## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF	Docket Number 50-155-OLA
CONSUMERS POWER COMPANY	(Spent Fuel Pool Modification)
Big Rock Point Nuclear Power Plant	

## REMARKS OF JOHN O'NEILL II CONCERNING EVACUATION PLANS

I offer some comments on the evacuation plan as litigated to date:

The Charlevoix Hospital should be included in the evacuation zone, since it is extreemly close to the 5 mile boundry. In no case should it receive patients in a general evacuation.

While the Stone and Webster report says that the hospital is with in the 5 mile zone, Earl Muma, Director of Emergency Preparedness, Charlevoix County, maintains that it is not. In any case, I believe no evacuation plans for the hospital appear in this case's record.

Disagreement between such central parties raises basic questions about the ability to formulate, execute and co-ordinate evacuation plans. I insist that this basic problem be resolved. Such lack of co-ordination was also revealed during the June hearing, and it seems as though the problem has not yet been resolved. This must be changed.

I understand that the city itself has only two ambulances, which are manned by part time volunteers. I question the reliability of counting on these ambulances in a crisis.

In no case should patients form Charlevoix be evacuated to Petoskey. They cannot pass by the plant on M-31, and the route around Lake Charlevoix, the only route outside the zone, is long, circuitous, over poor roads, very likely to be through the contaminated plume, and require driving against the tide of frantic citizens fleeing the area. A better plan would send Charlevoix hospital and nursing home patients to Munson and Osteopathic hospitals in Traverse City, roughly the same distance away with none of the above disadvantages. I will supply a map should the Board desire one. These hospitals should be included in the training plans.

News articles indicate serious funding problems exist regarding required training of evacuation workers outside the Consumers ower workforce. I question wether these critical participants will receive adequate training. One also wonders that if people are unwilling to train in such a critical matter, wether they are to be relied upon in an emergency. The Ewacuation Plans should not be approved until this is explicity resolved.

The Stone and Webster report did not cover all of the day care and nursery facilities. This must be cleared up.

Those women who might be pregnant, as well as children at home or in school, who live outside the small 5 mile boundry should also be required to evacuate because of their increased susceptibility to radiation's effects. If necessary, the Board should examine this important issue suo sponte, since the importance of special protection for these people was acknowleded at the hearing in June when the pamphlet was discussed.

There is a special problem for families living outside the 5 mile zone from which children attend schools within the zone. The parents do not receive the emergency pamphlet and are likely to panic, perhaps even to rush into the schools. The notice in the school bulletin is inadequate, if for no other reason that busy parents are likely to overlook it. Moreover, the information itself is deficient. This bulletin was just distributed this week, and I shall furnish copies to all parties as soon as I receive it.

Stone and Webster revealed that 300 people (I think this is about 10 percent of the city's population!) are without transportation. Their safe evacuation is the responsibility of the Charlevoix ty Chief of Police. It is unclear what he has done about this. These people should be sought out.

To depend upon poor people to identify themselves is not enough for myriad reasons; including their possible reluctance to incure social stigma, lack of phone, tv or even radio, poor health, and possible lack of personal responsibility. These people did not create the danger and should not suffer as a result of personal problems unrelated to the plant. This group includes a large percentage of ADC mothers with small children. These women may also be pregnant, and special care to evacuate these highly vulnerable citizens must be made. This question must be resolved beyond a reasonable doubt.

Beyond these points, I concure with the comments made by counsel for Christa-Maria, Joanne Bier and Jim Mills.

Very sincerely yours,

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