

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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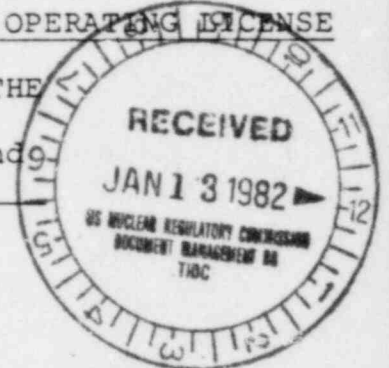
DOCKETED

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

CPA

ZAK ZACK

DIRECT TESTIMONY OF JOETTA GOODE ADDRESSING THE
ZIMMER AREA CITIZENS-ZIMMER AREA CITIZENS OF
KENTUCKY CONTENTIONS 20c(5); 20e(4); 24(6) and
(10).



State of Ohio)
) SS:
County of Clermont)

JoEtta Goode, being duly cautioned and sworn, as my testimony
state as follows.

My business address is 233 Main Street Batavia, Ohio. I am the
service coordinator for the Clermont Association of the Physically
Handicapped and Developmentally Disabled. I have been employed by
this agency, or its predecessor agency, for the past three and one-
half years. I am the designee of the agency for emergency prepared-
ness in the event of a Zimmer Station related emergency. In my
capacity as the emergency preparedness designee of this agency, I
have attended one meeting concerning the Clermont County radiological
emergency planning, which was an orientation meeting. Prior to that
time my agency has submitted materials upon request to planners
of the Clermont plan. Other than the orientation meeting, neither
I nor my agency have been further involved in planning or to render
any effort to date a reasonable assurance that the planning, as
pertaining to this agency's involvement, is capable of being
implemented.

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I have been certified as an emergency medical technician and in 1978, following the required course of study, I was certified as a paramedic. From 1975 to 1980 I served as a volunteer member of the Goshen life squad, and during that period of time, and since, I have had contact with members of the life squads located in Clermont County, Ohio.

The Clermont Association of the Physically Handicapped and Developmentally Disabled (CAPH/DD) has two vehicles equipped with a lift for the transportation of non-ambulatory persons. One vehicle is a converted maxivan with two wheel chair tiedowns and a seating capacity for six passengers. The other vehicle, which is the size of a 52-passenger school bus, is equipped with eight wheel chair tiedowns and seating capacity for 11 persons. Because of funding limitations, CAPH/DD will have one full time driver effective January 8, 1982. The sole driver to be retained by this agency after January 8th has no telephone at her residence, in which telephone contact in the event of a Zimmer Station accident requiring evacuation during the non-duty periods of this driver would render contact most difficult. The only present method of contact is to telephone the driver's mother to dispatch a message to this driver, in which the mother's residence is located eight miles from the driver's residence. This agency has neither the funds to provide a telephone at the residence of this driver, nor can it require that the driver have a residence telephone.

Some county lanes and township roads may be inaccessible to the large vehicle, possessing 11 seats and 8 wheel chair tiedowns, because of the narrowness and other characteristics of those lanes

and roads, and being roads and lanes necessary for the transportation of the disabled during a Zimmer accident requiring evacuation.

This agency has an identification list of handicapped persons which would require evacuation by this agency during a Zimmer emergency. This list has been created through individuals having made contact with this agency to advise of handicapped circumstances, or individuals who have been or are being served by this agency. However, the list of handicapped individuals which would require evacuation by this agency during a Zimmer related emergency is incomplete, the total number of persons requiring service during evacuation is not known, and there is an ongoing circumstance of individuals being temporarily disabled, through recent accident, and who have not identified themselves to this agency, and would not identify themselves until an actual evacuation circumstance. It is the deep concern of this agency that at the time of the necessity to evacuate handicapped individuals an incomplete list of such individuals requiring service would be present and the use of telephones as a communication device is inadequate for this agency to offer prompt and timely service for the safety and protection of handicapped individuals requiring transportation.

Based upon the statistics of the State of Ohio, four percent of the population is physically or mentally handicapped. The Clermont plan indicates an approximate county population of 150,000 persons. Of that assumed county population, statistically 6,000 county residents would be handicapped and in probable need of the services of this agency. The county plan further indicates approximate 24,400 persons living within the 10-mile plume exposure

pathway zone which would be subject to evacuation during a Zimmer accident. Again using the state statistic, there would be 976 handicapped individuals necessitating special needs for transportation located in the plume exposure pathway zone in the event of a Zimmer accident. There are 153 identified mentally disabled individuals living within the 10-mile radius of Zimmer. During different times of the day these individuals may be alone in the residence. There are, in all likelihood, other individuals who are mentally disabled living within the 10-mile radius of Zimmer who have not been identified to this agency. In the event of the need to evacuate occurring at a time that the mentally disabled individual is alone at the home, that individual would not possess the capabilities to arrange for evacuation. There are further difficulties in the circumstances of the removal of a handicapped individual from the home without the knowledge of the family members and in the absence of such knowledge would return to the home to assist in the evacuation of the disabled individual and may or may not during the course of the circumstantial stress of evacuation find notification left at the home that the disabled person had previously been evacuated.

There has been no program in the emergency planning by the planners with this agency to make a determination of the willingness or availability of this agency's personnel in an evacuation and the absence of either plan or the dependability of personnel to participate is a major concern, rendering this plan incapable of being implemented. Assuming a workable plan for identification and evacuation, this agency is confronted with the difficulty of implementation of that plan due to the limited ability of this

agency's vehicle, or vehicles, to travel several of the access roadways necessary for the transportation of handicapped evacuees. Based upon my own experiences, the traditional roadways to be utilized during evacuation will be congested to such an extent that emergency vehicles will have difficulty in their movement during the course of an evacuation, which will increase the evacuation time, resulting in a direct influence upon the health and safety of not only the general public, but the handicapped individuals requiring assistance in evacuation.

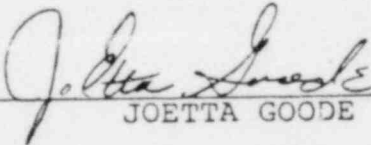
Based upon my experience with and knowledge of volunteer life squad personnel within the 10-mile radius of Zimmer to be utilized in varying response roles in addition to transportation of injured, several of those volunteers will first evacuate their families before engaging in any emergency response role, if any.

In the event of injuries, emergency medical technicians and emergency paramedics to be involved in emergency response roles within the Zimmer area during an emergency have limited knowledge and training in isolation techniques to be applied in radiological emergencies. After triage of injuries, appropriate destination of the injured must be predetermined and preplanned to avoid delay and confusion, which is a circumstance not currently addressed in the planning. A major concern is the adequate number of staff and area emergency rooms to deal with any emergencies and to avoid contamination of others being treated in the emergency room.

A circumstance not attended in the county plan is in the use of volunteer response groups during different hours of the day,

in which the number of available volunteers will be low during the workday hours and, conversely, high during the evening and night hours. Again, and including this agency, is the absence of any planning procedures with plan flexibility to adapt to variables, i.e., time of day, weather and road conditions, numbers involved, number and types of injuries, and alternative communications systems.


The Clermont County plan as currently drafted can not be implemented with any reasonable assurance that the handicapped persons involved can be timely and adequately evacuated during a Zimmer Station emergency requiring evacuation.



JOETTA GOODE

Sworn to and subscribed before me this 7th day of January,

1982.



ANDREW B. REYMOND, Attorney at Law
NOTARY PUBLIC - WYANDOTTS OHIO
My Comm. Exp. 12/31/83
Cald. Sec. 14700 H. C.