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'82 JAN -4 AM 11:15

AFFIDAVIT OF DR. DAVID VALINSKY

David Valinsky being duly sworn hereby deposes and says

1. I reside in Scarsdale, New York.
2. I have a B.S.E. in sociology and economics from Temple University; an M.B.A. in statistics from the City College of New York; and a Ph.D. in statistics and business from Columbia University.
3. I have served as member of the faculty at the Bernard M. Baruch College of the City of New York since 1940, and have held the post of Chairman of the Department of Statistics and Computer Information Systems since 1971. For the past three decades, I have studied and used scientific survey sampling principles, not only as a teacher, but also as a statistical and survey consultant in marketing and advertising research, pharmaceutical research, industrial marketing, public polling and social research, health care delivery, federal trademark problems, agriculture, and quality control. I have designed survey samples and questionnaires. I have acted as a research consultant to numerous public and private corporations and to various state and federal agencies, including: the City of New York; Fuller, Smith and Ross; L. Harris and Associates; the

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election unit of the American Broadcasting Company; Coca-Cola International; Yankelovich, Inc.; Interpublic; and Benton and Bowles.

4. I have been elected a fellow in the Royal Statistical Society of Great Britain, the American Association for the Advancement of Science, and the American Society for Quality Control. I have written three books and numerous articles and have presented numerous papers on the theory and application of statistical and survey techniques. See Exhibit A.

5. I have read and examined the document entitled "Parents' Survey," dated October 27, 1981, which was sponsored by New York Public Interest Research Group, Inc. (NYPIRG). See Exhibit B.

6. I have made no attempt in this affidavit to assess the validity of whatever scientific sampling process, if any, was employed NYPIRG in the distribution of the surveying instrument.

7. The main purpose of a scientific survey instrument is to elicit data and objective responses that are suggestive of attitudes or behavioral patterns. An atmosphere which facilitates an ease of response should be created. The order and sequencing of topics to be covered and the listing of questions should be set up to facilitate

the flow of ideas from topic to topic. Initial questions should be employed to establish the proper objective attitude for the respondent. Open-ended questions can be important in order to permit the respondent to provide the full range of information at his disposal.

8. It is my opinion that the survey instrument was not intended to elicit objective responses regarding attitudes or knowledge pertaining to the respondents' emergency evacuation plans, but rather that the instrument was intended to intimidate, frighten, and create a sense of helplessness in those who read it. The manner in which "questions" are stated and arrayed is also designed to create bias, direct responses, and ultimately to be a call to action on the part of the reader. The NYPIRG survey instrument fails utterly to meet any of the well-established rules governing survey questionnaires.

9. NYPIRG's apparent purpose in taking the survey--to focus upon the separation of parents and children in the event of a nuclear emergency--immediately creates anxiety and begins the process of biasing the balance of the responses.

10. The very title of the instrument--"Parents' Survey"--followed immediately by questions about children, establishes certain defenses and attitudes on the part of

the respondent which hopelessly bias the balance of the responses.

11. When the foregoing is considered with the third question and its subparts in which reference to "a nuclear emergency" is made, intimidation and fear result. This result will affect subsequent questions and raise sufficient fear and bias to taint the validity of responses to those questions.

12. The constant theme of subsequent questions is family, and especially child, separation. This theme effectively reinforces and exacerbates the sense of fear, anxiety, and helplessness already prompted by the instrument. For example, question number 8 seeks only to build upon the anxiety and fear already created. It can have no other purpose. If one were really concerned about patterns of family location, one would seek to establish a matrix of location for each family member. It is useless to know the number of locations for purposes of emergency planning.

13. The "survey" is neither designed nor constituted to be a genuine instrument for data collection, i.e., one capable of obtaining objective, precise, usable information. It is disorganized, moving from the topics of parents to children to separation to "family . . . nuclear emergency plans" to school

information efforts and back to separation again.

14. As structured and in the format employed, not a single question exists which would be considered acceptable as standard professional survey practice.

David Valinsky

David Valinsky, Ph.D.

State of New York
County of New York
Subscribed and sworn to before
me this 12th day of December, 1981.

IRVING POTASKY
Notary Public, State of New York
No. 41-3141705
Qualified in Queens County
Commission Expires March 30, 1983

Irving Potasky

Notary Public

NAME David Valinsky DOCKET DEPARTMENT Statistics
USMRC

BANK Chairman-Professor ~~FULL TIME~~ 82 JAN -4 - 11-15 PART TIME _____

1. EDUCATION

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SOCIAL AFFAIRS

<u>Degree</u>	<u>Institution</u>	<u>Date</u>
B.S.E. Sociology, Economics	Temple University	1936
M.B.A. Statistics	The City College of N.Y.	1943
Ph.D. Statistics	Columbia University	1962

2. FULL TIME AND PART TIME ACADEMIC AND OTHER EXPERIENCE

A. Teaching Experience

City College of New York and Bernard M. Baruch College, CUNY	Fellow to Professor Department of Business Administration and Statistics	1940 to present
Baruch College, CUNY	Chairman, Dept. of Statistics	1970 to Present
Rutgers University	Adjunct Assistant	1952-1953
NYU and Syracuse	Joint Appointment as Adjunct Lecturer	1957

B. Consulting and Research Activities

Since 1946, Dr. Valinsky has acted as a statistical consultant in the following sectors:

1. Government, Public Affairs and Civil Rights

Developed "Impartial" Quantitative Reapportionment Plan for the State of Alabama. (Implementation ordered by Federal District Court, January 3, 1972. Upheld by Supreme Court 1973)

Reapportionment Plan for the State of Mississippi, 1975. Implementation of modified version of plan ordered by U.S. Supreme Court, 1978.

Restructured Alabama Jury System -- Jury selection procedures and composition determined through probability sampling. (Upheld and implementation ordered by 5th Federal Circuit Court of Appeals - July 2, 1971.)

B. Consulting and Research Activities - continued

Expert Witness for American Civil Liberties Union since May 1969 - 1974
Lawyers for Civil Rights under law - 1973-1974
Guardian Association -- Organization of Black lawyers dealing with discrimination in police hiring and promotion. 1973

Mayor's Committee on Management Survey of the City of New York on (Fire Logistics) 1951-1952

Expert Witness, Civil Aeronautics Board, Southern Transcontinental Air Case 1959

Expert Witness, Coca Cola Corporation Trademark Federal Litigation 1978-1979

Expert Witness, C. Morgan Ltd. - Sears Roebuck Corp - Equal Opportunity Litigation 1979-1980

Expert Witness, FTC (Formica Trademark Litigation-1980

Expert Witness, (Boehringer Ingelheim Ltd. vs. Primo Pharmaceutical (U.S. District Court, New York-1979-1980 (Generic Prescription Drugs)

Expert Witness, Federal Trade Commission, Columbia Records 1963.

Mayor's New York Temporary Commission on New York City Finances 1965.

Office of Mayor of New York -- Office of Aging 1971-1973

Department of Corrections -- State of New York 1970.

Expert Witness - Justice Department - ASCAP 1958-1959.

Expert Witness - HEW vs. North Carolina University System Desegregation Litigation - Representing 19 States in the Adam's vs. Richardson case. States 1979-1980.

2. Medical and Hospital Administration

Statistical Consultant to Health Insurance Plan - 1951.

Principal Investigator, Mt. Sinai Hospital, "Optimum Utilization of Hospital Ancillary Services " funded by N.I.H. H.E.W. -- 1965-1979.

2. Medical and Hospital Administration - continued

The following 8 monographs comprise the Final Report to HEW USPHS, Health Service Research Center, with Dr. M. Rabinowitz and Barry Dumas, 1979.

- "Optimum Utilization of Hospital Oncillary Services", 211 pages.
- "A Simulator-Based Planning Model for Hospital Microscopy Laboratories", 204 pages.
- "Hospital Blood Banking - An Evaluation of Inventory Control Policies", 1972, 325 pages.
- "Simulation-Based Scheduling Model for Radiology", 1979, 59 pages.
- "Total Hospital System/A Simulation", 1979, 73 pages.
- "Hospital Admissions System", 1979, 106 pages.
- "Surgery Scheduling Systems", 1979, 86 pages.
- "Determination of Transfers for MISPLACED Patients: An Analytical Optimization Procedure, 1979, 32 pages.

Maimonides Hospital -- OR consultant to Director of Hospital.

Presbyterian Hospital (Columbia University), School of Public Health, 1970-1971.

Evaluation of Hospital Research Programs for N.I.H. -- 1969 to 1974. (Study Sections)

Consultant to Mt.Sinai Hospital - Operations Research 1965-1979.

3. Business Consulting - Developed more than 45 National and Regional Probability Samples (Partial List)

1964-1966	American Broadcasting Co.(Election Unit)
1964-1968	L. Harris and Associates(Political Polling)
1966-1978	John F. Kraft (Political Polling)
1965-1968	Interpublic
1958	J. Walter Thompson
1952-1956	Fuller, Smith and Ross
1956-1959	Liebman Breweries
1956-1958	Medimetrics Institute
1958	Ford Motor Company
1962-1963	Walter Kidde Construction Company -
1970-1972	Coca-Cola International
1954	Acme Steel Corporation
1956	Ely Lilly Pharmaceutical Company
1965-1976	Market Facts Inc.(New York)
1962-1966	Standard Rate and Data Corporation
1965-1979	Benton and Bowles

3. Business Consulting - continued

1972	Oxtoby-Smith
1969	Charles Pfizer Inc.
1950	Customer Audit Bureau
1967-1973	Motivational Programmers
1974	General Foods Corporation
1967-1968	Kenyon Eckhardt
1967	Young & Rubican
1964-1969	Yankelovitch Inc.
1967	Columbia Records
1962-1967	Becker Research
1958-1960	Joel Dean Research
1979-1980	R. Sorenson & Assocs.
1965-Present	R. Bruskin Assocs.
1972-1980	Monroe Mendelsohn Research
1979-1980	Feldman Research
1980	RX OTC Research Reports

4. 1943-62, U.S. Army Experience, Private to Captain
a) Chief Statistician Control Branch, Army Services Training Center, Aberdeen Proving Ground.

Organized and administered statistical control branch.

- b) Administration and Finance Officer Administration; officer in charge of mechanical operations, Office of the Dependency Benefits; coordinated and conducted training program for 350 clerks; planned and directed the installation of mechanical operations systems on Class E, St. Louis, Missouri.
- c) General Staff Officer, Pentagon. (Reserve 1947-63)

3. ACADEMIC AND PROFESSIONAL HONORS

U. S. Army Commendation Medal (1946)

Elected Fellow in Operations Research Society of America (1955)

Elected Fellow in Royal Statistical Society of Great Britain (1957)

Elected Fellow in American Association for the Advancement of Science (1959)

Elected Fellow in the American Society for Quality Control (1964)

Elected Beta Gamma Sigma Honorary Society - Faculty Representative (1973)

4. RESEARCH GRANTS

USPHS., National Institutes of Health and Health Services
Research Center

Grants- "Optimum Utilization of Hospital Ancillary Services" -
Research conducted at Mt. Sinai Hospital as Principal Investigator -
Supervisor of 8 professional researchers.

- 1964-6 1st Grant
- 1967-9 2nd Grant
- 1969-70 3rd Grant
- 1971-72 4th Grant
- 1973-74 5th Grant
- 1975-78 6th Grant

5. OTHER SCHOLARSHIP AND ACADEMIC OR PUBLIC SERVICE

Summer Session Supervisor - Dept. of Business Administration (1947-195

Taught Mathematics in the Army Specialization Training Program -
City College (1943)

Instituted and developed Cooperative Work-Study Training Programs -
(400 students). Department of Business Administration. Served as
Coordinator of 10 programs. (1947-1965)

Chicago & Harvard University Ford Foundation 1965
Faculty Seminar

Chicago University Ford Foundation 1966
Faculty Seminar

Saxe award for contributions to faculty - student activities. (1956)

Organized the first student chapter - ASQC

Supervisor, Graduate Operations Research Specialization

Developed the following undergraduate specializations:

Statistical Theory, Psychometrics, Sociometrics, Operations
Research and Systems, Computer Methodology, Quantitative Analysis
in Marketing, BBA-MBA-4 yr. Accelerated Program in Statistics, OR and Computers

Developed the following graduate specialization programs:

MS in Statistics, Operations Research; Computer Methodology
Ph.D. Program - Quantitative Analysis, MBA program in Operations Research

Wrote and introduced over 50 undergraduate and graduate courses in
Statistics and Operations Research and Decision Theory.

President, Desoff Choirs (1971-1972), Treasurer, St. Cecilia Chorus

6. SERVICE TO COLLEGE AND UNIVERSITY (PARTIAL LIST)

a. University

Chairman, University Faculty Senate (UFS), 1974-78
Executive Committee, UFS - 1968 - present
Board of Higher Education, Ex-Officio Member 1976-78
(Executive Committee, Committee on Long Range Planning,
Administrative Affairs Comm. Fiscal Affairs (1974-76)
Board of Directors CUNY- Research Foundation 1979-date
Chancellor's Task Force for the Future of CUNY
BHE Commission on Governance
University Advisory Committee on Health Services
University Committee for Implementation of Open Admission
Several University Search Committees
CUNY-SUNY Master Plan Committee
Preparation and Presentation - oral and written testimony
(20 legislative and governmental agency committees and hearings)
University Committee on Academic Computer Usage

b. College and Department of Statistic

Chairman Department of Statistics - 1971 present
Executive Committee of Department - 1950 present
School of Business, P & B committee 1971 present
Graduate Studies Committee Chairman 1972 present
Member of Baruch College Transition Committee.
Presidents Advisory Committee, 1974-1977
Presidents Committee on Baruch College Governance
Baruch College Registration Advisory Committee
President's Committee on Honorary Degrees
Baruch Representative to Graduate Faculty Council
Chairman, Ph.D. Curriculum Committee 1969
Chairman, Ph.D. Examination Committee 1967-8, 1973-4
Committee on Distinguished Scholarly and Excellence in Teaching 1980
Committee on Public Policy Center 1979
Board of Directors Center for the Visually Impaired 1979-80

7. MEMBERSHIP AND ACTIVITY IN LEARNED SOCIETIES

Fellow, Operations Research Society of America (1955) converted to
"Member." Treasurer, Health Division, 1974-1976; Chairman, Program
Committee, National Conference, New York, May 1978.

Fellow, Royal Statistical Society, Great Britain

American Society for Quality Control (Chairman, Metropolitan Chapter
and Fellow, Program and arrangements Chairman, National Conference)

7. MEMBERSHIP AND ACTIVITY IN LEARNED SOCIETIES - continued

Fellow, American Association for Advancement of Science

American Marketing Association

American Statistical Society

Intl. Assn. of Survey Statisticians, Intl. Statistical Inst.

8. PUBLICATIONS

a. Books:

"Encyclopedia of Management, Reinhold Publishing Company, Editorial Advisor on "Statistical and Quantitative Methods," entry on "Statistics," 1963, 60 pages. (Revised 1971 and 1980)

"Hospital Blood Banking - An Evaluation of Inventory Control Policies," with Dr. Manus Rabinowitz, National Institutes of Health, 1971, 325 pages.

"A Statistical Determination of the Distribution and Number of Ladder and Engine Companies in the City of New York," published by the City of New York, 1952, 110 pages.

"Health Operations Research: "A Critical Analysis Simulation: State of the Art" 103 pages, Johns-Hopkins Press 1975.

"Concise Guide to Management Decision Making" - Part Two: Statistics as a Tool of Decision Making, Van Nostrand Reinhold Co., New York, 1980.

b. Articles in Scholarly Journals:

"Application of Simulator-Based Planning Models in Hospital Laboratories" with Dr. Manus Rabinowitz and Barry Dumas - Proceedings - ORSA- Health Application Division Proceedings, (1971)

"A Two-Stage Optimization Model for Inpatient Transfers" with Rabinowitz, M. and Dumas, M.B. - Operations Research, October 1976.

"Compounded and Composite Probability Distributions in Simulation with Dr. H. Stein, Dr. M. Rabinowitz and B. Dumas, Proceedings A.S.Q.C. Conference, Rutgers University, 1971.

"Simulating Hospital Laboratories: Clinical Microscopy Laboratory System" with M.B. Dumas, Proceedings of Association for Computing Machinery, October 1972 - also published in SIGSIM, February 1973.

"Simulation of Hospital Blood Banking" - with Dr. M. Rabinowitz Proceedings of ACM - October 1972. (Refereed publication)

"Clinical Microscopy Laboratory Planning", with M.B. Dumas, Hospital Administration, December 1974.

8. b. Articles in Scholarly Journals continued

"Determination of the Optimum Location of Fire Fighting Units in New York City" Operations Research, November 1956.

"Administrative Application of Quality Control," in Proceedings of Columbia University Conference of the American Society for Quality Control, September 1957.

"Comments on Determination and Selection of Data in Operations Research" and Training in Operations Research," in Transactions of the First International Conference of Operations Research of America and Great Britian, December 1957.

"Statistical Control Applications to Chemical Experimentation," in Transactions of the Stevens Institute Conference of the American Society for Quality Control, January 1958.

c) Professional Papers

(1) Papers presented at Professional Societies

American Statistical Association

American Management Association

Society for the Advancement of Management

American Society for Quality Control

Operations Research Society

First and Third International Conferences on Operations Research

New York State Society of Certified Public Accountants

Association for Computing Machinery

The Institute of Management Sciences

(2) Papers Presented

"Marketing Techniques Applied to Industrial Research", Netherlands Study Group under auspices of Mutual Security Agency, January 1953

"Theory of Games and Statistical Decision Making", Society for Advancement of Management, March 1953

"Optimum Operating Conditions for the Control of the Boll Weevil, Entomological Society of America, Dec. 27, 1956.

8. c) Professional Papers - continued

"Correlation Methods in Marketing", American Management Association, March 1953

"Determination of Municipal Government Facilities Through Statistical Quality Control", American Society for Quality Control, Princeton University, December 1954

"A Determination of the Optimum Location of the Fire Fighting Units in New York City", Third Annual Meeting of Operations Research Society, held at Columbia University, June 1955

"Training of Teachers in Quality Control", presented to European representative Professors, Statisticians and businessmen under the auspices of International Cooperation Administration, U.S. Department of Commerce, June 1956

"Commercial Uses of Probability Sampling", American Society for Quality Control, Rutgers University, September 1956

Moderator of discussion on "Basic Principles of Quality Control", the American Society for Quality Control, held at Rutgers University September 1957

U.S. Delegate, Referee and Discussant at First International Conference on Operations Research, Oxford University, England September 1957.

Chairman of Panel at Conference on "Statistical Control in Auditing", by the New York State Society of Certified Public Accountants and the American Society for Quality Control, at Columbia University, October 1957

Chairman and Discussant at Conference on "Motivation Research" sponsored by the American Marketing Association and the American Society for Quality Control at Princeton University December 1957

Chairman and Discussant at United Nations, on International Applications of Quality Control, March 1958

American Society for Quality Control, "Games and Business Decisions", at the A.S.Q.C., May 12, 1959

Annual Joint Conference of American Statistical Association and Society for Quality Control on "Game Theory and Decisions", at Princeton University, December 5, 1959

American Society for Quality Control, on "Linear Programming - A.S.Q.C., May 1960

8. c) Professional Papers - continued

American Statistical Association, on "Role of Statistician in Business", National Cash Register Company, May 1962

Chairman and Principal Lecturer at three day seminar, American Management Association, "Quantitative Aspects of Marketing Management", 1962

"Queuing Theory in Hospital Administration", American Management Association, 1963

U.S. Delegate and Discussant at Third International Conference on Operations Research, University of Oslo, Norway. July 1963

"Operations Research in Hospital Administration", University of Chicago and Billings General Hospital, July 1964

Chairman of seminar, "Project 60", U.S. Department of Defense Inspection Specifications to Contractors, A.S.Q.C., May, 196

Series of 9 papers at American Management Association, 1965-69

National Health Symposium, "Admission-Surgery Simulation Models," and "Models for Emergency Hospital Care," Carmel, California 1977.

"Decision Models Under Uncertainty"
Mohawk Valley Community College, "Engineering Decision Models"

ORSA Symposium on Health, "Role of the Consumer", May 1969, Wash. D.C.

ASQC, "Operations Research Models for Production Management", New York, New York, 1968

"Commercial Uses of Probability Sampling", in Transactions of the Rutgers University Quality Control Conference of the American Society for Quality Control, September 1956.

"Simulation: Health Care state of the Art and Potential for the future" - Joint ORSA - TIMS National Conference, November 9, 1972 Atlantic City, New Jersey.

8. c) Professional Papers - continued

"A Critical Analysis of Simulation in Health Care" TIMS - Metropolitan Chapter, April 20, 1973

"Simulation - A tool for Health Care Productivity", Symposium on Productivity in the Health Professions, University of Pittsburgh, October 3-4, 1973

"Comparison of Hospital Laboratory Simulation Techniques", ORSA conference, Dallas, Texas, April, 1972.

Chairman and principal speaker in symposium on "Simulating Hospital Laboratories" ACM urban conference, October 1972.

"Compounded and Composite Probability Distributions in Simulation" with H. Stein, M. Rabinowitz and B. Dumas, American Society for Quality Control, September 1971.

d) Monographs and Professional Research Reports

Doctoral Thesis: "The Determination of Optimum Operating Conditions for the Control of Boll Weevil Infestations," Columbia University, 1962, 321 pages.

"The Relative Effectiveness of Chlorinated Hydrocarbon Insecticides in the Control of the Cotton Boll Weevil," research report to Hercules Powder Co., 3 volumes, 1956, 370 pages.

"Usage of Gas Appliances and Attitudes of Gas Consumers," prepared for the American Gas Association, 10 market areas were covered and 10 reports were prepared, composed of 163 pages each. 1954.

"The Business Outlook and Appliance Sales Objectives", for 20 leading U.S. cities, a separate 42 page report was prepared. This report was prepared for Westinghouse, 1952.

Preparation and Design of more than 45 National and Regional Probability samples.

e) Book Reviews

"Linear Programming - The Simplex Algorithm, Journal of American Statistical Association, March 1958.

"Laplace Transforms", Electronics Journal, 1964



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

5 Beekman Street • New York, N.Y. 10038 • (212) 349-6460

Offices in Albany Binghamton Brooklyn Buffalo Long Island Manhattan New Paltz Queens Staten Island Syracuse Utica

October 27, 1981

PARENTS' SURVEY

'82 JAN -4 A11:15

1. How many children do you have (who live with you and are still in school or are pre-schoolers)? _____ children

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2. How many children who stay home during the school day? 2. _____ children

3. How many children in day care during the school day? 3. _____ children

3a. How many in day care within ten miles of the Indian Point nuclear power plants? 3a. _____ children _____ don't know

3b. Would your child(ren) be sent home from day care if a nuclear emergency happened during school? 3b. ___yes___ ___no___ ___don't know___

3c. Would your child(ren) be bussed by the day care if a nuclear emergency happened during school (to another location farther from Indian Point)? 3c. ___yes___ ___no___ ___don't know___

4. How many children do you have in grades 1-12? 4. _____ children

4a. How many children who attend a school within ten miles of Indian Point? 4a. _____ children _____ don't know

4b. Would your child(ren) be sent home from school if a nuclear emergency happened during school? 4b. ___yes___ ___no___ ___don't know___

4c. Would your child(ren) be bussed by the school if a nuclear emergency happened during school (to another location farther from Indian Point)? 4c. ___yes___ ___no___ ___don't know___

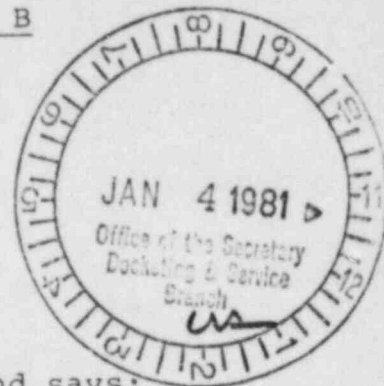
5. Is your home within ten miles of Indian Point? 5. ___yes___ ___no___ ___don't know___

(CONTINUED ON THE BACK)

The New York Public Interest Research Group, Inc. (NYPIRG) is a not-for-profit, nonpartisan research and advocacy organization established, directed and supported by New York State college and university students. NYPIRG's staff of lawyers, researchers, scientists and organizers works with students and other citizens, developing citizenship skills and shaping public policy. Consumer protection, higher education, energy, fiscal responsibility, political reform and social justice are NYPIRG's principal areas of concern.

6. Is your home between ten to twenty miles from Indian Point? 6. yes no don't know
7. Is an adult at home generally during the school day? 7. yes no don't know
8. During a normal weekday, in how many different locations are members of your family --include school, offices, any other regular activity place. 8. _____ location
9. Does your family have a nuclear emergency plan? 9. yes no
10. Has your family ever discussed what to do in the event of a nuclear emergency at Indian Point? 10. yes no
11. Has your child(ren)'s school ever sent home information on school emergency plans or conducted a drill? 11. yes no don't know
12. Has your parent-teacher association ever discussed this? 12. yes no don't know
13. Have you ever received any official information on what to do in the event of an accident at Indian Point? 13. yes no don't know
14. Would your children know what to do if an accident at Indian Point happened while they were away from home and not at school (after school, weekends)? 14. yes no don't know
15. Would you know what to do if an accident happened at Indian Point while your family was separated? 15. yes no don't know
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USNR



'82 JAN -4 A11:15 AFFIDAVIT OF ROGER STAVIS

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Roger Stavis, being duly sworn, hereby deposes and says:

1. I reside at 223-17 56th Road, Bayside, New York 11364.
2. I am a law student at George Washington University and a part-time law clerk at Morgan Associates, Chartered.
3. On December 24, 1981, I visited the office of the New York Public Interest Research Group, Inc. (NYPIRG), located at 5 Beekman Street, New York, New York 10038.
4. In the reception area of NYPIRG's office, publications are available for distribution to the public. From this display, I obtained a copy of the pamphlet entitled "In Case of a Nuclear Accident . . . Do You Know What To Do?", printed by the Fund for Secure Energy, Inc.

Roger Stavis

Roger Stavis

Subscribed and sworn to before me this 28 day of December, 1981.

[Signature]

Notary Public