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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF)
) Docket No. 50-155-OLA
CONSUMERS POWER COMPANY) (Spent Fuel Pool Modification)
)
(Big Rock Point Nuclear)
Power Plant))
_____)

INTERVENORS CHRISTA-MARIA, JIM MILLS AND JOANN BIER
REPLY TO LICENSEES RESPONSE TO BOARD ORDER OF SEPT 14, 1982

Licensee's response to the Licensing Board's order of September 14, 1982 is inadequate in the following areas: The evacuation of educational and day-care type facilities, training, hospital evacuation, the evacuation of persons without vehicles and transient evacuation.

1) Evaluation plans of educational and day-care type facilities.

Numerous licensed day care facilities have not been included in the plans and have evacuation needs. A notable example of the latter is a licensed day care center run by Connie Bradley, notable, because she was contacted by Stone and Webster Licensee's Consultant, but not included in their report. Ms. Bradley cares for ten to twelve children in her home, year round. Transportation in the form of the family car is available to her only during the summer months. She has no planned or available

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means of evacuation of the center during the winter months. Ms. Bradley is just one of several such day care centers not covered in the emergency plans. The child of Intervenors Christa-Maria and Mills attends this day care center.

The plans regarding school buses are inadequate. Vincent Olach, in his affidavit, bases his calculations of school bus capacity on an assumed bus capacity of 120% above manufacturers rating. 110% of capacity (1332.1 passengers) will accommodate his figure of 1312 students. The 120% figure is necessary if one bus is inoperable, more teachers need rides or there are more than 53 kindergarten students (such as at a change of class). The 120% figure is too high. Mr Olach does not state how he arrived at the conclusion that 120% is a safe capacity. However, on September 21, 1982 he used only 110% of capacity in calculating loads. The previous state law regarding overloads stated that 110% capacity was the maximum permissible load. (Olach affidavit p. 7-8). Unanswered questions raised by the 120% figures are, for example, how does this extra weight affect bus handling in snowy or rainy weather? Will the busdrivers know how to handle the extra weight when driving?

To plan on such an overload of the buses leaves very little room for flexibility. Mr. Olach also relies on an unknown number of high school students with cars as a contingency backup (Olach Affidavit p.13). Additionally few of the buses are equipped with radio communications. Denise Wiktor, Legal Intern, spoke with Earl Muma on 3/9/83 and he indicated that Charlevoix County does not have the money to supply communication equipment.

The Stone and Webster report recommends that the parents of school children be informed of evacuation plans by County emergency preparedness officials (p.3-4 of report). A brief notice in the February school newsletter mentioned school evacuation plans. Intervenors would contend that the blurb in the newsletter is inadequate information for the parents and families. Additionally, for those parents and children who live outside the 5 mile EPZ but attend school within it, no arrangements have been made for the parents to retrieve their children.

Mr. Olach further mentions that should there be a shortage of buses, support would be received from East Jordan Public Schools or Ellsworth Community Schools (Olach affidavit p. 14). However, none of these drivers are trained and currently neither of the co-operating school districts have money to provide training (Conversation with Earl Muma 3/9/83). These are not drivers from the immediate area and therefore could not function based on personal knowledge of the area.

One additional problem with the evacuation plan for the schools is that the adult-to-child ratio may be as high as 70 to 1 per bus. This is inadequate supervision on the bus as well as at the relocation center, especially where small children are concerned.

2) Problems with the Training Plans

Intervenors note that the majority of the past training in Licensees filing occurred prior to the June hearings and is part of the record on which the Board based their Sept. 14, 1982

decision. Of the training that has occurred since that time, it is unclear if any of the training has been monitored and/or approved by FEMA. What is problematic with Licensee's submission is future plans for training. On 3/9/83, Denise Wiktor, spoke with Earl Muma and he indicated that Charlevoix County has provided some training (such as for Charlevoix bus drivers) but does not have the money in its budget for further training or equipment of any type, including the training of back up school busdrivers. This county-utility money debate goes beyond training into supplies such as radios for busdrivers, emergency vehicles and staffing and labor needs. The utilities in Michigan have set up a type of "superfund" in which each utility pays money to the state for emergency operations. This money is not distributed to the counties and only covers training provided at the state level. Most of training needed in the Charlevoix area is to be provided at the local levels. Until this economic issue is resolved there is no guarantee that any of the training or other emergency services will continue or operate as planned.

3) The Evacuation of persons without vehicles

The Stone and Webster report notes that based on Census figure, there are approximately 300 people in the five mile EPZ without vehicles. It is clear from Licensee's filings that at the present time the planning for this need is still in the primordial stage, that the local officials are unsure as to the extent of the problem or how to resolve it. This does not comply with the Board order that Licensee show that the deficiency has been remedied, is not serious or is being remedied through adequate interim compensating action. (Board Order 9/14/82 p.12).

Of special concern is the Native American population of ten or more families that is within the five mile EPZ. These families are generally without radios, televisions or electricity and most are without cars. It is unclear if this special population has been included in any of the emergency planning.

Another source of concern is the poor such as individuals on SSI or AFDC. While Licensee has used the social services agencies to identify invalids, there are individuals who may own cars that are unreliable or the individual may not have the money for the gas needed to evacuate. Intervenors suggest this could easily be remedied through the appropriate social services agency via posters, letters or other means of informing such persons of means of evacuation.

4) Hospital evacuation

The current provisions for hospital evacuation are inadequate. Licensee has not identified the number of Group I or II type patients anticipated. It is unclear if the additional ambulances from Antrim County are available under a mutual aid agreement. The evacuation plan assumes that all ambulances will be available for evacuation purposes. Emergency services that may be needed for exposed plant workers or other emergencies are not anticipated. The two ambulances from Petosky will have to drive a substantial distance to provide such services (see attached map). The plans for evacuation of Group II patients are incomplete. There are currently no vehicles designated to remove Group II patients. Group II patients, if evacuated, will be taken to East Jordon Family Health Center. It is unclear if they will be released from care at that point or still require medical

care. The East Jordon Family Health Center is a complex of out-patient offices and is not equipped for in-patient care. There is no indication of any drills or evacuation training for ambulance drivers and hospital staff. Evacuation plans for Group II patients and evacuation training of medical personnel is necessary.

5) Transient Individuals

Transient individuals are not considered at all by Stone and Webster because "most" come in their own cars. (Stone & Webster Report 2-1). Many of the transients come by bus or are dropped off by relatives and are without cars. Still another group live on boats. Soon, there will be a hotel-convention center complex in Charlevoix City. There is a ski population in the winter, many of whom come by bus, and a transient summer population. The number of people who are without cars should be identified in the transient population. This could be done through hotels, boat docks, restaurants and ski areas, (although the ski areas themselves are outside of the 5 mile EPZ, where any of the patrons stay is not.) This is a group that may triple in size during peak tourist season, and therefore a sizable number of individuals have been overlooked in the emergency planning.

Conclusion

The Emergency planning needs within the five mile EPZ have been inadequately met, and due to a lack of funds on the county's part, the plans may never be realized.

Intervenors submit that Christa-Maria contentions 9(2), 9(4) and 9(5) remain current issues before the Board in light of the unresolved issues.

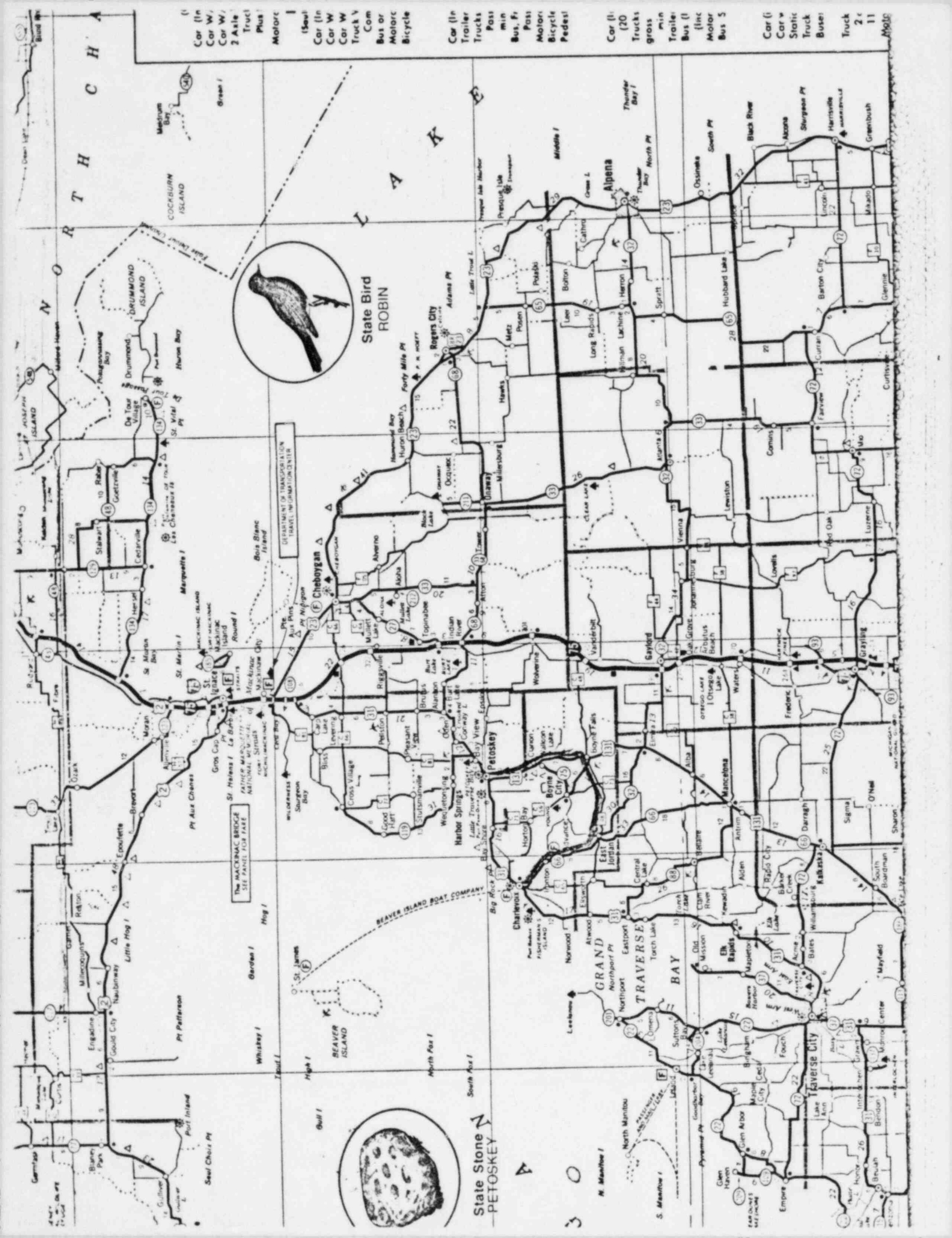
Respectfully submitted

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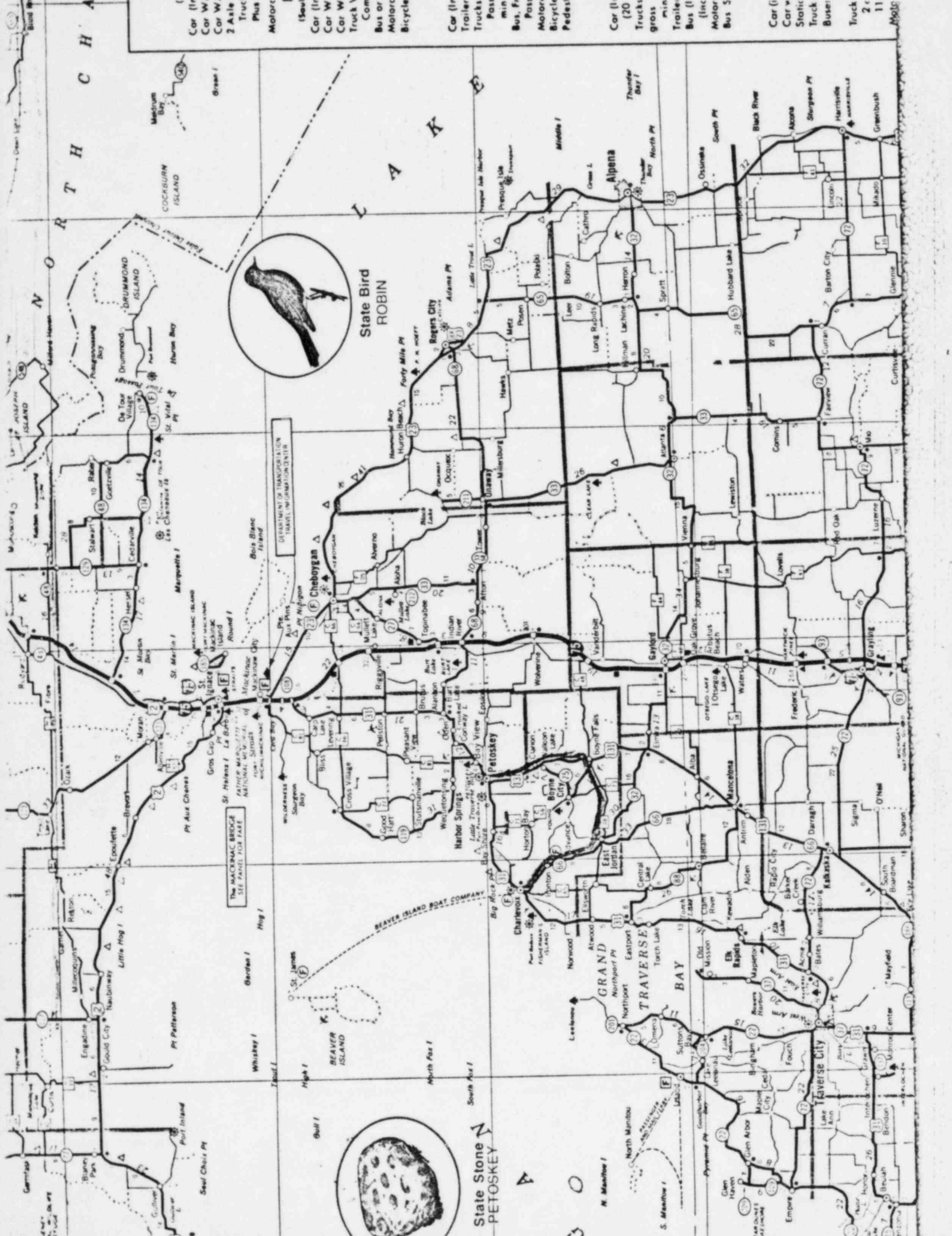
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CERTIFICATE OF SERVICE

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I certify that the foregoing Intervenor Reply to Licensee's Response was served on the 11th day of March 1983 to the attached service list by United States Mail, first class postage prepaid.

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