the NRC's web site:  
<http://ruleforum.llnl.gov/nrcforum/petition.html> the petition must as a  
minimum:

- 1) ***"Set forth a general solution to the problem or present the substance or text of any proposed regulation or amendment or specify the regulation that is to be revoked or amended."***
- 2) ***"State clearly and concisely your grounds for and interest in the action requested."***
- 3) ***"Include a statement in support of the petition that sets forth the specific issues involved; your views or arguments with respect to those issues; relevant technical, scientific, or other data involved that is reasonably available to you; and any other pertinent information necessary to support the action sought."***

5 For purposes of this Petition, the following applies to the general content:

Any reference to **host school pick-up centers** is referring to the designated relocation centers ALL school children, attending school (as defined in Footnotes 1 & 3) within the established evacuation zones around any of the licensed nuclear power station located around the nation under the control of the U.S. Nuclear Regulatory Commission, would be relocated to during a radiological emergency so parents or alternates could pick them up.

Any reference to **general population relocation centers** is referring to the designated relocation centers for the general population, that resides within the established evacuation zones around any of the licensed nuclear power station located around the nation under the control of the U.S. Nuclear Regulatory Commission, to be relocated to during a radiological emergency to be used as shelters and reunion points.

Any reference to **emergencies, emergency evacuations, or radiological incidents, radiological emergencies** are referring to any radiological condition that occurs (at any of the licensed nuclear power stations located under the control of the U.S. Nuclear Regulatory Commission) that poses a general threat to the public located within the established evacuation zones.

## **I. SOLUTION TO THE PROBLEM:**

The NRC must promulgate and codify regulations that extend of ALL host school pick-up centers to be at a **minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone** to properly ensure ALL school children are protected in the event of a radiological emergency.

## **II. GROUNDS FOR AND INTEREST:**

The NRC must codify and clarify relevant regulations to ensure that standards, pertaining to Radiological Emergency Readiness Planning, properly protect ALL school children are protected in the event of a radiological (4) emergency.

During the core-melt accident at Three Mile Island, a “precautionary evacuation” for pre-school children and pregnant women was issued on March 30, 1979 by Governor Richard Thornburgh.

However, the relocation centers were located in the plumes’ pathways at William Penn High School Harrisburg (north) and the Hersheypark Arena (northeast **just outside of the 10 mile EPZ.** (6) Out of a target population of 5,000, approximately 144,000 central Pennsylvania residents living within **15 miles** of Three Mile Island "evacuated" the area. (Please refer to Exhibits 5a & 5b and Exhibit 6)

6 Sources:

- “Mass Evacuations to Rural Communities,” School of Public Health, *University at Albany Center for Public Health Preparedness*, November 9, 2006.
- “Evacuation Intentions of Parents in an Urban Radiological Emergency,” *Journal Urban Studies: Geography and Planning and Urban Development Issue*, Volume 26, Number 2/April 1989, pp. 191-198.
- “In Response to Nuclear Power Plant Accidents,” *The Professional Geographer*, Volume 36 Issue 2 Page 207, May 1984, Donald J. Zeigler, James H Johnson Jr. “Evacuation Behavior in Response to Nuclear Power Plant Accidents.”)

### **III. STATEMENTS IN SUPPORT:**

**This Petition includes the following support statements:**

A) West Shore School District: “Care of Students Due to an Emergency” and “School Handbook” information. (7)

B) *The York Daily Record* (September 12, 2002): “Plans for a Quick Exit” by Teresa Ann Boeckel.

C) FEMA FACT SHEET: “Three Ways To Minimize Radiation Exposure.”

D) NUREG-0654r1: Data on radiation plume exposure times.

### **IV. ATTACHED SUPPORT MATERIALS:**

Exhibit 1: West Shore School District: “Care of Students Due to an Emergency” information and “School Handbook.”

Exhibit 2: Overlay of West Shore School District Designated Host School Relocation Centers on TMI’s 10 Mile Emergency Planning Zone.

Exhibit 3: FEMA Fact Sheet: “Nuclear Power Plant Emergency.”

Exhibit 4: NRC NUREG-0654r1.

Exhibit 5a and 5b: March 28, 1979: Hourly Wind Vector TMI-2 and “Reestablishing the Noble Gas Releases from the Three Mile Island Accident,” Jan Beyea and John M. DeCicco, National Audubon Society, August 14, 1990

---

<sup>7</sup> The West Shore School District has provided an exemplary and cogent platform on the web and through hard copy of “how to” distribute information to educators and parents. The School District is not at fault for implementing federal guidelines.

Exhibit 6: Nuclear Regulatory Commission, RIC 2007, "Emergency Preparedness Session," Apex HazMat Incident, Brian McFeaters, Assistant Director, Wake County Emergency Management, March 13, 2007.

Exhibit 7: "Report by James Lee Witt Associates Identifies Improvement Items at Penn DOT, State Police, PEMA, National Guard." (March 27, 2007) A full copy of the report by James Lee Witt Associates can be found at:  
<http://www.wittassociates.com>.

## **V. SUMMARY:**

The enclosed Petition for Rulemaking ("Petition" or "the Petition") seeks to codify and clarify Nuclear Regulatory Commission ("NRC") and Department of Homeland Security ("DHS") and the Federal Emergency Management Agency ("FEMA") relocation requirements by clearly mandating the extension of ALL host school pick-up centers to be at **a minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone** to properly ensure **ALL school children** (8) are protected in the event of a radiological emergency.

---

8 For purposes of this Petition, "**school children**" refers to the definition provided by the Nuclear Regulatory Commission in the Federal Register, Vol. 70, No 242, Monday, December 19, 2005, pp. 75085-75086.

"Emergency plans for all nuclear power reactors are required under Part 50, as amplified by NUREG-0654/FEMA-REP-1 and applicable FEMA guidance documents, to have specific provisions for all 'special facility populations,' which refers not only to pre-schools, nursery schools, and daycare centers, but all kindergarten through twelfth grade (K-12) students, nursing homes, group homes for physically and mentally challenged individuals and those who are mobility challenged, as well as those in correctional facilities. FEMA GM 24, 'Radiological Emergency Preparedness for handicapped persons,' dated April 5, 1984, and GM-EV-2, 'Protective Actions for School Children,' dated November 13, 1986 provide further guidance."

## **I. SOLUTIONS TO THE PROBLEM:**

***1) "Set forth a general solution to the problem or present the substance or text of any proposed regulation or amendment or specify the regulation that is to be revoked or amended."***

This petition sets forth general solutions to the problem with the NRC and DHS/FEMA oversights in regard to the location of host school pick up centers.

This Petition for Rulemaking seeks to clarify and codify U.S. Nuclear Regulatory Commission (NRC)/Federal Emergency Management Agency (FEMA) requirements to extend ALL host school pick-up centers minimum required distances to 5 to 10 miles beyond radiation plume exposure boundary zone.

These changes are requested and necessary to ensure ALL school children, attending school within the established evacuation zones around any of the licensed nuclear power station located around the nations under the exclusive jurisdiction of the U.S. Nuclear Regulatory Commission, are properly protected in the event of a radiological emergency. (See Exhibit 1)

The current requirements allow host school pick-up centers to be just outside of the 10 mile radiation plume exposure boundary zone, are inadequate, fail to meet the safety needs of school children, and clearly fail to meet any reasonable standard for the offsite plans to adequately protect their health and safety.

**Unlike general population relocation centers** which, according to NRC and DHS/FEMA regulations, are required to be at least **five miles and recommended to be at least 10 miles beyond the radiation plume exposure boundary zone**, host **school pick-up centers** are only required to be **outside** of the established radiation plume exposure boundary zone.

Due to inadequate guidance and regulations, many host pick-up schools are located within **2.5** miles and some as little as **.5** mile of this boundary line (See Exhibit 1.) The current evacuation scenario defeats DHS/FEMA's recommendations for minimizing radiation exposure to the public.

*"There are three factors that minimize radiation exposure to your body:  
Time, Distance, and Shielding."  
(FEMA: Fact Sheet, Exhibit 3.)*

The NRC's regulations are inadequate and contradict DHS/FEMA's recommended safeguards for mitigating radiation exposure, i.e., "Time, Distance or Shielding." There is no valid public objective or moral imperative that would keep children within a zone of exposure during a radiological emergency.

Furthermore, according to the data cited on page 17 of NRC NUREG-0654r1 (Please refer to Exhibit 4), it could take as little as **one to four hours** for the plume release to reach the 10-mile boundary line. These host school pick-up centers are where children will be waiting for parents, relatives, family members or care-givers to pick them up during a radiological emergency. School children may be at these centers for undetermined periods of time.

This Petition's general solution to the problem of proximity of host school pick-up centers to the radiation plume exposure boundary zone is for the NRC and DHS/FEMA to clarify and codify requirements for host school pick-up centers to be located a minimum distances of **at least five miles and preferably 10 miles beyond the plume exposure boundary zone.**

## **II. GROUNDS FOR AND INTEREST:**

### ***2) "State clearly and concisely your grounds for and interest in the action requested."***

This Petition addresses the deficiencies associated with the distance placement of host school pick-up centers and remedies the oversight by providing mandatory standards pertaining to Radiological Emergency Readiness Planning that ensure ALL school children are properly prepared and protected during a radiological emergency.

As previously stated, the current requirements which allow host school pick-up centers to be just outside of the radiation plume exposure boundary zone are inadequate, fail to meet the safety needs of school children and clearly fail to meet FEMA requirements for offsite plans to adequately protect the public's health and safety.

Since 1980, each utility that owns a commercial nuclear power plant in the United States has been required to have both an onsite and offsite emergency response plan as a condition of obtaining and maintaining a license to operate that plant. Onsite emergency response plans are approved by the Nuclear Regulatory Commission. Offsite plans (which are closely coordinated with the utility's onsite emergency response plan) are evaluated by the Federal Emergency Management Agency and provided to the NRC, who must consider the FEMA findings when issuing or maintaining a license.

Federal law establishes the criterion for determining the adequacy of offsite planning and preparedness, i.e., "Plans and preparedness must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate measures can be taken offsite in the event of a radiological emergency." (Exhibit 3)

These outdated and inadequate requirements also do not take into account a possible 9/11 style terrorist attack, which due to lack of advance warning, would severely truncate the timeframes evacuation plans utilize making the host school pick-up center distance from the plume exposure boundary line an extremely important health factor.

*“There are three factors that minimize radiation exposure to your body: Time, Distance, and Shielding.”*

The NRC and DHS/FEMA should expeditiously create and implement this Petition's recommendations regulations to expedite emergency planning amongst the states and counties with evacuation zones to properly ensure the safety, health, and well being of all populations residing in these established zones.

The “established grounds” and “interest” focus on the need to fix logistical deficiencies so that the Radiological Emergency Readiness Plans (RERP) meet the established requirements to properly protect the public.

But more importantly, the “established grounds” and “interest” are for the safety of all school age children that are currently not properly protected by the current federal, state or county emergency plans.

### III. STATEMENTS IN SUPPORT

**3) "Include a statement in support of the petition that sets forth the specific issues involved; your views or arguments with respect to those issues; relevant technical, scientific, or other data involved that is reasonably available to you; and any other pertinent information necessary to support the action sought."**

**This Petition includes the following support statements:**

A) West Shore School Districts: "Care of Students Due to an Emergency," p.1, para. 5, 6 & 7. The information is also accessible through the "School Handbook," pp. 14 and pp. 37-39. (9)

B) The *York Daily Record* (September 12, 2002): "Plans for a Quick Exit" by Teresa Ann Boeckel documented in 1994 experts state it could take over **11 hours** to evacuate the 10 mile Planned Evacuation Zone Area.

C) FEMA FACT SHEET: "Three Ways To Minimize Radiation Exposure."

*"Plans and preparedness must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate measures can be taken offsite in the event of a radiological emergency."*

*"There are three factors that minimize radiation exposure to your body: Time, Distance, and Shielding."*

D) NUREG-0654r1 data on radiation plume exposure times, pp. 16-18 and Tables 1 & 2, pp., and J. "Protective Measures," 60 -65 and Table J-1.

9 The West Shore School District has provided an exemplary and cogent platform on the web and through hard copy of "how to" distribute information to educators and parents. The School District is not at fault for implementing federal guidelines.

#### **IV. ATTACHED SUPPORT MATERIALS:**

##### **Exhibit 1: West Shore School Districts “Care of Students Due to an Emergency” information and the “School Handbook.”**

According to the map on the West Shore School District web site: <http://www.wssd.k12.pa.us/> the following four schools are the host school pick-up centers for all of the 17 West Shore Schools which are located inside the 10 mile emergency planning zone (See Exhibit 2):

- *Cedar Cliff High School = **less than .5 mile** from Plume Exposure Boundary (PEB) line.*
- *Allen Middle School = **less than 2.5 miles** from PEB line.*
- *Lemoyne Middle School = **less than 1.75 miles** from PEB line.*
- *Washington Heights Elementary School = **less than 1.75 miles** from PEB line.*

The farthest designated relocation center is within 2.5 miles of the plume exposure boundary zone. Cedar Cliff High School is within .5 a mile of the plume exposure boundary zone.

##### **Exhibit 2: Overlay of West Shore School District Designated Host School Relocation Centers on TMI’s 10 Mile Emergency Planning Zone.**

The Petitioner respectfully submits that "harm's way" does not end at an imaginary "ten (10) mile line." Investing in the theory that an invisible lead curtain will protect our children is not reality. Host school pick-up centers need to be located at safe distances well beyond the plume exposure boundary line to ensure the health and well-being of all school children in the event of a radiological emergency, and keep frantic parents from clogging vital evacuation routes by making them backtrack into the evacuation zone to pick up their children. Since school children are part of the general population and DHS/FEMA has stated it's the law to properly safe guard the public in the event of a radiological emergency.

- Parents may not be able to reach children in a timely manner due to clogged evacuation routes.
- Parents may not be able to reach children in a timely manner because they may need to travel to several host school pick-up centers to reunite with children of different age groups.
- Parents may not be able to reach children in a timely manner because they may not know where their children have been relocated to due to vague and inadequate instructions, and a general lack of awareness to the evacuation plans.
- Parents may not be able to reach children in a timely manner due to planning criteria that will utilize all evacuation route lanes in outbound only capacities.
- A possible 9/11 style terrorist attack would undermine advance warning and defeat planned time frames for evacuation.
- Incongruent time factors relating to radiation plume release figures as compared to estimated evacuation times.

**Exhibit 3: FEMA Fact Sheet, “Nuclear Power Plant Emergency - Three Ways To Minimize Radiation Exposure”**

According to the Fact Sheet, *“There are three factors that minimize radiation exposure to your body: Time, Distance, and Shielding.”*

Distance from the radiation plume exposure boundary line is crucial to provide a time and space buffer for host school pick-up centers .

*“Depending on the weather and time of year, it could take anywhere from 6 hours and 30 minutes to 11 hours and 10 minutes to evacuate the entire 10-mile radius around TMI, according to a 1994 study.”* (Please refer to “Support Statement B)

These estimates (10) are now over 13 years old and the population has grown substantially (especially in northern York County) since 1994. (United States 2000 Census, U.S. Census Bureau Bureau, December 24, 2006. Evacuation time estimates will most likely be longer (11).

#### **Exhibit 4: NUREG-0654r1 data on radiation plume exposure times**

According to page 17 of NUREG-0654r1 (See Exhibit 4), travel time for the radiation plume from the release of exposure point to the 10 mile range could take as little as one to four hours.

Distance considerations for host school pick-up centers from the radiation plume exposure boundary line are crucial to provide a time and space buffer.

Statements in support demonstrate the need and importance for these new NRC/FEMA requirements by showing there are risks posed to school children to radiation exposure due to:

---

<sup>10</sup> The *York Daily Record* (September 12, 2002), "Plans for a Quick Exit" by Teresa Ann Boeckel. This article documents that in 1994 experts state it could take over **11 hours** to evacuate the 10 mile Planned Evacuation Zone Area.

<sup>11</sup> On February 14, 2007, motorists were stranded for more than **24 hours** in subfreezing temperatures on I-78. This was the latest example of how ill prepared Pennsylvania is to handle an "**announced emergency**." If PEMA can't get people off a highway for more than 24 hours due to snow and ice, how is the Agency going to evacuate an entire population living in the 10 mile Emergency Planning Zone around a nuclear power plant? (Please refer to Exhibit 7.)

- The current placement of some host school pick-up centers are as little as .5 a mile from the plume exposure boundary zone.
- Plume exposure release times could be compressed from one to four hours. (12)
- Estimated evacuation times could exceed 11 hours.
- The lack of time and distance currently embedded in a closer proximity.
- Parents may not be able to reach children in a timely manner due to clogged evacuation routes.
- Parents may not be able to reach children in a timely manner because they may need to travel to several host school pick-up centers to reunite with children of different age groups.
- Parents may not be able to reach children in a timely manner because they may not know where their children have been relocated to due to vague and inadequate instructions, and a general lack of awareness to the evacuation plans.
- Parents may not be able to reach children in a timely manner due to planning criteria that will utilize all evacuation route lanes in outbound only capacities.
- A possible 9/11 style terrorist attack, which due to lack of advance warning, would severely truncating the timeframes evacuation plans.
- Current set of disproportionate time factors relating to radiation plume release figures as compared to estimated evacuation times.

---

12 It is **physically impossible** for federal, state, or local government to verify that any of Pennsylvania's special needs' populations can subscribe to NUREG-0654 J-12 Reception Centers since these facilities have not been assigned a relocation center. These facilities can not "reasonably assure" a **12 hour monitoring standard from an unidentified relocation center** that may (or may not) exist "at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone."

**Exhibit 5a & 5b: March 28, 1979: Hourly Wind Vector TMI-2 and “The Noble Gas Releases From the Three Mile Island Accident, Jan Beyea and John M. DeCicco, National Audubon Society, August 14, 1990.”**

Taken together, these exhibits demonstrate that the prevailing wind and plume directions during the March 28, 1979 accident, and “the highest doses were received in the NNW sector...Exposures were concentrated in the areas lying to the north and west...”[of Three Mile Island] (Beyea& DeCicco, p. 20 & pp. 67-68.)

The schools and relocation centers identified in Exhibit 2 are located in the northwest sector.

In the only American community asked to evacuate a nuclear accident, meteorological data, dose trends, regulatory requirements and history dictate that relocation centers must be at **a minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone** to properly ensure **ALL school children** are protected in the event of another radiological emergency.

**Exhibit 6: Nuclear Regulatory Commission, RIC 2007, “Emergency Preparedness Session,” Apex HazMat Incident, Brian McFeaters, Assistant Director, Wake County Emergency Management, March 13, 2007.**

This presentation and accompanying slides have been posted on the NRC’s web site at <http://www.nrc.gov/public-involve/conference-symposia/ric/slides/BMcFeastersslides.pdf>

For purposes of this Petition, please note that command post locations was moved several times. Although the wind direction never shifted, it was not until the **fourth move** that the command post was placed upwind of the fire and out of the plume pathway. (Slide 2)

Although this event was termed a success, the inability to move the command center out of harm's way until the **fourth relocation** demonstrates that plumes and wind speed can not be contained within a fictitious ten mile zone.

The Apex event demonstrates that **a minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone** to properly ensure **ALL school children** are protected in the event of another radiological emergency.

**Exhibit 7: "Report by James Lee Witt Associates Identifies Improvement Items at Penn DOT, State Police, PEMA, National Guard. State Police, PEMA, National Guard.** (March 27, 2007) A full copy of the report by James Lee Witt Associates can be found at:  
<http://www.wittassociates.com>.

On February 14, 2007, a series of natural and man-made events paralyzed Pennsylvania's emergency preparedness network. Despite recent assurances by the NRC that Pennsylvania emergency planning is sound (13), the Governor of Pennsylvania recently acknowledged major breakdown, and noted some of these issues had been identified **prior** to the Valentine Day's debacle.

---

13 Please refer to SECY-06-01001, "Memo to the NRC Commissioners" from Luis A. Reyes, EDO for Operations, May 4, 2006.

The Memo also revealed **private meetings and communications that had taken place without input from the public**. At PEMA headquarters in Harrisburg on January 26, 2006, a meeting to discuss the Petitioners' rulemaking request was convened. Mr. Epstein was **denied** permission to participate in the meeting by the NRC. Parties represented at the meeting included: PA DPW, PA DEP, DHS-HQ, DHS-Philadelphia, the NRC-HQ and NRC Region I et al, and a representative from Commissioner Jackzo's office. That meeting was followed-up by an NRC HQ teleconference (without public participation) on February 2, 2006 with PEMA, DHS-HQ, DHS-Philadelphia and NRC Region I.

On March 27, 2007, Governor Edward G. Rendell, responded to an independent review conducted by James Lee Witt Associates regarding Pennsylvania's emergency breakdowns during the snow storm that began on February 14, 2007. The Report identified major problems in emergency planning at the Pennsylvania Department of Transportation, the State Police, the National Guard, and the Pennsylvania Emergency Management Agency.

Governor Rendell expressed his disappointment at the state's failure to address the issues outlined in the report (despite the fact that some of these problems had been identified in earlier reports), and accepted responsibility for not acting on these matters.

"The most disturbing part of the report, I find, was its findings that state emergency system management is lacking and is not on par with national standards," said the Governor.

"I take full responsibility for that failing," he said. "As Mr. Witt noted in the report, 'The winter storm was not the first sign of issues with emergency management in Pennsylvania. After action reports on previous emergencies outline many of the ongoing problems with emergency management in the commonwealth.'" (Witt & Associates, Summary, March 27, 2007)

## **V. Summary**

The current requirements which allow host school pick-up centers to be just outside of the 10 mile radiation plume exposure boundary zone fail to meet the safety needs of school children. The current status quo clearly fails to meet any reasonable standard for the offsite plans to adequately protect the health and safety of ALL children.

The NRC and DHS/FEMA must promulgate regulations to extend minimum distances for ALL host school pick-up centers to be located at least 5 to 10 miles beyond the plume exposure boundary lines, to ensure our school children's safety and well being.

FEMA's regulations provide the best summation to grant this Petition for Rulemaking:

*“Plans and preparedness must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate measures can be taken offsite in the event of a radiological emergency.”*

*“There are three factors that minimize radiation exposure to your body: Time, Distance, and Shielding.”*

Respectfully submitted,

Eric Epstein, Chairman,  
Three Mile Island Alert, Inc.  
4100 Hillsdale Road  
Harrisburg, PA 17112

**Enclosures:**

- STATEMENTS IN SUPPORT: A, B, C & D
- ATTACHED SUPPORT MATERIALS: Exhibits 1, 2, 3, 4, 5 & 5b, 6 & 7

CERTIFICATE OF SERVICE

I hereby certify that copies of enclosed correspondence dated April 11, 2007, were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid or electronic mail. Please note that several exhibits were only available in hard copy.

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16 C1  
Washington, D.C. 20555-0001  
Attn: Rulemaking and Adjudication's Staff

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
One White Flint North, 16th Floor  
11555 Rockville Pike,  
Rockville, Maryland 20852  
Attn: Rulemaking and Adjudication's Staff

U.S. Nuclear Regulatory Commission  
John F. Cordes, Jr., Solicitor  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Federal Emergency Management Agency  
500 C. Street, S.W.  
Washington, D.C. 20472  
Attention:  
Document & Control Desk

Department of Homeland Security  
Office of Inspector General  
245 Murray Lane, SW  
Washington, D.C. 20528

# General Information



## Accessibility of Buildings to the Disabled

The West Shore School District welcomes disabled students. We will attempt to place all disabled students in schools close to their homes. Transportation will be provided by the District. The following schools are accessible to wheelchairs: Fairview, Highland, Lower Allen, Mount Zion, Newberry, Red Mill, Rossmoyne, and Washington Heights Elementary Schools; Allen and Crossroads Middle Schools; and Cedar Cliff and Red Land High Schools.

## Building Security

For security purposes, all entrances to West Shore school buildings are secured after school begins. Only the main entrance of a building may be made available for public access during the school day. The main entrance of a building may be controlled by electronic means. Visual inspection and proof of identity may be required of an individual before access is granted.

Students and visitors are reminded video and audio recorders are used in the District's schools. Electronic surveillance devices are being used within the schools at all times in an attempt to protect our students and staff. Individuals found tampering with surveillance equipment will be prosecuted to the fullest extent of the law.

Individuals exhibiting disorderly conduct, or refusing to follow District rules, while on school property, are subject to arrest. Arrest on District property will result in a loss of future visiting privileges.

## Care of Students Due to an Emergency

If an emergency should arise when students are in school, action will be taken to protect the health and safety of each child. The District has plans in place to deal with fire, bomb threat, hazardous materials spill, earthquake, aircraft accident, and severe weather. Specific plans for each building are held in the building(s). Parents should speak with their child's principal for more information before an emergency occurs.

In the event of a general emergency at TMI requiring evacuation of several of the schools in the West Shore School District, students will be bused directly to several sites designated as evacuation centers. They are Lemoyne Middle School, Cedar Cliff High School, Allen Middle School, Washington Heights Elementary School, and Highland Elementary School. All of these schools are outside the ten mile zone from TMI.

Parents or authorized persons are to meet their children at these assigned schools. You are urged not to call the schools or attempt to make different arrangements. This will only create confusion. Please find your school below in order to understand what will happen in case of an emergency at TMI.

### Cedar Cliff High School

Students who live inside the 10 mile zone will remain at Cedar Cliff. Students who live outside the 10 mile zone will be sent home.

### Red Land High School

All students will be evacuated to Cedar Cliff High School by bus.

### Allen Middle School

Students who live inside the 10 mile zone (Generally York County and Lisburn area) will be held at school for parents to pick up. Students who live outside the 10 mile zone (generally Cumberland County) will be sent home as soon as buses are available.

### Crossroads Middle School

## Modified Kindergarten

A modified kindergarten schedule was developed to address the need for morning kindergarten students to obtain necessary instructional hours when the District calls a two-hour delay due to inclement weather. When a two-hour delay is called, morning kindergarten students arrive at school at 10:35 a.m. with the other elementary students and remain in school until 12:35 p.m. A modified kindergarten schedule does not impact afternoon kindergarten students.

## Parent Volunteers & Tuberculosis Testing

State law requires that adults having more than incidental contact with students must have a tuberculosis test before volunteering in the classroom or assisting with student activities.

## Releasing Students to Non-Custodial Parents

In some cases, parents or guardians wish to make it impossible for certain relatives, friends, or non-custodial parents to communicate with or pick up a child at school. The business of the District is to educate children and not to preside over domestic disputes. It is up to parents and the judicial system to see that custody and visitation orders are obeyed. If a parent informs the building principal that a child is not to leave the building in the custody of the other parent, the principal cannot prevent the other parent from taking the child. The principal can inform the custodial parent, if possible, of the arrival of a non-custodial parent at school. If the parent wishes the principal to provide this information, a written request should remain on file.

## School Closing - Weather Related

If serious weather conditions necessitate the closing of school, notice of such closing will be broadcast by the local radio and television stations. School closings and early dismissals are also posted on the District's web site at [www.wssd.k12.pa.us](http://www.wssd.k12.pa.us).

The West Shore School District has developed a procedure for early dismissals due to inclement weather or other emergencies. Early closing of the schools will be announced by local radio stations. Under this plan, older children will be the first to be transported home. Building principals will send home more specific information. Students should be counseled in advance of such times how to seek shelter and supervision if a return to home is made during the absence of parents. Early dismissal information is available by calling 938-3179 or by calling *The Patriot-News* Campusline at 255-1212.

## School Day

AM Kindergarten - 8:45 a.m.-11:30 a.m.  
PM Kindergarten - 12:50 p.m. - 3:35 p.m.  
Elementary Schools - 8:45 a.m.-3:35 p.m.  
Middle Schools - 7:40 a.m.-2:45 p.m.  
High Schools - 7:34 a.m.-2:45 p.m.  
Modified Kindergarten\* - 10:35 a.m.-12:35 p.m.

\* Used when a two-hour delay is called. A modified kindergarten schedule does not impact afternoon kindergarten students.

## Six-Day Cycle

Classes are scheduled on a cyclical, numerical basis (1, 2, 3, 4, 5, 6). The first day of school will be Day 1; the second day, Day 2, to be followed by Day 3, Day 4, Day 5, and Day 6. The seventh day of school will follow as Day 1. This pattern will continue throughout the school year.

## General Information

All students will be evacuated to Lemoyne Middle School.

### Lemoyne Middle School

Students who live inside the 10 mile zone will remain at Lemoyne (generally Green Lane Farms, Allendale, Green Lane Manor, Lemoyne south of Lowther Street). Students who live outside the 10 mile zone, whether they ride buses or walk, will be sent home as long as it is safe to do so.

### New Cumberland Middle School

All students will be evacuated to Lemoyne Middle School.

### Fairview, Fishing Creek, Mt. Zion, Newberry, and Red Mill Elementary Schools

All students will be evacuated to Allen Middle School.

Hillside Elementary School will be evacuated to Washington Heights Elementary School.

St. Theresa's will be evacuated to Washington Heights Elementary School.

Parents and authorized persons who are coming to pick up students at the evacuation sites will need to provide identification and sign a register at the pick-up point before a student is released. Identification may consist of a driver's license, social security card, voter registration card, etc.

## Discipline and Corporal Punishment

The District strives for self-discipline - good behavior by the student because he/she knows it is right. Such behavior contributes to a pleasant and profitable educational experience. If a student is unable to discipline himself/herself, the misconduct which is detrimental to good education will be dealt with by the teacher who may refer more serious incidents to the principal. The rule of law, not the rule of personality, will be the guide.

The policy of the State Board of Education includes a provision that "corporal punishment may not be administered to a child whose parents have notified school authorities that such disciplinary methods are prohibited." However, "reason-able force may be used to quell a disturbance; or to obtain possession of weapons or other dangerous objects; or for self-defense; or the protection of person and property." It is the intent of the Board and the administration of this District to maintain order and discipline in its schools while at the same time respecting the law and the regulations of higher authority.

Therefore, should parents request the principal, in writing, to abstain from administering corporal punishment to their child or children, every reasonable effort will be made to cooperate with these parents in efforts to enforce the rules and regulations of the school. Letters of request should be signed and directed to the school office. Such letters should list the full name of each child affected and the name and grade of the school he/she attends.

The full text of the District's discipline policies are available in each school.

## Electronic Surveillance

Students and visitors are reminded video and audio recorders are used in the District's schools. Electronic surveillance devices are being used within the schools at all times in an attempt to protect our students and staff. Individuals found tampering with surveillance equipment will be prosecuted to the fullest extent of the law.

## Lunch

The District's cafeterias serve a type A lunch as defined by the National School Lunch program and provide a la carte lunch service as well. School meal prices for the 2001-2002 school year

## Student Accident Insurance

The Board recognizes the need for insurance coverage for unforeseen accidents which may occur to students in the course of attendance at school or to students participating in athletic and extracurricular programs offered by the school. Except for students on the football rosters of Cedar Cliff and Red Land High Schools, the West Shore School District DOES NOT carry medical insurance on students. However, for parents who do not have their own medical insurance coverage or who may wish to supplement their medical insurance plan, the District does provide the opportunity to purchase a group medical insurance plan.

The plan provides medical coverage on a school time basis or on a 24-hour basis and is usually purchased at the beginning of the school year. Parents may wish to consider this option in addition to any medical/hospital coverage they may have. Ambulance fees and medical costs resulting for accidental injury to students in the course of attendance at school or to students participating in athletic (except football) and extracurricular programs of the school should be submitted to parents' medical/hospital provider(s).

## Telephone Security

The telephones within the schools of the West Shore School District have the capability of caller identification (ID) and customer operated tracing. Threatening or harassing calls will be reported to the telephone companies and the local police department.

Threatening or harassing telephone calls will be prosecuted in the courts by the District's administration to the fullest extent of the law.

## Use of Student Photos & Interviews

Individual and/or group interviews, photographs, or videotapes of West Shore School District students may be taken during the school year for use by the District in various publications including local newspapers, and for training and review purposes. This publicity provides the community with information about various school programs and achievements. The District provides opportunities for positive media publicity by arranging for reporters or photographers to interview and/or photograph students. If parents prefer their child's photograph not appear in any of these publications and that the child should not be interviewed for publicity purposes, notify the child's building principal in writing.

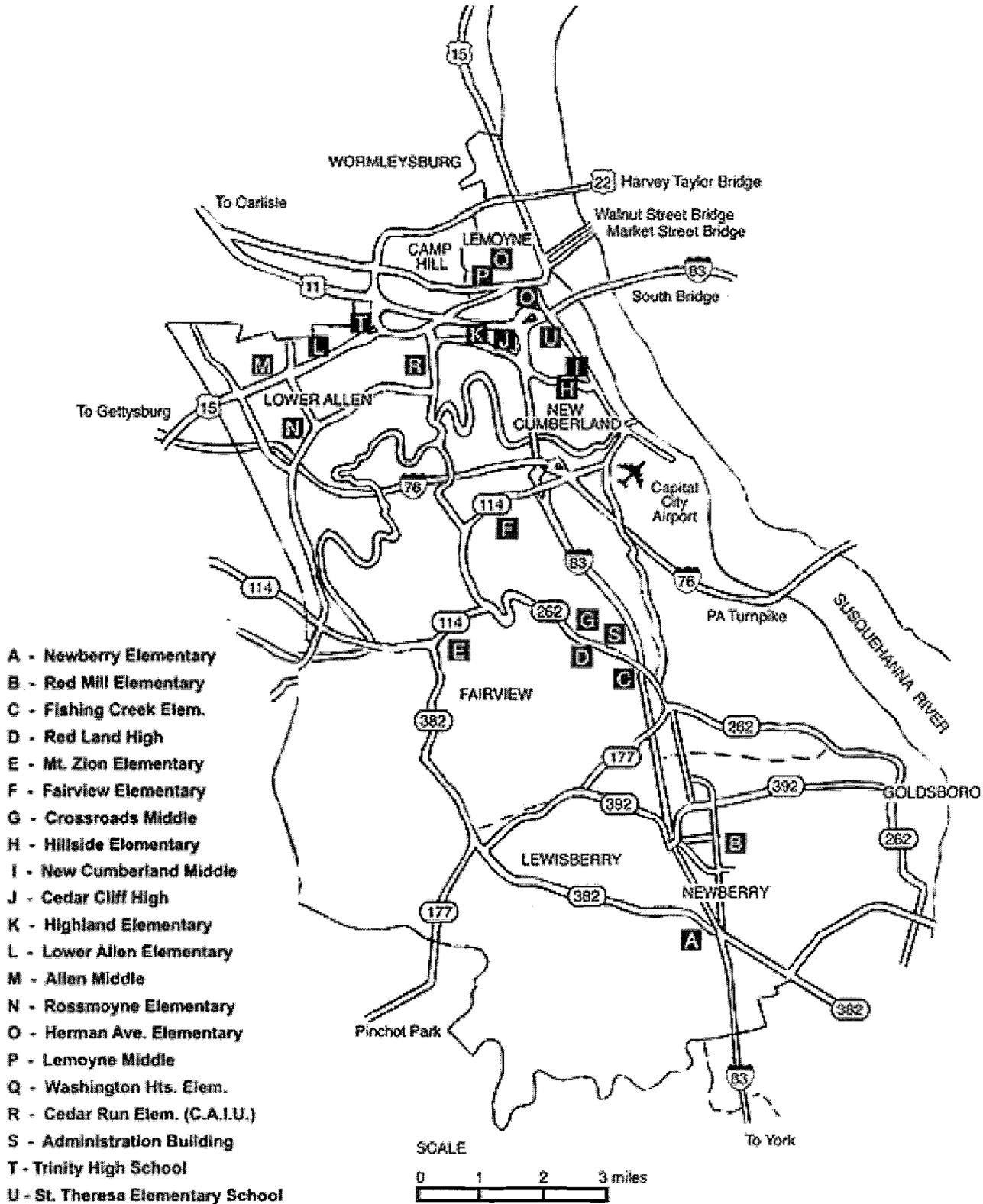
## Visiting School

Parents of children in our schools and other interested citizens are always welcome to visit us. All such visitors must register in the school building office. Permission must be secured from the principal if the purpose is to observe a classroom session. The best procedure is to arrange such a visitation with the principal by telephone in advance since there are days when the giving of examinations, special tests, medical or dental examinations, etc., may make the observation of a classroom session impractical.

The principal shall have the authority to refuse permission to observe a certain class if he/she believes such a visitation would be detrimental to the program of the school. Parents are urged not to bring young children when visiting schools. Small children tend to be a distracting influence and their presence usually makes it impossible to observe a normal classroom situation.

# District Public & Private Schools

Due to the size of the map, it may take a few moments to load.



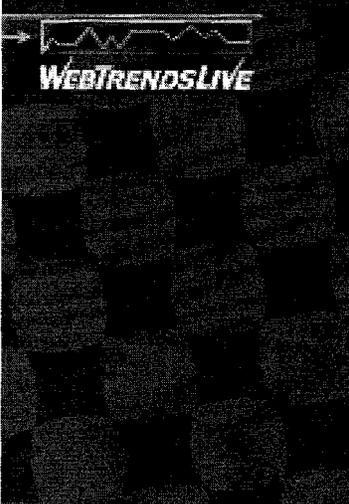


Main Local Sports Business Living Opinion

Main News

- Special Reports
- [Black Flight Census](#)
- [2000 Election](#)
- [Changing of the Guard](#)
- [A Measure of Justice](#)
- [1969 Riot Investigation](#)
- [The Rusk Report 2002](#)

- [About us](#)
- [Announcements](#)
- [Calendar of Events](#)
- [Classifieds](#)
- [County History](#)
- [Newslibrary](#)
- [News Projects](#)
- [Obituaries](#)
- [Pets](#)
- [Photos](#)
- [ProQuest Archive](#)
- [YDR Links](#)
- [YDR Store](#)



E-mail story Printer friendly

## Plans for a quick exit

### Evacuation plans near nuclear power plants have been revisited since last year's terrorist attacks.

By TERESA ANN BOECKEL  
Daily Record staff  
Tuesday, September 10, 2002

See also: [Power plant evacuation routes](#)  
[pdf file]

A year ago, as terrorists attacked the United States and officials reported that another plane was in the air over Pennsylvania, Larry Christian and his wife picked up their daughter at a nursery school that is in sight of the Three Mile Island nuclear power plant.

The attacks prompted Christian to ask a question: How would children at nursery schools and day-care centers be evacuated if there would be an emergency at TMI, the site of the worst nuclear accident in the nation's history?

He asked the director of their daughter's nursery school, Salem Community in Fairview Township, about its evacuation plans. She checked and confirmed they did not have any. Christian then called local and state officials. He found that

Search:

### WEATHER

Downtown York, PA  
Accuweather

AccuWeather.com  
5-day Forecast  
Enter your U.S. location

### ONLINE TODAY

- **Local:** [New Bridgeville fire station saves water](#)
- **Sports:** [Foot Power tracks down eco-challenge runners](#)
- **Business:** [Money sought for expo center](#)
- **Living:** [Ready to look away](#)
- **Opinion:** [Community leads the way](#)

### MARKETPLACE

- [pacarbuyer.com](#)
- [jobs.inyork.com](#)
- [Buy the paper](#)
- [YDR store](#)

### LOTTERY

- [Pennsylvania lottery](#)
- [Maryland lottery](#)

[top](#)

day-care centers and nursery schools are not required to have emergency evacuation plans in case there is an emergency at a nuclear power plant.

So last week, with the assistance of watchdog group, Three Mile Island Alert, Christian submitted a petition to the U.S.

Nuclear Regulatory Commission. The petition asks that all day-care centers and nursery schools are properly protected in case of an emergency at a nuclear power plant.

“We’re not happy that there is no evacuation (plan),” Christian, of Fairview Township, said.

The lack of such a plan isn’t the only concern when it comes to evacuating people within a 10-mile radius of TMI or Peach Bottom Atomic Power Station in an emergency.

Depending on the weather and time of year, it could take anywhere from 6 hours and 30 minutes to 11 hours and 10 minutes to evacuate the entire 10-mile radius around TMI, according to a 1994 study.

For those who live within 10 miles of Peach Bottom, the times range between 3 hours and 15 minutes to 5 hours and 50 minutes, according to a 1990 study.

The county’s population has grown since those studies, so it could take longer.

The studies are being updated by Earth Tech Inc. in Concord, Mass. Dr. Richard Londergan, who is working on the study, said he expects that the report will be finished by the end of the year.

That study will determine whether the current evacuation routes are adequate or need to be revised, according to David Carl, a spokesman for Exelon Nuclear

Corp., which co-owns TMI.

The phone book outlines the routes for residents to take if officials order an evacuation. Residents in York Haven, for example, would drive south on Interstate 83 and head to Susquehannock High School in Shrewsbury Township.

If an emergency happens while school is in session, students would be bused to a host school outside of the 10-mile radius.

Parents would be expected to pick up their children at the host school — not at their home school. Parents who do not know where their children could go may call the district for details.

That is why planning is important for families in case there is an evacuation, according to Patrick McFadden, the county's executive director of emergency management.

Families should talk about where they would go and select two people — relatives or friends — who live at least 20 miles away — to serve as contacts. Those contacts can help relay information if the family is split up at different mass care centers or other locations, McFadden said.

People also should be prepared to take shelter in their own homes, which officials could order instead of evacuating.

Hopefully residents will never need to use the plans, but they'll feel secure with the plans, McFadden said.

While it may take hours to evacuate the 10-mile radius around the nuclear plants, and people may not be able to drive 60 mph, McFadden said, "I think there's sufficient time for people to get out of the area."

Highways, such as I-83, would become four-way lanes in one direction from the evacuation zone, according to Mike Fetrow, deputy coordinator with the York County Department of Emergency Services.

There are those who remain skeptical, though, about whether an evacuation would work.

“The evacuation plans are fatally flawed in our opinion,” said Eric Epstein, chairman of TMI Alert in Harrisburg. The group, which formed two years before the 1979 TMI accident, is concerned about state and national regulation of the nuclear-power industry.

The plan assumes that there is an invisible lead curtain surrounding the 10-mile radius of the plant, Epstein said. People who live outside of the 10-mile radius will leave too, he said.

During the TMI accident, more than 140,000 people left the area, he said.

Officials need to consider other problems: What if there is a bad snowstorm? What if it happens when there is heavy traffic heading to a football game in Happy Valley?

And not everyone plans to follow the evacuation route plans.

Carl Huntzinger, 77, and his wife, Norma, live in East Manchester Township and, according to evacuation plans, should head south on Route 24 to Red Lion Area High School.

The Huntzingers, though, plan to travel west and make a big circle through the northern part of Pennsylvania to reach their camp in Hegins, Schuylkill County. They are not interested in reporting to a mass care site.

“You can’t try to figure out something that hasn’t happened, and you don’t know the variables,” he said.

While legislation does not require evacuation plans for day-care centers or nursery schools, some have started devising their own plans.

Clayton Ort, director of the Laugh ‘N’ Learn Day Care Center in Newberry Township, said he would pack a 15-passenger van with kids and cribs, food and other necessities. Other day-care workers would take children in their vans as well. They would head to the Hanover area.

The day care started taking a serious look at its plans after Sept. 11. Ort said they started calling around for help in creating their plan but kept being referred to other people. Finally, they reached the emergency management coordinator for their municipality, who helped them come up with a plan.

Ort said he thinks officials got an education as he did.

Local emergency management officials plan to have meetings with day-care centers and nursery schools throughout the entire county about evacuation plans. They are needed whether it is a nuclear accident, a gas leak or a chemical spill anywhere in the county, McFadden said.

The department had tried to have a similar meeting last year before Sept. 11, but few showed up, McFadden said.

“We think we’re going to have a bigger response post 9/11,” he said.

*Reach Teresa Ann Boeckel at 771-2031 or [teresa@ydr.com](mailto:teresa@ydr.com).*

[top](#)

[Main](#) · [Local](#) · [Sports](#) · [Business](#) · [Living](#) ·  
[Opinion](#)

[Jobs at the York Daily Record](#) | [Contact](#)  
[us](#)

Send Web site feedback to [web@ydr.com](mailto:web@ydr.com)

Copyright © York Daily Record 2002  
122 S. George St., P.O. Box 15122  
York, PA 17405, (717) 771-2000

# TMI evacuation routes

If you are asked to evacuate, locate the route and reception center designated for your municipality, and use the map as a guide. Or go to a friend or relative outside the evacuation zone. If you need a ride, try to go with a neighbor or co-worker.

## Conewago Township

■ For the area EAST of Lewisberry Road: Take I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.

■ For the area WEST of Lewisberry Road: Take local routes west to Route 74 south to Route 30 west to New Oxford Jr./Sr. High School complex.

## Dover Township\*

■ Take Route 74 south to Route 30 west to New Oxford Jr./Sr. High School complex.

## East Manchester Township

■ For the area EAST of the Conrail Railroad tracks: Take Route 24 south to Red Lion Area High School.

■ For the area WEST of the Conrail Railroad tracks: Take I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.

## Fairview Township

■ For the area EAST of I-83: Take I-83 north to PA Turnpike west to Route 15 south to Route 30 west to Gettysburg Jr./Sr. High School Complex.

■ For the area WEST of I-83: Take Route 382 and Route 114 west to Route 15 south to Route 30 west to Gettysburg Jr./Sr. High School Complex.

■ For the area WEST of I-83: Take Route 382 and Route 114 west to Route 15 south to Route 30 west to Gettysburg Jr./Sr. High School Complex.

## Goldsboro

■ Take I-83 north to PA Turnpike west to Route 15 south to Route 94 south to New Oxford Jr./Sr. High School complex.

## Hellam Township\*

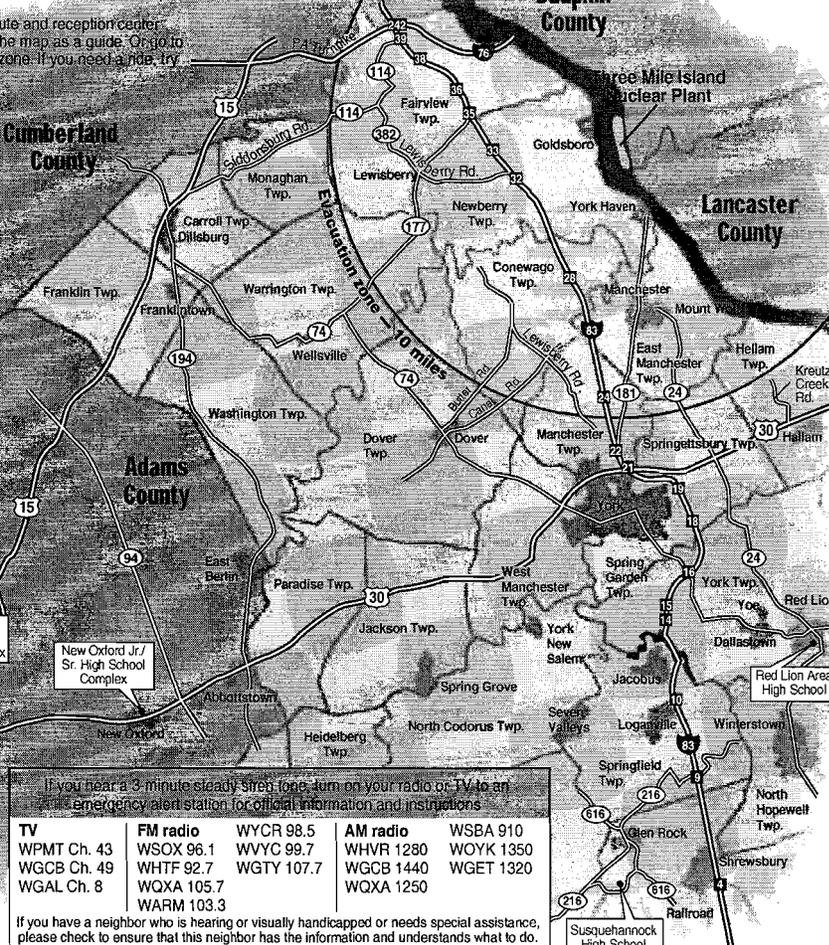
■ Take Kreutz Creek Road south to Route 30 West to Route 24 south to Red Lion Area High School.

## Lewisberry

■ Take Route 382 and Route 114 west to Route 15 south to Route 94 south to New Oxford Jr./Sr. High School complex.

## Manchester

■ Take Route 181 south to I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.



If you hear a 3 minute steady siren tone, turn on your radio or TV to an emergency alert station for official information and instructions.

TV	FM radio	WYCR 98.5	AM radio	WSBA 910
WPMT Ch. 43	WSOX 96.1	WVYC 99.7	WHVR 1280	WOYK 1350
WGCB Ch. 49	WHTF 92.7	WGTY 107.7	WGCB 1440	WGET 1320
WGAL Ch. 8	WQXA 105.7	WARM 103.3	WQXA 1250	

If you have a neighbor who is hearing or visually handicapped or needs special assistance, please check to ensure that this neighbor has the information and understands what to do.

## Manchester Township\*

■ For the area EAST of Lewisberry Rd: Take I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.

■ For the area WEST of Lewisberry Road: Take local routes west to Route 74 south to Route 30 west to New Oxford Jr./Sr. High School complex.

## Mount Wolf

■ Take Route 24 south to Red Lion Area High School.

## Newberry Township

■ For the area NORTH of Newberrytown/EAST of I-83: Take I-83 north to PA Turnpike west to Route 15 south to Route 94 south New Oxford Jr./Sr. High School complex.

■ For the area SOUTH of Newberrytown/EAST of I-83: Take I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.

■ For the area WEST of I-83: Take Route 382 and Route 114 west to Route 15 south to Route 94 south to New Oxford Jr./Sr. High School complex.

## Springettsbury Township\*

■ Take Route 24 south to Red Lion Area High School.

## Warrington Township\*

■ Take Route 177 and Route 74 west to Route 194 south to Route 30 west to New Oxford Jr./Sr. High School complex.

## York Haven

■ Take I-83 south to Glen Rock exit to Route 216 west to Route 616 south to Fissels Church Road to Susquehannock High School.

# Peach Bottom evacuation routes

## Delta

■ Take Main Street to Maryland Route 136 west to Route 624 north to Route 851 west to Route 616 north to Fissels Church Road to Susquehannock High School.

## Fawn Grove\*

■ Take Route 851 west to Route 616 north to Fissels Church Road to Susquehannock High School.

## Fawn Township\*

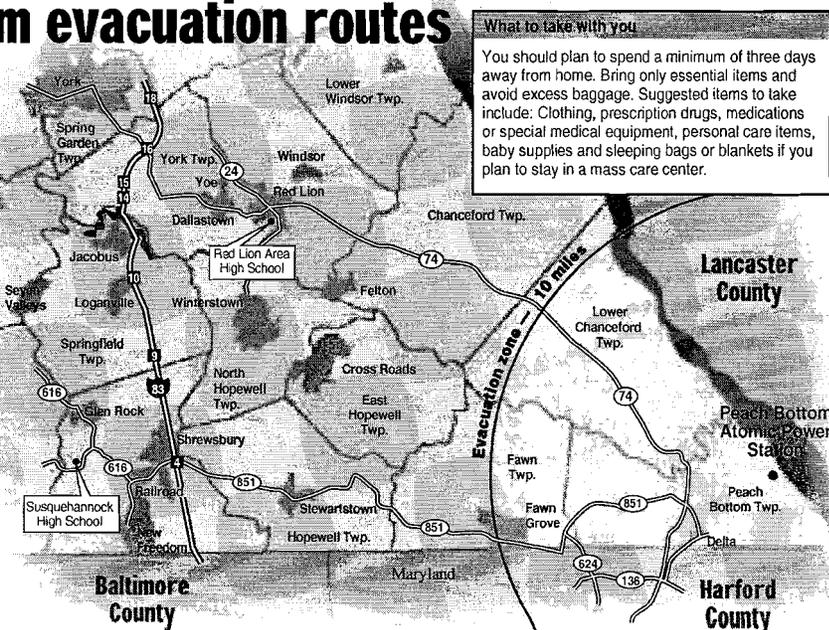
■ Take local routes to Route 851 west to Route 616 north to Fissels Church Road to Susquehannock High School.

## Lower Chanceford Township\*

■ Take local routes to Route 74 north to Red Lion Area High School.

## Peach Bottom Township

■ Take local routes to Route 851 west to Route 616 north to Fissels Church Road to Susquehannock High School.



**What to take with you**

You should plan to spend a minimum of three days away from home. Bring only essential items and avoid excess baggage. Suggested items to take include: Clothing, prescription drugs, medications or special medical equipment, personal care items, baby supplies and sleeping bags or blankets if you plan to stay in a mass care center.

\*Partially located in evacuation zone

# LIBRARY

## VIRTUAL LIBRARY & ELECTRONIC READING ROOM

[\[home\]](#) | [\[feedback\]](#) | [\[library\]](#) | [\[privacy policy\]](#) | [\[search\]](#) | [\[site help\]](#) | [\[site index\]](#) ]

## FACT SHEET: NUCLEAR POWER PLANT EMERGENCY

Since 1980, each utility that owns a commercial nuclear power plant in the United States has been required to have both an onsite and offsite emergency response plan as a condition of obtaining and maintaining a license to operate that plant. Onsite emergency response plans are approved by the Nuclear Regulatory Commission (NRC). Offsite plans (which are closely coordinated with the utility's onsite emergency response plan) are evaluated by the Federal Emergency Management Agency (FEMA) and provided to the NRC, who must consider the FEMA findings when issuing or maintaining a license.

Federal law establishes the criterion for determining the adequacy of offsite planning and preparedness, i.e: "Plans and preparedness must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate measures can be taken offsite in the event of a radiological emergency."

Although construction and operation of nuclear power plants are closely monitored and regulated by the NRC, an accident, though unlikely, is possible. The potential danger from an accident at a nuclear power plant is exposure to radiation. This exposure could come from the release of radioactive material from the plant into the environment, usually characterized by a plume (cloud-like) formation. The area the radioactive release may affect is determined by the amount released from the plant, wind direction and speed and weather conditions (i.e., rain, snow, etc.) which would quickly drive the radioactive material to the ground, hence causing increased deposition of radionuclides.

If a release of radiation occurs, the levels of radioactivity will be monitored by authorities from Federal and State governments, and the utility, to determine the potential danger in order to protect the public.

### What Is Radiation?

Radiation is any form of energy propagated as rays, waves or energetic particles that travel through the air or a material medium.

Radioactive materials are composed of atoms that are unstable. An unstable atom gives off its excess energy until it becomes stable. The energy emitted is radiation. The process by which an atom changes from an unstable state to a more stable state by emitting radiation is called radioactive decay or radioactivity.

People receive some natural or background radiation exposure each day from the sun, radioactive elements in the soil and rocks, household appliances (like television sets and microwave ovens), and medical and dental x-rays. Even the human body itself emits radiation. These levels of natural and background radiation is normal. The average American receives 360 millirems of radiation each year, 300 from natural sources and 60 from man-made activities. (A rem is a unit of radiation exposure.)

Radioactive materials--if handled improperly--or radiation accidentally released into the environment, can be dangerous because of the harmful effects of certain types of radiation on the body. The longer a person is exposed to radiation and the closer the person is to the radiation, the greater the risk.

Although radiation cannot be detected by the senses (sight, smell, etc.), it is easily detected by scientists with sophisticated instruments that can detect even the smallest levels of radiation.

### **Preparing For An Emergency**

Federal, State and local officials work together to develop site-specific emergency response plans for nuclear power plant accidents. These plans are tested through exercises that include protective actions for schools and nursing homes.

The plans also delineate evacuation routes, reception centers for those seeking radiological monitoring and location of congregate care centers for temporary lodging.

State and local governments, with support from the Federal government and utilities, develop plans that include a plume emergency planning zone with a radius of 10 miles from the plant, and an ingestion planning zone within a radius of 50 miles from the plant.

Residents within the 10-mile emergency planning zone are regularly disseminated emergency information materials (via brochures, the phone book, calendars, utility bills, etc.). These materials contain educational information on radiation, instructions for evacuation and sheltering, special arrangements for the handicapped, contacts for additional information, etc. Residents should be familiar with these emergency information materials.

Radiological emergency plans call for a prompt Alert and Notification system. If needed, this prompt Alert and Notification System will be activated quickly

to inform the public of any potential threat from natural or man-made events. This system uses either sirens, tone alert radios, route alerting (the "Paul Revere" method), or a combination to notify the public to tune their radios or television to an Emergency Alert System (EAS) station.

The EAS stations will provide information and emergency instructions for the public to follow. If you are alerted, tune to your local EAS station which includes radio stations, television stations, NOAA weather radio, and the cable TV system.

Special plans must be made to assist and care for persons who are medically disabled or handicapped. If you or someone you know lives within ten miles of a nuclear facility, please notify and register with your local emergency management agency. Adequate assistance will be provided during an emergency.

In the most serious case, evacuations will be recommended based on particular plant conditions rather than waiting for the situation to deteriorate and an actual release of radionuclides to occur.

### **Emergency Classification Levels**

Preparedness for commercial nuclear power plants includes a system for notifying the public if a problem occurs at a plant. The emergency classification level of the problem is defined by these four categories:

**Notification of Unusual Event** is the least serious of the four levels. The event poses no threat to you or to plant employees, but emergency officials are notified. No action by the public is necessary.

**Alert** is declared when an event has occurred that could reduce the plant's level of safety, but backup plant systems still work. Emergency agencies are notified and kept informed, but no action by the public is necessary.

**Site Area Emergency** is declared when an event involving major problems with the plant's safety systems has progressed to the point that a release of some radioactivity into the air or water is possible, but is not expected to exceed Environmental Protection Agency Protective Action Guidelines (PAGs) beyond the site boundary. Thus, no action by the public is necessary.

**General Emergency** is the most serious of the four classifications and is declared when an event at the plant has caused a loss of safety systems. If such an event occurs, radiation could be released that would travel beyond the site boundary. State and local authorities will take action to protect the residents living near the plant. The alert and notification system will be sounded. People in the affected areas could be advised to evacuate promptly or, in some situations, to shelter in place. When the sirens are sounded, you should listen to your radio, television and tone alert radios for site-specific information and instructions.

### **If You Are Alerted**

- Remember that hearing a siren or tone alert radio does not mean you should evacuate. It means you should promptly turn to an EAS station to determine whether it is only a test or an actual emergency.
- Tune to your local radio or television station for information. The warning siren could mean a nuclear power plant emergency or the sirens could be used as a warning for tornado, fire, flood, chemical spill, etc.
- Check on your neighbors.
- Do not call 911. Special rumor control numbers and information will be provided to the public for a nuclear power plant emergency, either during the EAS message, in the utilities' public information brochure, or both.
- In a nuclear power plant emergency, you may be advised to go indoors and, if so, to close all windows, doors, chimney dampers, other sources of outside air, and turn off forced air heating and cooling equipment, etc.

### **If You Are Advised to Evacuate the Area**

- Stay calm and do not rush
- Listen to emergency information
- Close and lock windows and doors
- Turn off air conditioning, vents, fans, and furnace
- Close fire place dampers

Take a few items with you. Gather personal items you or your family might need:

- Flash light and extra batteries
- Portable, battery operated radio and extra batteries
- First aid kit and manual
- Emergency food and water
- Essential medicines
- Cash and credit cards

Use your own transportation or make arrangements to ride with a neighbor. Public transportation should be available for those who have not made arrangements. Keep car windows and air vents closed and listen to an EAS radio station.

Follow the evacuation routes provided. If you need a place to stay, congregate care information will be provided.

### **If Advised to remain at Home**

- Bring pets inside.

- Close and lock windows and doors
- Turn off air conditioning, vents, fans and furnace
- Close fireplace dampers
- Go to the basement or other underground area
- Stay inside until authorities say it is safe

### **When Coming In From Outdoors**

- Shower and change clothing and shoes
- Put items worn outdoors in a plastic bag and seal it.

The thyroid gland is vulnerable to the uptake of radioactive iodine. If a radiological release occurs at a nuclear power plant, States may decide to provide the public with a stable iodine, potassium iodide, which saturates the thyroid and protects it from the uptake of radioactive iodine. Such a protective action is at the option of State, and in some cases, local government.

Remember your neighbors may require special assistance--infants, elderly people, and people with disabilities.

### **School Evacuations**

If an incident involving an actual or potential radiological release occurs, consideration is given to the safety of the children. If an emergency is declared, students in the 10-mile emergency planning zone will be relocated to designated facilities in a safe area. Usually, as a precautionary measure, school children are relocated prior to the evacuation of the general public.

### **For Farmers and Home Gardeners**

If a radiological incident occurs at the nuclear facility, periodic information concerning the safety of farm and home grown products will be provided. Information on actions you can take to protect crops and livestock is available from your agricultural extension agent.

#### **Crops**

Normal harvesting and processing may still be possible if time permits. Unharvested crops are hard to protect.

Crops already harvested should be stored inside if possible.

Wash and peel vegetables and fruits before use if they were not already harvested.

#### **Livestock**

Provide as much shelter as possible. Take care of milk-producing animals.

Provide plenty of food and water and make sure shelters are well-ventilated. Use stored feed and water, when possible.

## **Three Ways to Minimize Radiation Exposure**

There are three factors that minimize radiation exposure to your body: Time, Distance, and Shielding.

**Time**--Most radioactivity loses its strength fairly quickly. Limiting the time spent near the source of radiation reduces the amount of radiation exposure you will receive. Following an accident, local authorities will monitor any release of radiation and determine the level of protective actions and when the threat has passed.

**Distance**--The more distance between you and the source of the radiation, the less radiation you will receive. In the most serious nuclear power plant accident, local officials will likely call for an evacuation, thereby increasing the distance between you and the radiation.

**Shielding**--Like distance, the more heavy, dense materials between you and the source of the radiation, the better. This is why local officials could advise you to remain indoors if an accident occurs. In some cases, the walls in your home or workplace would be sufficient shielding to protect you for a short period of time.

### **What you can do to stay informed:**

Attend public information meetings. You may also want to attend post-exercise meetings that include the media and the public.

Contact local emergency management officials, who can provide information about radioactivity, safety precautions, and state, local, industry and federal plans.

Ask about the hazards radiation may pose to your family, especially with respect to young children, pregnant women and the elderly.

Ask where nuclear power plants are located.

Learn your community's warning systems.

Learn emergency plans for schools, day care centers, nursing homes--anywhere family members might be.

Be familiar with emergency information materials that are regularly disseminated to your home (via brochures, the phone book, calendars, utility bills, etc.) These materials contain educational information on radiation, instructions for evacuation and sheltering, special arrangements for the handicapped, contacts for additional information, etc.

Updated: February 27, 1997

.....  
Federal Emergency Management Agency

NUREG-0654  
FEMA-REP-1  
Rev. 1

---

---

# Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

---

---

**U.S. Nuclear Regulatory  
Commission**



**Federal Emergency Management  
Agency**



TABLE 1

GUIDANCE ON SIZE OF THE EMERGENCY PLANNING ZONE

<u>Accident Phase</u>	<u>Critical Organ and Exposure Pathway</u>	<u>EPZ Radius</u>
Plume Exposure Pathway	Whole Body (external) Thyroid (inhalation) Other organs (inhalation)	about 10 mile radius*
Ingestion Pathway	Thyroid, whole body, bone marrow (ingestion)	about 50 mile radius**

\* Judgment should be used in adopting this distance based upon considerations of local conditions such as demography, topography, land characteristics, access routes, and local jurisdictional boundaries.

\*\*Processing plants for milk produced within the EPZ should be included in emergency response plans regardless of their location.

TABLE 2

GUIDANCE ON INITIATION AND DURATION OF RELEASE

Time from the initiating event to start of atmospheric release	0.5 hours to one day
Time period over which radioactive material may be continuously released	0.5 hours to several days
Time at which major portion of release may occur	0.5 hours to 1 day after start of release
Travel time for release to exposure point (time after release)	5 miles -- 0.5 to 2 hours 10 miles - 1 to 4 hours

J. Protective Response (continued)

<u>Evaluation Criteria</u>	<u>Applicability and Cross Reference to Plans</u>		
	<u>Licensee</u>	<u>State</u>	<u>Local</u>
e. Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.		X	X
f. State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers; <sup>1</sup>		X	X
g. Means of relocation;		X	X
h. Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, <u>beyond</u> the boundaries of the plume exposure emergency planning zone; (See J.12).		X	X
i. Projected traffic capacities of evacuation routes under emergency conditions;		X	X
j. Control of access to evacuated areas and organization responsibilities for such control;		X	X
k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures;		X	X
l. Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (See Appendix 4); and		X	X

1/ See DHEW (new DHHS) Federal Register notice of December 15, 1978 (43 FR 58798) entitled "Potassium Iodide as a Thyroid-Blocking Agent in a Radiation Emergency." Other guidance concerning the storage, stockpiling, and conditions for use of this drug by the general public, is now under development by the Bureau of Drugs, DHHS.

**Illustration 1: Overlay of West Shore School District Designated Host School Relocation Centers on TMI's 10 Mile Emergency Planning Zone**

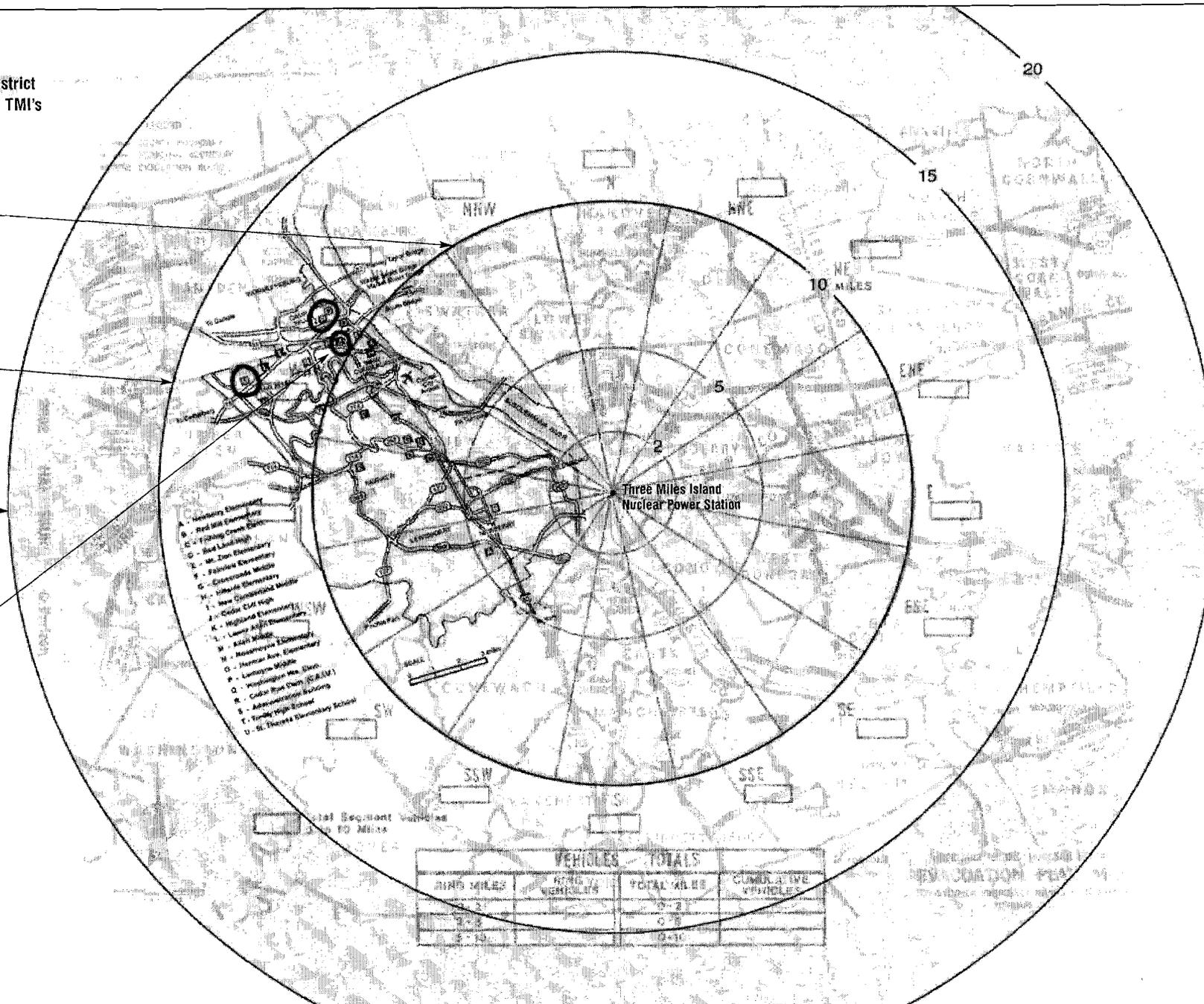
**10 Mile Plume Exposure Boundary (PEB) Line**  
(10 Mile Emergency Planning Zone)

**NRC Minimum Relocation Center Line**  
(5 Mile Past Plum Exposure Boundary Line)  
All designated host centers are to be beyond this line according to regulations listed in NUREG-0654/FEMA-REP-1

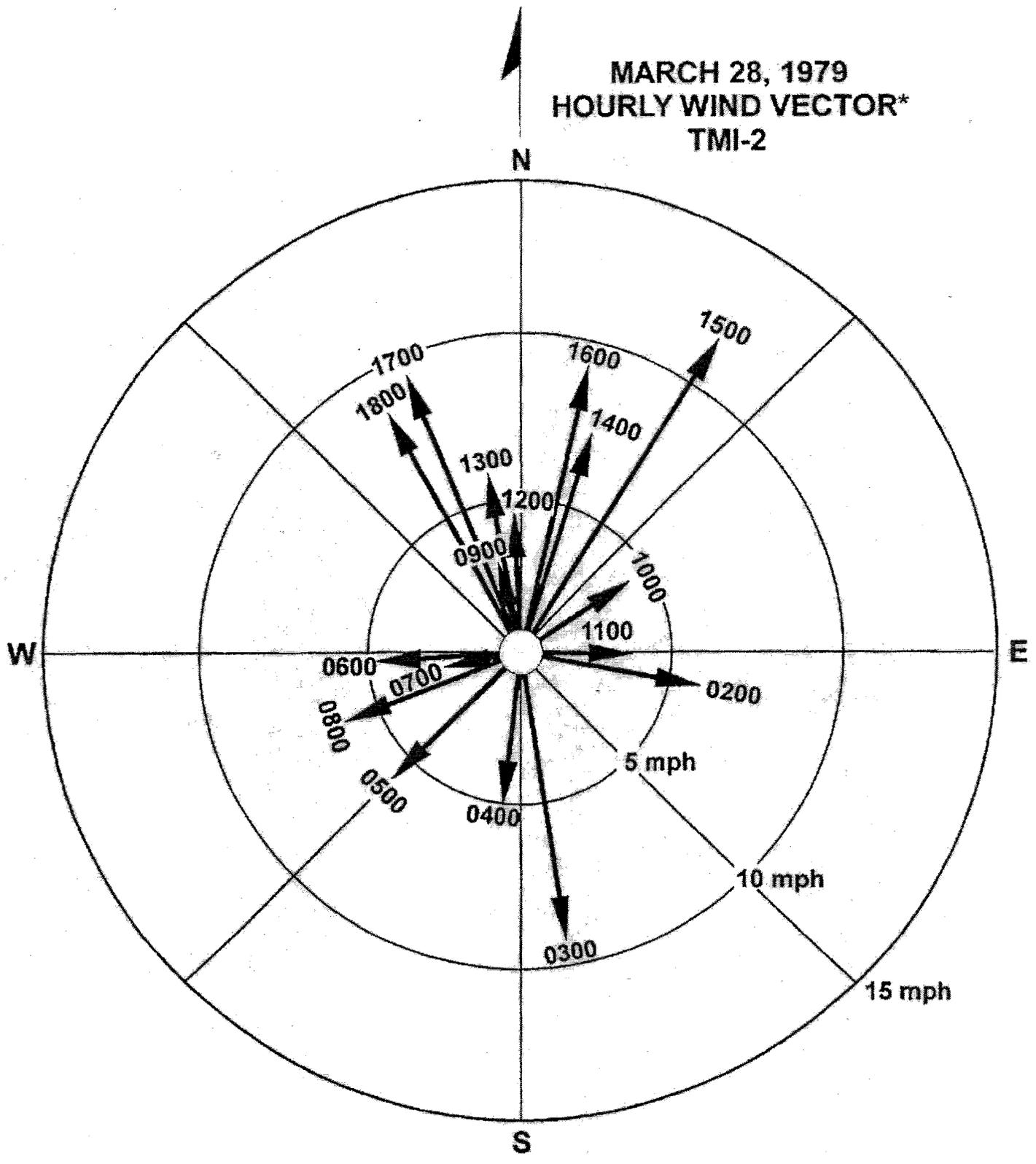
**NRC Recommended Relocation Center Line**  
(10 Mile Past Plum Exposure Boundary Line)  
All designated host centers are recommended to be beyond this line according to regulations listed in NUREG-0654/FEMA-REP-1

**West Shore School District Designated Host Centers:**

- J) Cedar Cliff High School  
(less than .5 mile from PEB line)
- M) Allen Middle School  
(less than 2.5 miles from PEB line)
- P) Lemoyne Middle School  
(less than 1.75 miles from PEB line)
- Q) Washington Heights Elementary School  
(less than 1.75 miles from PEB line)



MARCH 28, 1979  
HOURLY WIND VECTOR\*  
TMI-2



\*Arrows indicate direction toward which the on-site wind was blowing at the local time indicated. Circles represent varying wind speeds.

Hourly wind vector at Three Mile Island on March 28, 1979

## Exhibit 5 b

- RE-ESTIMATING THE NOBLE GAS RELEASES FROM THE THREE MILE ISLAND ACCIDENT, “**The Noble Gas Releases From the Three Mile Island Accident, Jan Beyea and John M. DeCicco, National Audubon Society, August 14, 1990.**” (Beyea& DeCicco, p. 20 & pp. 67-68.)

[www.cipi.com/PDF/tmi\\_Full\\_Report\\_1.pdf](http://www.cipi.com/PDF/tmi_Full_Report_1.pdf)

- Presentation by Jan **Beyea** to the Committee of the National Research Council (with J. **DeCicco**), TMI Public Health Fund, August 1990.

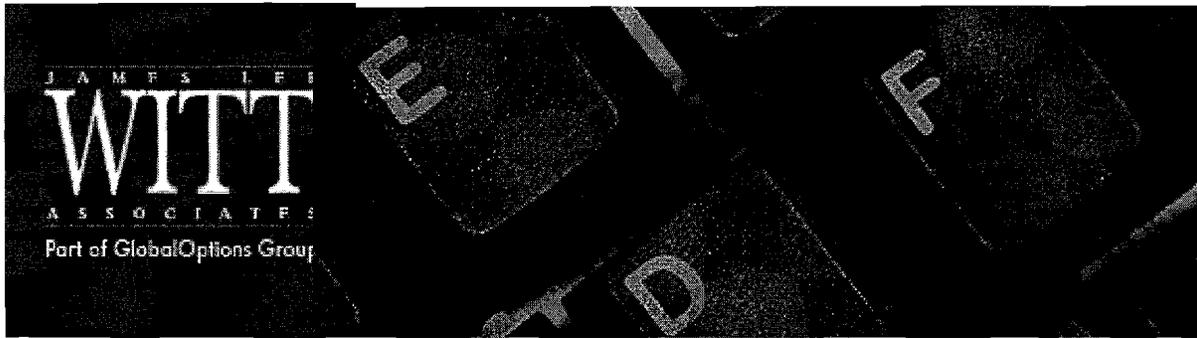
[www.cipi.com/artclnuk.shtml](http://www.cipi.com/artclnuk.shtml) - 17k

## **Exhibit 6**

**Nuclear Regulatory Commission, RIC 2007, "Emergency Preparedness Session," Apex HazMat Incident, Brian McFeaters, Assistant Director, Wake County Emergency Management, March 13, 2007.**

This presentation and accompanying slides have been posted on the NRC's web site at **<http://www.nrc.gov/public-involve/conference-symposia/ric/slides/BMcFeatersslides.pdf>**

For purposes of this Petition, please note that command post locations was moved several times. Although the wind direction never shifted, it was not until the **fourth move** that the command post was placed upwind of the fire and out of the plume pathway. (Slide 2)



[Home](#)

[What We Do](#)

[Our Team](#)

[Solutions](#)

[News & Reports](#)

- [News & Reports](#)
- [Press Releases](#)
- [Reports](#)
- [Archives](#)
- [High-Res Photos for Media](#)
- [Media Contact](#)
- [Information](#)

## **FOR IMMEDIATE RELEASE: GOVERNOR RENDELL RESPONDS TO INDEPENDENT REVIEW OF STATE'S SNOWSTORM RESPONSE; PLEDGES REFORMS TO EMERGENCY MANAGEMENT OPERATIONS**

### **Crisis Resource Guide:**

One of the most comprehensive Disaster, Crisis and Emergency Resource Guides. Links to everything from Homeland Security sites to hurricanes, floods, earthquakes, wildfire and health and medicine.

[enter](#)

### **Contact Us:**

Headquarters  
**Washington, DC**

E-mail:  
[info@wittassociates.com](mailto:info@wittassociates.com)

Voice: 202.585.0780  
Fax: 202.585.0792

PLEASE NOTE NEW ADDRESS:

James Lee Witt Associates  
A Part of Global Options Group, Inc.  
1615 L Street NW

**FOR IMMEDIATE RELEASE:  
March 27, 2007**

### **GOVERNOR RENDELL RESPONDS TO INDEPENDENT REVIEW OF STATE'S SNOWSTORM RESPONSE; PLEDGES REFORMS TO EMERGENCY MANAGEMENT OPERATIONS**

*REPORT BY JAMES LEE WITT ASSOCIATES IDENTIFIES IMPROVEMENT ITEMS AT PENNDOT, STATE POLICE, PEMA, NATIONAL GUARD*

**HARRISBURG** — Governor Edward G. Rendell said today that an independent review of the state's response to the Valentine's Day snowstorm has yielded valuable insight into Pennsylvania's emergency response operations that will help public officials better respond to future incidents.

The report, issued by James Lee Witt Associates, evaluated the performance of the Pennsylvania Emergency Management Agency, state police, Department of Transportation, and the National Guard, and identified key areas in need of operational reform.

In response to the report, Governor Rendell issued three directives to PennDOT, PEMA and the state police, ordering immediate adoption of changes that address specific findings outlined by the firm.

The Governor added that James Lee Witt Associates will be retained to help state government officials look at broad and major changes in the commonwealth's system of emergency preparedness.

"With today's action, I can assure the citizens of Pennsylvania that specific deficiencies in our planned readiness will be addressed immediately," Governor Rendell said. "For example, I will ask PennDOT to work with James Lee Witt Associates on a second report that is specifically designed to foretell traffic conditions

Suite 300  
Washington, DC  
20036  
[more contacts](#)

instantaneously. Additionally, we'll take steps to immediately repair each component of the roadway weather information system so PennDOT can improve its situational awareness in future events similar to this.

"These changes are much needed and, frankly, should have been done a long time ago. They will be corrected. Our work to revamp and improve this system will continue with the help of Mr. Witt and his team," the Governor said.

Governor Rendell went on to express his disappointment at the state's failure to address the issues outlined in the reports, despite being noted in earlier after-action reports, and accepted responsibility for not acting on these matters.

"The most disturbing part of the report, I find, was its findings that state emergency system management is lacking and is not on par with national standards," said the Governor

"I take full responsibility for that failing," he said. "As Mr. Witt noted in the report, 'The winter storm was not the first sign of issues with emergency management in Pennsylvania. After action reports on previous emergencies outline many of the ongoing problems with emergency management in the commonwealth. Yet, due in great part to extraordinary efforts by individuals in response to previous events, these problems had not surfaced to the extent that they did during the winter storm.'

"Since I've been Governor, there have been eight different disasters where we have been called on to provide emergency services," said the Governor. "In each and every case, that response was more than satisfactory and received high praise from citizens and commentators alike.

"In retrospect, I see that the above portion of the report is correct; the extraordinary effort of many Pennsylvanians overshadowed systemic failings and lured us into a sense of complacency. What happened in this snowstorm, therefore, was a much needed wake-up call.

"I would note that in the snowstorm we experienced on March 16, although it did not present similar challenges to the Valentine's Day incident, our response did demonstrate that some of those lessons have already been learned."

Following a slow response by state officials to two days of freezing rain and snowfall across Pennsylvania, and what he deemed a "total breakdown in communications," Governor Rendell asked that James Lee Witt, chairman and CEO of James Lee Witt Associates, a part of GlobalOptions Group, conduct an independent review into the state's performance.

The report issued today by the Washington D.C.-based public safety and crisis management consulting firm, is the result of that review.

The firm's examination included interviews with key personnel involved in the response from that state and local levels; compiling a detailed chronology of events leading to the storm and the response in the days that followed, analyzing pertinent records within each agency, and evaluating the statutes and missions to which each department adheres.

Looking at PennDOT, JLWA found conditions at the agency in the weeks prior to the storm contributed to its performance in clearing the roadways and maintaining safe driving conditions. Among the firm's findings:

- PennDOT did not have sufficient manpower to operate the available plows beyond one 12-hour shift in Berks County, apparently due to lack of oversight at the local level regarding staffing practices
- The agency does not subscribe to one weather forecasting service, leading to varied weather outlooks between local districts
- Some PennDOT officials has no previous experience dealing with a storm of this magnitude, particularly in Berks County where the management team had been in office less than a month following the former team's retirement
- The state's roadway weather information system was not operational due to improper maintenance
- The department did not grant high priority to customer information systems, causing many highway information signs to be neglected and provide outdated or inaccurate information

The James Lee Witt Associates report characterized PEMA's level of readiness as below what was expected, citing its reluctance to activate the state emergency operations center to Level 3 and not fully implementing procedures required by the U.S. Department of Homeland Security's National Incident Management System.

Additionally, the report says, the agency failed to communicate the seriousness of the events to the Governor and his office.

State police were found to have lacked a coordinated response to the storm until early in the evening of the second day. This hampered information flow from the units on the ground because there was no overall incident command at the regional or state levels. It was not until Commissioner Jeffrey B. Miller learned of problems on I-78 that the department was able to raise situational awareness to the point where a common operational picture could emerge.

The report's findings also said that the National Guard could have begun initial distribution of food and supplies to stranded motorists as early as 3 a.m. on Feb. 15, rather than shortly after 10 a.m. as was the case. JLWA said the earlier delivery start time could have been made possible if PEMA had assigned the Guard with the mission earlier.

Overall, the Witt team faulted the commonwealth for not adopting emergency management as a core principle, and found a lack of awareness among all levels of the state's system.

The report went on to make several recommendations to the administration, including steps to:

- Ensure that emergency preparedness and management is a higher priority in the commonwealth
- Instruct PEMA to more clearly define the roles and responsibilities of each agency during emergencies, in accordance with Title 35 of the Pennsylvania Code, which outlines the agency's statutory powers and duties
- Expedite the adoption and full implementation of the National

#### Incident Management System

- Establish of a joint information center at the state emergency operations center that could coordinate messages to the public and media in times of emergency
- Improve horizontal and vertical communications through an improved, formal notification process developed by the state police commissioner that maximizes situational awareness
- Develop and implement ongoing training and exercises to test the state's system and employees
- Appoint a team of state and local officials, lead by the secretary of Transportation, to develop written traffic diversion plans along primary interstate and state highways that will also serve the commonwealth in the event of a statewide evacuation.

The report also outlined additional steps for the transportation secretary that includes implementing management protocols that assure the department's ability to maintain and operate portions of Pennsylvania's interstate highway system; revising its customer communication goals; and immediately direct the repair of all tools and technology PennDOT can employ to enhance awareness in Harrisburg and among motorists throughout the state.

Governor Rendell was urged to call for an extensive examination of the commonwealth's preparedness and emergency management capabilities. The evaluation should include key leaders at the local, state and federal levels, as well as representatives from academia and the non-profit sector, according to the report. Such an assessment should cover management structure, legislative and policy changes, and new procedures.

Founded in 2001, James Lee Witt Associates is a public safety and crisis management consulting firm based in Washington, DC with offices in Atlanta, Chicago, Little Rock, and Sacramento. Led by James Lee Witt, the Federal Emergency Management Agency director under President Bill Clinton, JLWA has unrivaled experience and hands-on knowledge of public safety, disaster response, continuity of operations, and emergency management issues. JLWA was retained by the State of Louisiana to help coordinate activities in the aftermath of Hurricane Katrina, and has conducted analyses for the City of Philadelphia and other cities, counties, universities and corporations.

To learn more about the firm, visit <http://www.wittassociates.com>

A full copy of the report by James Lee Witt Associates can be found [here](#).

# # #

EDITOR'S NOTE: Letters from Governor Rendell to Secretary of Transportation Allen D. Biehler, State Police Commissioner Jeffrey B. Miller, and PEMA Director James R. Joseph discussing the report and its findings are available [here](#).

- 
- [\*\*Access GlobalOptions Groups' Community Engagement: Leadership Tool for Catastrophic Health Events Report and Related Documents\*\*](#)

- **GlobalOptions Groups' Emergency Preparedness Expert Participates In Panel to Provide Guidance for Cities in Extreme Health Event**
- FOR IMMEDIATE RELEASE: GOVERNOR RENDELL RESPONDS TO INDEPENDENT REVIEW OF STATE'S SNOWSTORM RESPONSE; PLEDGES REFORMS TO EMERGENCY MANAGEMENT OPERATIONS
- **GlobalOptions Group Executive James Lee Witt to Testify at House Small Business Committee in Washington on Thursday**
- **GlobalOptions Group Receives Emergency Preparedness Contract with George Mason University**
- **FOR IMMEDIATE RELEASE: Rendell Team says Snow Storm Response Hampered By Problems In Preparation, Execution and Communication**
- **FOR IMMEDIATE RELEASE: GlobalOptions Group Expert Named to Public Health Preparedness Panel**
- **FOR IMMEDIATE RELEASE - James Lee Witt Associates Taps Area Company for Security Technology Expertise**
- **James Lee Witt Associates Adds Emergency Management and Capitol Hill Veterans to Sacramento and DC Teams**
- **GlobalOptions Group's James Lee Witt Associates, Anderson Kill & Olick, P.C. and Anderson Kill Loss Advisors to Present "Natural Disaster Preparedness: Insurance Coverage and Emergency Response Planning"**

[Crisis Resource](#) [GuiSite](#) [Map](#) [Contact](#)

Powered by Janmedia Interactive,

Copyright © 2004 James Lee Witt Associates



**From:** Eric Epstein <ericepstein@comcast.net>  
**To:** Secretary <SECY@nrc.gov>  
**Date:** Wed, Apr 11, 2007 12:33 PM  
**Subject:** Fwd: Petition for Rulemaking to Extend the Minimum Distance for Host School Pick-up Points

Begin forwarded message:

> From: Eric Epstein <ericepstein@comcast.net>  
> Date: April 11, 2007 12:27:38 PM EDT  
> To: Eric Epstein <ericepstein@comcast.net>  
> Subject: Petition for Rulemaking to Extend the Minimum Distance for  
> Host School Pick-up Points  
>  
> SUBJECT: SUBMITTAL OF PETITION FOR RULEMAKING TO EXTEND THE  
> MINIMUM DISTANCE FROM FIVE TO TEN MILES FOR HOST SCHOOL PICK-UP  
> POINTS BEYOND PLUME EXPOSURE BOUNDARY LINES  
>  
> April 11, 2007  
>  
> Secretary  
> Office of the Secretary  
> U.S. Nuclear Regulatory Commission  
> Washington, D.C., 20555-0001.  
>  
> Dear Secretary:  
>  
> The enclosed Petition for Rulemaking ("the Petition") seeks to  
> codify and clarify Nuclear Regulatory Commission ("NRC") and  
> Department of Homeland Security ("DHS") and the Federal Emergency  
> Management Agency ("FEMA") relocation requirements by clearly  
> mandating the extension of ALL host school pick-up centers to be at  
> a minimum distance of five to 10 miles beyond the radiation plume  
> exposure boundary zone to properly ensure ALL school children (are  
> protected in the event of a radiological emergency.  
>  
> Sincerely,  
>  
>  
>  
> Eric Epstein, Chairman,  
> Three Mile Island Alert, Inc.  
> 4100 Hillsdale Road  
> Harrisburg, PA 17112  
>  
>  
> Three Mile Island Alert , Inc., is a safe-energy  
> organization based in Harrisburg, Pennsylvania and founded in 1977.  
> TMIA monitors Peach Bottom, Susquehanna, and Three Mile Island  
> nuclear generating stations.  
>  
> Enclosures:  
>  
> • Petition for Rulemaking to Extend the Minimum Distance from Five  
> to Ten Miles for Host School Pick-up Points Beyond Plume Exposure

> Boundary Lines

>

> • STATEMENTS IN SUPPORT: A, B, C & D

>

> • ATTACHED SUPPORT MATERIALS: Exhibits 1, 2, 3, 4, 5 & 5b, 6 & 7

>

>

>

>

>

>

>

>

>

>

>

>

>

**Mail Envelope Properties** (461D0DD2.315 : 8 : 41749)

**Subject:** Fwd: Petition for Rulemaking to Extend the Minimum Distance for Host School Pick-up Points  
**Creation Date** Wed, Apr 11, 2007 12:31 PM  
**From:** Eric Epstein <[ericepstein@comcast.net](mailto:ericepstein@comcast.net)>  
**Created By:** [ericepstein@comcast.net](mailto:ericepstein@comcast.net)

**Recipients**

nrc.gov  
 TWGWPO02.HQGWDO01  
 SECY (Secretary SECY)

**Post Office**

TWGWPO02.HQGWDO01

**Route**

nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2081	Wednesday, April 11, 2007 12:31 PM
TEXT.htm	12007	
TMIA Asks NRC to Move Kids from Harm's Way.pdf		170922
TEXT.htm	1260	
A & Ex 1 WSSD info.pdf	150468	
TEXT.htm	985	
B "Plans for a quick exit".pdf	145822	
TEXT.htm	904	
C & Ex. 3 FEMA fact Sheet.pdf		58992
TEXT.htm	1126	
D & Ex 4 NUREG-0654r1.pdf	1083840	
TEXT.htm	1060	
Ex. 2 Map overview.pdf	648958	
TEXT.htm	871	
Ex. 5 a 3:28:79 -Houlry Wind Vector		504524
TEXT.htm	871	
Ex. 5 b Beyea & DeCicco, 1990 .pdf		30295
Ex. 6 Apex- March 13, 2007.pdf		28155
Ex. 7 Witt Report, PR 3:27:07.pdf		434870
TEXT.htm	881	
Mime.822	4485527	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No

**Return Notification:** None

**Concealed Subject:** No

**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling

This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled

Block List is not enabled