

NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

THREE MILE ISLAND
SPECIAL INTERVIEWS

DEPOSITION OF CRAIG A. WILLIAMSON

Place - Harrisburg, Pennsylvania

Date - Friday, September 28, 1979

Pages 1 - 49

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of: :
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THREE MILE ISLAND :
SPECIAL INTERVIEWS :
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- - - - - X

DEPOSITION OF CRAIG A. WILLIAMSON

Holiday Inn Town Motel
2nd and Chestnut Streets
Harrisburg, Pennsylvania

Friday, September 28, 1979
10:00 a.m.

BEFORE:

For the Nuclear Regulatory Commission:

MALCOLM ERNST
FREDERICK HERR
PETER SICILIA, JR.

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C O N T E N T S

WITNESS:

EXAMINATION

Craig A. Williamson

2

E X H I B I T S

EXHIBIT NUMBER:

IDENTIFIED

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PLR.

P R O C E E D I N G S

(10:00 a.m.)

1
2
3 Mr. ERNST: On the record,
4 whereupon,

CRAIG A. WILLIAMSON

5
6 was called as a witness and, having been first duly sworn,
7 was examined and testified as follows:

EXAMINATION

BY MR. ERNST:

8
9 Q State your name and position for the record.

10
11 A My full name is Craig A. Williamson. I am deputy
12 director of the Pennsylvania Emergency Management.

13 Q Mr. Williamson, have you received a letter from us
14 providing certain important information concerning this
15 deposition? That's this letter here.

16 A Yes, I have.

17 Q This letter is marked as Exhibit 1.

18 (Exhibit 1 identified.)

BY MR. ERNST:

19
20 Q This is a photocopy of a letter that was sent to
21 you?

22 A That's correct.

23 Q This confirms that your deposition here will be
24 under oath.

25 A That's correct.

POOR ORIGINAL

1 Q Have you read the document in full?

2 A Yes.

3 Q Do you understand the information set forth in the
4 letter including the general nature of the inquiry, your
5 right to have an attorney present and the fact that
6 information you provide here may eventually become public?

7 A I do.

8 Q Mr. Williamson, is counsel representing you
9 personally?

10 A No.

11 Q I would like to note for the record that the
12 witness is not represented by counsel today.

13 If at any time during the course of this interview you
14 feel like you would like to be represented by counsel and
15 have counsel present, please advise me and we will adjourn
16 these proceedings to afford you the opportunity of obtaining
17 counsel. Is this agreeable?

18 A Agreeable.

19 Q You brought a copy of your resume to this
20 deposition. This is that copy?

21 A That is correct.

22 MR. ERNST: I would like to enter that as Exhibit

23 2.

24 (Exhibit 2 identified.)

25

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BY MR. ERNST:

2 Q The document is entitled at the top "Biographical
3 Sketch of Craig A. Williamson." It's one page. Does this
4 accurately summarize your educational and employment
5 background?

6 A It does.

7 Q Mr. Williamson, I wonder if you would describe for
8 me your assigned, regular duties at PEMA.

9 A As deputy director, I am responsible for assisting
10 the director of state, county, and local emergency
11 management programs and to assure their coordination with
12 like programs in other states and with the
13 Federal Government.

14 Q So your basic responsibility is not coordinating
15 inside Pennsylvania but coordinating with other
16 governments -- other state governments and the Federal
17 Government?

18 A No. It's coordination of state, county, and local
19 plans within the Commonwealth with those like plans of other
20 states and the Federal Government agencies.

21 Q I see. So to that extent, your reasonably
22 familiar with existing county plans and local plans?

23 A That's correct.

24 Q How did these duties change during the Three Mile
25 Island accident? Like the first week or so. What were your

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1 principal duties during this period of time?

2 A My principal duties for the first several weeks in
3 the TMI incident were those of assisting the director in the
4 conduct of emergency operations associated with the TMI
5 incident. In that respect, not greatly unlike my day to day
6 responsibilities as fast as my relationship with the director
7 and the duties and responsibilities of the agency.

8 Q A difference — I'm postulating now — might have
9 been that you were on essentially 24-hour emergency call so
10 you were short of sharing the directing responsibilities?

11 A Not really on call out there all the time,
12 assisting the director in things that had to be done in the
13 agency and working in conjunction with the Governor's office
14 and the Lieutenant Governor's office.

15 Q What responsibility does PEMA have for assuring
16 the existence of county and local plans in correspondence
17 with the public law of 1978 in that such plans and staffing
18 are adequate and plans are capable of being implemented?

19 A The Pennsylvania Emergency Management Services Act
20 of 1978 establishes that responsibility with PEMA, and those
21 responsibilities are legally established for the agency.

22 Q As I understand it, is it true that all local
23 emergency coordinators were appointed at the time of the TMI
24 incident, recognizing that some were being replaced and in
25 the state is being approved at that time, but that there

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1 were -- and that all county plans were -- written emergency
2 plans were formulated, at least to the extent of the six
3 counties involved in the TMI incident. There were county
4 plans that had been reviewed by PEMA and were effective at
5 that time?

6 A Prior to TMI?

7 Q Yes.

8 A The plans reviewed by PEMA were limited to the
9 counties of Dauphin, Lancaster, and York. At that time we
10 were working with the five-mile radius evacuation plans and
11 they only included those three counties I mentioned. When
12 we went out to 10, we picked up Lebanon and Cumberland, out
13 to 20, Perry, to come up to your total of six.

14 Q Let me clarify one point of a previous question I
15 had to make sure that the record is clear.

16 The previous question, I also talked about local plans.
17 Does PEMA have a responsibility for assuring the existence
18 and adequacy of local emergency plans? Not the county plans
19 out the local.

20 A They don't. The county coordinators have that
21 responsibility under the state plan program. Did I
22 understand your initial question to deal with local
23 coordinators? You started off by asking about local
24 coordinators?

25 Q I did ask a question whether, to your knowledge,

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1 all of the coordinators had been designated, recognizing a
2 few were in the process of being replaced. I think your
3 answer was that they -- the local coordinators were in
4 existence, designated at that time.

5 A That's correct. We have some 2200 local
6 coordinators of record, duly appointed emergency management
7 coordinators, out of approximately 2600 political
8 subdivisions. So there are a few who have not recommended
9 an appointment and, therefore, are without the services
10 of a duly appointed, at least, local coordinator.

11 Q What physical planning, administrative,
12 operational and other duties were assigned to the director
13 of PEMA by the Pennsylvania Emergency Management Council in
14 correspondence with the Public Law 323 of 1978?

15 A The formal assignment of duties and
16 responsibilities for the director position are those
17 contained in the position description for that
18 classification. I am not in a position to recite them out
19 that would be the only formal setting out of duties and
20 responsibilities that I am personally aware of.

21 Q During the TMI emergency response, what one might
22 describe as a de facto command center was apparently
23 established in the Governor's office, which consisted of
24 maybe a half a dozen people who were relied upon by the
25 Governor in making recommendations.

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1 How did you relate to this function or how did PEMA relate
2 to it?

3 A From time to time, Colonel Henderson, I believe,
4 met with the group, either individually or collectively, and
5 on several occasions I had contact with this group, as we
6 will describe them. On one occasion, I had a lengthy
7 conversation with Secretary Wilburn of the Office of
8 Budget Administration concerning the adequacy of the then
9 5-mile plans.

10 On another occasion prior to the Governor's announcement
11 of his recommendation involving pregnant women and
12 pre-school-age children, I was in the presence of the group as
13 they were discussing some of the ramifications of that
14 decision. That's the only two occasions that I was directly
15 involved with them. I was aware of the existence of those
16 supporting the Governor.

17 Q On these two instances, do you recall the
18 approximate time frame of this involvement?

19 A My conversation with Secretary Wilburn was on
20 Saturday morning. That would have been March 31. The
21 occasion of the meeting with the group in the Governor's
22 office was in the morning, Friday the 30th.

23 Q Do you recall who was present at these two
24 meetings?

25 A The first meeting I described was limited to

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1 Dr. Wilburn. The second meeting, I recall in addition to
2 the Governor, Mr. Gorusky, Press Secretary Critchlow, and
3 Jay Waldman and others who I at the moment can't recall.

4 Q Do you recall some of the information sources that
5 this group was relying upon at that time?

6 A In my conversation with Dr. Wilburn, I was
7 providing the information. On the other occasion, the
8 decision had been made before I arrived in the Governor's
9 office as to what the announcement would be, so there wasn't
10 a great deal of discussion associated with what led to
11 making that decision.

12 When I left our emergency operations center, we had
13 received the telephone call from Mr. Collins recommending
14 evacuation out to 10 miles. Of course, we had the two
15 preceding calls from the plant. As I left on my way to the
16 Governor's office, I encountered Mr. Dornsife, who is an
17 employee of the Bureau of Radiation Protection, and he
18 indicated to me as I was en route to the Governor's office
19 that he did not consider the NRC recommendation for
20 evacuation out to 10 miles to be a valid one based on the
21 data that he had received from the plant.

22 He also indicated that the Bureau of Radiation Protection
23 had been attempting to reach our headquarters and couldn't
24 because of the overload on the Commonwealth telephone system at
25 that time and he was coming to personally deliver the

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message.

So when I left for the Governor's office, I was not aware of calls that I subsequently learned had been made to Commissioner Hendrie and conversations between the Governor and Mr. Gerusky and these things that led to the decision and the Governor's announcement. My arrival at the Governor's office was the first that I knew that Colonel Henderson's recommendation to the Governor was not going to be accepted.

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1 Q So your arrival was after Colonel Henderson had
2 gone to the Governor's office.

3 A Talked with the Governor on the telephone, yes.
4 It was subsequent to that conversation.

5 Q So the PEMA -- or Colonel Henderson's --
6 recommendations were by telephone and not in person?

7 A That's correct. By telephone.

8 Q Then you were the personal representative
9 subsequent to that time in the Governor's office?

10 A That's correct.

11 Q The conversations with Mr. Wilbourn on Saturday,
12 what was it that was discussed? You mentioned, as I recall,
13 on the record some appraisal or evaluation of the adequacy
14 of five-mile plans. What specifically was discussed and how
15 did Mr. Wilbourn discharge his assignment?

16 A He was interested -- and I assume had been
17 assigned the responsibility by the Governor to look into the
18 matter and evaluate the effectiveness or the capability of
19 the counties to evacuate if called upon to do so.

20 So I explained to him initially the proceedings of the
21 previous day, Friday the 30th, when we went from 5 to 10 to
22 20, and indicated to him that we had no plans for the
23 current 20 although we had been working all night in
24 conjunction with the now six counties to develop them.

25 He was interested in my evaluation of their ability to

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1 perform or carry off an evacuation even in the absence of
2 detailed plans at that point. That conversation led into a
3 discussion about the adequacy of the written plans that we
4 did have, the five-mile plans.

5 Q What was your evaluation at that time?

6 A They were adequate for the circumstances
7 associated with an evacuation in the five-mile zone, where
8 we were dealing with something in the neighborhood of 25,000
9 people, and the evacuees would be taken care of in the
10 county in which they resided. Under those circumstances, it
11 was an adequate plan.

12 Q Were there any weaknesses identified at that time
13 that were surprising?

14 A No, not really.

15 Q What were the plans for taking care of some of the
16 more difficult evacuees, such as hospitals and nursing
17 homes?

18 A Well, the state Department of Health, working in
19 conjunction with local health authorities — this was a very
20 large part of the preparation of an evacuation plan for the
21 20 mile area — they were busily engaged in that from
22 midnight Friday on until they completed it, utilizing the
23 emergency medical system people in the county, the county
24 medical society, authorities from the hospitals, nursing
25 homes. A team effort to get in place.

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1 The county planning effort would ultimately reflect a
2 deficiency in their resources to do what they wanted to do.
3 This would be relayed to us and we would attempt to resolve
4 the matter from other resources outside the area. When
5 sufficient resources to do this were not available, then we
6 would place a requirement on the Federal Government in the
7 person of Bob Adamcik, the then Region II director of the
8 Federal Disaster Assistance Administration who had been
9 designated as the coordinator of federal activities in
10 support of the Commonwealth.

11 Q Were these resources required for hospital or
12 nursing home evacuation for the five-mile plan adequate at
13 that time?

14 A Yes. Mainly because there are no hospitals
15 involved, for example, in the five-mile evacuation zone. I
16 believe two nursing homes. Then, when we moved out to 10
17 and then to 20, which would include the cities of Harrisburg
18 and York, we picked up a total of 12 hospitals and something
19 in the neighborhood of 65 to 70 nursing homes, plus State
20 Correctional Institution and six or seven other prisons. We
21 had a lot of special handling problems that didn't exist
22 with the five-mile treatment.

23 Q Was Mr. Wilburn also looking at the adequacy of
24 the current planning activities for the 10- and 20-mile
25 evacuations or was he only interested in the five-mile?

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1 A He was interested in discussing this but I had
2 nothing to show him at that point in time other than some of
3 the preliminary route assignments that had been made, so
4 that was principally a discussion and a reporting to him on
5 what we were doing and how we were doing it, which included
6 at that point, we had assigned additional state people and
7 additional federal people to assist the county authorities in
8 their planning efforts.

9 Q Were you aware of any other activities by
10 Mr. Wilbourn at that time in his evaluation?

11 A No.

12 Q Were any other groups or people requested by the
13 Governor, or perhaps somebody else, to also assess the
14 adequacy of planning?

15 A Mr. McConnell -- John McConnell from the Defense
16 Civil Preparedness Agency -- had been designated to assist
17 us in our evacuation planning, I believe representing the
18 White House, and it was our understanding that we do also
19 utilize the experience of Mr. Adamcik and his outlet to the
20 other federal agency people.

21 Mr. McConnell visited, I believe, all of the counties.
22 Pardon me, in the period of probably Saturday through Monday,
23 in that time frame, he personally visited the six counties
24 and I believe he reported back to the Governor on the
25 adequacy of their planning effort as he viewed it.

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1 Q Are you aware of efforts of the White House to
2 evaluate plans on Sunday, perhaps, of Mr. Eidenburg or
3 Jessica Matthews or anyone of that nature?

4 A No.

5 Q You're not aware of any plans that they might have
6 evaluated or anything like that.

7 A I am not. The only association that I would
8 make with the White House was the presence of Mr. McConnell.

9 Q Were any recommendations made by Mr. McConnell or
10 by Mr. Wilburn as a result of their evaluations?

11 A As I recall, Secretary Wilburn had no specific
12 suggestions other than the obvious suggestion that where in
13 our judgment we thought we needed to bolster the country the
14 most, we tried to direct our best people there.

15 Mr. McConnell's report — it would be more of a report
16 than a recommendation — would treat generally how the
17 planning effort was proceeding, and if there were things
18 that needed to be bolstered or strengthened, he would
19 suggest that. There was no formal recommendation and I
20 can't recall offhand anything that he specifically suggested,
21 but there were things that you would expect. We reacted to
22 that.

23 Q From the previous questions and answers, I would
24 assume, then, that Mr. Wilburn was looking at the existing
25 five-mile plans for the three counties?

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1 A That's correct.

2 Q You mentioned federal assistance for the necessary
3 resources to conduct an evacuation. I think you said that
4 such resources would not be necessary for the five-mile
5 plan, that there were sufficient Commonwealth resources to
6 do that evacuation?

7 A Not necessarily Commonwealth resources, but
8 resources within the Commonwealth, within Pennsylvania.

9 Q I infer from that, then, that federal resources
10 would have been required for a 10- or 20-mile evacuation?

11 A That's correct, principally in the areas of
12 additional doctors and nurses, additional ambulances, and
13 cots and blankets, and a neonatal airborne unit that we knew
14 of as being available for evacuating incubator infant
15 problems.

16 Those are the ones that come immediately to my mind as
17 being the most critical ones. There were others but those were
18 the most critical.

19 Q Where would resources like this come from and what
20 kind of time frame was necessary for response?

21 A Well, the American Red Cross— there were a number
22 of federal agencies that could provide some resources in
23 terms of additional doctors and nurses, but the assistance
24 offered to Mr. Adamcik by the American Red Cross was the
25 most promising.

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1 As I recall, we were talking about something in the
2 neighborhood of 150 to 200 nurses and 50 to 100 doctors.
3 I'm not sure of the figure. They said they could provide
4 that, I believe, within a matter of 12 hours. Located at
5 the Letterkenney ordnance depot in Chambersburg, which is
6 about 45 miles from here, there were 100 or something close
7 to 100 ambulances and I believe the delivery time, if you
8 will, on that was something in the neighborhood of four
9 hours because of their need to muster drivers, principally.
10 The equipment was ready to go.

11 Then there were additional resources, but then you got
12 into a time frame that was considerably greater than the
13 hours that we were looking for.

14 Q What kind of additional resources would have been
15 needed?

16 A Well, at that point we needed more ambulances than
17 the 100 at Letterkenney. I forgot the details of where they
18 were. Perhaps at Meade or something like that, but they
19 were talking about a lead time in hours that would have made
20 it extremely difficult working with the two- to eight-hour
21 kind of advance warning that we had been told we were
22 working with at that time.

23 Q What was the source of this two- to eight-hour
24 advance warning?

25 A As far as I'm concerned, Colonel Henderson picked

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1 this up at one of his meetings or briefings with the EOC
2 people and the Governor. On one of the occasions when he
3 attended those sessions.

4 Q Considering the necessary resources, what was your
5 reasonable estimate to conduct a 10-mile and a 20-mile
6 evacuation at the time that you were first advised that you
7 had to start preparing for a 10- or 20-mile, before you had
8 started the process of working on plans and getting things
9 in motion?

10 A I don't really believe that — if you're talking
11 of the period, say, midnight Friday night, how long would it
12 have taken us to conduct a 10- or 20-mile evacuation, I
13 don't really have any sophisticated guesses as to what that
14 time element might be. We did compute with the
15 circumstances we were dealing with on Sunday, April 1, that
16 we could conduct a 10-mile evacuation in seven hours, a
17 20-mile in 10 hours. Assuming that we did not have any
18 unusual problem associated with the special handling cases,
19 hospitals, nursing homes.

20 Q How was this computation made?

21 A This was made in conjunction with the Department
22 of Transportation as far as traffic flow was concerned, and
23 consultation with the state Department of Health and Public
24 Welfare emergency response members working with us in the
25 EOC.

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1 You are meeting with Chuck Crowe later on today. He can
2 give you more detail on Penn DOT's involvement in the
3 computation of traffic flow.

4 Q I think I recall somewhere on the record that this
5 computation might have been an assumption of maybe 30 miles
6 per hour for cars and three occupants per car or something
7 of that nature.

8 A That's correct.

9 Q Maybe half the people left in the area that have
10 to get out by automobile and a few things like that.

11 A I don't believe we used that high a factor on
12 voluntary evacuation. I think it was less than half. I
13 think it was a third or something.

14 Q A third left or a third that he evacuated?

15 A No, that figure -- those figures of 7 and 10 hours
16 were on total evacuation of the area. As I recall, that was
17 not taking into consideration any voluntary evacuation. At
18 that point, we were generally aware that there had been such
19 a thing, but we didn't have any good intelligence on the
20 degree of it.

21 Now, this was predicated on the situation as it existed
22 then. The patient load in all of the hospitals had been
23 reduced to about 25 percent of what was normal by the hospital
24 authorities and everybody was leaning forward, if you will, in
25 anticipation of having to do something. Of course, the

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1 schools were closed. School buses were available. Drivers
2 had been alerted.

3 As I recall, the patient load was something in the
4 neighborhood of 4000 and subsequently was reduced to 1000.

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1 Q I know it's difficult to make a judgment, but I would
2 like to pursue the point one more time. Considering seven
3 hours and 10 hours for a 10- and 20-mile evacuation on Sunday,
4 what would be your professional judgment -- realizing the
5 inaccuracies of the judgment -- of a 10- or 20-mile evacuation
6 at midnight Friday?

7 Clearly, I am not asking to the nearest hour or anything
8 like that. Would it be a factor of two or three higher; what,
9 generally?

10 A I believe it would be reasonable to add a 10- to 12-
11 hour period to those figures.

12 Q There were a number of meetings with the Governor
13 and Lieutenant Governor, a number of press conferences, and
14 things of this nature. How often were you a representative
15 from PEMA at meetings of this nature, say, through Sunday?

16 A I attended or participated in several press confer-
17 ences and meetings with the Governor and Lieutenant Governor
18 on Wednesday, the 28th and Thursday the 29th. I participated
19 in the single meeting and press conference in the Governor's
20 Office on Friday morning. Those are the only press conferences
21 or meetings that I personally attended during the period.

22 Q Was PEMA represented -- by "PEMA," I mean the staff,
23 not the Lieutenant Governor or the counsel -- was the PEMA
24 staff, yourself, Colonel Henderson, or some other staff member
25 present at all or most of the meetings with the Governor,

1 Lieutenant Governor, at press conferences and things of this
2 nature through Sunday?

3 A I would say most of them in the period Wednesday
4 through Sunday. I attended one additional session, which
5 relates to your previous question, that just comes to mind, I
6 believe Sunday evening. The Governor had a briefing for members
7 of the General Assembly in the vicinity of the area, at the
8 Mansion. Colonel Henderson and I both attended that function.

9 Q There was quite a bit of information presented at
0 these meetings, technically, after Mr. Denton was a participant
11 at the meetings. What did PEMA do with the information gathered
12 at these meetings?

13 A When the agency was represented at one of the meet-
14 ings, it was Colonel Henderson that represented the agency, and
15 I would bring back to the staff those pieces of information
16 that were of interest to our evacuation planning effort.

17 Q This was for use by the PEMA staff?

18 A Right. There were a number of those meetings and a
19 number of associated press conferences that we weren't included
20 in. We didn't know of their occurring.

21 Q I am a little confused. Would you clarify, please?
22 I thought you answered a previous question saying PEMA was
23 represented at most, if not all, meetings and press conferences
24 through Sunday.

25 Now, it seems like there were a number --

1 A Let me clarify that. I am now talking about the
2 period subsequent to Sunday, April 1. There were a number of
3 meetings, particularly those between the Governor and
4 Mr. Denton, that we weren't included in.

5 Q Okay. Getting back to the time frame Wednesday
6 through Sunday, this was the time of interest for this particu-
7 lar question, which was: What did PEMA do with the information
8 obtained at these meetings Wednesday through Sunday?

9 Your answer there was: The information that was pertinent to
10 emergency planning was disseminated by either yourself or
11 Colonel Henderson to the PEMA staff.

12 A That's correct, and then to the field. If it had
13 something of application to our PEMA assigned to the counties,
14 we gave it to them with the instructions they were to share
15 it with the counties.

16 Q Is it true that another function of PEMA, other than
17 planning, is one of information dissemination?

18 A That's correct.

19 Q Again, sir, there was considerable concern expressed
20 by the counties that they weren't getting timely information
21 regarding the status of events and the status of the plant and
22 what might happen next. Why wasn't PEMA routinely disseminat-
23 ing information of this nature that they obtained at press
24 conferences and so forth to the counties?

25 A The information that was obtained at these meetings

1 was provided to the County Directors. Our principal source
2 of technical information, of course, according to the plan of
3 the Commonwealth, is the Bureau of Radiation Protection.

4 The bulk of the information and guidance we were getting
5 from them was such that it was a no-change situation, about the
6 same, this kind of thing, which really didn't give us a great
7 deal to impart to our field people.

8 Q That's a fair statement for Wednesday, Thursday, and
9 Friday morning; but what about Friday, Saturday, and Sunday,
10 which was, I think, the time frame of most concern expressed
11 by the counties, to our knowledge anyway?

12 A As I indicated in previous testimony, we attended --
13 Colonel Henderson attended most of these conferences. He
14 didn't attend all of them. The information that had anything
15 to do with our role as we then believed it to be, that of
16 purely preparing evacuation plans, was given to the counties.

17 Everything that we had they got, but Tuesday or Wednesday,
18 which would be early April, we learned of the daily reports
19 that were prepared by the Nuclear Regulatory Commission,
20 learned of them indirectly through some source -- the Federal
21 Disaster Assistance Agency had a copy of one -- and then, when
22 we managed to get on the distribution list for that, then we
23 had a little bit more to provide the counties with, and we did
24 that regularly, with the information we could get from any
25 other sources -- authoritative sources.

1 Q As I understood it, these NRC announcements or brief-
2 ing papers, or however you want to describe them, were distrib-
3 uted to the press at every press conference -- at least once
4 they started to be distributed.

5 Are you aware of when these NRC releases first were made at
6 these press conferences, what day they first were started to
7 be distributed to the press conferences?

8 A Yes. I can't recall the date, but when we learned
9 of the availability of the report and when we got on the dis-
10 tribution list, we also asked for past copies and these were
11 telecopied to us and covered the previous -- it must have been
12 five or six days. Whenever that process started, when we
13 learned of it, we were about six or seven behind.

14 Q Was there ever a formal or informal instruction
15 to state agencies that the Governor's press office would be
16 the sole source of information on TMI?

17 A It was our understanding that that was the
18 Governor's desire, that Mr. Critchlow, his press secretary,
19 would be the source of information relating to the incident.

20 Q Was this a contributing factor to PEMA's distribu-
21 tion of only planning information to the counties instead of
22 status information?

23 A Yes.

24 Q On March 28th, at about 2:00 to 3:00 o'clock in the
25 afternoon, Mr. Miller, Mr. Herbine of Met Ed, briefed

1 Lieutenant Governor Scranton. Were you or a PEMA representa-
2 tive present at that particular meeting?

3 A I was not. I don't believe any representative of our
4 agency was. But I am not absolutely certain of that because I
5 was not present.

6 Q Are you aware of the meeting at all or who may have
7 been there?

8 A No.

9 Q As I understood it, you were on duty when the two
10 phone calls came in from Met Ed on Friday morning.

11 A Yes.

12 Q One was a Mr. Floyd, calling Mr. Kuehn; and another
13 one was someone from Met Ed, calling Mr. Cassidy. Are you aware
14 of who made the second call, the one to Mr. Cassidy?

15 A No, I am not.

16 Q Could you please describe the calls or how you
17 became aware of these two calls?

18 A I became aware of the two calls as a result of being
19 advised of them by, I believe, our operations supervisor some
20 minutes after the conclusion of the individual telephone
21 conversations.

22 Q So this was secondhand, either Mr. Kuehn or
23 Mr. Cassidy talked to you directly about these.

24 A That's correct.

25 Q How did PEMA decide to recommend evacuation

1 following these calls and the ones from Mr. Collins.

2 A Please state that again.

3 Q Rephrased: After these calls, these two calls,
4 combined with some telephone calls from Mr. Collins of the
5 NRC, Colonel Henderson recommended to the Governor a five-mile,
6 360 degree evacuation. I was curious about the discussions
7 within PEMA prior to Colonel Henderson's recommendation and
8 what was discussed, and how was it decided that this recommenda-
9 tion should be made.

10 A Following Mr. Collins' conversations with
11 Colonel Henderson, I subsequently reported the gist of the
12 conversation to Mr. Gerusky and asked him to get back to us
13 with their recommendation. At that point, or shortly thereafter, we had
14 a second call from Mr. Collins, indicating that his previous
15 recommendation had the support of the -- I forget the exact
16 words -- the brass or the Commission -- or the Commission,
17 something -- and there was a very limited discussion among the
18 management element of the agency because so many different
19 things were going on at the same time and we were doing so
20 many things simultaneously.

21 What we did -- shortly thereafter, the Governor called
22 Colonel Henderson and asked for an analysis of Mr. Collins and
23 asked him what his recommendation was, and we had a hasty conversation
24 prior to Colonel Henderson talking with the Governor.

25 Under the circumstances that we had at the moment -- the two

1 calls from Mr. Collins, two calls from the plant, one of which
2 was identified as a very excited kind of conversation -- we
3 felt that we had no other prudent position than recommending
4 a 5-mile evacuation.

5 In the absence of any information to the contrary, that
6 seemed to be the prudent thing to do.

7 Q Was there a telephone call from Colonel Henderson
8 or perhaps yourself to the Governor's office after the TMI
9 calls but prior to the telephone call from Mr. Collins?

10 A There was a telephone conversation between Colonel
11 Henderson and the Lieutenant Governor. I don't believe there
12 was a conversation between Colonel Henderson and the Governor
13 during that time frame.

14 Q And the purpose of that was just to advise the
15 Lieutenant Governor of the TMI telephone calls?

16 A Right. And a similar call was made following
17 Mr. Collins' initial call.

18 Q Which counties were called by PEMA on the morning
19 of March 30 regarding a possible evacuation; that is, Friday?

20 A Dauphin, Lancaster, and York Counties were informed
21 of the calls and were told to stand by and that evacuation was
22 a possibility.

23 Q Do you recall who made each of these calls?

24 A I believe Colonel Henderson made them. I don't know.
25 I believe Colonel Henderson did.

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1 Q At the Governor's meeting Friday morning, you
2 indicated that you weren't present at the decisionmaking
3 process -- during the decisionmaking process. Could you
4 describe to me what was decided?

5 A When I entered the room, I noted Mr. Gerusky lament-
6 ing the fact that the announcement was going to be made. He
7 didn't believe that that kind of action was indicated. But
8 he indicated to me that he understood that the Governor had to
9 do that in light of what had been recommended by NRC.

10 There were a number of questions addressed to me by the Governor
11 and others in the group as to numbers of schools involved and
12 where would the people go and these type of things. Then most
13 everyone left the session except the Governor, myself, and, I
14 believe, Mr. Waldman.

15 The discussion then had to do with the upcoming press con-
16 ference, arrangements that were being made to carry that.

17 Q There was one discrepancy that we seem to have run
18 into in these advisories that went out. Let me describe to
19 you the problem. At noon on March 30th PEMA sent a teletype to
20 all affected counties lifting the "stay indoors" advisory.
21 You are aware of that teletype?

22 A Yes, sir.

23 Q However, also about noon, the Governor held a press
24 conference at which, in answer to a question, he said that the
25 advisory still remained in effect.

1 Then subsequently, at a 10:00 p.m. news conference on
2 Friday, the Governor officially lifted this advisory, effective
3 immediately. We were just unclear as to the circumstances
4 regarding this apparent discrepancy.

5 A It would appear to me that it's a discrepancy. I
6 was not present in the headquarters when the teletype message
7 was transmitted to the counties. I learned of it later. It
8 appears to me that it was a misunderstanding between PEMA and
9 the Governor's office as to that item.

10 Q Do you know where PEMA headquarters got its informa-
11 tion to support the teletype?

12 A No, I don't.

13 Q Do you recall the nature of the original advisory
14 that was to "take cover" at 10:00 o'clock? Was the nature of
15 that the two-hour advisory or an open-ended advisory?

16 A It was until noon, as I recall.

17 Q The original one.

18 A The original one, the one that was issued mid-
19 morning.

20 Q We are a little curious as to how there could be a
21 teletype out to the affected counties saying one thing and then
22 the Governor at a press conference saying something else, and
23 the public not reacting to whether or not they should still
24 take cover. Is there any explanation of why this went
25 unnoticed by the public?

1 A The teletype message is directed to the County
2 Emergency Management Coordinators. At this period, and con-
3 tinuing, we were doing our best to keep the counties informed
4 of decisions that were being made, press conferences that were
5 being held, and announcements that were being made as a matter
6 of information to the emergency system. We didn't -- we
7 weren't providing that for them to notify the public, because
8 in most instances it was after-the-fact kind of information
9 which frustrated us, but we kept plugging along.

10 Q So you would not have expected the county organiza-
11 tion to do anything with regard to notifying the public based
12 on the teletype?

13 A No, because the press conference and the Governor's
14 announcement had already been made at the time that that was
15 transmitted.

16 Ideally, we would like to get this kind of information to
17 them ahead of the fact so they have it and don't have to hear
18 it from some other source, but even under those circumstances,
19 we would not expect them to make any public announcement
20 unless we requested them to do so.

21 If this was necessary or desired, we would so indicate in
22 the body of the message.

23 Q During your meeting with the Governor at 10:00
24 o'clock or thereabouts on Friday morning, what was your
25 opinion to the Governor regarding the state of readiness for a

1 five-mile evacuation?

2 A I wasn't asked that question.

3 Q As I understand it, for nuclear power or fixed-fault
4 kinds of accidents, PEMA relies on BRP for technical evalua-
5 tions and recommendations regarding protective measures and
6 things of this nature.

7 However, the emergency response to implement a protective
8 measure such as evacuation again, as I understand it, it is the responsibil-
9 ity of PEMA as far as coordinating, directing, things of this
10 nature, what are the peacetime, radiological exposure criteria
11 for emergency doses and lifesaving doses for PEMA personnel and
12 other people who would be critical to a successful evaluation
13 such as the State Police and National Guard?

14 A I can't answer that. That information we would
15 expect to be provided by the Bureau of Radiation Protection.

16 Q But there are no criteria existing. This would be
17 an ad hoc determination?

18 A It has been established, and it's part of our plan.
19 I can't personally quote the numbers.

20 Q What are the consequences of an evaluation? Clearly,
21 an evaluation is taken to protect public health and safety from
22 some potential or actual hazard, but what are the consequences
23 of an evaluation? It clearly is not a consequence-free
24 measure.

25 A Well, you are disrupting the lives and exposing them

1 to certain dangers which are an inherent part of any evacua-
2 tion. We attempt to minimize those in doing our best to
3 effect an orderly evacuation with the kind of traffic control
4 and the kind of assistance that are required under those cir-
5 cumstances.

6 The consequences of some of the special-handling kind of
7 evacuees is quite a decision. If you are moving aged or infirm,
8 ill people, the gamble there is you are going to lose some if
9 you move them.

10 The consequences of particularly that group who have medical
11 problems, some of the consequences are quite difficult. You're
12 damned if you do, and damned if you don't, that kind of thing.

13 Q How strongly do these consequences enter into your
14 decisional process for making recommendations regarding
15 whether or not to evacuate?

16 A Well, some of the later consequences that I described
17 are more appropriately applied to movement plans for a special
18 group as contrasted to an evacuation of a large area. Maybe
19 under one set of circumstances it would be better to let the
20 residents of a nursing home or hospital, a certain segment of
21 the hospital patients, remain there even though the area
22 generally would be evacuated.

23 A number of these kinds of special considerations would be
24 treated perhaps independent from the general decision to
25 evacuate an area.

1 Q The Dauphin County emergency plan, dated April 6,
2 1979, which was put together after the TMI incident and was a
3 planning document for 5-, 10-, and 20-mile evacuation, states
4 that "After evacuation of hospitals, PEMA will provide
5 emergency services in the evacuated area." We were curious
6 what this type of statement means. Generally, how would an
7 injured person or someone within the evacuated area, after the
8 hospitals are no longer functional, what would PEMA do about
9 this kind of situation? Is it PEMA's responsibility? What
10 would they do?

11 A Are you talking about someone that was injured as
12 part of the evacuation?

13 Q Perhaps.

14 A I don't understand your question.

15 Q Perhaps. The statement basically indicates to me
16 that somehow PEMA picks up the responsibility for somebody who
17 is injured within the evacuation area, but after the hospitals
18 and facilities are not longer functional --

19 A I don't know that that is meant in that manner.

20 As far as the Dauphin County plan is concerned, those ser-
21 vices provided outside of Dauphin County are the responsibility
22 of PEMA. Medical assistance would be provided in the support
23 counties through available medical facilities, just like it
24 would for any other resident of that particular county utiliz-
25 ing available medical resources, perhaps augmented where the

1 support county has indicated a deficiency.

2 Q Augmented by PEMA actions?

3 A That's correct.

4 Q To what extent is reliance placed on the State Police
5 during an evacuation?

6 A Well, they are the principal traffic control element
7 associated with this kind of planned evacuation. This is their
8 set and assigned role.

9 Q As I understand it, the State Police was on a four-
10 hour white alert during this time period. Would that affect
11 their ability to respond in case an evacuation had been
12 necessary?

13 A I believe it was the National Guard that was on a
14 four-hour white alert.

15 Q If they had been on an alert status, would that
16 substantially affect the ability to evacuate?

17 A It would increase the mobilization time. If I
18 understand your question correctly, it would increase the
19 mobilization time by that number of hours that it would take
20 for them to muster sufficient forces in the area to effectively
21 control an evacuation. I think it's important to understand
22 that our understanding of our mission, following the TMI
23 incident, was to proceed with your evacuation planning. But
24 we understood very clearly, and accepted and supported the
25 Governor's desire to play this down as much as possible, so

1 things that we would have done normally had we been anticipat-
2 ing some other kind of emergency or disaster, we didn't do in
3 this instance because of the effect that it would have on the
4 public.

5 This includes the mobilization of State Police. You don't
6 move a lot of troopers into an area without arousing somebody's
7 curiosity.

8 The same thing is true of the Pennsylvania National Guard.
9 We would normally move some of our stockpile facilities,
10 resources, in closer to where we plan for their possible
11 use.

12 These things weren't done because of the effect it would
13 have.

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1 Q The Dauphin County emergency plan of April '73,
2 which is the one in effect at the time of the TMI accident,
3 anticipates that a representative from BRP will be at the
4 county emergency operations center, if possible, to assist
5 in the evaluation of incoming information.

6 A Also, as I recall, during the TMI accident, there was an
7 admitted shortcoming in either PEMA or understanding the
8 problems, that BRP would have perhaps been more able to
9 effectively communicate with PEMA had they had a
10 representative in your emergency operations center.

11 A Right.

12 Q In your view, how important is this direct
13 interface with BRP at the state level and at the county
14 level in a situation like this?

15 A I think it's extremely important that rad
16 protection of capable and competent personnel in the state
17 emergency operations center to give direct technical advice
18 to the council and the agency and the emergency response
19 teams.

20 A I don't believe it's necessary for them to be directly
21 represented in any one county. We have the means of getting
22 that information to the counties when it's made available to
23 us.

24 A I assume that the reason that that was included in the
25 Dauphin County plan is that they were given some

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1 encouragement to include that as a planning assumption based
2 on the if possible kind of --

3 Q It's clear from reading the state plan that there
4 are different functions to be performed by FEMA and the state and
5 local emergency coordinators, and clearly in my mind there
6 should be a difference as to what is contained in the
7 various emergency plans as you go from the state level down
8 to the local level.

9 A Would you please give me your observations as to what
10 level of detail should be contained in state plans, county
11 plans and local plans? What you might expect to find to
12 have the most effective reasonable plan.

13 A In my view, the state emergency operations plan
14 should be a guide for state, county and local emergency
15 forces to conduct disaster operations. As you go down from
16 the state plan to county plans and to local plans, more and
17 more detail should be provided down to the point where you
18 have telephone numbers and intersections and assignments and
19 individual's named and that type of thing. That is the kind
20 of detail that belongs in the local plan.

21 A A certain amount of specific detail, less than that
22 contained in the state plan -- more than that contained in
23 the state plan but less than that contained in most local
24 plans, should be what is found in county plans.

25 A Now, there is some variation as to the method of

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1 planning in several counties in the Commonwealth. Some
2 county organizations rely more heavily on the county/
3 organization to conduct emergency operations with less
4 involvement on the part of local organizations. There is a
5 bit of flexibility in that across the Commonwealth.

6 Now, the individual Commonwealth departments and agencies
7 should have plans in considerable detail associated with
8 their duties and responsibilities associated with
9 emergencies, all under the umbrella of the Pennsylvania
10 Disaster Operations Plan.

11 Now, generally that's our approach to planning in the
12 Commonwealth. Under most circumstances, it seems to track
13 well. The one possible exception has been planning
14 associated with fixed nuclear facilities.

15 We are providing more detailed guide answer in Annex E,
16 for example, than we would normally for some other kind of
17 disaster, but we feel we have to do this.

18 Q Why? In what areas?

19 A Mainly because emergency plans associated with
20 fixed nuclear facility incidents are scrutinized by people
21 who, for one reason or another, either don't have our
22 disaster operations plan available to them or don't take the
23 time to wade through it, it being a document of considerable
24 size. So we have attempted to have our emergency planning
25 for fixed nuclear sites be not so dependent on our

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1 Q Umbrella plan as we do in other -- I don't know if that
2 makes any sense or not.

3 Q Taking the Dauphin County plan of April 6th as an
4 example for discussion purposes, this particular plan
5 contained a fair amount of detail, as I recall, in the area
6 of routes and placement of signs and people and cars and
7 buses and things of this nature. So I guess it would be
8 fair to characterize that as a combination county/local
9 plan.

10 A Yes.

11 Q That is, in essence, I guess, how it was
12 developed?

13 A Right.

14 Q Is this the kind of detail that you feel is
15 necessary for local plans?

16 A In support of county plans, yes. Since that
17 April 6th date, in this vicinity, a number of local plans
18 have been developed by subdivisions in the immediate area
19 that strengthen, if you will, the county plan and flow with
20 it.

21 Q How often would such plans have to be updated,
22 since they are so very specific?

23 A Our current instructions are at least annually.

24 Q Is it a fair statement that existing county plans
25 at the time of TMI had virtually no detail in them except

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1 notification requirements?

2 A Limited detail.

3 Q It's also fair to say that there were no -- or
4 essentially no -- local plans in existence at that time?

5 A There were few local plans in existence.

6 Q Then we seem to have a disagreement of what
7 perhaps yourself or maybe PEHA in general feels is necessary
8 for adequate planning on the one hand, as opposed to what
9 was in existence on the other hand. Is that a fair
10 statement?

11 A No. I think that's based on the assumption that
12 if you don't have a written plan you can't possibly react to
13 an emergency. I don't believe that's a valid assumption.

14 We find in our dealings with county and local emergency
15 organizations that written plans are not their strong point,
16 but they can implement their plans -- they have
17 organizations who we have confidence in as a result of
18 working with them that can implement and get the job done
19 without volumes of written plans.

20 Now, we would like to have many more written plans of the
21 type that we are all comfortable with, but getting them is
22 something else. One of the problems that we have following
23 an incident, for example, like TMI is to convince or somehow
24 interpret for someone who is not familiar with the county
25 emergency organization, for example, the fact that they

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Wros 1 have the capability to implement their plan, even though the
2 plan is not written or if it is written, it's in less than
3 desirable form in substance.

Q Then you would characterize an emergency plan -- a
5 detailed emergency plan as desirable but not necessary?

A That's correct. Highly desirable.

Q What about plans for federal coordination? Is it
8 clear that everybody knows who the actors are and what the
9 state-federal interface is and who you go to in an emergency
10 quickly and how fast the response can be? And are these
11 procedures and definitions of responsibilities clearly set
12 forth?

A I believe they are clearly set forth and
14 understood by employees of Pennsylvania Emergency Management
15 Agency, yes. Now, some of the relationship between federal
16 agencies and other Commonwealth departments and agencies
17 sometimes is not that clearly known to us.

We are generally familiar with the kinds of emergency
19 assistance available from all federal agencies but the
20 intricate detail of some of it is contained by individuals
21 in that state agency. They know more about their federal
22 counterpart than we do.

Q Okay, is it fair then, to rephrase that that you
24 are intimately familiar with those agencies providing

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1 direct support to things like evacuation, such as CCPA and
2 FDAA, but Mr. Gerusky would be more familiar with those
3 kinds of responses necessary from DOE and radiological
4 monitoring?

5 A That's correct. We are generally familiar that
6 that kind of assistance is generally available, and
7 generally who can provide them, but the Bureau of Radiation
8 Protection knows specifically what kind of assistance is
9 available and how to obtain it.

10 The same condition exists, for example, with US
11 Department of Agriculture. We are familiar with many of
12 their disaster programs because we are in and out of them
13 almost on a daily basis. There are other kinds of
14 assistance that is available to a state through USDA that we
15 don't have that much occasion to become involved in, but the
16 State Department of Agriculture knows these avenues and we
17 look to them and their emergency response team members to
18 provide the missing link.

19 Q That's about all I have in the way of questions.

20 Do you have anything else you would like to state for the
21 record at this time regarding any aspect that might help our
22 inquiry?

23 A I don't believe so. I can't think of anything.
24 In those instances where there has been something that I
25 thought I could add that would better describe the

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1 substance being talked about. I have done that.

2 Let me ask you one more question, I guess to try
3 and wrap up this local plan aspect.

4 I think you previously said that PEMA has no
5 responsibility for the existence or adequacy of local
6 plans. But you have also said that detailed local plans, at
7 least in your view -- and I assume in PEMA's view -- are
8 highly desirable. It would appear to me that PEMA would be
9 interested in trying to assure that such plans exist, and I
10 wonder if you could tell me to what extent PEMA might carry
11 this interest?

12 A I don't know that -- if I indicated we have no
13 responsibility for the preparation of local emergency plans.
14 Legally or technically, that's so. But we are constantly
15 working with county directors in the development of model
16 local plans and continuing to pressure them, if you will, to
17 get out and work with their locals and develop the kind of
18 plans, detailed plans, that are essential and will make an
19 emergency operation go that much more smoothly.

20 We do a lot of this. This is the kind of day-to-day
21 assistance that we provide counties. We are constantly
22 after them to improve and update their own planning effort
23 and to get in and pitch and help the local folks develop and
24 update their plans.

25 MR. ERNST: Mr. Harr?

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BY MR. HERR:

1 I have several areas where I would like to tie up
2 some loose ends. You mentioned at the start that when the
3 evacuation planning went out from five to 10 miles -- I
4 believe it was Friday -- that this expanded the number of
5 counties from three to five. I think you said Lebanon and
6 Cumberland counties were included.

7 A That's correct.

8 Q To your knowledge, was Lebanon County advised to
9 begin a 10-mile evacuation plan on Friday?

10 A I would have to answer that by I assume so. I
11 didn't personally speak with Lebanon County concerning that
12 but I assume that someone else on the staff did.

13 Q Do you know when the notification went out to the
14 counties to begin 10-mile planning?

15 A No. It happened in that period from mid-morning
16 to noon, while I was in the Governor's office, but I assume
17 it occurred during that period, but I don't know that as a
18 matter of fact because I was not in headquarters. That
19 would be my educated guess, that we notified them during
20 that period.

21 Q Okay. You mentioned also that there are somewhere
22 around 2200 localities within the state that have local
23 coordinators and I believe you said at the time of the
24 accident there were a few localities that did not have local
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1 coordinators?

2 A That's correct.

3 Q Were any of those within the 20-mile zone
4 surrounding IMI?

5 A I couldn't tell you that. I could get that
6 information for you but I don't have it at my fingertips.

7 Q I would appreciate if you could provide that
8 information to us.

9 A Fine.

10 Q You mentioned that a PEMA representative was
11 present at most of the meetings or briefings in the
12 Governor's office through Sunday. However, you weren't
13 present after Sunday. I believe the Lieutenant Governor was
14 present in most of those meetings and he serves as chairman
15 of the council, Emergency Management Council.

16 Was PEMA receiving briefing or information from the
17 Lieutenant Governor following Sunday as to what was taking
18 place at these meetings and briefings in the Governor's
19 office?

20 A I would like to qualify my previous statement
21 about we were present at most of the meetings during this
22 period from Friday to Sunday by adding that I am aware of.
23 I'm sure there were meetings conducted that we were not
24 aware of. How many they might add up to, I really don't
25 know but I'm sure there were meetings conducted during the

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1 Friday to Sunday period we did not know about. We were
2 invited to most of the ones we knew about.

3 Q Let me clarify my question a bit. I guess I am
4 interested primarily in the meeting preceding the Governor's
5 press conference, the joint press conferences between Harold
6 Denton and the Governor which I believe took place almost
7 every evening, and there was a meeting preceding those press
8 conferences.

9 A Colonel Henderson was present at only a very few
10 of those.

11 Q Until Sunday. After Sunday he was not present at
12 any?

13 A That's correct.

14 Q Was PEMA receiving information from the Lieutenant
15 Governor, or any other person that was present for that
16 matter.

17 A Colonel Henderson was receiving some information
18 from the Lieutenant Governor Scranton, information that
19 Lieutenant Governor Scranton considered to be of some value
20 to our evacuation planning effort.

21 Q Was PEMA notified when these meetings were taking
22 place or when the press conferences were going to be held so
23 you could at least listen to the radio, that kind of thing?

24 A Frequently we would hear of them from somebody
25 outside. We would attempt to keep our television and radio

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1 equipment in our emergency center tuned to local stations
2 but very frequently we would hear about announcements from
3 some outsiders.

4 Q Okay. One final question. I believe you said
5 that you were present in the Governor's office Friday
6 morning shortly before noon, before the press conference.
7 During the meeting preceding the press conference, was the
8 lifting of the stay indoors advisory discussed?

9 A No.

10 Q It was not discussed at all?

11 A No.

12 Q As far as you were concerned, the advisory which
13 went into effect at noon -- excuse me, the advisory that
14 went into effect at 10:00 o'clock and was at that time to
15 last two hours was to expire at noon as originally planned?

16 A That was my -- this was not discussed specifically
17 in the discussion ahead of the press conference. The emphasis
18 of that discussion was on the pregnant women and pre-school
19 children and closing schools and problems associated with
20 those three things.

21 Q So to your knowledge, the Governor's response to
22 the reporter's question during the press conference as to
23 whether the stay indoors advisory would remain in effect or
24 would be lifted was a personal decision made by him without
25 any input from you or --

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1 A Anything that I was aware of, yes.

2 MR. HERR: I have nothing else.

3 BY MR. ERNST:

4 Q I would like to ask one clarifying question and
5 maybe one additional. If you talk about detail in emergency
6 plans, from what I have heard before there could be two
7 types of detail. One type of detail could be a listing of
8 available resources or resources that might be tapped or
9 might be available.

10 A second type of detail might be a specific evacuation
11 route, specific things that specific people do and at what
12 time they do them and who they pick up and things of that
13 nature.

14 Do you perceive any difference in these two types of
15 detail? Which one would be more advantageous than the
16 other?

17 A The resource inventory, which is something that we
18 have long advocated that county and local emergency
19 coordinators have and constantly update, is not really a
20 plan in my mind. It does not qualify as a plan.

21 Your second description would more closely agree with my
22 impression of a plan. However, many people in the emergency
23 system will point to their resource inventory as "my plan"
24 and therein lies the basis for my comment about the kind of
25 detailed planning that approval planners are looking for.

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1 You know, when there is a scarcity of this, they don't
2 think an organization could possible respond yet that fellow
3 with his resource inventory in his hip pocket, sometimes
4 it's amazing, you know, an operator, a born operator, with
5 something like that can get an awful lot done in almost a
6 complete absence of written plans.

7 Q In your knowledge, did such resource inventories
8 exist at the county and local levels at the time of the FBI
9 accident?

10 A They existed at the county level. I would not
11 know about the local level.

12 Q This is separate from the plan.

13 A That's correct.

14 Q Have you personally reviewed some of these files
15 and so forth to get a feel as to the extent that the
16 counties know about their resources?

17 A Well, this is something that we constantly pursue
18 at our annual seminars. I have reviewed them on those
19 occasions when I have been visiting a county coordinator.
20 Others in the agency regularly review these for accuracy and
21 update them.

22 It's something we put considerable effort into because
23 it's a very necessary and useful device in the conduct of
24 emergency operations. If you don't know where your
25 resources are, you're sort of lost.

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In conclusion, I would like to say that you will get a copy of this deposition for any corrections you feel might be warranted.

I would also like to say this is an ongoing investigation and although I have completed the questions I have for you today, it's possible we might need to bring you back for further questions — I doubt it and will certainly make every effort not to do so — but for that reason only, I will recess this deposition rather than close it, but I do wish to thank you for your time and your help in our inquiry.

(Whereupon, the taking of the deposition was adjourned at 11:55 a.m.)

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POOR ORIGINAL