

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

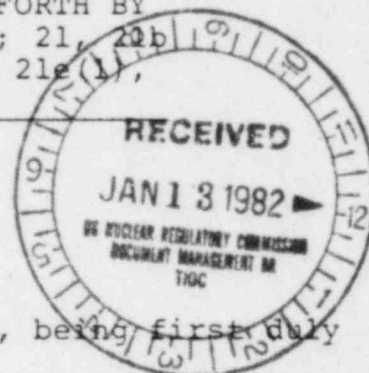
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In the Matter of :  
: CINCINNATI GAS & ELECTRIC : DOCKET NO. 50-358  
COMPANY, et al. :  
(William H. Zimmer Nuclear :  
Power Station) : APPLICATION FOR AN OPERATING LICENSE

DIRECT TESTIMONY OF GENE SELL, MYRON REINHARDT AND  
WILLIAM VOELKER, A PANEL OF WITNESSES, ADDRESSING  
THE ZIMMER AREA CITIZENS-ZIMMER AREA CITIZENS OF  
KENTUCKY AND CITY OF MENTOR CONTENTIONS PERTAINING  
TO THE CAMPBELL COUNTY SCHOOL DISTRICT SET FORTH BY  
CONTENTIONS 20, 20b(6), (i), (ii), (iii), (iv); 21, 21b  
(2); 21c(4); 21d, 21d(1), (2), (3), (4); 21e, 21e(1),  
(2), (3); 36(E).

State of Kentucky )  
County of Campbell ) SS:



Gene Sell, Myron Reinhardt and William Voelker, being first duly  
cautioned and sworn, as their testimony state as follows.

I, Gene Sell, am the Superintendent of the Campbell County School  
District and my business office is 101 Orchard, Alexandria, Kentucky.  
As the Superintendent of the Campbell County School District, I am  
responsible for the health and safety of the students enrolled in  
the public schools of my district at all times that the students  
are within the control of the district, which includes presence at  
public school sites, during school programs conducted away from the  
school site and during school bus transportation of students. I am  
further responsible for the health and safety of the students enrolled  
in the private schools of my district at times that such students  
are being transported by school bus and I am obligated to ensure  
safe transportation of such privately enrolled school children and

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to provide school bus transportation for students enrolled in private schools within Campbell County, Kentucky. I am responsible for the administration of all affairs present and touching upon the public schools within the Campbell County School District, and to provide the programs required by law for the benefit of pupils and to take measures necessary for the well-being and protection of school children entrusted to my care in the Campbell County School District.

I, Myron Reinhardt, am the Deputy Superintendent and Director of Transportation for the Campbell County School District and my business office is 101 Orchard, Alexandria, Kentucky. It is my responsibility to assist Gene Sell in the administration of his duties as Superintendent and I have the direct responsibility for the direction, operation, control, routing and other matters pertaining to the transportation of both public and private students enrolled in the schools within the Campbell County School District. Included within my duties is the responsibility to provide safe transportation for all students enrolled in the schools within the Campbell County School District and to protect the health and safety of school children.

I, William Voelker, am the Principal of A. J. Jolly Elementary School, a public school of the Campbell County School District and located at Route 2, California, Kentucky. My business address is 101 Orchard, Alexandria, Kentucky. As the Principal of A. J. Jolly Elementary School, I am responsible for the health and safety of the pupils attending this school during their presence at the school site and for their transportation to and from that school site to the point and place where the students are released to the care and control of a parent, guardian or other proper custodian.

We, and each of us, state the following as our testimony. The schools, public and private, situated within the plume exposure pathway planning zone of the Zimmer Nuclear Power Station, together with student enrollment and grades present at each school, for the scholastic year 1981-1982, is as follows:

<u>Public</u>	
A. J. Jolly Elementary	221, grades K through 5;
Alexandria Elementary	617, grades K through 5;
Grants Lick Elementary	271, grades K through 5;
South Middle School	582, grades 6 through 8;
Campbell County High School	1580, grades 9 through 12;
Campbell County Vocational	362, grades 9 through 12;
<u>Private</u>	
St. Peter and Paul Elementary	62, grades 1 through 8;
St. Mary Elementary	410, grades 1 through 8;
Bishop Brossart High School	242, grades 9 through 12;

for a total enrollment of 4,347 students. In addition to the above-listed schools and student populations there are an additional three public and three private schools within the Campbell County School District but outside of the plume exposure area. The total student population for Campbell County is 6,111.

Campbell County School District operates 60 school buses for the transportation of pupils. 49 buses are used in student transportation possessing a seating capacity for 65 passengers and two lift buses for the transportation of handicapped pupils, each bus having a seating capacity for 12 passengers and two wheel chair positions. The District has nine spare buses each possessing a seating capacity for 65 passengers. 25 of the 60 buses are 8 years old or older. The model year and number of buses is as follows:

1981	4	1975	6	1969	1
1980	2	1974	8	1968	1
1979	6	1973	4		
1978	6	1972	4		
1977	7	1971	4		
1976	4	1970	3		

The buses, due to age and mileage, are not dependable for daily operation as experienced during the 1980-1981 scholastic year in which there were 78 days of bus out-of-service for repair.

54 regular drivers are employed by the District, 25 of which have other employment and several drivers are engaged in farming and are not available at all times. One driver has no telephone and can be reached by telephoning a neighbor and requesting that a message be delivered or by dispatching someone to contact that driver, Roberta Hughes, bus number 10, while in route. Bus 10's route encompasses three Kentucky counties during the school day.

37 buses are parked overnight at the bus garage and the remaining 21 regular-sized buses and the two lift buses are parked at other sites, including drivers' homes. During the course of the school day buses not being used between the morning and afternoon routes will be parked at various locations, including driver's home, and away from the school site that they service; other buses will be in route during the greater portion of the school day, permitting an approximate one to one and one-half hour period between the termination of the morning routing and the commencement of the afternoon routes; and buses will be distances ranging from 5 to 15 miles to an extreme distance of 35 miles from the school sites that they service. Buses arrive with school children at the school site commencing at 7:30 a.m. and depart the school site at the termination of the school day at 3:30 p.m. Kindergarten children are separated into two shifts: 8:15 to 11:30 p.m.; 12 noon to 2:45 p.m.; in which the child is bused to school for the first shift and from the school for the second shift, the parent being responsible for transporting

the student at the mid-day shift change. Once the buses commence their routes there is no means of communicating with the driver and the drivers are not available during the course of the day between routes for communications unless reached by telephone and if the driver is present at the site of that phone. In the event that it is necessary to summons buses to schools for evacuation during the course of the school day it is difficult and time consuming to summons the drivers and there is no reasonable assurance that drivers can be contacted to respond to such an emergency.

Snow and ice accumulation and flooding circumstances present a difficult situation with which to effectively transport school children by school bus. During December, 1981, the schools of this District were closed due to roadway conditions of snow accumulation for a period of four days: consecutive Thursday, Friday and following Monday and Tuesday. During the scholastic years 1976-1977 and 1977-1978 the schools of this District were closed 23 and 25 days, respectively, due to impassable roadway conditions.

In the past, and due to snow and ice accumulation and flooding conditions, as well as vehicular accidents blocking roadways, school buses have been unable to transport school children or were blocked during transportation due to traffic congestion. Portions of Route 10 for an approximate distance of four miles, between Carthage and California Cross Roads, are rendered impassable due to either flash flooding or flooding of the Ohio River and remain impassable for several days requiring alternate bus routing. Oneonta Road from Route 8 to Four and 12 Mile Pike is rendered impassable for approximately 10 days each year due to flash flooding and the flooding of



the Ohio River. U.S. 27 during snow and ice circumstances is closed from Alexandria to Cold Springs. Bus transportation is limited during inclement weather due to the nature of the roadways within the District: narrow, steep and winding roads, generally without berms, and the absence of adequate bus turn-arounds. These roadways further create the problem of student transportation, especially A. J. Jolly and St. Peter and Paul Elementary Schools, because of traffic congestion due to vehicular accident or snow fall, and in the event of resident evacuation the movement of school buses into and from those two elementary schools would be greatly curtailed.

Campbell County School District has neither the funds nor the buses and drivers to maintain buses parked at the A. J. Jolly and St. Peter and Paul Elementary Schools to be available in the event of student evacuation. Buses would have to be dispatched from other sites to evacuate the students of those two schools and under the most optimum conditions to evacuate those schools it would require two hours for evacuation, and under reasonably optimum conditions three hours to facilitate evacuation of the students of A. J. Jolly and St. Peter and Paul. Under other conditions the minimum evacuation time for those schools would be five hours to probably several hours after notification to evacuate.

The Superintendent's Office has four service telephone lines, the bus garage has two service telephone lines, Campbell County High School has three service telephone lines, Alexandria Elementary has two service telephone lines and the remaining schools have one service telephone line. During snow conditions and other similar circumstances the telephone lines servicing the schools, bus garage

and Superintendent's Office are overloaded limiting and halting telephone communications. In the event of a declared emergency at the Zimmer Station telephone communications would be rendered useless due to overloading of the service lines by parent telephone calls and the total inability of the Superintendent to communicate with Principals, drivers, and others necessary during an emergency. Under the present conditions of relying upon telephones for communications and reception of radio transmissions, as well as television information, the Campbell County School District cannot timely and effectively communicate within its system or to summons and dispatch bus drivers to afford any evacuation of students to protect their health and safety. Evacuation of the students within the plume exposure pathway of the Zimmer Station would require at least several hours and would permit exposure of the children within the affected schools. The complexity of buses located at various sites during the course of the school day or in route, the communication with school bus drivers, the roadways involved, population reaction, school bus routes, and the other factors present, including the limited buses and telephone system, results in the inability of this District to effectively respond to timely and safely evacuate school children.

Two children attending the A.J. Jolly Elementary School, a school situated 3.5 miles from the Zimmer Station, have received maximum doses of radiation and this concern by the parents of those children has been expressed as to the timely evacuation of that school. Parents have generally evidenced anxiety as to the plans to be implemented for the protection of their children.

Meetings have been held between ourselves and emergency planners

and we have reviewed the Campbell County Radiological Emergency Plan and the Protective Action Procedure plans in draft form for schools in other counties and the A.J. Jolly Elementary School. Those plans are inadequate for us to engage in any emergency response for the protection of the children within our District. The plans to date are totally inadequate. We have been afforded little information. By way of example, the Protective Action Procedure plan for the response of "Take Shelter" provides that upon notification teachers are to instruct the students to place cloth or paper over their mouth and nose, but without any consideration of the situation that would then and there exist as to the child's anxiety or appropriate explanation and advice.

The county plan provides for the closing of school and discharging of students to their home upon the event of any accident at the Zimmer Station before an accident circumstance requiring "Take Shelter" or "Evacuation." We cannot discharge our responsibility to student and parent by transporting school children to a home which may be unattended and where the child may not be capable of entering upon the advice to do so and with the potential that the accident may accelerate.

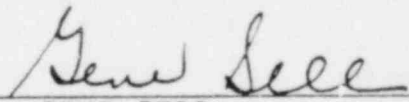
We have not been advised of the hazards attended to a Zimmer Station accident, the times within which we must respond or other matters critical to our planning and to afford information to staff, including drivers, to obtain their assurance and agreement that they would provide emergency response support necessary to protect the children within this school district. We have no means to obtain the support of parents and in the event of a Zimmer Station emergency parents would respond to the schools to transport their children and create




traffic congestion at school sites frustrating any timely evacuation of students by school bus.

In the event that an evacuation is declared during school when children are in route on buses there is no means available by which we could advise and alter busing and evacuate children present at schools, some portion of the student population being at school sites and the other portion being on buses.

We do not have sufficient buses, drivers or communication systems to effectively implement protective action plans for the health and safety of school children within our District. We cannot implement the plans currently in existence to afford any protection of the students within this District and based upon the limitations heretofore addressed we must state that the Campbell County School District cannot respond to a Zimmer Station emergency in any degree which will protect the health and safety of our school children.

  
\_\_\_\_\_  
GENE SELL

  
\_\_\_\_\_  
MYRON REINHARDT

  
\_\_\_\_\_  
WILLIAM VOELKER

Sworn to and subscribed in my presence this 4th day of January,  
1982.

  
\_\_\_\_\_  
Notary Public