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PARENTS CONCERNED ABOUT INDIAN POINT'S  
COMMENTS TO THE NUCLEAR REGULATORY  
COMMISSION ON THE RECOMMENDATIONS OF  
THE ATOMIC SAFETY AND LICENSING BOARD

Parents Concerned About Indian Point  
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Joined by

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While recommending that the Nuclear Regulatory Commission (NRC) allow the plants to continue operating, the Atomic Safety and Licensing Board (ASLB) points to some "unresolved" or "inconclusive" problems that the utilities should correct. In fact, the Board's findings include a recognition of the absence of any real plans for evacuating school children, as well as:

- \* lack of emergency plans under adverse weather conditions - specifically severe winter storms, hurricanes or tornadoes,
- \* lack of back-up communication should warning sirens fail,
- \* lack of necessary police radio equipment,
- \* lack of proven plans for evacuating the blind, deaf, disabled or non-English speaking,
- \* lack of formal agreements with evacuation centers,
- \* incomplete training of police, firefighters and bus drivers,
- \* questions about protecting food and water supplies within the 50-mile radius.

The recent 438-page report issued by the ASLB recommends continued operation in spite of substantial risk to those living within 50 miles, which includes New York City, and its recognition of problems with evacuation planning. This report is based on 20,000 pages of testimony presented during the Indian Point safety hearings which spanned almost two years. It was to the issue of emergency planning that Parents Concerned About Indian Point (Parents), a group of Westchester residents from within the 10-mile Emergency Planning Zone (EPZ) first addressed itself in its capacity as intervenor.

In the belief that the Board and the NRC had an honest interest in factfinding, Parents presented local experts to testify to the feasibility of evacuating school children, conditions of roads, evacuating elderly, handicapped and transportation dependent people, and problems implicit in such situations. From our own and our neighbors' experiences, we knew that the utilities were not addressing the question of safety of all residents within the EPZ, and were presenting "paper plans" to the NRC that had never been tested. We also felt we would help the NRC meet its own standard of requiring proven, workable evacuation plans for licensing of nuclear power plants. Our participation in the hearings was extremely important because we were committed to presenting as witnesses the people responsible for carrying out the plans.

The "deficiencies" which were the contents of these witnesses' testimonies have been common knowledge in northern Westchester and Rockland counties for years and are among the very contentions Parents set out to prove during the hearings!

Intervenor's witnesses repeatedly testified to the many major problems they saw in the evacuation plan. Children of the same family often would be sent to reception centers miles apart, making it unlikely that families could be reunited within a reasonable time. Testimony further shows that the reception centers themselves are not prepared or equipped to receive the children. It was stated repeatedly by those in

charge, including former Westchester County Executive Del Bello, that three crucial problems exist with transportation of school children in the event of an emergency: (1) insufficient numbers of buses to remove all children within the EPZ from the contaminated area; (2) the two-wave evacuation caused by this lack of buses; and (3) the lack, to date, of formal agreements with school bus drivers. School superintendents, teachers, nurses, bus drivers and school personnel have testified that they would be torn between obligations to their charges and concern for their own families in event of an accident. While the hearings were in progress, a plan was circulated by the utilities and Westchester's acting executive, Mr. O'Rourke. This plan would send children home from school instead of busing them to reception centers.

Mr. O'Rourke's proposal, made during the height of the hearings and on the eve of testimony by school officials, had the effect of leaving no one clearly responsible for the safety of our school children, those least able to protect themselves. With Mr. O'Rourke's early dismissal concept, emergency planning for the protection of school children has gone from bad to worse. Now we are talking not only about separated families, but children unattended at home or en route. In addition to the possible increased risk of exposure to radiation while walking home, Mr. O'Rourke was flagrantly attempting to divert attention from the real problems, to which neither he nor the utilities have any solution: i.e.,

the lack of buses, lack of contracts with drivers, unprepared reception centers, conflict of roles of people working at all levels with children, and the always unreliable roads.

Lest we forget, the record shows that most school districts no longer use early dismissals because so many mothers are not at home during the day. Contacting an adult for every child in school during an emergency at Indian Point is totally unrealistic. Nor do we have assurances that no child would be released to an empty house. We have no guarantee that children allowed to walk home would not be exposed to dangerous levels of radiation; we're assured rather flippantly that everyone will know at the alert stage whether it is a fast-moving or slow-moving accident, and that the go-home plan would only be used in the case of a slow-moving accident, yet schools have no sheltering facilities, medical supplies or even water. On top of all this, how would roads be affected by thousands of parents re-entering the EPZ to unite with their children? We shudder at the thought, and yet the entire "unresolved" problem of the protection of school children was not deemed important enough for the Board to recommend closing the plants even temporarily.

These and other problems with early dismissal and the safety of school children in general, have left parents, community people and human beings of conscience wondering if anyone on the Board, the Commission or FEMA, has been listening at all. Children are the hope of our future, and their welfare

is being bandied about and used as a pawn in what is looking more and more like a game of shuffling papers. Never, since the NRC's original mandate requiring workable evacuation plans, have the aforementioned gross deficiencies ever been characterized as significant and granted the weight they deserve. Instead, every attempt on the part of the intervenors to suggest how the issue should be studied and improved was ignored. Worse, our witnesses, respected members of their communities with a unifying concern for safety of those for whom they are responsible, were insulted and demeaned by the Board's blase acceptance of the licensee's insulting attempts to trivialize their testimony.

No comprehensive exercise of the go-home plan has ever been attempted. Indeed, the only drill to date took place at Blue Mountain Middle School, in a school district atypical of others in the EPZ. Once again, the drill was no surprise and all that was tested was the ability of county officials to contact a single prepared and waiting school administrator. The school chosen for the drill was one of the few schools with buses and custodial drivers on hand. Unlike the Hendrick Hudson school district, many districts contract with outside bus companies from as far as 15 miles away and the drivers, mostly part-time workers, cannot be reached between shifts.

During the aforementioned drill, no one was sent home. Children were merely told to board and disembark buses. Nothing really happened.

Under great public pressure and criticism over the continuing failure to ascertain facts about working and otherwise absent parents, Westchester county conducted a phone survey during the drill of the homes of the children enrolled at Blue Mountain Middle School. The phone calls were not made by school officials themselves, or even from those phones which would be available at the school during a real emergency. In White Plains, at the Westchester County Office Building, it took two computers and five human beings to attempt to make telephone contact with an adult at the home of each child. No one can guarantee two computers and five people per school in the event of an accident at Indian Point, during which all school children in the EPZ may have to be sent home at once. Yet, despite all these telephones running continuously from 9:30 A.M. to 12:20 P.M., and even in the absence of any circuit overloading which will be caused by a radiological accident at Indian Point, in more than 53% of the homes called, there was no one present.

Blue Mountain was just another contrived meaningless unworkable drill of a paper plan. The flaws are obvious:

- \* no children were sent home,
- \* no unusual weather condition slowed egress,
- \* no panicked parents were storming the schools for their children,
- \* no general evacuation was in progress, congesting roadways even more,
- \* teachers were all on hand to supervise the children; there was no real emergency which would

tempt them to desert their students to see to the needs of their own families,

- \* the drill ignored the that reception centers, which would still be needed in the case of a rapidly escalating accident or for children whose homes could not be reached, are still not adequately supplied and staffed.

The Blue Mountain drill was a futile exercise, not a model on which the NRC can rely in evaluating this incipient plan for protecting school children.

We highlight this issue not just because of its importance at Indian Point, but because we understand that the same concept is being considered at other reactor sites where the evacuation of school children presents difficulties.

\* \* \*

As parents who are in contact with the community through our concerns as intervenors, we can tell you that the plans are totally confusing to us, to our children, to our school teachers and administrators. Because of the simultaneous existence of two -- or perhaps three or more -- school plans, no one really knows what will happen. While Mr. O'Rourke's go-home plan was presented as a solution to existing problems, it really did nothing more than create a third untenable possibility. Now, should an accident occur, a sudden imminent release of radiation would result in sheltering children at school, a fast-moving accident might see them moved to reception centers, while a slow-moving accident may send them home on foot. All this presumes that at the start of

an accident, the utilities will know exactly how the accident will progress, and keep all school officials well-informed. But in reality, it takes many days after the event to sort out what really happened, as was the case at Three Mile Island.

As we see it, the Board has totally ignored the sad truth that emergency planning for school children is in a still dangerous and ambiguous stage. Despite the repeated testimony of teachers, parents and administrators to the contrary, and the passage of numerous resolutions opposing the plans by parents, teachers and school organizations,\* The Board has gratefully and frantically clutched at the straw of the go-home plan, thrown to it at the last minute by Mr. O'Rourke. We urge the Commission to admit that this still leaves many major problems with the protection of school children.

Even more, we fervently hope that the Commissioners will each personally see to it that the safety of our children is realistically provided for.

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\* See <sup>UCS</sup> ~~USE~~/NYPIRG Motion Requesting the ASLB and the NRC to Commission Studies on Human Response to Radiological Emergencies at Indian Point, dated 4/26/83.