

7690 Ida East Road
Ida, Michigan 48140

February 10, 1983

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

It has come to our attention that your office has accepted Monroe County's petition to intervene in the licensing proceeding of Detroit Edison's Fermi II Atomic Power Plant as a petition pursuant to 10 CFR 2.206. During the past year, we have actively worked with a group of Monroe County citizens to help the Monroe County Board of Commissioners be aware of the local concerns over the evacuation process for Fermi II.

Enclosed is a document we presented to the Board of Commissioners in August, 1982, summarizing some of those concerns. It is our hope that you will include this information in your investigation.

We would like to pursue the documentation of our concerns more fully and present them to your office. In order to do so, we would like to be informed of the procedure to follow and timetable you anticipate for your investigation.

Thank you.

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To: Monroe County Board of Commissioners

Re: Citizens' concerns regarding the Proposed
Radiological Emergency Response Plan

1. An evacuation of the residential areas surrounding Fermi III would be extraordinarily difficult because of the unique geography of the beach communities, particularly Stoney Point and Estral Beach. These communities are directly on Lake Erie. Therefore, any escape to the east is impossible. The residents of this area would have few roads available to them. In most cases, they would have to travel north or south before being able to escape to the west. This could mean travelling extremely close to the plant itself. The roads have an hourly capacity of 1200 vehicles and would have to be the main arteries of emergency vehicles going to the plant itself. Therefore, movement out of the beach area will be very slow.

These difficulties are compounded by meteorological factors. As last winter demonstrated, this area can be paralyzed by heavy snowfall and is susceptible to flooding. Sheltering in lieu of evacuation is unacceptable because of the proximity to the plant. Another feature of the area is that it is a relatively short distance across the lake to the Davis-Bessie nuclear facility in Ohio.

2. The evacuation process outlined in Monroe County's Radiological Emergency Response Plan (RERP) is dependent upon the Governor of the State of Michigan declaring a State of Disaster according to Public Act 390. This will necessitate a lapse of time which will further endanger those in close proximity to the plant. It also leaves the decision to evacuate in the hands of the Governor.

3. A full county-wide response to a nuclear emergency is dependent upon the activation of the Emergency Operating Center (EOC) and the establishment of the decontamination/reception centers. This process as well and the mobilization of the county's forces will take a great deal of time. This time will be available only if an unusual event progresses slowly to a general emergency. The county can not respond with full force to an incident which immediately threatens lives and property.

4. The facilities for the EOC at 106 East First in Monroe may be insufficient for the staff it must accommodate. This facility also may not adequately protect the EOC staff since it is inside the ten-mile Emergency Preparedness Zone (EPZ).

5. Throughout the plan the authorities are dependent upon the plant operator to determine when a nuclear incident has occurred. Although there is periodic monitoring by the Michigan Department of Public Health, there is not a moment by moment independent monitoring of the plants perimeter or the intake for the City of Monroe's water system.
6. The RERP states, "It is the responsibility of each agency committed to a nuclear power incident response to initially and annually train and maintain the capability of its own staff to respond to an incident." Since this training responsibility rests within each agency, there is no guarantee that the training is sufficient and is fully coordinated with other agencies. This is particularly true of volunteer organizations. The drills called for in the plan do not test the adequacy of training programs because the actual moving of people, decontaminating of vehicles, and protecting of property are never part of the drills. There is never a realistic evaluation of the training of emergency workers since a mock evacuation is impossible due to the liabilities it imposes on local government.
7. The plan states, "If possible contaminants are involved, the evacuees may require processing through decontamination centers." The plan proposes five possible centers:
- Monroe High School
 - Monroe Intermediate School District
 - Airport Community Schools
 - Ida Community Schools
 - Mason High School

The Monroe County Department of Social Services is responsible for staffing these centers.

Federal criteria states that sufficient resources shall be available for registering and monitoring evacuees in a 12 hour period. If the entire EPZ was forced to evacuate, these centers would have to process well over 1000 people per hour. Creating additional centers is virtually impossible because the Department of Social Services has only approximately 100 employees available for administering the centers. It is even questionable if the five centers can be properly staffed given the size of the DSS staff even with the assistance from the Red Cross. This problem is compounded by the fact that the majority of the DSS employees reside outside the confines of Monroe County. If an emergency occurred other than between 8:00 to 5:00 on a weekday, the DSS would have great difficulty in meeting its responsibility.

The physical location of three of these facilities may present a problem since Monroe High School, Monroe ISD, and Ida High School are in a line southwest of the plant. A movement of a plume southwest could render all three centers useless. Other facilities exist that could replace these, but a shift of 60% of the decontamination/reception centers at the last moment could create tremendous confusion.

8. Although the RERP establishes decontamination centers and a decontamination process, there are not provisions to monitor cars leaving the EPZ for decontamination. Therefore, participation in the monitoring for radioactivity and decontamination is voluntary. To monitor vehicles within the EPZ would disrupt and retard the traffic within the areas being evacuated. This would increase the risk of exposure to radiation.

9. The process available to the county for the decontamination of vehicles may be inadequate and may create additional problems. This process calls for a decontamination center to be established at a school where vehicles and emergency equipment will be hosed off by the local fire department. The plan states, "The water pressure attained will serve to decontaminate vehicles."
It is questionable if this method will be effective. The effect of running contaminated water into a field has not been studied. This also raises the possibility of contaminating the water table beneath the field by the run-off. This is an important question since the schools available for the proposed centers are very close to residential areas dependent upon well-water.
Another questionable aspect of the decontamination procedure is the reliance on the local fire departments within the district of the center to perform the decontamination. In many cases, this means relying on volunteer fire departments for the personnel and equipment. Since these persons will be volunteers, they are placed in a legal position that prevents them from having liability coverage. This might affect their willingness to actively participate in this dangerous operation. Since the selection of decontamination centers will be dependent on the wind direction, all fire department personnel must be trained and willing to participate in the decontamination procedure.

10. Local fire departments have many responsibilities in addition to the decontamination process. These include:
 - a. The Frenchtown Fire Department (a volunteer unit) will provide on-site fire and rescue service at the Fermi plant.

- b. Fire department will provide notification to residents not provided with siren coverage.
- c. Fire personnel will assist immobilized and institutionalized persons leaving their homes or facility if evacuation is ordered.
- d. Each fire department will perform re-entry and recovery tasks as necessary.

The majority of these fire departments are volunteer organizations. Because of the limitations of P.A. 390 and insurance policies, volunteers have no liability coverage. Therefore, it is inadvisable to depend upon volunteers for these vital functions.

11. Local law enforcement agencies have substantial duties during an evacuation in addition to their normal responsibilities. Yet these agencies have rather limited personnel to meet these duties. This limitation is compounded by the fact that law enforcement personnel will be working in areas where they will be exposed to radiation. As each officer is exposed to maximum levels of radiation, the local law enforcement agencies will be dramatically depleted. Depending upon the National Guard troops to supplement local agencies means turning very fundamental emergency procedures over to people unfamiliar with not only the locality, but also the coordinated effort of all agencies in the radiological emergency response.

12. It has been widely accepted that the ingestion of potassium iodide (KI) can significantly reduce the dangers of exposure to certain radiation by its thyroid blocking properties. It is also widely understood that KI must be ingested immediately to have its full impact. The RERP states that the Michigan Department of Public Health maintains a quantity of KI at its central office. When an incident occurs this supply will be transported to the local area. The plan calls for the Director of the Monroe County Health Department to distribute the drugs. The plan even has a sample press to instruct persons living in designated areas where to pick up a supply of potassium iodide.

This procedure will take several hours. This delay will render potassium iodide unavailable and useless to evacuees. The delay will also minimize its value for emergency workers.

13. The RERP places the responsibility for the recovery of and re-entry into areas evacuated and /or contaminated due to an off-site release on local government. During this period, local government is assigned numerous tasks including: decontamination of people, property, and food; health and medical services for evacuees mass care and welfare; and radioactive waste disposal.

The cost to fulfill this list of tasks in addition to the other requirements placed upon local government is astronomical. The cost of decontamination of private houses and property could destroy the local government financially. Especially the cost of decontamination of farms in the rural area surrounding the plant could be devastating. The environmental impact statement states, "where the material becomes relatively fixed in its location as an environmental contaminant (for example, in soil), the hazard can continue to exist for a relatively long period of time - months, years or even decades." It is doubtful if homes and property could ever be decontaminated fully if the cost is beyond the resources and expertise of the local government responsible for it. Health and medical services that would be necessary following a nuclear emergency could become very costly. This is a cost local government can not assume. Mass care and welfare could place the county in a position of long term care for the people whose homes and farms are uninhabitable because of contamination. It is obvious that the county can never accept responsibility for radioactive waste disposal. The entire process of re-entry and recovery could destroy the county financially but the real danger is that a full and proper response is beyond the ability of the local government.

14. The first priority during a response to a radiological emergency will be the transportation of children, the sick and the elderly. This means a complete evacuation of the Monroe Public Schools, Airport Community Schools, Jefferson Schools, all parochial schools, all private schools, pre-schools, Mercy-Memorial Hospital, and all nursing care facilities. A minimal estimate of the school children involved is 15,500, ^{and} 1100 people will need evacuation from nursing homes and hospitals. The combined capacity of the buses of Monroe Public Schools, Jefferson Schools, Airport Community Schools and Lake Erie Transportation Commission is 9685. In addition, roughly 2800 people will need public transportation to leave the area. In rough figures, 20,000 people must be transported by vehicles which can carry only 10,000. Help from out county schools will be very limited since Bedford, Milan, Mason, Dundee and Ida will be transporting their children home. Reliance on buses and trucks coming from a distance away from the EPZ creates increased hazard to children, the sick and elderly.

15. It is unfortunate that the county's two hospitals are within the EPZ. As stated previously, it will be very difficult to use buses to transport patients. There is also an alarming lack of ambulances available. In addition to the transportation problem, no thorough evaluation of the availability of hospital beds to relocate the very ill have been done. This need is compounded by the possibility of illness and accidents occurring during the evacuation.

16. The proposed plan never addresses the protection and care of farm livestock and other animals.

17. Numerous agencies and volunteer organizations are involved in the evacuation. A partial listing includes:

- a. Law Enforcement Agencies
- b. Fire Departments
- c. Health Department
- d. Hospital staffs
- e. Department of Social Services
- f. School Personnel
- g. Red Cross
- h. Salvation Army
- i. Road Commission
- j. Planning Department

This means a tremendous number of individuals are involved in the evacuation process. Unfortunately many of these people have families living inside the EPZ which they will want to care for during an emergency. This, combined with a general reluctance to enter a radioactive area, places these emergency workers under a great deal of pressure.