



THE PUBLIC SCHOOLS OF DUXBURY

130 ST. GEORGE STREET DUXBURY, MASSACHUSETTS 02332
TELEPHONE (617) 934-5601

OFFICE OF THE SUPERINTENDENT

June 10, 1991

Mr. Robert Ericson
Pilgrim Offsite Emergency
Preparedness Task Force
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Ericson:

This statement is in response to the NRC Task Force's Draft Report for Comment entitled "Findings on issues of Offsite Emergency Preparedness for Pilgrim Nuclear Power". The School Committee requests that the statement be made part of the official record of the NRC Task Force Public Hearing to be held in Plymouth, Massachusetts on June 12, 1991.

First, the School Committee understands that NUREG 0654.J.12 provides:

"Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host area. The personnel and equipment should be capable of monitoring within a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers."

On June 3, 1991, the Duxbury School Committee voted:

"That in the event of a radiological accident at Pilgrim Nuclear Power Station, all Duxbury students and staff relocated from Duxbury to Needham High School (the current relocation center for Duxbury students) will be monitored by portal monitors at the Needham High School (also referred to in Implementation Plans as the "host school").

The School Committee also voted to make the following requests:

1. That Boston Edison Company provide two portal monitors to be kept at the Needham High School or at any other "host school" that may be designated for Duxbury students or staff. With respect to this request, we note that the Task Force suggested that portal monitor requirements be determined based on a "ten seconds per person" formula. Using this formula, over ten hours would be required to

monitor the Duxbury school population with a single monitor. The two monitors are requested in view of this fact, and with consideration of the possibility of mechanical failure.

2. That the Massachusetts Civil Defense Agency assign and train personnel to operate the portal monitors at the Host School.

3. That all appropriate Implementation Plans be revised to reflect, and provide, that the Duxbury school population will be monitored at the host school relocation sites.

The Duxbury School Committee believes that the above vote and requests comply with federal regulations and guidelines, including the NUREG cited above.

In addition to this vote and requests, we take this opportunity to raise five other concerns and ask that they also be made part of the official record of the June 12th hearing:

1. Vans for Handicapped Students - The draft Task Force report (see page 2-138) inaccurately assumes that only 2 vans, and no lift vans, are required for handicapped students in the Duxbury schools. We have attached a schedule which accurately assesses the transportation needs for the Duxbury Public Schools. In particular, you will note that the current requirement is for vans and lift vans, as follows: Alden School 1 lift van; Chandler School 6 vans with children's car seats; Intermediate School 1 lift van; High School 6 vans with children's car seats.

2. Training - The draft report notes (pages 23-44) that 349 Duxbury school personnel required training and that as of February 26, 1991 only "98 of the 349 persons had received training during the previous 12 months." The report also noted that "additional training sessions for School Department personnel had been scheduled for March 18-21, 1991." As of the current date, June 3, 1991, only 40% to 50% of those required have been trained.

3. Transportation Officers - The Committee is seriously concerned with the proposed "interim" assignment of BECO employees as Area II Transportation Officers. (Draft report, pages 2-144). Trained transportation officers are essential to the successful evacuation of the Duxbury school population. We do not believe that this critical need is met by "BECO volunteers ... on an interim basis and ... not ... for more than a 4-to 6 month period." We request that whatever personnel are required be assigned on a permanent basis.

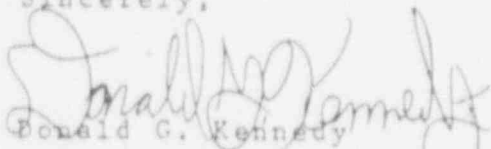
4. Dose Reduction - The draft report notes that "no realistic dose-reduction study had been performed for the shelters in Duxbury" (pages 2-150) and that the "State plans do not contain specific procedures to guide officials who must decide whether sheltering or evacuation is the protective action recommendation. (Pages 2-150).

Both to (A) provide guidance to those who must decide whether to shelter or evacuate, and (B) permit the Duxbury school staff to move the student body to the areas of each building that offer the greatest shielding factor, the School Committee requests that a dose reduction study be performed on each school building which has been designated as an emergency shelter.

5. LOA format - We note that the "Task Force did not review the new LOA format". (Draft report, pages 2-131). The School Committee has done so, and it is clear that the new LOA format effectively reduces the level of effective planning. Among other things, the new format extends mobilization time to three hours, and delays evacuation. According to the NESHAP documents, this delay will greatly increase the possibility of exposure. Further, the new format omits the numbers of drivers that will be available, and thus makes it impossible to determine the actual number of busses that can be provided.

The Duxbury School Committee is grateful for the time and effort the Task Force has committed to reviewing the Emergency Preparedness Process for the Pilgrim EPZ. We are hopeful that it will continue with its efforts, and will resolve these remaining issues to insure that Duxbury school children will be properly protected in the event of an accident at Pilgrim.

Sincerely,



Donald G. Kennedy
Superintendent of Schools
for the Duxbury School Committee
DK/pc

cc: Affected parties

Wellesley Relocation Center

In its findings, the task force determined that the issues pertaining to the relocation centers fall into two broad categories - (1) facilities and equipment and (2) staffing.

Staffing is the key word so far as the Wellesley Relocation Center is concerned. The National Guard has repeatedly made clear that planning should proceed on the basis that the Guard will require a twelve hour response time. Because of this, Wellesley does not meet the standards for a functioning relocation. The first evacuees will arrive about eleven and a half hours before the National Guard -- and the Guard cannot possibly monitor all the evacuees in the thirty minutes remaining.

Over the past few years I have identified the obvious problem of the National Guard response time to all the responsible parties. I hand delivered the information to Chairman Carr of the NRC on Oct. 12, 1989, the day of the only recent almost-full scale training exercise. In the exercise itself, the NRC, MCDA and BECo covered up the response time problem by giving the Guard several days (not hours) advance notice that they where to report to Wellesley on the morning of the 12th. All of the responsible authorities were aware of this, yet the FEMA assessment of the Exercise failed to identify the deficiency. Why? The answer is simple - An admission that the Wellesley reception center would be completely unable to monitor the evacuees in the prescribed twelve hours (at least without several days advance notice) would have precluded the NRC from making its critical finding of "reasonable assurance."

This time the Task Force listened to, acknowledged and identified and assessed the significance of this deficiency. In this respect they fulfill the requirements of their charter; and if they had stopped here they would have been hero's today. They would have done their job; and the result of their so finding would have been giving BECo 120 days to correct the situation - or shut down.

But in the tradition of the NRC, just doing your job and honestly protecting public health and safety, is never top priority. The Top Priority, as always, is protect the industry - never to shut it down. Thus we have THE QUICK FIX - just let BECo say it will do the job.

BECO will now fill the void and handle monitoring and the other staffing positions assigned to the National Guard. Our knights in shining armor....BECO!!!, with the help of some MCDA workers from Fort Devens (which is about to close) and DPW workers from Arlington.

THE QUICK FIX appeared as a last desperate attempt on the part of BECO to avoid part 5 of the Task Force Charter - "Recommend Whether the NRC Should Reconsider its Reasonable Assurance Finding," and if there is no "reasonable assurance" to set the 120 Clock.

By the end of April the Task Force had completed its review, and had found that the National Guard staffing of the Wellesley Reception Center did not meet federal regulatory requirements. To avoid setting the 120 day clock, the Task Force delayed issuing its already completed report, told BECO what it was unwilling to tell the public, and then gave itself and BECO extra time to find this obviously inadequate QUICK FIX.

What are the problems with the QUICK FIX:

THE FIRST QUICK FIX PROBLEM - USURPING STATE RESPONSIBILITIES

Planning is the responsibility of the State and Local Authorities. The new director of MCDA, Dave Rodham, not only appears to be extremely competent, he has displayed a willingness to do the job properly. Indeed Mr. Rodham recognized the significance of the National Guard staffing problem and has been working on a realistic resolution to the deficiency. He has identified approximately 85 professionals with radiation backgrounds and is now in the process of getting them on board and under agreement to fill the vacancies the National Guard can not handle in a timely manner.

To avoid setting the 120 day clock, the NRC and BECO pushed aside a reasonable and acceptable resolution that had already been proposed by, and both then and currently is in process at, MCDA. By doing so, they simply usurped the authority of the State.

The State wanted time to put into place a workable plan that would protect its citizens; neither BECO nor the NRC was willing to permit the State to do so. Letting the State provide something that worked might mean setting the clock. But if the clock were set, fixing the problems would finally

become top priority - which would be a welcome change since BECO certainly hasn't made fixing the problems a significant priority in the past.

THE SECOND QUICK FIX PROBLEM: CONFLICT OF INTEREST

A United States Court of Appeals defined a conflict of interest (463 F.2d 600, 602) -

"Situation in which the regard for one duty leads to the disregard of another."

"The concept refers to a clash between Public Interest and private pecuniary (finances) of the individual."

It does not take a Harvard Law Degree to quickly understand the conflict here.

Every BECO employee will know that every person he monitors and finds contaminated is a potential law suit against BECO.

Every BECO employee will know that honest monitoring may well mean the end of Pilgrim I, and of his job.

There is no double check to provide any assurance of of accuracy and honesty in monitoring; a total of two men are assigned to the three monitors at Wellesley.

The conflict of interest is clear; and the result is the very real danger that contaminated citizens will not be identified and decontaminated.

THE THIRD QUICK PROBLEM: INADEQUATE STAFFING AT WELLESLEY

BECO and the Task Force would like us to believe that they can replace 50 trained and disciplined military personnel by giving two training sessions to 20 BECO employees, 16 DPW workers from Arlington and, if it hasn't closed, 4 MCDA employees from Fort Devens. Had Stormin' Norman know this, I am sure he could have ended Desert Storm in less than 12 hours. Had we told Saddam the BECO boys were coming and sent him Pilgrim's track record, we could have had an total surrender without a single bomb being dropped. Incompetence is far more frightening than a smart missile.

Let's compare what the BECO boys (with their 2 training

session) will be doing to the jobs that had been assigned to the National Guard.

Reception Center Position	Number of National Guard	BECo and friends
EOC Liason	1	0
Radio Operator /	1	0
Monitoring/Decon Station		
Coordinator	1	1
Docimetry Coordinator	1	1
Docimetry collector	1	0
Personnel Monitoring/Decon		
Group leader	1	1
Vehicle Monitoring/Decon	1	1
Group Leader		
Portal Operator	4	2
(n.b. there are now only 2 operators for 3 portal monitors)		
Initial Monitor (handheld)	2	2
Personnel recorder	3	2
Personnel decon assistant	4	2
Secondary Monitor (Decon)	4	4
Runners	6	4
Vehicle Monitor	12	10
Vehicle recorder	4	2
Vehicle Decon Assistants	4	0
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	50	32

What does this mean? The most obvious problem is the portal monitor operators. We finally got the long-fought-for third monitor, so that if monitoring got started at a reasonable time it could be completed within the proscribed 12 hours. But now we don't have an operator. Another example of Beco planning expertise. BECo finally provided the third monitor; one would have thought that whoever at BECo planned the Quick Fix would have remembered and provided a third operator. More important, each portal monitor really should have 2 operators, particularly in view of the conflict of interest issue. So we're really short 4 men, not only one.

The so-called Initial Monitors are really second - they are hand-held monitors that follow the 2/3 portal monitors and are supposed to locate the particular area of contamination on people who have set off the alarms (which are set by BECo about once a year) of the portal monitors.

This very time consuming. At a minimum, there should be 2 initial monitors for each of the 2/3 portal monitors; not two total. (We're down 2 to 4 initial monitors, and four more men). I should also point out that, at some time, these two initial monitors are supposed to be used to monitor all all the handicapped people, babies and others who can't use a portal monitor. There are over nine hundred identified handicapped in the EPZ. At a bare minimum, at least two more initial monitors (and trained people to operate them) are needed.

Personnel recorders are supposed to take down all the personal information that is required to insure family reunification. With two recorders assigned to the portal monitors, and one more assigned to the handicapped, the flow will be anything but rapid; and don't forget that this all has to be completed within the mandated 12 hour time frame.

Interestingly enough, Beco has assigned 10 people (a third of the total number of available personnel) to do Vehicle Monitoring, although no vehicle will be decontaminated until after the National Guard gets there. The priority of cars over people is interesting, to say the least, and it makes one wonder what the BECO boys have been trained to do. Do they work overtime for a car wash?

NO RADIO OPERATOR. It is truly amazing how much time the Task Force, FEMA and the NRC spend talking about the importance of communication, when they then accept a QUICK FIX that doesn't even include a radio operator during the early and most crucial part of the accident. Communication was an integral part of the entire evacuation planning process. Without a radio operator, anyone that Wellesley was supposed to communicate with now has a communication deficiency.

Even more amazing is that we're supposed to believe that the BECO BOYS and friends were fully trained in two QUICK FIX training sessions MAY 14, and 16th. In just a few short hours, they didn't learn just the job they were supposed to do, they learned everything there is to know about a relocation center -- they can monitor, register, and decontaminate anything, be it a car, mother, baby or quadraplegic.

Is there a need to say it ? The QUICK FIX IS A DISASTER. All we are asking is that you do your job. State as you did in the draft report that "the monitoring evaluation criterion (3.12) and the protective measure planning standard [10 CFR 50.47(b)(10)] have not been met;" and say so unequivocally.

It is an easy statement to make; I have been saying it since April of 1968. The NRC, FEMA and BECO - you are all in violation of NUREG 0654 AND 10 CFR 50.47 by allowing Pilgrim to operate at above 5% power without Emergency Planning in place.

The Quick Fix isn't a fix at all; and the list of problems with the Wellesley Reception Center goes on.

1. The question is not whether you think you need an LOA to insure the cooperation of the Red Cross, even though the guidelines in NUREG 0654 are clear that all support groups must sign an agreement or signature page. The real issue is that the Red Cross Congregate Centers don't even exist, and that the Red Cross has stated that it will not participate in your man-made disaster.

2. The statement in the draft report that the third monitor is needed only in case one of the others breaks is not quite accurate. The third is needed to perform monitoring within the proscribed time.

3. FEMA's guideline for sending contaminated injured to a "nearby" hospital would be fine if the transportation were provided (which it isn't), and if we had enough hospitals to handle the volume. Collectively, and using the numbers that you have accepted, the thirty hospitals can handle 39 people in 12 hours. There are over 900 special needs people that have been identified. Chances are if any become contaminated, many will be. A plume does not selectively seek out only one or two people; it covers a vast area and everyone in it. Thirty-nine people in 12 hours is just the beginning.

4. Relocation Centers, like all things in planning must conform to common sense. Reading your and BECO's justifications of ridiculous planning scenarios brings Clare Conahue to mind again. Clare would listen to and read through all the foolishness and bring it right back to reality with her now immortal quote: "And who will bring the towels?" There are still no towels.

DUXBURY SCHOOL PROBLEMS

Planning for the Duxbury Schools is still plagued with problems. The majority were created by mistakes in Area II planning, or by a failure to integrate Area II plans with local plans. The statement that "no man is an island" is particularly pertinent when applied to planning. It is not enough for each individual to do its own job to insure that the small section for which he is responsible reflects the outstanding needs for that particular portion of the overall plans. Real success comes only when all of the co-dependent individual aspects are examined and the necessary dovetailing or integration is then accomplished so that all the different pieces can be brought together.

Here, many of the the needed individual plans have not been properly developed, and very few of the individual pieces have been fit together.

I. Lack of Monitoring - Perhaps the most critical shortcoming for the schools is the lack of any plan for effective monitoring.

NUREG 0654 §.12. provides, in pertinent part:

"Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment should be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers."

In the Draft Report the Task Force finds the concept of monitoring school children at reception centers (relocation center) acceptable. In concept, I agree; but once again the task force missed the real point. The student relocation centers - the so-called "host schools" have no monitoring capabilities. It would be difficult to imagine a more unambiguous and clear, violation of the just-cited NUREG provisions.

As an aside, I should note that, contrary to what is stated in the task force draft report, the idea of "host schools" for the school population was not an option first presented or developed by the state. Rather it was another of BECO's ideas - "Let's keep numbers down at reception centers to hell with the kids."

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Let's dispel some of the myths that BECO has presented to justify this blatant violation of the NUREG monitoring requirement.

A. Precautionary Transfer of School Children -

BECO has attempted to convince the world that the children will be moved out before any release occurs. As might be expected, there are a number of flaws in this BECO "thinking" -

1. As I've already discussed, there are not enough buses to evacuate the entire school population [See Buses or Lack Thereof]; and the "new LOA format" allows, and in many cases actually creates, and creates a 3-5 hour delay time before any evacuation will even begin.
2. Yet, according to NUREG 0654 a release from Pilgrim could occur in 0-30 minutes.

B. If the children leave the schools and pass through a radioactive plume, while riding on one of the supposed buses, the buses will be contacted by radio and told to go to Wellesley.

1. Given the length of time it will take to get the children on the busses in the first place, the likelihood of the busses passing through a plume is far greater than it should be. If they do, it is not a laughing matter - The buses offer less than 1% dose reduction, meaning that they might as well be standing out in the open.
2. What is worth at least a chuckle is BECO's apparent confidence that the busses will be contacted. During the only recent "almost full scale" exercise in October of 1989, the town of Duxbury lost all communication with the buses very early in the game. Since neither FEMA nor the NRC acknowledge this failure in the FEMA report reviewing the exercise, there is no way of knowing if the communication void has been or will be corrected. By the way William Russell of the NRC was in Duxbury's EOC during the time the entire EOC was trying to "find" the buses. Bill neither noticed nor reported this problem, although the busses weren't officially "found" until the next day.

C. If the children have been contaminated they will be sent to Wellesley to be monitored.

Here, again, there is a wide variance between reality and the BECO "truth". Again as already discussed, Wellesley simply does not have the capability to monitor the school population within the proscribed 12 hour time. The reception center can't even handle the non-school population within that time period. The new suggestion that school monitoring will be solved by providing some "express line" ignores (i) that there aren't monitors to use in such a line, (ii) that the "QUICK FIX" doesn't provide any people to operate the "express" monitor even if one should be found, and (iii) that monitoring Duxbury's students and staff will take 10 hours, not including the Marshfield students and staff who will be in the same express line.

As an aside, this is probably an appropriate time to raise a related question. Given the obvious length of time it would take to monitor children in Wellesley even if Wellesley had monitoring capabilities, why does the plan both with separate "host school" student relocation centers at all? The "take-the-children-to-the-Needham-host-schools-after-they're-monitored-in-Wellesley" concept will result in chaos. Parents will be arriving in Needham to find their children are still at Wellesley. Then, with their pre- or post-school children, they'll arrive at Wellesley overloading a system that already is not equipped to handle the minimum population percentage (20%) requirements.

This can only result in bedlam - foreseeable to all. On whom do we pin the blame? BECO? MCDA? The state? FEMA? Or the NRC? They all know; they are all aware; and they have all been personally informed.

CAN THIS FLAW BE FIXED? YES !!!

On June 3, 1991, the Duxbury School Committee June 3rd 1991 voted:

That in the event of a radiological accident at Pilgrim Nuclear Power Station, all Duxbury students and staff relocated from Duxbury to Needham (the current relocation center for Duxbury students) will be monitored by portal monitors at the Needham Relocation Center (also sometimes referred to as the "host school")

The School Committee also voted:

1. That Boston Edison Company provide two portal monitors to be kept at the Needham High School or at any other "host school" that may hereafter be designated for Duxbury students or staff;
2. That the Massachusetts Civil Defense Agency assign and train the appropriate personnel in a number sufficient to operate the portal monitors at the Host School; and,
3. That all appropriate I.P.'s be corrected and redrafted as required to reflect, and provide, that the Duxbury school population will be monitored at the host school relocation sites.

As a hidden "bonus" these two additional monitors could also be used to monitor parent and siblings who arrive in Needham to pick-up their children, and provide some needed relief to the overloaded monitoring system in Wellesley.

I discussed this "monitor-the school-children-in-Needham" procedure with Chairman Carr, and his response to it was favorable. Dave Rodham of MCDA has told me that to monitor the school children at the Needham host school was feasible and realistic, and has given his word he will put the procedure in place.

If the Task Force will face up to the inadequacy of the present plan, and support the relatively simple solution, this is one area in which "reasonable assurance" may actually be provided.

II. Other problems for Duxbury Schools - Unfortunately, the current lack of monitoring plans or facilities is not the only problem with the proposed emergency planning for the Duxbury Public Schools. For example:

1. Hand-held monitors: BECo has not delivered the handle-held monitors it promised the School Superintendent. Among other things these are needed to back-up portal monitors in Needham.

2. Training of teachers: Less than 50% of the teachers have been trained. Perhaps this is an indication that the teachers meant it when, in response to a poll, they said that

they would not participate.

3. Interim assignment of Transportation Officers: This is another part of the QUICK FIX. As noted in the letter that the School Committee has submitted to the Task Force,

The Committee "is seriously concerned with the proposed "interim" assignment of BECO personnel employees as Area II Transportation Officers. (Draft report, page 2-144) Trained transportation officers are essential to the successful evacuation of the Duxbury school population. We do not believe that this critical need is met by "BECO volunteers ... on an interim basis and ... not ... for more than a 4- to 6-month period." We request that whatever personnel are required be assigned on a permanent basis.

4. Dose Reduction: As the School Committee said, a dose reduction study should be performed on each school building that has been designated as an emergency shelter. In the event of a fast breaking accident, current plans call for sheltering, not evacuating, the school children. A dose reduction study is necessary (i) to provide guidance to those who must decide whether to shelter or evacuate, and (ii) if sheltering is the choice, to permit the Duxbury school staff to move the student body to the areas of each building that offer the greatest shielding factor.

5. The "new LOA format": The new format, which the Task Force did not review, severely diminishes the level of effective evacuation planning for the schools. The extended mobilization time delays evacuation to such an extent that the concept of "Precautionary Transfer of School Children" is a joke.

6. Misrepresentations of Host Schools: The Task Force draft report refers somewhat obliquely to the fact that, just before the October 1989 exercise, it was discovered that BECO had misrepresented to the NRC that Framingham and Newton were the "host schools" for Duxbury. The Task Force treatment of this is another interesting example of its habit of relying on BECO for factual information, and avoiding public statements embarrassing to BECO. The fact is BECO LIED to the State, to Duxbury, to FEMA, and to the NRC. Did you, the Task Force identify this violation of Title 18 Sec. 1001 to Mr. James Taylor, EDO as you were supposed to?

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7. Camp Squanto: Dr Kennedy and the Task Force again missed the point. This is not a training problem; it is a problem in planning. The children to which the Task Force draft report refers, including my son, fell through the cracks because BECo's planners, as they admitted in their Oct. 4, 1990 response to the NRC, could not comprehend that school and camps might run simultaneously. Under BECo's plans, when schools are open, Camp I.P.'s will not be activated. The reverse is also true, as was apparent in Duxbury, last summer when the School were not notified of an unusual event. BECo planners have not yet figured out that all schools and all camps must be notified anytime that Emergency Planning is activated.

Remember, as NRC officials have taught me over the last four years, planning is simply "get them out and get them monitored". Those two key issues have not yet been satisfactorily resolved for Duxbury's School Children.

What can the TASK FORCE do? Recommend setting the 120 day clock - so the State will have the time, and BECo will finally have a real incentive, to fix the problems.