

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:  
Louis J. Carter, Chairman  
Mr. Frederick J. Shon  
Dr. Oscar H. Paris

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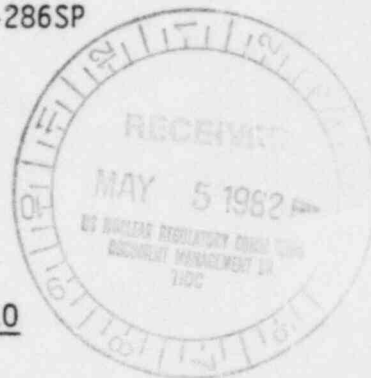
In the Matter of

Consolidated Edison Company of  
New York (Indian Point Unit 2)

Power Authority of the State of  
New York (Indian Point Unit 3)

Docket Numbers 50-247SP  
50-286SP

May 3, 1982



WESPAC'S INTERROGATORIES FOR

WESTCHESTER COUNTY EXECUTIVE ALFRED B. DELBELLO

On April 23, 1982 the Atomic Safety and Licensing Board issued a Memorandum and Order Formulating Contentions, Assigning Intervenors, and Setting a Schedule for the above-captioned proceeding. The Board ordered that formal discovery was to begin on April 26, and that all interrogatories on "matters under Commission Questions 3 and 4" be filed by May 3, although "discovery on matters to be heard later than the week of June 22 shall continue." (Board 4/23 order at 22, footnote 5). WESPAC received this order on the evening of April 28, two working days before the filing deadline.

We have put together a number of discovery interrogatories which are asked within this filing. Since hearings on matters relating to Commission Questions 3 and 4 will undoubtedly take longer than the week of June 22, we would like to be able to ask interrogatories on these issues after this initial May 3 filing deadline.

WESPAC hereby requests that the Westchester County Executive answer each of the following interrogatories in accordance with the foregoing and in line with the Federal Rules of Civil Procedure as soon as possible, but in no event later than May 31, 1982.

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- 1(a) What is the "Four-County Nuclear Safety Committee" (FCNSC) whose name and address is on the brochure (the "brochure") entitled "Indian Point, emergency planning, and you."?
  - 1(b) What is the "Four-County Task Force" (FCTF) on Indian Point Emergency Planning? Is it related to the FCNSC?
  - 1(c) Has Westchester County supplied any financial support to the FCNSC?
  - 1(d) Does the FCNSC have any direct relationship with Westchester County, or is it strictly a creature of Con Ed and PASNY? If so, describe the relationship.
2. Supply copies of any contractual arrangements between Westchester County or the FCTF and Con Edison, PASNY, the FCNSC, EDS Nuclear, or Parsons, Brinkerhoff, Quade, and Douglas relating to emergency planning for Indian Point. How much money was paid by Westchester or the FCTF to any of the five other parties? How much money was paid by the five other parties to Westchester or the FCTF? Is there an ongoing financial relationship?
  3. Supply copies of records, reports, and correspondence between Westchester County or the FCTF and any of the five parties listed above (the licensees, their consultants, and the FCNSC), the NRC, FEMA, and/or the New York State Department of Health and/or other governmental bodies relating to the efficacy, practicality, and/or deficiencies in the emergency plans.
  - 4(a) Does the Westchester County Executive consider the New York State Radiological Emergency Plan for Indian Point (and its subsidiary County Plans) ("the Plan") to be in satisfactory state of preparedness and implementability?
  - 4(b) If the County Executive considers the plans to be unsatisfactory or incomplete, specify the respects in which such is the case, and any remedies the County intends to implement or recommend.
5. Supply copies of any memoranda, reports, or communications from agencies of the Westchester County government, or from local governments within Westchester County, regarding the feasibility of their carrying out assigned roles under the Plan.

6. Supply copies of any information the County Department of Transportation can supply about the availability of buses, ambulances, and other special vehicles for use in an evacuation. Include the following information, if possible:
  - (i) How many vehicles can be provided? For how long?
  - (ii) How many drivers can be provided? For how long?
  - (iii) How many special (kneeling, wheelchair, ambulance, etc.) vehicles are available? What percentage of the time are they functional?
  - (iv) How could the drivers and the vehicles to be notified when they are needed to participate in an emergency?
  - (v) What is the total number of passengers (average and maximum) who will already be on buses which will be needed during the evacuation?
  
7. What information does the County have with regard to Westchester residents who may need special attention because of transportation problems or physical impairments?
  - 7(a) Describe all studies or surveys which seek to identify the persons and problems referred to in (b), and attach copies thereof.
  - 7(b) Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:
    - (i) Wheelchair disabled
    - (ii) Confined to bed
    - (iii) Sight-impaired
    - (iv) Psychologically or emotionally unable to react to their role in the emergency plan.
    - (v) Dependent on life-support equipment.
  
8. What information does the County have with regard to Westchester residents who are hearing-impaired or have one of the other conditions enumerated in 8(b) and thus will not hear or understand the sirens or the radio announcements which are integrals part of the notification system:
  - 8(a) Provide copies of all studies or surveys which seek to identify such persons and problems.

- 8(b) Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:
- (i) Hearing-impaired
  - (ii) Spanish-speaking
  - (iii) Other non-English speaking
  - (iv) Emotionally or psychologically unable to comprehend their role under the emergency plans.
  - (v) Without radios (outdoors, in parks, or otherwise unable to tune in the Emergency Broadcast System).
  - (vi) Unable to hear sirens (because sirens are not loud enough, people are indoors, other noises interfere, sirens malfunction).
9. Supply any information the County Department of Corrections, Department of Health, and/or the Department of Social Services can provide with respect to institutions in the EPZ which contain people with special mobility or notification requirements either as outlined in (7) and (8) above or for other reasons (e.g. imprisonment). Include:
- (i) A list of such facilities, with address and phone of a contact person.
  - (ii) The number of patients/inmates/residents in each such facility, with an indication of their special needs.
  - (iii) An estimate of the feasibility of evacuating them as envisioned in the Plan.
10. What are the responsibilities of Westchester County personnel under the emergency plan?
- 10(a) Supply a list of all County personnel who have responsibilities under the Plan and identify those responsibilities.
- 10(b) Have all such personnel been informed of their roles, and have they agreed to participate?
- 10(c) What training has been and/or will be provided for these people? Please supply copies of training materials.
11. For each Westchester County road involved in an Evacuation Route, supply the following information:
- (i) What is the capacity, under optimum conditions, in terms of number of cars per hour? What assumptions is this based on?

- (ii) What would the capacity be under adverse weather conditions.
  - (iii) What are the effects of traffic accidents on traffic flow?
  - (iv) What are the effects of intersections, traffic signals, malfunctioning traffic signals, and other factors which impede the normal flow of traffic?
  - (v) What are the effects of road closings due to construction, accidents, etc.
  - (vi) What would be the effect of additional traffic on evacuation routes outside the EPZ as others self-evacuate along major roads?
12. Please list all closings or major disruptions of traffic on those Westchester roads which would be involved in evacuation due to construction or adverse weather for the past five years. Indicate the cause and duration of the service disruption, and the methods taken to ensure workable transportation.
13. How much money has Westchester County spent on Indian Point emergency planning and preparedness in each of the past five years? How much do you expect to spend per year between now and when Indian Point is decommissioned?

Respectfully Submitted,



Charles A. Scheiner  
Co-Chairperson

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