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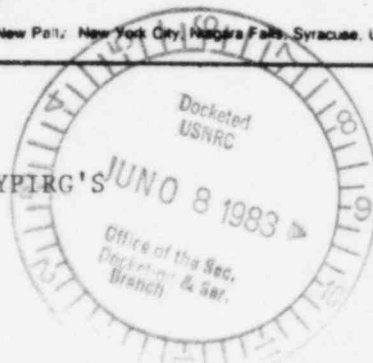
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STATEMENT OF JOAN HOLT, DIRECTOR OF NYPIRG'S

INDIAN POINT PROJECT



The New York Public Interest Research Group appreciates the opportunity to appear here today to present our views on the role of federal, state, and local governments, and the utilities in planning, testing, and executing emergency response procedures for nuclear power plant accidents. We respectfully submit that consideration should also be given to the crucial role of the public in these efforts.

After the accident at Three Mile Island, NYPIRG undertook to monitor and evaluate emergency planning efforts for the Indian Point nuclear plants. From the outset, we have strongly urged the direct involvement of the public in the process of developing emergency plans--because we have always believed that the effort would fail without the input of the people most familiar with the resources and capabilities of their communities, the people who must have confidence in procedures planned for their protection, the people who, when the sirens go off, must respond knowledgeably and quickly.

The emergency planning effort at Indian Point has failed. No plant in the country has been the subject of as many regulatory delays, faulty drills, and negative reviews. More than two years after NRC's deadline for implementation of emergency plans, actual preparedness to cope with an accident still does not exist in the region around Indian Point. The utility and state effort has, to date, produced little more than libraries of paper plans--words on paper which have not been translated into implemented reality. The public still does not know what they are supposed to do when they hear the sirens. Most emergency

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personnel are still untrained or insufficiently trained. Equipment of every sort is lacking. Transportation plans have been rejected and must be replaced. Little has been done to deal with the special needs of our most vulnerable residents--children, the elderly, the handicapped, the infirm, the deaf, the mobility impaired, to name just a few of the groups whose special needs have been neglected. We have found it incredible, in particular, that though plans for the safe evacuation of school children remain the subject of greatest concern to residents of the ten-mile emergency planning zone, this element has not been identified as a "significant deficiency" by FEMA. Parents, teachers, administrators, school A and other citizens concerned about the welfare of our children are outraged over the proposals that have emerged thus far with regard to the schools. I use this example to illustrate NYPIRG's conviction that the entire planning effort at Indian Point has failed because the public and local officials have been systematically excluded from the planning effort. No group of parents would ever have written plans such as those developed for our school children.

The effort at Indian Point has been backward from the start. Con Edison, the Power Authority, and the New York State Disaster Preparedness Commission, instead of working closely and cooperatively with village, town, and county governments and with the public, hired outside consultants and worked behind closed doors. The inevitable result of this approach is that, tomorrow, the NRC faces a decision which may result in the suspension of operation of the Indian Point plants, because they still fail to meet the regulations requiring assurance that the public can be protected in the event of an accident.

Planning, testing, and implementing emergency response procedures is the traditional role of local governments and citizens. State governments must support and supplement the local effort, but they cannot replace them in any emergency. The utilities' role is on-site emergency response. Their

job during an emergency is to bring the accident under control and assure that there is no loss of off-site power. Beyond that, their responsibility is to finance, as a cost of doing business, the expenses incurred by local governments who are forced, by the existence of nuclear reactors sited within their communities, to prepare to protect their residents in the event of a reactor accident. The role of the federal government is to evaluate planning and preparedness (FEMA) and to enforce the emergency planning regulations (NRC). We are, frankly, chilled by recent suggestions to bring federal troops (swat teams, strike forces, etc) into our communities as part of the emergency planning effort. Such suggestions are more appropriate to a police state than to our civilian, democratic society. We fervently hope that our elected representatives will quickly and decisively put an end to this dangerous notion.