

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
METROPOLITAN EDISON COMPANY, ET AL.) Docket No. 50-289
) (Restart)
(Three Mile Island Nuclear Station,)
Unit 1))

TESTIMONY OF FEMA'S VERNON E. ADLER AND
FREDERICK J. BATH ON CONTENTIONS
RELATED TO OFFSITE EMERGENCY PREPAREDNESS

MARCH 16, 1981

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OUTLINE

TESTIMONY OF FEMA'S VERNON E. ADLER AND FREDERICK J. BATH ON CONTENTIONS RELATED TO OFFSITE EMERGENCY PREPAREDNESS

This testimony addresses the 54 remaining contentions directed to State and local emergency plans and offsite emergency preparedness.

This testimony is subdivided into the major areas of emergency planning of:

- (A) Protective Action Decisions;
- (B) Public Warning and Emergency Instructions;
- (C) Implementation of Protective Actions, including
 - (i) Communications, (ii) Support Services, (iii) Chain of Command, (iv) Staffing, (v) Protection of Property/Livestock and (vi) Other;
- (D) Post Evacuation Support; and
- (E) Funding for Emergency Response and Adequacy of Municipal Resources,

insofar as these relate to offsite emergency planning and State and local emergency plans.

York and Dauphin County plans address the protective action decision-making process for evacuation taking into account such factors as resident populations and traffic estimates. FEMA asserts the need for a sensitivity analysis, in agreement with the intervenor, which includes evacuation time estimates which consider adverse weather and road conditions and shifts in population movement due to transient daily work force and seasonal recreational groups. The licensee has completed such a study, intended to meet FEMA requirements; it is under review and its adequacy will be assessed in the course of this hearing.

In the area of public warning and emergency instructions, this testimony identifies deficiencies in offsite preparedness with regard to coverage by the siren warning systems currently operational in York and Dauphin counties. Deficiencies of this kind are to be corrected by the licensee in response to NRC Rule (10 CFR Part 50) and in conformance with NUREG-0654, requiring essentially complete siren alert coverage within the plume exposure EPZ.

Testimony in this area also addresses the necessity for notification using the Emergency Broadcasting Station (EBS), conventional telephonic and other communications media, integral to a positive program of public information planning and execution.

The adequacy of five involved county government communications links is established in the portion of this testimony (communications) which addresses the implementation of protective actions. Use of telephones to notify key officials and working arrangements to obtain augmenting volunteer communications services are described for York and Dauphin Counties.

Also in the implementation of protective actions (support services), the York County plan is deemed deficient because it neither identifies hospitals which have the capability to treat people exposed to radiation, nor does it identify that group of people whose mobility may be impaired. The stated FEMA recommendation is that sufficient radiological monitoring equipment should be located with the emergency response organizations which will be using it.

The need for letters of agreement between local and county bus companies is endorsed by FEMA; actions to be taken in an evacuation of York county are clarified, including a statement of potential need for the county to request

unmet resources through PEMA, at the State Emergency Operations Center (EOC).

Testimony states that the National Guard will meet a radiological emergency situation with conventional military clothing and without radiation protective equipment. The role of the Red Cross is clarified and the expectation is stated by FEMA that there will be significant law enforcement personnel and reinforcements available to insure that law and order is maintained in the evacuated areas. Additionally, within the area of the implementation of protective actions, it is asserted that the State's Bureau of Radiological Protection would advise concerning procedures to be followed in dealing with contaminated members of the public. FEMA anticipates that the procedures for decontamination at mass care centers, presently absent from county plans, will be provided for FEMA review by mid-April 1981.

It is recommended that county plans be modified to identify and to provide for substitute management coordinators in the absence of a key person during an emergency.

Because the highest priority of emergency planning under NUREG-0654 is protection of human life, not property, FEMA testimony elaborates on the recommended care of property and livestock, taking into account accident severity and the prospect on an ad hoc basis, for actions to protect property/livestock investment. This can include travel within the plume exposure EPZ for livestock care to be controlled by local officials and based on existing conditions.

FEMA states its view in this testimony, based on previous experience in disaster situations, that emergency workers do perform their assigned functions in situations where their own families may be endangered by the emergency.

It is FEMA's view that additional planning on the issues of school evacuation and bus re-routing should be included in the York County plan, and that the Dauphin County plan include in its school evacuation planning, early notification of bus drivers by school officials and district school plans which provide for school bus use from beyond the plume exposure EPZ.

The unique needs of groups such as the Old Order Amish community are addressed with recognition that the licensee, state and local governments have the responsibility to ensure that procedures and facilities exist to meet needs of such groups.

In the area of post evacuation support, testimony is given in response to an asserted need for auxiliary/back-up electrical power and heating systems at mass care centers.

Finally, the question of availability of funds to York County Commissioners to provide for emergency expenses arising from an evacuation is addressed, while noting the fact that the source(s) of funds for payment of emergency expense is not within the scope of NUREG-0654 planning standards or its criteria.

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In the Matter of)
METROPOLITAN EDISON COMPANY) Docket No. 50-289
(Three Mile Island, Unit 1)) (Restart)

TESTIMONY OF FEMA'S VERNON E. ALDER AND
FREDERICK J. BATH ON CONTENTIONS RELATED TO OFFSITE
EMERGENCY PREPAREDNESS

Aamodt Contention	5	(EP-2)
ANGRY Contentions	III B(F)	(EP-5C)
	III C(7)	(EP-6A)
	III C(8)	(EP-6B)
	III C(9)	(EP-6C)
	III C(10)	(EP-6D)
	III C(12)	(EP-6F)
	III C(13)	(EP-6G)
ECNP Contention	2-28	(EP-10)
Newberry Contention	3	(EP-14C)
York Plan	4	(EP-14D)
	8	(EP-14H)
	9	(EP-14I)
	11	(EP-14K)
	12	(EP-14L)
	15	(EP-14O)
	16-1	(EP-14P)
	17	(EP-14R)
	18	(EP-14S)
	19	(EP-14T)
	20	(EP-14U)
	21	(EP-14V)
	22	(EP-14W)
	23	(EP-14X)
	24	(EP-14Y)
	26	(EP-14AA)
	27	(EP-14BB)
	29	(EP-14CC)
	31	(EP-14EE)
	33	(EP-14GG)
	34	(EP-14HH)
	35	(EP-14II)

Newberry Contention	37	(EP-14KK)
York Plan	38	(EP-14LL)
(continued)	39	(EP-14MM)
	40	(EP-14NN)
Newberry Contention	2	(EP-16B)
Dauphin Plan	3	(EP-16C)
	5	(EP-16E)
	6	(EP-16F)
	7	(EP-16G)
	8	(EP-16H)
	9-1	(EP-16I)
	9-2	(EP-16J)
	14	(EP-16N)
	15	(EP-16O)
	16	(EP-16P)
	17	(EP-16Q)
	18	(EP-16R)
Newberry Contentions	3b(12)	(EP-1400)
	3c(5)	(EP-16T)
Sholly Contention	8I(B)(3)	(EP-17A(3))

TESTIMONY OF FEMA'S VERNON E. ADLER AND FREDERICK J. BATH
ON CONTENTIONS RELATED TO OFFSITE EMERGENCY PREPAREDNESS

Q.1. State your name and title.

A. (Mr. Bath) I am Frederick J. Bath, an Emergency Management Specialist for the Federal Emergency Management Agency (FEMA), assigned to FEMA Region III, Philadelphia, Pennsylvania.

(Mr. Adler) I am Vernon E. Adler, Director, Division of Plans and Preparedness for FEMA Region III in Philadelphia, Pennsylvania.

Q.2. Do you have statements of professional qualifications?

A. Yes. Our statements of professional qualifications are attached to the "Testimony of Frederick J. Bath and Vernon E. Adler of the Federal Emergency Management Agency on Certain Offsite Emergency Planning Contentions" filed on February 23, 1981.

Q.3. What is the purpose of this testimony?

A. The purpose of this testimony is to address those contentions in the TMI-1 restart proceeding related to offsite emergency preparedness which were not addressed in our written testimony filed on February 23, 1981.

In this testimony, these contentions have been categorized in various major emergency planning areas as follows:

A. Protective Action Decisions

Newberry Contentions York Plan 34 (EP-14(HH)), 37 (EP-14(KK)), 39 (EP-14(MM)), 40 (EP-14(NN)), and Newberry Contentions Dauphin Plan 14 (EP-16(N)) in part, and 16 (EP-16(P));

B. Public Warning and Emergency Instructions

Newberry Contention York Plan 3 (EP-14(C)) in part, 15 (EP-14(O)), 19 (EP-14(T)), and 24 (EP-14(Y)); Newberry Contention Dauphin Plan 5 (EP-16(E));

C. Implementation of Protective Actions

(i) Communications

ANGRY Contention IIIC(9) (EP-6(C)); Newberry Contentions York Plan 4 (EP-14(D)) and 16-1 (EP-14(P)); and Newberry Contentions Dauphin Plan 3 (EP-16(C)), 6 (EP-16(F)), and 17 (EP-16(Q));

(ii) Support Services

ANGRY Contentions IIIC(7) (EP-6(A)), IIIC(8) EP-6(B)), and IIIC(10) (EP-6(D)); Newberry Contention York Plan 3 (EP-14(C)) in part, 9 (EP-14(I)), 11 (EP-14(K)), 12 (EP-14(L)), 18 (EP-14(S)), 21 (EP-14(V)), 22 (EP-14(W)), 23 (EP-14(X)), 29 (EP-14(CC)), 35 (EP-14(II)); Newberry Contentions Dauphin

Plan 7 (EP-16(G)), 8 (EP-16(H)), and 15 (EP-16(O)); and
Newberry 3b(12) (EP-1400); ECNP 2-28 (EP-10);

(iii) Chain of Command

Newberry Contentions York Plan 8 (EP-14(H)) and 17 (EP-14(R))
and Newberry Contention Dauphin Plan 9-1 (EP-16(I));

(iv) Staffing

Newberry Contention York Plan 38 (EP-14(LL)) and Newberry
Contention Dauphin Plan 2 (EP-16(B));

(v) Protection of Property/Livestock

Aamodt Contention 5 (EP-2); and Newberry Contention York
Plan 27 (EP-14(BB));

(vi) Other

ANGRY Contentions IIIB(F) (EP-5(C)) and IIIC(12) (EP-6(F));
Newberry Contentions York Plan 20 (EP-14(U)) and 26 (EP-14(AA));
Newberry Contentions Dauphin Plan 9-2 (EP-16(J)), 14 (EP-16(N)),
and 18 (EP-16(R)); Newberry Contention 3C(5) (EP-16T) and
Sholly Contention 8I(B)(3) (EP-17(A)(3));

D. Post Evacuation Support

ANGRY Contention IIIC(13) (EP-6(G)) and Newberry Contention York
Plan 31 (EP-14(E));

E. Funding for Emergency Response and Adequacy of Municipal Resources

Newberry Contention York Plan 33 (EP-14(GG)).

A. Protective Action Decisions

Q.4. Newberry York Plan 34 (EP14-HH) states:

The York County Plan has no provision in its population calculations for periods of time during the day when most people are working and outside of the area, during the day when there may be an increase in population because of industries located within the areas, or during the summer periods when many individuals may be on vacation or there would be an influx of individuals coming into the area to vacation. Without that type of population differential tables, it is Intervenor's contention that the Plan is deficient.

Newberry York Plan 37 (EP14-KK) states:

The York County Plan contains no time sequence for the removal of the exposed at-risk population. There is only assumption that there would be adequate time in which to remove all individuals; however, there is no estimate as to the number of hours that would be required to effect a selective evacuation or a general evacuation. Moreover, there is attached to the York County Plan an estimate of the number of vehicles per hour that could be handled by various major arteries and access roads; however, there appears to be a conflict in the estimates in that urban roads with parking are estimated to handle at least 1,700 cars per hour whereas major arteries could only handle 1,300 per hour and it is submitted that such a gross distortion renders the Plan deficient. Furthermore, there is absolutely no hard-core statistical data to back up the calculations relied upon in the York County plan.

Newberry York Plan 39 (EP14-MM) states:

The York County Plan does not state how many businesses are located in risk areas and what the population of those businesses are during working hours. Without this information, it would be impossible to determine the number of

hours that would be required to effect a general evacuation in the event one was ordered. Therefore, it is Intervenor's position that the Plan remains defective.

Do the York County Plans have population calculations based on time of day to incorporate work force fluctuations and based on time of year to incorporate fluctuations of population due to vacation and vacationers?

A. At present York County population figures are based on resident population only.

Q.5. Is this a sufficient population calculation to produce adequate planning?

A. It is sufficient to determine the estimated need for mass care, the best location for reception centers, and the best routes for evacuation. It is not sufficient to produce an evacuation time estimate study as called for in NUREG-0654, standard J-8 and Appendix 4. Also, based on the size of the nonresident work force, special measures may be needed to evacuate or to shelter them. It should be recognized that there is no large recreation park or amusement center in the plume exposure pathway EPZ areas of York County; therefore, seasonal population fluctuations should be minimal. Also, work force population groups are highly mobile in that they commute to and from work each day.

Q.6. What study has been conducted to date, site specific to TMI, which recognizes the work force or vacation populations?

A. Wilbur Smith Associates have produced an evacuation study for FEMA site specific to TMI. Col. O. K. Henderson, former Director of PEMA,

has provided conservative evacuation-time estimates. These estimates are weather and time of day related. The licensee has completed an evacuation time estimate study which is to meet NUREG-0654 Appendix 4 criteria and take into account these population groups. It is FEMA's intention to review this study. This study became available on March 12, 1981, and we have not had the opportunity to review it at the time of preparation of this testimony.

Q.7. What is the explanation of the apparent conflict in the York County Plan between urban roads estimated to carry 1,700 cars per hour and major arteries carrying only 1,300 cars per hour?

A. The present evacuation plans are a product of state level and county level input. The State in its testimony provides the following as an explanation of the differences in traffic capacity: "In the York County Plan the reference to major arteries is listed under 'Rural Roads' with a 12-foot wide lane, while under 'Urban Roads' is listed a 30-foot wide, one-way road with parking. It appears logical that the wider one-way road would carry greater traffic capacity." This appears to be a reasonable explanation of the apparent conflict.

Q.8. Does FEMA consider York County Plans adequate in this area of planning?

A. An evacuation time estimate study which proves out the evacuation routes planned and which accounts for transients is required before FEMA will consider York County Plans adequate.

Q.9. Newberry York Plan 40 (EP14-NN) states:

As a general overall comment, evacuation routes as set forth are not wind-dependent, and therefore, in the event of an evacuation, wind direction is a factor that would be required to be taken into consideration in order to formulate an effective evacuation plan. The Plan as set forth does not provide for this factor and, as such, persons evacuating the evacuation areas may be directed into a potentially more hazardous situation in the manner in which they are routed.

What are the requirements with regard to accounting for wind direction in developing evacuation routes?

A. NUREG-0654, Appendix 4 does not require that wind direction be considered in determination of evacuation routes. However, NUREG-0654 Planning Standard J-10 provides that wind direction will be considered in determining appropriate protective measures. BRP will consider wind direction and speed in its choice of protective actions. In the TMI area it was shown that during the TMI-2 incident wind direction shifted frequently. Therefore, the State has planned the best and fastest routes to get the people out, and it is BRPs job to determine when it is dose-effective to do so.

Q.10 Newberry Dauphin Plan 14 (EP16-N) states, in part:

Finally, the Plan seems to assume that the best of all atmospheric and weather conditions would exist at the time of the evacuation. What would take place in the event of a snowstorm and how would that affect the evacuation? What would be done in order to clear the roads? These are all questions that have to be considered and are necessary to be considered in a total evacuation plan and the location and placement of staging areas.

Newberry Dauphin Plan 16 (EP16-P) states:

The Dauphin County Plan as set forth does not provide for differentiation of time of day or seasons or weather conditions at the time of the evacuation. There is no sensitivity analysis as to these factors, and the Plan is based upon an assumption of best-case analysis. Therefore, it is Intervenor's position that without taking these factors into consideration, the Plan remains deficient as concerns the time needed to effect an evacuation.

Will adverse conditions that could affect evacuation be accounted for in protective section decisionmaking?

- A. NUREG-0654 Planning Standard J.10.M requires that a variety of factors be considered before any protective actions are recommended. This decision-making process and evaluation is the responsibility of the Bureau of Radiation Protection and PEMA.

During periods of meteorological or other impediments to evacuation, it is expected that responsible officials will consider alternatives and implement the best protective action in the circumstances.

Q.11. What are your views on the need for a sensitivity analysis on evacuation?

- A. FEMA believes that such a need exists and that an evacuation time estimate study should account for such variables as adverse weather conditions. NUREG-0654 specifies that an evacuation time estimate study accounting for adverse conditions is to be produced. A study which purports to satisfy NUREG-0654 criteria has been produced by the licensee although we have not had the opportunity to evaluate that study.

B. Public Warning and Emergency Instructions

Q.12. Newberry York Plan 3 (EP-14(C)) states, in part:

This section of the York County Plan is deficient in that it depends upon the York County Chamber of Commerce to notify and pass on the general evacuation information to business and industry. There is no assurance that the Chamber of Commerce has the necessary manpower, equipment, and training to pass on such information to the general public. For example, does the York County Chamber of Commerce possess necessary trunk lines to advise all industry within an affected area? What happens in the event that telephone communications are jammed or overloaded and that notification of industries cannot be effected by the York County Chamber of Commerce? Furthermore, does the York County Chamber of Commerce and all industry within the possible affected area have radio communication capabilities?

Is the York County Chamber of Commerce the primary means for notifying business and industry within York County?

- A. No. The primary means of warning is the outdoor warning system and Emergency Broadcast System. To insure that business and the general public are aware of such warning and notification, outdoor sirens will be used to direct that the listener turn on radio and television for emergency instruction. York County, through its Chamber of Commerce, is recommending that business and industry purchase a weather radio as an additional means of receiving warning. This system is to be activated by PEMA. York County will educate business and industry on the need for commercial radio or television as a means for receipt of official county notification and information via the EBS after warning is received.

Q.13. Does York County depend upon the Chamber of Commerce to provide emergency information to business and industry?

A. No. Emergency information on protective actions and conditions at the TMI-1 facility are to be provided by York County through the EBS. However, the York County Chamber of Commerce is used in the York County Emergency Response Plan. Their role as seen by FEMA is to provide a telephone fan-out service, supplementary to EBS, for business and industry. Provision of this added notification will further insure sufficient lead time and follow-up on public notification.

Q.14. What communications facilities does the York County Chamber of Commerce have to perform this mission?

A. The York County Chamber of Commerce service is dependent upon commercial telephones. This service, which is necessary at the present time only because siren coverage is inadequate, will be redundant when the siren coverage is expanded to meet NUREG-0654 (E and Appendix 3) standards. As has been stated, FEMA considers commercial telephone adequate for notification of Emergency Response personnel and therefore, would consider such a fanout service from the York County Chamber of Commerce adequate as back-up to the public notification system (siren and EBS) when it is installed. Business and industry within the York County plume exposure EPZ would receive primary notification through public notification systems. At present, FEMA considers the time required to alert business and industry and other segments of the general public inadequate because of the current lack of siren coverage. The most effective delivery means

available at this time is through a combination of outdoor warning signal and EBS. FEMA does not, at this time, recommend establishment of a business and industry radio system or dedicated telephone system. Absence of such systems is not a deficiency. The current deficiency resides in the overall adequacy of the Public Warning Delivery System as described in the Plan. The licensee is in the process of enhancing the notification system in accordance with the NRC requirements.

Q.15. Newberry York Plan 3 (EP14-C) states, in part:

The York County Plan in Section VI, Subsection (C) provides that posting of evacuation maps and semi-annual distribution of evacuation routes in local newspapers will be accomplished. It is submitted that there is no set designation of the responsibility for the effecting of this part of the Plan and it is Intervenor's contention that unless the Plan directs and places responsibility upon someone to effect this part of the Plan, the Plan is defective.

Who is responsible for pre-incident distribution of Public Information material which provides evacuation maps and instructions for the public?

A. The Commonwealth's Plan Annex E, Section IX (g) and (h) provides that pre-incident public information distribution is a Risk County responsibility, with technical assistance to be provided PEMA. The Commonwealth's Plan Annex E, Appendix 15 to the State Disaster Operations Plan provides that the Governor's Press Secretary will establish policies and procedures for a public education and information program, to be implemented by Commonwealth agencies. Posting of radiological emergency protection information, including evacuation routes, is not yet provided for in the York County Plan. Public education on radiological emergency protection matters for residents and transients will be accomplished through a

coordination of the Commonwealth's and County public information programs. The York County Emergency Coordinator has distributed brochures outlining evacuation routes and procedures.

Q.16. What is the timing of the Public Information Program?

A. Site specific brochures have been printed for each Risk County within the plume EPZ. In York County, distribution has been made through the York Emergency Management Agency. The York Daily Record recently carried an article forecasting this distribution and identifying the County EMA/York County Emergency Management Director as the county official responsible for public education relating to radiological emergency preparedness. The York Dispatch, on Thursday, December 11, 1980, published the planned evacuation routes and selected essential information from the York County radiological emergency preparedness brochure. PEMA and other State agencies are preparing input for the Commonwealth's Public Information Program, shown in the Commonwealth's Plan as Annex E, Appendix 15. The Commonwealth and County public information programs will provide for redistribution of brochures annually to continue throughout the life of the plant.

Q.17. Is the projected program adequate to meet NUREG-0654 standards?

A. The State level programs, which will supplement the County programs, are under development and have not been implemented. However, progress is being made toward development of an adequate program. The projected

utilization of public television, commercial radio and television, newspaper, facility mailing, inclusion in public school curriculum as well as the distribution of handout materials appears thorough and, if completed, should be adequate to insure compliance with NUREG-0654 Planning Standard G with respect to the permanent population. FEMA will monitor State and local programs to insure that the programs are carried out. Deficiencies, if found, will be reported to the Commonwealth. Any significant deficiency found by FEMA during plant operation will be reported to the NRC.

Q.18. Newberry York Plan 15 (EP14-0) states:

Annex C of the York County Plan is deficient in that its total concept of operations is based upon tone-coded siren control and that nowhere in the Plan is it stated that all individuals are within hearing distance of the sirens located within a 20-mile radius of the TMI nuclear plant. Moreover, the Plan provides as a back-up or supplementary system to the siren system that police and fire vehicles would travel throughout the communities and again it is raised that the townships, boroughs, and municipalities located within the 20-mile radius of the TMI nuclear facility do not have the necessary commitments of manpower to effect such a plan. Therefore, it is Intervenor's position that the York County Plan remains deficient.

Will the required Siren System have coverage of 20-miles?

A. The system being designed in accordance with NUREG-0654 Planning Standard E-6, Appendix 3, and 10 CFR 50, will provide for sirens within the plume exposure pathway EPZ of about 10-miles.

Design of the system to meet this criteria will be such as to provide sufficient coverage to reduce need for supplementary notification methods to a minimum. Until the system is supplemented, we cannot ascertain its

adequacy nor the quantitative need for supplementary notification. At that time, procedures for supplementary notification, if any, will be required.

Q.19. Newberry York Plan 19 (EP14-T) states:

Appendix I of the York County Plan regarding warning is deficient in that it assumes that local fire companies will be able to alert all members of a rural community by direct notification such as knocking on doors. There is absolutely no conceivable way in which individual direct notification can be made in Newberry Township because of the number of residents versus the number of volunteer firemen and it is submitted that the same conditions exist in all local municipalities located within the 20-mile radius of the TMI Nuclear Facility. Therefore, until and unless a system is designed that can adequately insure that a substantial majority of the population can be notified of an incident at TMI, the Plan is deficient.

Is York County warning capability adequate?

A. At present, although the estimated time to accomplish such warning has not been determined, it is thought that the warning portion of the public notification system is inadequate to cover the area needed. This has resulted in an impractical reliance on emergency service personnel to provide public notification.

Q.20. How is this to be corrected?

A. The licensee is developing a public notification system to meet the public notification standards of NUREG-0654. The coverage of the plume EPZ by an outdoor siren system is designed to exceed the standards set out in Appendix 3 of NUREG-0654 and, as such would not require reliance

on emergency service personnel to provide supplementary alerting within the plume EPZ. Upon installation and testing of licensee's alert and notification system, FEMA will provide NRC with an evaluation of the system's capabilities and advise parties of the need for corrective action.

Q.21. What area will this system serve?

A. As set out in NUREG-0654, Appendix 3, the system shall serve the plume exposure EPZ. This area is less than the 20-mile coverage mentioned by the Intervenor. Detailed planning beyond the established plume exposure EPZ exceeds current standards and is not, at this time, considered necessary.

Q.22. Newberry York Plan 24 (EP14-Y) states:

Annex N, Subsection VII, Subsection G provides for certain duties and responsibilities for a County Director and these duties and responsibilities conflict directly with those of the Emergency Management Coordinator. Specifically, this section provides that the County Director shall provide appropriate notice of information received and emergency actions taken and proposed to the York County Police and Fire Departments, other agencies and emergency operational chains, and local news media for emergency public information and news announcements, whereas, Appendix II provides that the Public Information Officer is responsible for the issuance of official information, advice and instructions from the county to the public. This conflict renders the Plan deficient.

Do the duties and responsibilities for the York County Director conflict with those of the Emergency Management Coordinator?

A. In York County, the York County Director and the York County Emergency Management Coordinator are the same person. The use of the two titles is

a result of plan modification. Since the two titles used in the Plan refer to a single position, no conflict is presented by differing responsibility assignments to each title, so long as the titles continue to be assigned to one person. For the sake of clarity, FEMA recommends deletion of one title.

Q.23. Does a conflict exist between the York County Director and the York County Public Information Officer (PIO)?

A. No. The announcements which the York County Director/Coordinator will provide to the participating EBS Network will be prepared statements from the York County Plan. The PIO, as the designated spokesperson for York County, is to provide official information, advice and instructions to the public. The issuance of EBS warning notifications by the County Director/Coordinator does not conflict with the PIO's responsibility to prepare and issue emergency information and instructions through non-EBS media sources.

Q.24. Newberry Dauphin Plan 5 (EP16-E) states:

Appendix 5 of the Dauphin County Plan provides that alert warnings will be initiated through siren activation. Again, this part of the Plan makes a broad base assumption that the populace within the county can hear the sirens at all locations and it is Intervenor's position that this is not true. Therefore, until and unless a sufficient number of sirens are placed throughout the county area at locations that will ensure that the total populace of the county is within hearing distance of the sirens, the Plan will remain deficient.

Must all of Dauphin County be covered by a servant alert system?

A. No. A warning system sufficient to notify the general public within the plume exposure EPZ is required by NRC Regulation to be in operation on or before July 1, 1981. NUREG-0654 reflects the planning standard for such a system in Planning Standard E and Appendix 3. The plume exposure EPZ for TMI-1 does not encompass all of Dauphin County.

Q.25. What is the present siren coverage for Dauphin County?

A. Present siren coverage based on a Civil Preparedness Program status report is estimated at 70% of Dauphin County's population. As previously noted, the license is undertaking installation of a siren alert system designed to provide 100% coverage of the plume exposure EPZ, including those areas of Dauphin County within the plume EPZ.

C. Implementation of Protective Actions

(i) Communications

Q.26. Angry III C-9 (EP6-C) states:

There is no assurance of the operability of county-local government communications links on a 24 hour basis, as required by N.0654 Sec. F1(a) and PA SDOP Sec. IX (B) (1)(f).

Are the County Government communication links manned 24 hours a day?

A. Yes. The County EOC's in the five risk counties (Cumberland, Dauphin, Lancaster, Lebanon, and York) are these counties' emergency services dispatching centers. The 911 emergency services and county dispatching

are colocated with the EOC communication centers of all five counties. These are manned 24 hours a day. It is these locations that the State Duty Officer (PEMA) or the State Operation Officer (PEMA), the Licensee (in the General Emergency classification), and Dauphin County or PEMA (if telephone service is disrupted), will contact in initiating the TMI-1 Warning and Notification System. The present County Warning Systems can be centrally activated from the EOCs.

Q.27. Newberry York Plan 4 (EP14-D) states:

Section VI, Subsection (d)(1) provides that, upon notification from PEMA, the County Director will assemble and consult with appropriate members of the county staff and elected officials. There does not seem to be included in the Plan any means in which to contact the local elected officials, unless it is the assumption that these officials would be contacted by telephone. It is Intervenor's contention that, in the event of an emergency situation at Three Mile Island, once the public has any notice or indication that something has occurred at TMI, that the telephone lines will become overloaded and that incoming calls to local officials will not be able to be effected. Moreover, the Plan does not indicate where local officials will assemble, how they will know where to assemble, and when to assemble and thus the Plan is still deemed to be deficient.

What elected officials will be contacted and assembled by the County Director.

A. The elected officials referred to in this section of the York County Plan are the three York County Commissioners.

Q.28 How will these officials be contacted?

A. These officials will be contacted by telephones.

Q.29. What are your views as to the adequacy of this method of contacting these officials?

A. It is FEMA's view that telephone communication should be adequate because of the timing of the calls. These officials will receive telephonic communication as part of the initial governmental notification process before notification of the public. There is no reason to believe that at this period telephone systems will be overloaded.

Q.30 How will these elected officials know where and when to assemble if this is not set out in the York County Plan?

A. Those officials are designated members of the York County emergency response organization and have prearranged assignments to assemble at the York County Courthouse which is the location of the York County EOC.

Q.31. Newberry York Plan 16-1 (EP14-P) states:

Annex D, Section V, provides that the concept of operation will be effected by the regular communications staff augmented by "qualified volunteers" as required. The Plan also indicated that amateur radio will be relied upon in the event of an incident at TMI nuclear facility. There is no assurance that any amateur radio operators have agreed to participate in such an operation or that each school district has had an operator assigned to it to coordinate the utilization of school buses. Moreover, there is no definition of who is a

qualified volunteer in the event that volunteers are required to be used by the communications staff. Finally, the concept of operations in this section provides that RACES would provide interim communications at the Hanover site until full communications capability could be restored. It is Intervenor's position that the Hanover site must be placed in an immediate ready condition in order to effectively serve as an alternate site for emergency operations control. It is intervenor's position that until and unless the Hanover site is placed in a ready condition, that the Plan remains deficient. Furthermore, Subsection VI of this particular section provides that the common carrier system within the Emergency Operations Center is the 911 system, of which 49 out of 79 emergency telephone trunk lines are committed. Furthermore, 6 of the lines are standby rumor-control lines, leaving 24 emergency telephone trunk lines for those areas not contained within the 911 system. The Newberry Township, Fairview Township, Goldsborough and Lewisberry areas are without 911 service. It is Intervenor's contention that, in the event of an incident at the TMI nuclear facility, the telephone grid system would become so overloaded during such an incident that the making of a phone call to the remaining 24 committed lines at the Emergency Operations Center would be difficult if not impossible. Therefore, it is claimed that this part of the Plan also is deficient in that there are not enough emergency trunk lines available for all residents within the 20-mile radius zone of TMI with a special emphasis on those areas in York County, which are closest to the nuclear power facility.

What communication volunteers are planned for in the York County Plan?

A. The York County Plan Annex D, Section V, reflects that qualified volunteers will augment the regular communication staff, as required. The York County RACES Inc. is an organized group of radio operators, with radio amateur licenses. During an emergency, RACES members will work with and augment York County Emergency Management Coordinators to provide a volunteer communication service to include use of their own equipment, and their time as communication operators.

Q.32. What assurances are there that York County RACES Inc. has agreed to provide the communication services which are relied upon?

A. At this time, there is no formal assurance from RACES. A Letter of Agreement as specified in NUREG-0654 Standard A, criterion 3, should be provided from York County RACES, Inc. FEMA has been informed by the York County Emergency Coordinator that such a Letter of Agreement will be obtained to formalize this arrangement.

Q.33. Should the Hanover site be maintained in a ready condition to effectively serve as an alternate site for emergency operation control?

A. There is no requirement for the establishment of an alternate county EOC and therefore, there is no requirement for the Hanover site to be maintained as an alternate EOC. The reason for this conclusion is fully addressed in our testimony of February 23, 1981 on Newberry Contention York Plan 5 (EP14-E).

Q.34 What is the common carrier (telephone) capability in the York County EOC?

A. Section VI of Annex D to the York County Plan provides that there are 79 trunk lines entering the EOC; 49 of these service the 911 system and enter from all sections of York County. Six of these lines can be used as standby rumor control lines and operated during emergency situations. The other trunk lines are for the County emergency response personnel manning the EOCs.

Q.35. If the telephone systems are jammed due to excessive use, are the telephone lines into the EOC adequate?

A. Specific dedicated circuits assist in this situation, and are in place and operational from the County EOC to the EBS station and are in place (to be activated in the event of an emergency) between the State and the EOCs in the five risk counties. It is not required that there be sufficient emergency trunk lines available for use by all residents within 20 miles. Emergency notification within the EPZ will be provided by licensee's early warning sirens, followed by EBS transmissions. Telephone notification of large segments of the general public is not anticipated.

Q.36. Newberry Dauphin Plan 3 (EP16-C) states:

Appendix 3, Annex E of the Dauphin County Plan indicates that approximately 65 people will be notified in the event of an emergency. It indicates that notification of these people will be by radio whenever possible and then by telephone. Nowhere in the Plan is it indicated that the individuals listed have radios which are compatible with that of the County EOC. Moreover, there's no indication that the frequencies to be used for communicating with these individuals would be free of any outside disturbance. Therefore, until and unless it is indicated in the County Plan that these individuals have compatible radio equipment and that frequencies are being used that are relatively free from any other type of traffic, it is Intervenor's position that the Plan remains defective.

Are radios in the possession of key personnel compatible with those of the EOC?

A. Yes. Key personnel have access to two-way radios which are tuned to the County Direction and Control frequency. (See testimony in response to Newberry Dauphin Plan Contention 6 (EP-16F)).

Q.37. Is there frequency compatability of this equipment?

A. Yes. This equipment was purchased for use on the county wide Direction and Control Net which is designed to operate on a frequency of 46.56 MHz.

Q.38 Should there be substantial outside disturbance on this radio network?

A. No. This is a dedicated local government radio frequency assigned to Dauphin County and not available under FCC rules for any other use; consequently outside disturbance on this radio network is precluded.

Q.39. Newberry Dauphin Plan 6 (EP-16F) states:

Appendix 6 of Annex E of the Dauphin County Plan provides that the American Red Cross, military unit assignments, fire and ambulance units, and police units will be assigned various frequencies for radio operations, and will have various radio equipment at their disposal. Nowhere in the Plan is it indicated that there is an existence presently of the equipment necessary to operate on the indicated frequencies or that if the equipment is presently available, that it is being maintained. Moreover, the Plan as written indicated that the police only have two frequencies on which to operate in the event of an emergency. Furthermore, fire, ambulance, Red Cross and military units will all share the same frequency, and it is submitted that in the event of an emergency, the traffic on those those frequencies will cancel effective communication among all of the groups. Therefore, until and unless it is stated that each of these units has its own frequency for operation, and that there are sufficient number of frequencies in order to ensure effective operations, the Plan is deficient. Moreover, until and unless the Plan indicates that there is an existence of compatible equipment in order to effect this part of the Plan, and that there is a responsibility for maintenance of the equipment, it is Intervenor's position that the Plan remains inadequate.

Does the dual use of frequencies by different resource groups cancel the effectiveness of radio communications?

A. No. The County dispatchers maintain net control on all the radio frequencies assigned in the Dauphin Plan. They control and allow for proper use of radios. Diminished effectiveness generally depends upon the number of persons using the frequency, rather than the number of organizations using the frequency. Although separate frequencies would definitely enhance communications, it is not a requirement. Dauphin County maintains a totally separate frequency for Emergency Management/Direction and Control. Dauphin County provides a separate administrative frequency for the sole purpose of Direction and Control of the County Emergency Management personnel as follows:

- Three County commissioners each have a portable radio.
- CD Director, Assistant CD Director, Communication Officer, and Deputy County Director each have a portable, a mobile and a remote radio;
- RADEF Officer, RACES Officer, Situation Analysis Officer, Medical Officer, and all Local CD (EMA) Directors, have a portable and mobile radio;
- The Transportation Officer, Police representative, and fire representative, each have a mobile radio;
- The Mass Care Director has a portable, and a remote radio; and the County Engineer has a remote radio.

This provides communication to approximately 56 Emergency Response Personnel. In addition to this network, the County ambulance and fire companies utilize 4 additional frequencies, and the police utilize 5 additional frequencies.

Q.40. What assurance is there that the necessary radio equipment is in existence and is maintained?

A. This equipment is in routine use by county emergency services and is maintained as part of regularly utilized emergency services. Confirmation of availability and operability of this equipment is provided by communications drills provided for in the State emergency plan.

Q.41 Newberry Dauphin Plan 17 (EP16-Q) states:

The Dauphin County Plan lists only two (2) 911 operators in place in the event of an evacuation. It is submitted that two operators is grossly insufficient when it is taken into consideration that the York County Plan incorporates forty-nine (49) 911 operators in order to deal with an evacuation. Until and unless there is a commitment for more 911 operators to be in place during an emergency, the Dauphin County Plan remains deficient.

How many operators will Dauphin and York Counties have in the event of an evacuation?

A. Dauphin County plans for two 900 operators for an unspecified number of 911 lines; York County, with 49 trunk lines, also plans for two 911 operators.

Q.42. Are two 911 operators for each of these counties sufficient during an emergency?

A. Yes. Counties have been directed to set up rumor control centers, which will relieve some of the burden from 911 operators. Call volume exceeding 911 operator capacity will be transferred to the rumor control centers or other appropriate resources.

(ii) Support Services

Q.43. ANGRY III C-7 (EP6-A) states:

There is inadequate provision in the York County Plan for providing medical services for contaminated individuals, for training persons providing these services, and for transporting radiological victims to medical facilities, all as required by NUREG-0654, Section L.

What are the criteria of NUREG-0654 with regard to county plan provisions for medical services to contaminated persons?

A. NUREG-0654 stipulates that counties are to arrange for local and backup hospital and medical services for individuals exposed to radiation, to assure that persons providing medical services are prepared to handle contaminated individuals and to arrange for transporting victims of radiological accidents to medical support facilities.

Q.44 How does the York County plan compare to these criteria?

A. The York County plan at present makes no provision for local and backup hospital and medical services for individuals exposed to radiation. PEMA has informed York County that its plan should be modified to identify hospitals which have the capability to treat individuals exposed to radiation.

The York County plan does not provide assurance that persons providing medical services are prepared to handle contaminated individuals.

This responsibility is being met, however, under the Commonwealth's plan by the State Department of Health. When the State Department of

Health has carried out its responsibilities in this regard, the requirement will have been satisfied for York County which then should reflect this in its emergency plan and procedures.

The York County plan has provided for the transportation of all persons needing medical aid, including victims of radiological accidents, to medical support facilities, through available ambulances or other vehicles allocated for this purpose.

Q.45. ANGRY III C-8 (EP6-B) states:

Although the Pennsylvania DOP, Section IXB (1)(p), delegates the responsibility for arranging for emergency wrecker and fuel services to risk counties, the York County Plan assigns this responsibility to the Pennsylvania National Guard (Section VIA (7)(c)).

Which agencies are responsible for emergency wrecker and fuel services in the event of an evacuation?

A. The Commonwealth's Plan, Section IXA(II)c, assigns fuel distribution to the Department of Transportation, with the National Guard providing wrecker support. The Commonwealth recognizes that initial fuel and wrecker services will, however, be provided by the risk counties. Therefore, Section IX B(1)(p) of the Commonwealth's Plan suggests that the counties should "select locations for and prepare to provide emergency services to include first aid, wrecker and fuel services." This approach is consistent with accepted emergency management practices, in that it dictates utilization of local resources to meet initial requirements.

Q.46. ANGRY III C-10 (EP6-D) states:

There are numerous assignments of responsibility to persons and organizations that are not documented by written agreements demonstrating knowledge of and ability to perform assigned roles as required by NUREG-0654, Section A3. The most important of such delegations are:

1. American Red Cross (operation of relocation centers; Annex I).
2. Maryland Department of Health (provision of ambulances and helicopters for hospital evacuations; Annex J).
3. Amateur radio operators (communications with local governmental units and school districts; Annex D, §VE).
4. "State C.D." (50-2 passenger ambulances for evacuation of nursing homes; Annex J., Appendix 2).
5. School Districts (transportation of school children to relocation centers and provision of facilities for such centers; Annex O).
6. York Area Transit Authority (evacuation of nursing home patients, Annex K).
7. State of Maryland (overflow mass care capacity; Annex I, Section IVD).
8. Adams County (relocation center, Annex I).
9. York Chamber of Commerce (notification of business and industry; Section VIA(7)(a)).
10. York County USDA Disaster/Emergency Board (monitoring crop and animal surveillance; Annex R).

Are there written agreements with organizations listed in this contention?

- A. With one exception, there are currently no such written agreements. During review of the County Plan, FEMA was told by the York County Emergency Management Coordinator that documentation of existing agreements between the County and the listed emergency services organizations would be obtained in the near future. The existence of a service relationship

between the parties is not questioned and in an emergency the documentation, or lack thereof, would certainly not govern the assurance of such services to the community. When completed, the documentation will be added to the Plan. At this time, one letter of agreement, namely between York County and the Department of Health and Medical Hygiene of the State of Maryland has been provided to FEMA. Letters of agreement for items 4 and 10 of the contention are not needed and should not be provided because these items speak to responsibilities assigned to State organizations under the State emergency plan and are, therefore, specifically provided for in the State plan.

Q.47. Newberry York Plan 9 (EP14-I) states:

Appendix 2, Section III, Subsection (g) of the York County Plan indicates that the Area Agency on Aging should develop a system to identify the homebound and invalid personnel that require special transportation group. Until and unless the Area Agency on Aging is directed to effect such a system, it is Intervenor's position that the York County Plan is deficient because, without such listing, there would be no way in which local communities could be assured that all invalids and homebound persons would be removed from an evacuation area.

What special planning has been established to provide for homebounds and invalids during an evacuation of York County?

A. NUREG-0654 Planning Standard J, Criterion 10d requires procedures for protecting those persons whose mobility may be impaired. The responsibility to prepare a list of such persons and prepare for their care has been assigned to municipalities and boroughs. These provisions

and procedures are under development and have not been provided for review to FEMA. Consequently, the York County Plan is inadequate in this regard.

Q.48. Newberry York Plan 11 (EP14-K) states:

Appendix 3, Annex A, Situation Analysis Group, of the York County Plan provides that it will support the State Bureau of Radiological Health with available personnel and equipment and that in the event of a general evacuation on request it will support fire and mass care operations with monitors for decontaminations. Nowhere in the Plan does it state that the Situation Analysis Group will have the necessary equipment required in order to support the various bureaus and fire and mass care operations with the necessary equipment monitors for decontamination operations.

What arrangements have been made to assure that emergency response units have sufficient radiological monitoring equipment to perform assigned functions?

A. Based on our review, we have been unable to identify any arrangements in this regard. FEMA agrees with the intervenor's contention that the Plan should reference the equipment necessary to perform the monitoring service. FEMA believes that equipment should be located with emergency response organizations that will be utilizing the equipment. The State was informed by FEMA of this deficiency and is working with the County involved to correct it.

Q.49. Newberry York Plan 12 (EP14-L) states:

Appendix 3, Annex A, providing for police operations in a selective evacuation and a general evacuation provides that

the police would support and assist in notification and, on request, that police operations provide fire and police support for traffic control and security. It is submitted that support and assist in notification and support for traffic control and security are mutually exclusive operations. It is intervenor's contention that police in local communities cannot be asked to both support traffic control and security and, at the same time, support and assist in the notification of area residents of the impending dangers and evacuation notification in the event of an incident at TMI.

How will police handle notification and security and traffic control in the event of a selective or general evacuation?

- A. The Licensee is installing a prompt notification system for the plume EPZ which should reduce to a minimum the need for police to provide notification services. Police officers thereby released from notification assignments through use of the prompt notification system should be available for security and traffic control. Additionally, it should be noted that notification assignments may be given to other than law enforcement personnel. Such complementary service personnel do, in fact, exist.

Q.50. Newberry York Plan 18 (EP14-S) states:

Annex G of the York County Plan is deficient in that it assumes that local fire companies will have sufficient manpower to effect emergency operations procedures as outlined in the Plan. As is previously been pointed out by the Intervenor, there is usually insufficient staffing of the individual fire companies to assure that all residents in rural areas would be notified of an incident at the TMI nuclear facility because of the number of miles of road located in each township. The Plan also contains a concept that the county distribute radiological monitoring equipment to individual fire companies to be monitored by the fire company personnel. There is no indication in the Plan that volunteer firemen have been trained to operate such equipment.

and there is no assurance that such equipment is presently located within the county for distribution. Until these deficiencies are resolved, it is Intervenor's position that the Plan is deficient.

Does adequate staffing exist to assure that all residents in rural areas would be notified of an incident?

A By July 1, 1981, the Licensee will be required, under the NRC's emergency planning regulations, to have an operable warning system for the plume EPZ. It is expected that most residents will be notified through this warning system. Fire personnel may be used to supplement the mechanical system. It is not expected that large numbers of fire personnel will be required to conduct notification operations.

Q.51. Do adequate resources exist to provide radiological monitoring equipment and training for each fire company in York County?

A. The County has not yet provided an inventory of radiological monitoring equipment to be used, and its distribution in support of operations for decontamination of people or vehicles. Fire companies, as stated in the York County Plan, provide the available monitoring service. As to the training of firemen in the use of such monitoring equipment, the York County Plan indeed does not provide for such training. However, the State of Pennsylvania training program does provide for training firemen in the use of such equipment. Training programs have existed in the past, administered by the US DOT and the Defense Civil Preparedness Agency, to instruct personnel in dealing with radiological emergencies.

In all likelihood, many York County firemen have been trained at these courses.

Q.52 Newberry York Plan 21 (EP14-V) states:

Annex K of the York County Plan provides for the transportation of various individuals out of the evacuation area. Intervenor's contention in this area is that there is no direct stated coordination of plans between YATA, local school districts, the Baltimore Transit System, and the Pennsylvania and Maryland Railroad Company. The Plan as set forth in the concept of operation indicates that total coordination of the system will be left to the county Transportation Coordinator who will establish a system, but it doesn't identify when he will establish a system to identify priority use of transportation resources. Moreover, it states that any buses without missions would report to the Vo-Tech school located in York and be dispatched from that point. There is no provision for the refueling for any of the buses in any particular area and there is no guarantee that school buses driven by volunteer drivers would be willing to return to a risk area. Furthermore, the transportation area of the York County Plan has totally disregarded the initial five hour plan which had been included in the initial evacuation plan. Nowhere in this Plan does it appear that transportation could be effected in any set time period and, therefore, this section again, by implication, contains the realistic admission that, regardless of whether school was in session, the evacuation plan would appear inoperable and unrealistic. Until and unless the Plan shows exact designation of buses, commitment by bus companies to react within set stated times and letters of agreement between the surrounding school districts and the York County Commissioners with regard to assurances of delivery of local school buses, the Plan will remain deficient.

What coordination will be provided to assure transportation utilization during an evacuation?

- A. The York County Plan assigns to the York County Transportation Coordinator (TC) the responsibility for development of a system to utilize transportation resources during an evacuation. The

plan for the system has not yet been provided to FEMA for review; however, the County Plan does list resources available to the TC in the event of an emergency.

Q.53 How will the evacuation buses be manned and refueled?

A. The system to be developed by the TC should establish a method for insuring manning and refueling of evacuation buses. During initial refueling operations, local fuel facilities, i.e., county fuel pumps and local gasoline stations should be utilized. For extended operations, the TC should consider fuel support from the State and National Guard resources. Bus drivers can be expected to return to the risk area as needed, to accomplish their assigned missions.

Q.54 Are specific assignments and time limits necessary for effective operation of the transportation section of the County Plan?

A. While specific assignments would clarify operational priorities, actual emergency conditions will probably require a distribution of transportation assets to meet the specific circumstances. General response assignments for buses involved in the evacuation of school children are an explicit part of the plan based on the schools and school districts they now support.

Q.55 Must letters of agreement between the county and local bus companies and school districts providing evacuation buses be included in the Plan?

- A. Agreements with private bus companies are indeed necessary. It is anticipated that during a general evacuation however, available vehicles would be used to assist the evacuation, regardless of the status of existing documented agreements.

Q.56 Newberry York Plan 22 (EP14-W) states:

Annex L of the York County Plan provides for resource requirements which, it is assumed, would set forth what would be required to set the whole evacuation plan of York County into operation with regard to manpower, equipment, and other resources. The Plan as of this date remains under development in this area and until and unless the Plan is completely finalized, it is Intervenor's contention that the Plan is deficient.

How will personnel and equipment resources necessary to implement the evacuation of York county residents within the plume exposure EPZ be activated?

- A. The York County EOC will be activated to respond to radiological emergencies. The emergency response personnel designated in the York Emergency Plan should deploy previously identified resources. These personnel have the authority to manage the resources. Unmet resources will be requested through PEMA, at the State EOC.

Q.57 Newberry York Plan 23 (EP14-X) states:

Annex M of the York County Plan providing for military support states that the Pennsylvania National Guard will enter into active duty upon an order of the Governor. Moreover, they will respond to any individual local political subdivision's needs upon request of the local political subdivision for aid. The Plan does not state with any specificity whether the Guardsmen will be protected by radiation-proof equipment, under whose orders and directions

they will remain during their encampment in a local political subdivision, and when they will arrive in the local political subdivision after requested to do so. Until and unless these deficiencies are rectified, it is Intervenor's contention that the Emergency Plan is deficient.

Will the National Guardsmen be protected by radiation-proof equipment?

A. No. Standard military clothing including fatigue uniform, field jacket, poncho, helmet liner, and M17 protective mask as well as other standard issue, will be worn by Guardsmen.

Q.58 Under whose orders and direction will they remain during encampment in a local political subdivision?

A. National Guardsmen will remain under the command and control of the guardsmen's chain of command.

Q.59 When, after it is requested, will they arrive in the political subdivision for encampment?

A. Upon coordination between PEMA and the National Guard, the units most accessible will be dispatched to the subdivision. However, precise times for the arrival of National Guard units is not known.

Q.60 Newberry York Plan 29 (EP14-CC) states:

Nowhere in the York County Plan does there exist a catalog of the tow trucks available for use in York County. Until and unless a catalog of the tow trucks available for use is attached to the Plan, the Plan remains deficient.

How will the County determine tow truck availability during an emergency?

- A. State and local law enforcement agencies utilize tow truck services for motor vehicle accidents in their jurisdictions on a daily basis. This experience will be relied on to contact and utilize available tow truck services in an emergency. A separate catalog of tow trucks is neither required nor necessary.

Q.61 Newberry York Plan 35 (EP14-11) states:

The York County Plan provides that the American Red Cross would provide for distribution of certain foodstuffs, clothing, and other personal articles. There is no mention in the Plan whether the Red Cross would have at its disposal the estimated foodstuffs required to feed the evacuated population, the cots needed for the sheltered area and the evacuation centers. Until and unless the Plan contains the statement that these items are in storage and available for distribution, it is Intervenor's position that the Plan remains deficient.

Must the Red Cross have evacuation support materials in storage in the TMI area?

- A. NUREG-0654, Planning Standard J, Criterion 12 states that relocation centers should have capabilities to register and monitor evacuees within 12 hours of the incident; however, this criterion does not require that mass care facilities be established. The State Plan provides criteria for mass care centers and assigns to the Red Cross the mass care support mission, in conjunction with the host county. It has been FEMA's experience that Red Cross/County emergency management agencies

have provided adequate operations of mass care facilities during actual disasters, either through onhand or borrowed resources. Thus, it is our view that the lack of a statement in the York County plan on the availability of mass care resources is not a deficiency.

Q. 62 Newberry Dauphin Plan 7 (EP16-G) states:

Appendix 8, Attachment 8-1, indicates that there are local pickup points for individuals who are without transportation. There is no indication within the Emergency Plan as now drafted that there will be police protection for people waiting at the pickup points in order to insure security. Moreover, the pickup points as listed do not ensure that individuals who assemble at these points will be sheltered for their protection under some type of cover. Until or unless it is assured that there will be police protection provided and that sheltering will be provided, the Plan is deemed inadequate.

What security and shelter will be provided to persons assembled at the pickup points?

A. NUREG-0654, Planning Standard J, Criterion 10g and Appendix 4 requires evacuation plans to consider the moving of people who do not have transportation resources. This criterion does not call for police protection for these individuals. It has been FEMA's experience with mass evacuation that personal security has not been a significant problem.

There is no requirement or planning guidance specifying that short term shelter or cover is to be provided for persons at pick-up points. Therefore, we do not view the lack of provision of short-term cover at all pick-up points as a deficiency in the emergency plan.

Q.63 Newberry Dauphin Plan 8 (EP16-H) states:

Appendix 8, Attachment 8-2 of the Dauphin County Plan provides that local municipalities shall provide one personal lead vehicle to the EOC Reception Area from the staging Area. The problem with this particular part of the Plan is that there is no designation of who will be the person to lead vehicles to the EOC Reception Area. Moreover, there is a candid admission that there is the chance that municipalities will hijack vehicles intended for other communities. Until and unless there is some type of security provided for incoming and outgoing units, the Plan shall remain deficient. Moreover, there is no provision in this Plan to provide for refueling of the incoming buses and ambulances and until and unless there is some indication of how refueling is going to take place, there is the risk that incoming buses and ambulances would run out of fuel and be rendered useless.

Should local municipalities designate specific individuals to be lead vehicle operators for the EOC reception area?

A. No, lead vehicle operators should be designated from personnel available to the municipalities at the time of an accident, with consideration to the need for other services. The failure to pre-designate lead vehicle operators is not a deficiency.

Q.63 Is hijacking of emergency vehicles considered a serious threat?

A. No. Except for war-time situations, FEMA is unaware of any disaster in which local governments hijacked the transport capability; i.e., vehicles of other governments, to provide for evacuation or emergency services.

Q.64 How will the county provide for refueling buses and ambulances used in an emergency?

- A. Refueling will be conducted through local resources, county pumps and private gasoline stations, with support from the state and National Guard on an as needed basis. Lack of explicit provisions in the plan for refueling is not a deficiency.

Q.65 Newberry 3b-12 (EP14-00) states:

Because of the experiences of the past, even the limited evacuation of pregnant women and children under five years of age left many of the areas surrounding the Three Mile Island Nuclear Power Station deserted and open to looting without proper security. The assumption that the National Guard would, in the event of an evacuation, be called up by the Governor, is one that is a void in the evacuation plan and the National Guard is not called up or does not respond to the Governor's request because its members are busily evacuating their own families.

What is the potential for looting during an evacuation?

- A. Annex F of the York County Plan calls for the Pennsylvania State Police, York County Sheriff and local police departments to exercise their normal responsibility with respect to law enforcement.

It has been FEMA's experience that in mass evacuation situations, looting has not been a significant problem. Furthermore, it is FEMA's expectation that there will be significant law enforcement personnel and reinforcements to insure that law and order is maintained in the evacuated area.

Q.66 Newberry Dauphin 15 (EP16-0) states:

The Dauphin County Plan indicates that it has a total need of approximately 600 ambulances for the evacuation of all members of the exposed populace and indicates only 45 are available. The Plan also indicates that it could obtain an additional 226 ambulances from outside the county, still leaving a shortfall of approximately 300 ambulances. There is no solution to the problem indicated in the Plan.

Is there in fact an ambulance shortfall in the Dauphin County Plan?

- A. The Dauphin County plan provides at page 8-11 that 600 ambulances will be required for a 20-mile evacuation. Since the plume EPZ used for TMI is approximately 10 miles, the requirements for ambulance availability for Dauphin County can not be precisely determined based upon the current plan. However, in a general evacuation, ambulances will be drawn from the 327 ambulances identified by county planners on page 8-11 of the county plan. By utilization of these resources and conversion of standard vehicles into make-shift ambulances, sufficient ambulances should be available to evacuate severely incapacitated residents.

Q.67 Newberry York Plan 3 (EP14-C) in part states:

The Plan in subsection (c) also assumes that homebounds and invalids will be able to be transmitted by means of ambulance and bus and that individuals with no transportation could request the same through local fire companies for bus pickup. The capabilities to effect such a plan within Newberry Township are nonexistent. For example, Newberry Township has two ambulances that could be placed into service, assuming that a volunteer would operate the same. Local communities surrounding the Newberry Township area include Goldsboro Borough and Lewisberry Borough, each borough having an ambulance to effect evacuation of their homebounds and invalids. It is submitted that within the 34 mile square

area that encompasses Newberry Township and the boroughs of Lewisberry, Goldsboro, and York Haven that four (4) ambulances would not be sufficient to evacuate homebounds and invalids. Moreover, transportation through local fire companies will be impossible, as local fire chiefs have indicated that they could not guarantee that any personnel could or would effect such an evacuation service. Finally, it is submitted that if local volunteer fire companies cannot assure manpower staffing during a general emergency situation, that they cannot be again counted upon to provide transportation to designated areas for bus pickup for those individuals who are within transportation.

What are the considerations in York County planning to provide for homebounds and invalids who have no means of transportation and cannot get to a mass transit pick-up point?

- A. The York County planning places this responsibility on the municipal/borough/township level government. The EMA director or coordinator of each jurisdiction is to prepare lists of persons in this category in preparation for their care. The York County Public Information Brochure which was distributed provides, in the section entitled "How to Get There" that persons physically unable to leave their homes are to contact their Local emergency Management Coordinators and "report any disabling conditions now to your Local Coordinator." The Local Coordinator is to determine the transportation requirements and identify those which cannot be met from local resources. The county, in Annex L, "Resource Requirement," provides its concept of operation to meet these local unmet resources and to establish a control receiving point at York Vo-Tech School for out of county resources to be applied against local needs.

The municipal plans which are to meet this requirement have not been provided to FEMA for review. It is expected that this planning as well as any other where municipalities have been assigned specific responsibility to meet planning standards in NUREG-0654 will be included in the upgraded county plans which are to be submitted to FEMA by mid-April 1981.

Q.68 Does the York County Plan in subsection (c) conflict with the information in Annex P Example of Local Plan and Annex L, Resource Requirement?

A. The present York County Plan received by FEMA on December 10, 1980, and dated September 3, 1980 does not have a subsection (c) which contains this information. However, in Annex G, Fire Service, under II. Responsibility, E. "Fire companies in risk area are to establish/maintain a system of information of invalid/ambulatory/handicapped persons in their area of responsibility." Although this appears to be a dual assignment of the same responsibility, it must be recognized that local fire companies are essential elements of the EMA Coordinator resources and are fully represented on his staff. If this demand, based on the number of the homebounds, is greater than the resources available, there must be a provision in the municipal planning to provide the required resources. FEMA cannot ascertain from the planning to date whether demands beyond resources have been identified or whether supplemental resources have been provided for.

Q.69 ECNP2-28 (EP-10) states:

Appendix D of the (State) Plan contains reference to the need for the decontamination of radiologically contaminated

individuals (p. 16) but does not provide any information as to how many people may be contaminated, the kind and degree of contamination expected or to be planned for, or the number of facilities and medical personnel appropriately trained in decontamination and radiation injury treatment techniques which may be necessary.

- A. What are the requirements and provisions for caring for radiologically contaminated persons?

NUREG-0654 does not require projections as to how many people may be contaminated or the kind and degree of contamination that may be experienced. The contamination which might be experienced would be limited to beta and gamma emitters. In this case, the local mass care center would notify the State BRP which would then advise concerning the procedures to be followed in dealing with contaminated members of the public. BRP procedures are to be followed for decontamination of personnel. The medical facilities capable of treating contaminated persons are identified in the State Plan in SDOH, Appendix 9. Personnel at these medical facilities are trained in decontamination and radioactive injury treatment techniques. The state recognizes that if large numbers of the general population would require decontamination, state resources would be inadequate. In this case, the state would request assistance from the U.S. Department of Energy. The procedures for decontamination at mass care centers have been developed for inclusion into county plans, and will be reflected in revised county plans to be submitted by mid-April.

(iii) Chain of Command

Q.70 Newberry Dauphin Plan 9-1 (EP16-I) states:

Appendix 9 of the Dauphin County Plan regarding police policy and procedures during relocation indicates that when evacuation is ordered, units will proceed to pre-designated stations. The Plan does not indicate where the pre-designated stations are located and how the chain of command will operate in the event of relocation of local police departments and their interaction with National Guard units arriving to provide additional manpower to local departments. Until and unless a definite chain of command is stated and the relationship between civil police departments and the National Guard regarding chain of command is documented, it is Intervenor's position that the Plan is deficient.

What is the policy and procedure for relocation of law enforcement agencies during an evacuation?

A. Certain police units in Dauphin County are to relocate to specified sites. The units to relocate and their predetermined relocation sites are provided on page 9-1 of Appendix 9, Annex E, Dauphin County Plan. In point of fact, the relocation stations are pre-designated in the Dauphin County plan.

Q.71 What affect will relocation have on the command and control of police agencies and their interaction with the National Guard units?

A. The local units will remain under the charge of the ranking officer of each Department. This is provided on page 9-1 also. The National Guard chain of command will not change. (See Testimony in response to Newberry Contention York Plan 8 (EP14-H)).

Q.72 Newberry York Plan 8 (EP14-H) states:

Appendix 2, Section III, of the York County Plan provides that the Assistant Director of Police Operations is responsible for the overall management of law and order, traffic control and security. In the event the National Guard is ordered to assist local communities, it is questionable whether the Assistant Director of Police Operations would be in a position to direct orders to a military organization as is assumed he would be in the York County Plan. There seems to be no coordination between the National Guard chain of command and the chain of command in the operations group in Annex 2, Section III, and therefore, it is Intervenor's position that the Plan is deficient in that there is no stated area of responsibility concerning police operations, vis-a-vis the National Guard.

Similarly, Newberry York Plan 17 (EP14-R) states:

Annex F, Section II of the Plan is inconsistent with Appendix 2, Subsection III, Subsection A in that the Assistant Director of Police Operations is stated to be responsible for all management of law and order, traffic control and security, whereas Annex F provides that the Pennsylvania State Police is responsible for coordinating law enforcement and traffic control and the Pennsylvania National Guard is responsible for providing security for the evacuated areas. Intervenor is of the position that until and unless the order of command is sufficiently, adequately, and clearly stated, there lies the possibility in the Plan for mass chaos and confusion with regard to who is responsible for giving direct orders to the Pennsylvania State Police, the sheriff in local police departments and the Pennsylvania National Guard in the event that there is an incident at the TMI nuclear facility.

Does the Assistant Director of Police direct the National Guard and/or the State police while they are assisting in traffic control and security in York County?

- A. No. State legislation provides that state level augmentation shall remain under the operational control of the Department, agency, or office furnishing personnel. (P.L. 1332 of 7504 (f)).

Q.73 What coordination exists between the Assistant Director of Police Operations and law enforcement personnel?

A. The operational interface for these units will be at field level and the command interface will be at State level in the State EOC.

Q.74 Is there conflict in these chains of command and the role assigned to the Assistant Director of Personnel Operations?

A. The National Guard, the State Police and the Local Police have worked together on many national disasters and during the TMI-Unit 2 accident. They are familiar with the interactions which must take place within their separate chains of command. We are aware of no evidence of conflict during these previous instances. The Assistant Director of Police Operation's role is to provide overall management of law and order, traffic control and security within York County.

(iv) Staffing

Q.75 Newberry York Plan 38 (EP14-LL) states:

The York County Plan contains a thin staffing of all emergency coordinators and does not list any substitutes in the event that an emergency coordinator is ill, on vacation, or otherwise indisposed. Without substitutes or standby emergency coordinators, the Plan is defective.

Similarly, Newberry Dauphin Plan 2 (EP16-B) states:

Appendix 2 of Annex E of the Dauphin County Plan lists Dauphin County Local Emergency Preparedness Directors and

Coordinators; however, those coordinators do not list any substitutes in the event of an emergency. If these individuals cannot be reached at the telephone numbers listed, it would lead to confusion within their particular areas of responsibility. Therefore, until and unless substitutes are listed as local emergency coordinators, it is Intervenor's position that the plan is deficient.

Should the counties provide for substitute emergency management coordinators if primary emergency management coordinators are unavailable?

- A. Yes. FEMA has not yet been provided with planning which will provide for substitution of emergency management coordinators by other suitable contacts. It is our understanding that in the case of an absence of a key person, direct contact will be made by the Emergency Operation Center, with the emergency service affected by the absence. We believe that these county plans should be modified to identify and provide for substitute emergency management coordinators.

(v.) Protection of Property/Livestock

Q.76 Aamodt Contention 5 (EP-2) states:

Is it contended that present evacuation plans do not provide for care and/or relocation of livestock. It is further contended that such provision should be made before restart of TMI-1.

Does present emergency planning provide for care and/or evacuation of livestock?

A. Present planning does not provide for evacuation of livestock. It does provide for care for livestock. The State Department of Agriculture Appendix 7 to Annex E of the Commonwealth Disaster Operations Plan provides information on how to shelter and care for livestock in the event of a fixed nuclear facility incident. It is stated in this appendix that the evacuation of livestock will not be called for and should, in fact, not be undertaken. The farmer is considered a member of the general public in the application of protective actions and not an emergency worker. They are not, as presently planned, to receive thyroid blocking agents, personnel monitoring, or to be provided with communication support equipment. The County Emergency Management Coordinator has prepared preprinted messages for an EBS announcement, directing the farmers to shelter their livestock when it is appropriate to do so. As to evacuation of livestock, the NRC's emergency planning regulations do not require measures for the protection of property, including livestock, and, in fact, are directed to the protection of the public health and safety with protection of property left to ad hoc measures. The absence of plans for evacuation of livestock is not a defect.

Q.77 Newberry York Plan 27 (EP14-BB) states:

Annex R of the York County Plan does not provide for any evacuation of domestic farm animals and until and unless the plan does provide for a plan of evacuation, the Plan remains deficient. Domestic farm animals cannot be left for any period of time without human care and attention and, therefore, it is assumed that farmers who have such large investments in live-stock will not leave their investment unattended and, thus, they are left at risk. Moreover, the agricultural part of the York County Plan provides that the County Emergency Management Agency Director will charge and distribute dosimeters for agricultural personnel who are required to enter the

designated risk area but does not state who will provide the dosimeters and who will interpret the dosimeter readings. Until and unless those two facets of the York County Plan are remedied, it is intervenor's contention that the Plan remains deficient.

What protective actions will be taken to protect farmers and livestock in the plume EPZ?

A. The thrust of emergency planning under NUREG-0654 is the protection of people, not property. Property investment protective actions will be taken on an ad hoc basis, depending upon the severity of the occurrence and risk to human life. At present, it is planned by all jurisdictions that livestock will be sheltered, not relocated or evacuated. Farmers are considered as members of the general public, without special status. They will be instructed to evacuate; however, depending on conditions, they may be allowed to return to their livestock for maintenance purposes. Travel within the plume exposure EPZ for livestock care will be controlled by local officials, based on local conditions.

Q.78 Will dosimetry be provided for agricultural personnel who will be required to enter the risk area?

A. Self reading dosimeters and dose record cards will be provided by the county emergency management agency to agricultural emergency workers (not farmers) who may be required to survey the risk area to determine the effects of the accident on the ingestion pathway. No such dosimetry will be provided to farmers.

(v) Other

Q.79 ANGRY III-B(f) (EP5-C) states:

In order to assure proper execution by emergency response personnel of duties assigned to them the Commonwealth should adopt and apply to all levels of the emergency response network the principle that such personnel should "not have more important commitments to families within the immediate area of TMI" (Department of Health Plan, Appendix I, p. 5)

What is the likelihood that emergency response personnel will abandon their duties in an emergency to be with their families?

A. Based on previous disaster experience, it is FEMA's view that emergency workers will perform their functions in situations where their families may be endangered by the emergency.

Q.80 What is the potential for emergency service mission failure resulting from loss of emergency workers as a consequence of family commitments?

A. The degree of mission failure is directly related to the recognition by emergency workers that by performing their mission they reduce the risk to their own families as well as to others. This recognition of importance is reinforced by training, periodic drills, and exercises. FEMA has in its library a Technical Report Number 77, entitled a Perspective on Disaster Planning, dated December 1972, which was produced for the Defense Civil Preparedness Agency. It concludes that emergency workers respond to the requirements of their assignment regardless of personnel demands.

Q.81 ANGRY III C(12) (EP6-F) states:

York County "Evacuation Plan" is seriously deficient in the following primary respect: The preparation of a "list of homebounds and invalids" and a plan for their evacuation (Annex J) and satisfaction of unmet "resource requirements" (Annex L) should be accomplished prior to TMI-1 restart.

Should there be planning for the protection of those persons with limited mobility?

- A. Yes. NUREG-0654 Planning Standard J, Criterion 10d requires procedures for protecting those persons whose mobility may be impaired. The responsibility to prepare a list of such persons and plan for their care has been assigned to municipalities and boroughs. These provisions and procedures are under development and have not been provided for review. Where a political subdivision is delegated specific responsibilities by the County, the planning to meet that responsibility will be reviewed by FEMA. Based on recent discussions with the York County EMA Director, these plans are not ready for review at this time. FEMA would expect to review such plans when it reviews the upgraded county plan due by April 15, 1981.

Present provisions in York County as provided in the County Public Information Brochure under the Paragraph "How to Get There" instructs persons who are unable to leave their home to contact their local Emergency Management Coordinator. These persons would be cared for on a case-by-case basis by local officials.

Q.82 Newberry York Plan 20 (EP14-U) states:

Annex H of the York County Plan provides in its general concept of operations that evacuation routings would be inherently dependent upon climatic conditions, time factors involved, etc. The Plan also provides that residents would be evacuated on major interstates and state highways. There is no mention as to the condition of the access roads to these major arteries and it is submitted that evacuation generally is dependent upon climatic conditions and the conditions of the access roads within the individual townships and local communities. Access roads within Newberry Township vary from a 20 to a 26 foot width and it is Intervenor's contention that in the event of an evacuation, traffic flow on these access roads could quickly become terminated as a result of the vehicles running out of gas or being involved in auto accidents for which there would be no way in which to remedy the situation. Moreover, in ice and snow conditions, it is submitted that these access roads which are located in generally hilly areas would be generally impassable and; therefore, there would be no access to the evacuation routes. Until and unless the evacuation Plan provides for a means to assure that access roads will be passible during a general evacuation, it is submitted that the Plan is deficient.

What consideration is there of the use and condition of access roads in the York County Plan?

- A. The York County Plan provides evacuation routes for the different jurisdictions within the EPZ. These routes are assigned to groups based on their access to these routes. The county has made the assumption in its planning that the access roads to these roads are in such a condition that they are useable.

Q.83 What provisions have been made for access to the evacuation routes in Newberry Township?

A. People in Newberry Township north of Newberry Town are to use I-83 North to the Pennsylvania Turnpike then west to Route 15 then south on Route 15. People in Newberry Township south of Newberry Town are to use I-83 South. Individuals residing in a municipality with more than one evacuation route is identified should select the most appropriate one for their household. Interstate 83 runs north and south through the center of Newberry Township and is a major interstate highway with two lanes in both directions.

Q.84 What consideration has been and should be applied to the changing widths of access roads and road blockage caused by disabled vehicles?

A. NUREG-0654 Planning Standard J, Criterion 10 m specifies development of procedures that will allow for choice of recommended action based upon plant conditions, direct inhalation exposure, climatic conditions and evacuation time estimates. BRP has written procedures to meet these criteria. Evacuation time estimates are still required. The licensee has completed an evacuation time estimate study of the evacuation plan. Impassable roads which can not be cleared or changing widths of road which may affect traffic flow adversely are considered in this evacuation study. Based on this evacuation time estimate study, identified problem areas should be considered in upgrading the evacuation plans. Resources, including tow trucks and fuel supply, will be applied as required. The state provides augmenting resources if local resources prove inadequate. Newberry Township residents will be familiar with their road system and the municipality

is to receive augmentation of such state resources as required through the emergency management channels to effect traffic control.

Q.85 Newberry York Plan 26 (EP14-AA) states:

Annex O of the Emergency Plan is deficient in that the concept of operations division does not require mandatory preparation of local plans for emergency notification of bus drivers and the organization of mobilization of transportation necessary to meet the needs of evacuating their student populations. Moreover, the Plan does not include any direction or plan to the local school superintendents as to rerouting their buses for general evacuation of local residents. For example, in an emergency, is a principal of Fishing Creek Elementary School to send a bus to the Vo-tech School for rerouting while area residents wait for transportation? Until and unless there is some type of generalized plan for each school district as to the rerouting of school vehicles not in use for removal of school population, the Plan will remain deficient.

What planning has been done for school evacuation and bus rerouting?

- A. Although the York County Plan does not mandate local planning for notification of bus drivers and the organization of transportation to evacuate school children, it is a responsibility assigned to each Risk County. NUREG-0654 Planning Standard F requires procedures for alerting and activating personnel in each response organization. The State Department of Education is responsible for advising each School District Supervisor within the Plume Exposure EPZ on guidance for development of school evacuation plans. These Superintendents are to coordinate with the County EMA Coordinator in the development of these Plans. PEMA has advised York County that a listing of supporting plans for schools and localities is necessary. FEMA has

been advised that these plans are under development and not ready for service in York County. Therefore FEMA's view, at this time, is that additional planning on the issues of school evacuation and bus rerouting should be included in the York County Plan.

Q.86 Newberry Dauphin Plan 9-2 (EP16-J) states in part:

Appendix 12 of Annex E of the Dauphin County Plan provides that during school hours, upon receipt of a condition yellow alert, school districts shall begin returning school students to their homes. Moreover, the Plan continues, that in the event parents are not home, children shall be returned to one pickup point as listed in the Appendix. There is an exception to this rule indicated in the Plan. It is Intervenor's contention that the Plan is deficient because it first of all allows the busing of children during a condition yellow situation. It is Intervenor's contention that a much more sensible approach to this problem would be to bus all the children to a pre-designated area outside of the 20-mile EPZ and allow parents in an orderly fashion to pick their children up if a condition yellow alert does not change. There is a potential, as the Plan is now written, that in the middle of busing children home during a condition yellow situation that the situation could degrade to a condition red situation and there would be no means of notifying the bus drivers of the change in situation and the change in the school policy plan under a condition red emergency situation.

What are your views as to the provisions of the Dauphin County Plan with regard to transporting children home during a condition yellow (Alert)?

A. The Dauphin County Plan indicates that during a condition yellow (Alert) school children may be bused home as a precautionary measure. Under such a situation (Alert) there will not be actual or projected levels of radiation offsite which would require protective action. Thus, measures providing for sending children home are conservative, precautionary measures. If accident conditions subsequently degrade,

requiring other protective measures, the fact that children are to be bused home should be announced over the radio and television station so that parents or guardians can make arrangements or travel home to supervise their children. School plans describing the actions available to bus drivers and what they should do if the accident conditions worsen during the course of driving children home have not been completed.

FEMA believes that during an Alert or condition yellow, a more advisable course of actions would be to not deliver children home, but to increase local readiness to take protective actions by alerting school bus drivers and providing information and guidance to response personnel.

Q.87 Newberry Dauphin Plan 18 (EP16-R) states:

The Dauphin County Plan as presently written envisions mass transportation vehicles to assemble at two staging areas. Upon arriving at the staging areas, the vehicles would then be dispatched to various areas to be led by community leaders. It is submitted that such a plan without the provision of security being placed on the buses and mass transportation vehicles does not ensure that said vehicles will be able to carry out their intended functions. It is submitted that more staging areas would be required in order to effectively deal with mass transportation and until and unless those local regionalized areas are stated in an emergency plan, all plans will remain deficient.

Does NUREG-0654 call for additional security at staging areas for vehicles to be used as augmenting resources?

A. No, and FEMA is unaware of any situation during mass evacuations which have been conducted where emergency vehicle security was a

serious problem. The County plan calls for such vehicles to be convoyed into the local area from the staging area. Also the staging area, according to the Dauphin County Plan, will be staffed with an overall coordinator, communications, incoming traffic coordinator, outgoing traffic coordinator (maps provided to each vehicle), three traffic control assistants and fuel coordinator. Thus, there will be government presence at these staging areas with the above listed staff and communications. During an evacuation there will be an increased staffing of police forces in the area to perform traffic control and security functions. Therefore, we see no reason to require extra security at the staging areas.

Q.88 Are more staging areas required in order to effectively deal with mass transportation?

A. PEMA, in its guidance, recommended two or more staging areas; Dauphin County planned for two. One is located at City Island, Harrisburg for incoming units from the West and North and the other is at Hershey Arena Parking lot for incoming units from the East and West. This appears to be adequate.

Q.89 Newberry 3c(5) (EP16-T) states:

Moreover, the plan does not envision the method of notifying school and CAT bus drivers and assumes that all drivers will respond in an emergency situation. Moreover, it doesn't indicate anywhere that the CAT bus drivers will know what is expected of them in an emergency situation and know where they are going and how to get to the appointed emergency staging areas. This is a contingency that can be planned for in advance, should be specifically set out in a plan,

and thus, the absence of such specificity in the plan renders the plan inadequate.

What does the Dauphin Plan indicate as to the method of notifying school and CAT bus drivers and does it assume that all drivers will respond in an emergency situation?

- A. Appendix 3 to Appex E, Dauphin County Plan provides that the County Transportation Officer is one of the key personnel notified in the event of a radiological emergency. Appendix 8 to Annex E provides a Bus Company/Transit Authority list with telephone numbers for use by the County Transportation Officer in meeting transportation resource requirements. FEMA would recommend additional planning to include in school evacuation planning, early notification of bus drivers by school officials and district school plans which provide for school bus use from beyond the EPZ. FEMA further recommends that the Transportation Officer be charged with responsibility for notification and activation of the transportation resources planned for in the Dauphin County Plan.

As to the assertion that the plan assumes all such drivers will respond in an emergency, there is such assumption in the plan. In any event, as we have indicated before, FEMA has had no experience in previous disasters where there was mission failure as a result of a failure of personnel to perform their function.

Newberry Dauphin Plan 14 (EP16-N) states:

The Dauphin County Plan does not specifically state how the following occurrences would be dealt with in the event of an evacuation:

- (1) Accidents on the highways
- (2) Cars running out of gas
- (3) Generally disabled vehicles
- (4) Individuals who need ambulance service for removal from accidents.

The Plan does not state whether gas stations will be mandatorily required to be open in order to meet the demands of the evacuating public.

How will such occurrences be dealt with in the event an evacuation of a portion of Dauphin County is directed?

- A. Local resources normally applied in these situations are to be applied in the event of an evacuation. The state provides augmenting resources if local resources prove inadequate. As reflected in the Pennsylvania DOP, Annex E, Section VII, 12, the Governor's Energy Council is to provide for emergency fuel allocations to assure adequate fuel availability to support an evacuation, if necessary, in a fixed nuclear facility incident, as was done during the TMI-2 accident.

Q.91 Sholly Contention 8IB(3) states:

Numerous members of the Old Order Amish community reside in relatively close proximity (within 10 miles) of the outer boundary of the licensee's plume Exposure EPZ in Lancaster County. Because the Old Order Amish eschew the use of electricity, telephones, and automobiles, they present

unique problems with respect to warning, communication of protective action advisories, and transportation. These unique problems warrant the special consideration the inclusion of Old Order Amish within the Plume Exposure EPZ would provide.

Should special provisions for warning, communications of protective action advisories, and transportation be established for members of the Old Order Amish community within the plume exposure EPZ?

A. The unique needs of groups such as those posed by the Old Order Amish Community warrant consideration in radiological response plans. The licensee, State and local governments have the responsibility to ensure that both procedures and facilities exist to meet the special needs of such groups.

Q.92 What special arrangements have been made for notification of and protective actions for members of the Old Order Amish community within the plume Exposure EPZ?

A. The Commonwealth of Pennsylvania has met with and documented by memorandum that the Mennonite disaster services will accept responsibility for and plan for the needs of the Old Order Amish as well as other related groups in the Plume Exposure FPZ. PEMA's staff duty officer manual in the Mennonite Disaster Service Annex contains the telephone numbers for round the clock contact with both the Mennonite National Director and an alternate. Details of procedures used by the Mennonites or other State and local authorities which address the unique needs of the Amish have not been received or reviewed by

FEMA. It should be noted that, at this time, there has been no formal identification of the number of Old Order Amish located within the plume EPZ.

D. Post Evacuation Support

Q.93 Angry III C(13) (EP6-G) states:

The York County Fairgrounds is an inappropriate location for the agricultural "Information Center" (Annex R, Sec. IV) since it is within the 20-mile distance from the plant to which under the plan's assumptions, a total evacuation may be required. The provision establishing this center fails to provide also for the necessary predetermination by farmers wishing to avail themselves of its services of the nature and timing of the "essential functions" for their farms, the number of persons needed to perform such functions, and the identity of such persons. Dissemination of information concerning this program and the compiling of information provided in response thereto should be accomplished prior to TMI-1 restart.

Is the York County fairground an appropriate location for the agricultural "Information Center"?

A. Yes. Current county planning provides for an agricultural center at the fairgrounds. The fairgrounds are located beyond the plume EPZ. Moreover, the function and services provided are not a requirement of NUREG-0654. This center is supplemental to those assets already in place at the EOC, which meet the NUREG-0654 requirements for emergency public information dissemination. Because the agricultural "information center" is above and beyond requirements, we believe that no further provision for the center are necessary.

Q.94 Newberry York Plan 31 (EP14-EE) states:

The mass evacuation centers contained in the York County Plan do not state that the centers have auxiliary backup electrical power and heating plants in the event that they are placed into use. It is Intervenor's contention that, without such auxiliary power and heating systems, that the Plan is deficient in that evacuees would arrive either at a darkened or cold evacuation center.

Is it necessary that mass evacuation centers contained in the York County Plan have auxiliary backup electrical power and heating plants, in the event that they are placed into use?

- A. No. FEMA testimony of February 23, 1981 on related Newberry Contention Dauphin Plan 11 (EP-16L), addressed this issue. Auxiliary power and heating systems are not required, nor does NUREG 0654 require any provisions for mass care of evacuees. In the event of a power loss in the York County area, mass care evacuation centers will remain open for operation. Alternative heating and electrical utilities will be provided on an as-available basis. Evacuees requiring more than minimal emergency services will be relocated.

Q.95 Newberry York Plan 33 (EP14-GG) states:

The York County Plan does not contain any treasury or source of financing in the event that an emergency is declared and payment to be made. It is a general assumption, apparently on behalf of the Plan, that the county treasury can be invaded by the Commissioners for use during an emergency; however, it is Intervenor's position that a set emergency fund should be in place and stated within the Plan so that there would have to be no indecision as to the legality of withdrawing funds in the event of an emergency situation for ad hoc expenses.

What funds would be available to the York County Commissioners to provide for emergency expenses arising from an evacuation?

- A. The source of funds for payment of emergency expense is beyond the scope of NUREG-0654 coverage. Advice on the legal authority for expenditure of County funds should be obtained from the County Counsel or legal advisor. While it is not unusual for county commissioners to be unaware of the full extent of their authority to commit public funds in an emergency, FEMA is unaware of any situation where this condition resulted in serious injury, suffering or death during a disaster.