

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))	

AFFIDAVIT OF VINCENT R. OLACH

I, Vincent R. Olach, being first duly sworn do
depose and state:

1. I am employed as the Business Manager for the Charlevoix Public School District, Charlevoix, Michigan and I have served in that position since July 1, 1975. My business address is 208 Clinton Street, Charlevoix, Michigan 49720. My responsibilities in that position include all fiscal services, food services, buildings and grounds maintenance, and transportation for the school district. Prior to my employment as Business Manager, I served in the U.S. Army for 27 years. My experience in the Army included 4 years in Grafenwohr, Germany where I assisted in preparation for evacuation of U.S. dependents in the event of an invasion. Also, while stationed in Homestead, Florida, I wrote a plan in cooperation with the local civil defense agency for the purpose of keeping certain roads clear for military vehicles

in event of an emergency.

2. The purpose of this affidavit is to explain the following in regard to an emergency arising out of an accident at the Big Rock Point Nuclear Power Plant; that, if required, there is adequate transportation available for evacuation of students including students who do not ordinarily rely on school buses for transportation; that evacuation routes for the buses have been established and are in place; that the school bus drivers are familiar with such routes; that there is satisfactory method of alerting school bus drivers who are not on duty; that the bus drivers can be relied upon to respond in a nuclear emergency; and that parents are being informed of the evacuation plan.

3. Pursuant to procedures developed under Annex M "School Support" to the Emergency Operations Plan for Charlevoix County, the Charlevoix Public School District is prepared, if necessary, to evacuate all of the students in its school system, the students of St. Mary's School, the students of the Charlevoix Cooperative Nursery, and the teachers who will need evacuation assistance or who will be called on to assist such an evacuation.

4. The number of students of the Charlevoix Public School District who would need to be evacuated in an emergency should not exceed 1312. I arrived at that figure

based on the following:

- a. The official enrollment of the Charlevoix Public School District for the 1982-83 is 1393 students. There are 520 students at the Elementary school (Kindergarten through Grade 5); 373 students in the Middle School (Grades 6 through 8); and 500 students in the High School (Grades 9 through 12).
- b. There are 94 Kindergarten students. 53 attend in the morning and 41 attend in the afternoon. Thus, the need for evacuation capacity would be reduced by at least 41, the smaller of the two classes.
- c. Over the last five years, the lowest rate of absenteeism of students on any one day was 3 percent. (The average rate of absenteeism is 8 percent.)
- d. Thus:

Number of enrolled public students	1393
Less 41 Kindergarten students	-41
Less 3 percent absenteesim	<u>x.97</u>
Total number of public school students needing evacuation	<u><u>1312</u></u>

5. The teachers and staff of the Charlevoix Public Schools will evacuate by their own transportation except for those teachers who will stay with the students and assist the bus drivers. At least one teacher will be on each of the school district's 19 buses. Thus, the total number of Charlevoix Public School District teachers and students who would need evacuation assistance is 1331.

6. St. Mary's School, a parochial elementary school, has a 1982-83 enrollment of 77 students and a maximum staff of 14 adults. Assuming a 3 percent absenteeism, 75 of the parochial students would need evacuation. Only 3 of the St. Mary's staff members would require evacuation assistance. The Charlevoix school buses would also be used to evacuate the Charlevoix Cooperative Nursery, a private nursery school located in the Elementary School. The Nursery has a staff of 3 persons and there are 17 children in each of its morning and afternoon sessions. The evacuation demands of St. Mary's School and the Charlevoix Cooperative Nursery thus raise the number of persons to be evacuated by the Charlevoix Public School District to 1429.

7. The Charlevoix Public School District has 19 school buses, two 14-passenger vans and one 8-passenger station wagon available for transportation of students in

an emergency. The buses have a total passenger capacity of 1453. The vans and buses have a passenger capacity of 36. (These figures do not count the drivers' seats.) Thus, the Charlevoix Public School District has the capacity to evacuate 1489 students and teachers.

8. I determined the passenger capacity of the school buses to be 1453 based on the following:

- a. Each bus has a manufacturer's rated capacity which is based on seating area in accordance with state and federal standards. The Charlevoix Public School System has 9 buses with a manufacturer's rated capacity of 66 passengers, 7 buses with a rated capacity of 65 passengers, 2 buses with a rated capacity of 59 passengers, and one with a rated capacity of 44 passengers. (The 44-passenger bus has individual seats similar to commercial passenger bus). A 66-passenger bus has 22 seats which are each rated to seat 3 students. In compliance with federal standards, the seats are 39 inches wide and allow 13 inches of seating for each student. The 65-passenger bus also has 22 seats, but one seat is shorter to allow more space around

the emergency exit at the rear of the bus. The 59-passenger bus has only 20 seats, one of which is also a shorter seat near the rear exit.

- b. Making use of the space available in the aisles of the buses where students could sit or stand, the buses can be safely loaded to 120 percent of their rated capacity. The aisle space of a 65 or 66-passenger bus is approximately 13 inches wide and about 30 feet in length from the dashboard to the emergency exit. (The area around the driver, a length of about 3 feet, would be kept clear of students but a teacher would stand there or in the doorwell to assist the driver and supervise the students). Filling these buses to 120 percent of their rated capacity would require 13-14 students to stand or sit in the aisle. On a 59-passenger bus, it would mean 11-12 students in the aisle. On a 44-passenger bus, a 120 percent capacity fill would require 9 students to stand or sit in the aisle. Filling the buses with these

additional number of students has been effectively done on routine occasions without any safety problem. There is no law or regulation that addresses the maximum capacity of a bus. It is a matter of safety and common sense.

c. The following table summarizes the foregoing information:

<u>Number of Buses</u>	<u>Manufacturer's Rated Capacity</u>	<u>Total Rated Capacity</u>
9	66	594
7	65	455
2	59	118
1	44	<u>44</u>
Total rated capacity of all buses		1211
Emergency evacuation capacity of buses (120% of rated capacity).		1453
Plus passenger capacity of vans and station wagon		<u>36</u>
Total emergency evacuation capacity of the Charlevoix Public School System		<u>1489</u>

9. On September 21, 1982, I sent a letter to Mr. Earl Muma, Emergency Services Director for Charlevoix County. That letter stated that we have 20 school buses with a rated capacity of 1277 students which, under ordinary

loading procedures, could be increased by 10 percent to a capacity of 1404 students. Since that time, one bus has broken down, leaving us with the present 19 buses. Further, I based my calculations at that time on the assumption that there was a state regulation which allowed filling a bus for routine use to only 10 percent beyond its rated capacity. I have since learned that this regulation no longer exists and have considered the question of bus capacity from a safety and common sense viewpoint. Thus, I determined that filling the buses to 20 percent beyond their rated capacity can be safely and effectively done in an emergency.

10. In the event of a nuclear accident at the Big Rock Point Plant, the Charlevoix County Emergency Operations Center ("EOC") would notify the Charlevoix Public School District by telephone. In turn, the administrative offices would notify the schools and the Transportation Supervisor. If evacuation of the students is required, the school bus drivers would be notified through a "fan-out notification system" which is found in Annex M to the Emergency Operation Plan. By that system, the Transportation Supervisor calls three designated drivers, each of whom calls another driver on the fan-out who in turn

calls the next driver, etc. Should an emergency be announced while the buses are on the morning or afternoon runs, the drivers can be contacted by calling the houses ahead of them on their route since the names and addresses of the students on the drivers' routes are on file in my office. (This method of contacting drivers on their routes has been effectively used before for other purposes). The drivers would report to the bus garage which is located near the High School. The drivers would be apprised of the situation and given instructions. The drivers would inspect their buses and then proceed with their buses as directed. The first eight available buses would be directed to the Elementary School to evacuate the students of that school and the Charlevoix Cooperative Nursery students. (The Elementary School is the closest to the Big Rock Point Plant. The Nursery is located in the same building as the Elementary School.) Other buses will be directed to the Middle School and High School. The buses with the Elementary School and Nursery students will proceed to the Middle School to fill any extra space on those buses. All buses will converge at the High School which is the school furthest from the Big Rock Point Plant. The students from St. Mary's School which is located across the street from the High School will meet the buses there as well. Once all

the buses are filled, they will proceed in convoy style on the evacuation route toward East Jordan.

11. Prior to evacuation, each teacher will prepare three copies of a roster of their students. Two copies of the roster will be given to the school principal who in turn will distribute them to the EOC and the School Superintendent. The third copy of the roster is for the evacuation reception center at East Jordan High School.

12. The main evacuation route to be followed is south on US 31 to the intersection with M-66, then south on M-66 to the evacuation reception center - the East Jordan High School in East Jordan. There are two alternate routes. One follows County Road 65 to Ellsworth and County Road 48 from Ellsworth to East Jordan. The other alternative route follows US 31 south to Atwood and County Road 48 from Atwood to East Jordan. After the students have been safely transported to the evacuation area, the bus drivers will return to the EOC and receive further instructions.

13. The Charlevoix Public School District has 14 regular bus drivers and 5 substitute bus drivers. In addition, 8 high school teachers have volunteered to drive buses in an emergency evacuation, if needed. The regular bus drivers and the substitute drivers recently received

training in their appropriate response to a nuclear emergency. A training session was conducted on October 27, 1982 with the cooperation of the School District, the County Emergency Services Director, the State Emergency Services Division, and Consumers Power Company. We plan to conduct such training as needed but at least once per year. The training session included general information on radiation and its effects, and the emergency plan. The session also included specific information on notification of drivers, the evacuation routes, and procedures for bus drivers. All but two bus drivers (one regular and one substitute) attended the session. The two drivers not present had both attended a prior session which was conducted in 1981. I plan to have the two drivers in my office in the near future to brief them on the material covered in the October 27th session.

14. As mentioned, the bus drivers were instructed in evacuation routing at the training session. These routes (see paragraph 12) use roads that are well known to any resident who drives in the area and are not difficult to follow. All of our bus drivers reside in the Charlevoix area and I cannot anticipate that they would have any difficulty in following the evacuation routes.

15. I personally know each of the bus drivers for the Charlevoix Public School District. Near the end of the school year in 1981, I had an opportunity to discuss evacuation routes with them and at that time I told them they would not be forced to expose themselves to any danger. The general response I received was that the bus drivers are more concerned for the students than for their own safety and they expressed their willingness to assist in a nuclear emergency. Many of the bus drivers have children or grandchildren in the schools. I have complete confidence that the bus drivers can be relied on to respond and carry through with their duties in a nuclear emergency. I also believe that the bus drivers would continue to assist the EOC after the students have been evacuated though they will not be required to do so.

16. I also know each of the school teachers personally and I am confident that they also can be relied on to assist in an evacuation, especially the teachers at the Elementary School. The teachers are acquainted with their emergency responsibilities through an orientation session which is conducted at the beginning of each school year.

17. The buses are kept at the bus garage which is located about one-quarter mile from the High School. (The

two vans and the station wagon are kept at the administrative offices). The buses are subjected to a rigorous annual inspection by the state, usually just before the start of the school year. During the summer, the buses are completely overhauled if required. Routine maintenance and repairs are performed throughout the year as needed. The drivers are responsible for daily maintenance of the buses which includes checking of fluids, lights, tires, and brakes. Mr. Bud Heeres, Transportation Supervisor for the Charlevoix Public School District, strictly requires that this inspection be carried out daily in accordance with a checklist.

18. Should one of our buses be inoperable at the time of an evacuation, I believe that the students can be safely loaded on to 18 buses. My calculations indicate a margin of 60 spaces. An inoperable 66-passenger bus would require about 79 students to fill that margin and be distributed over the buses with only slightly more crowding than anticipated by my calculations. It should be noted that the absenteeism will probably be greater than assumed by my calculations. Also, many high school students drive to school and could provide their own transportation should it be required. However, if a temporary shortage of buses were to compromise our capacity to evacuate all the students

and teachers who need evacuation transportation, we would receive support from the East Jordan Public Schools or the Ellsworth Community Schools. I have received a verbal commitment from the superintendent of both of those schools that they would provide any necessary evacuation assistance. East Jordan is located about 15-18 miles south of Charlevoix. If their assistance were needed, I would determine the additional capacity needed and call either of those school systems and request that a specified number of their buses report to our bus garage or directly to the High School. If there was a delay in the arrival of the support buses, the convoy would proceed to East Jordan with the youngest students and the remaining students would wait for the support buses in the High School.

19. The Charlevoix Public School District recognizes that it is important for the parents of students who would be evacuated to be informed of the School District's evacuation plan in order to prevent undue concern and unnecessary actions in the time of an emergency. The School District will publish evacuation information in its next newsletter to be distributed in February, 1983. The information will assure parents that the School District is prepared and has the capacity to evacuate all students of the Public School District, St. Mary's School and the

Charlevoix Cooperative Nursery. The parents will also be informed that their children would be evacuated to the East Jordan High School where the parents could pick them up. The newsletter is mailed to all residents of Charlevoix Public School District.

To the best of my knowledge, the foregoing information is true and correct.

Vincent R. Olach
Vincent R. Olach

SUBSCRIBED AND SWORN to
before me this 15th day of
December, 1982.

Judy A. Boss
NOTARY PUBLIC

JUDY A. BOSS
NOTARY PUBLIC, CHARLEVOIX CO., MI
MY COMMISSION EXPIRES MAY 25, 1983

SUBSCRIBED AND SWORN to
before me this 15th day of
December, 1982.

Anah H. Potter
Anah H. Potter
NOTARY PUBLIC, Charlevoix,
County, Michigan
My commission expires
February 5, 1986