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NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

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UNITED STATES OF AMERICA

BEFORE THE NUCLEAR REGULATORY COMMISSION

COMMISSIONERS:

- Nunzio J. Palladino, Chairman
- Victor Gilinsky
- Thomas M. Roberts
- James K. Asselstine
- Frederick M. Bernthal

_____)
 CONSOLIDATED EDISON COMPANY OF NEW YORK)
 (Indian Point, Unit 2))
 _____))
 POWER AUTHORITY OF THE STATE OF NEW YORK)
 (Indian Point, Unit 3))
 _____)

Docket Nos. 50-247
50-287

June 9, 1984

SUPPLEMENT TO

NEW YORK PUBLIC INTEREST RESEARCH GROUP ET AL.

PETITION FOR

SUSPENSION OF OPERATION OF INDIAN POINT UNITS 2 AND 3

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PETITION FOR
SUSPENSION OF OPERATION OF INDIAN POINT UNITS 2 AND 3

On April 6, 1984, the New York Public Interest Research Group, Inc., joined by seven community groups,* petitioned for the "immediate suspension of the operating licenses of Indian Point Units 2 and 3 in order to relieve an unacceptable risk to the health and safety of school children in the vicinity of the plants."

Two months have passed and we have received no response from the Commission or its staff. We have, however, received a response from the Licensees which fails to confront any of the substantive issues raised by our petition, or even to allege that children in the vicinity of Indian Point are adequately protected

*The School Task Force of the Alliance to Close Indian Point, Croton Parents Concerned About Indian Point, Greater Ossining Neighborhood Action Group, Yorktown Parents Concerned About Indian Point, North Rockland Alliance on Nuclear Danger, Rockland Families to Close Indian Point, and West Branch Conservation Association.

by current emergency planning and preparedness. Instead, the Licensees attempt to impugn the petitioners and to misrepresent the substance and the intent of our petition.*

We wish here (1) to respond to the Licensees' incredible assertion that our petition "raises no new issues for consideration by the Commission" and (2) to submit additional, newly acquired material which supports our position that the state of radiological emergency planning TODAY provides no better, and in some instances less, protection to school children in the vicinity of Indian Point than it did at the close of the ASLB hearings.

It is incomprehensible to us that anyone who has read our April 6th petition and its attachments could conclude that it is simply a rehash of matters brought before the ASLB more than a year ago. The petition contains new information gathered recently by NYPIRG about the current lack of preparedness in the schools and school districts to implement the very procedures incorporated in State and County Radiological Emergency Response Plans for Indian Point.**

Just as the Commission's decisions of May and June 1983 regarding emergency planning and preparedness at Indian Point were procedurally independent of the ASLB investigation, so, too, this petition should be judged independently and on its own merits.

*We do not wish to enter into a paper war with the Licensees, who once again are attempting to trivialize and insult the legitimate efforts of citizen groups to act within our legal and democratic rights and to protect ourselves and our children. Nevertheless, we will satisfy them on one matter. Attached are signed assurances from our co-petitioners that they are indeed parties. (Attachments A-1 through A-7) We did not think it necessary to sign and initial each name on our petition as one Licensee attorney did for the other on their May 4 Response.

**All the attachments which document the facts asserted in our April 6, 1984 petition, with the exception of Attachment C, are dated after the close of the ASLB record. These documents could not have been available to parties during the ASLB proceeding. Nor could the pertinent data have been elicited by any amount of discovery or cross-examination of Staff or Licensee witnesses.

PETITION BACKGROUND

Perhaps it would be useful for the Commission to know how the petition came about. As the months passed following the Commission's decision of June 9, 1983, NYPIRG and other concerned groups (some Intervenors, some not) attempted to monitor progress on the many promised improvements in emergency planning and preparedness at Indian Point. It was evident that, with the pressure off, the "dynamic process" was more lethargic and perfunctory than dynamic. Drivers were not getting trained, letters of agreement were still missing, money and equipment were still in short supply, public information and education were at a standstill, and after June 9th nobody was paying much attention.

Though many other unresolved matters concerned us, we were especially troubled by the lack of progress in school emergency planning. In a number of informal meetings with the regional director of FEMA and members of his staff, we presented our concerns about the lack of adequate protection for school children. (See, for example, Attachment B.) We conveyed numerous bits of information brought to our attention by many local contacts in the communities around Indian Point. But the FEMA representatives told us that they could not act upon undocumented "anecdotes." When we urged them to verify certain State and County claims regarding school planning--which we maintain are not accurate--we were told of staffing, financial, legal, and policy constraints. So, we undertook to do the job ourselves.

NYPIRG RESEARCH

Using the New York State Freedom of Information Law as our tool, NYPIRG sent FOI requests to State agencies, the four counties, 23 school districts, and Educational three BOCES (Boards of Continuing /Services) around Indian Point. (See Attachments C-1 through C-5 for sample FOI letters.) We are still involved in the tedious and time-consuming task of viewing, selecting, and studying documents. We have visited most school district offices within the EPZ and reviewed their

relevant files. Everywhere we have found that school administrators have not been fully informed of the extent and complexity of their responsibilities under the New York State and the County Radiological Emergency Response Plans. Nor are they being offered adequate--if any--guidance, planning criteria, training, or financial resources to help them meet these responsibilities. (See Attachments D-1 through D-3.)

GENERAL FINDINGS

Westchester County. In Westchester little has changed since the old school evacuation plans were deemed unacceptable. New transportation studies were undertaken but are yet to be finalized and incorporated into the County's plans. The County Executive first stated that "either the Go Home Plan or sheltering in the school will cover all bases" (see Attachment H to our April 6 petition), but later stated that "since these two options do not cover all contingencies... Westchester County elects to retain in the plan the concept of school evacuation and the system of school reception centers." (See Attachment E, which had not been supplied to us at the time we filed our April 6 petition.)

Though our research efforts in Westchester County have met with less cooperation than elsewhere, it is clear that since June 9, 1983 there has been little or no progress in school emergency planning. Where school districts have supplied us with any documents at all, they are scanty and out of date. With Westchester schools--attended by approximately 30,000 children--still lacking complete and up to date written implementing procedures for radiological emergencies, we are now told that "Westchester County is not satisfied with them (the plans) either" and is "custom-designing plans for each school district." (Attachment F) Westchester County Executive, Andrew O'Rourke, has promised that these "hand-tailored" plans will be completed by November (Indian Point's latest 'due date'). (Attachment G)

Rockland County. In Rockland there has been much activity, due first to the State's "compensating" take-over, and then to Rockland's effort to take things back into its own hands. But Rockland school planning has gone, in our view, from bad to worse, from flawed to irresponsible. Evacuation planning has been all but discarded, and schools are seriously planning only for Early Dismissal (Go Home) (Attachments H-1 through H-5), except pre-school nurseries and day-care centers which, where they have any plans at all, will hold children until parents pick them up. (See, for example, Attachments D-1 and D-2.)

Rockland County is considered a "bedroom community", with large numbers of parents working a considerable distance away in New York City (30-40 miles away). Thus, it can be expected that there will be no adults present--either to receive their children at home or to pick them up at school--at a great many homes. (Attachments I-1 and I-2; see also Attachment J of April 6 Petition.)

To make matters worse, we are discovering that, in spite of earlier reassurances to the contrary, some school districts are eliminating parental notification procedures from their early dismissal plans, even for children as little as kindergartners.* (Attachments J-1 and J-2) Faced with insurmountable difficulties with regard to parental notification, some school districts are now simply going to release children however (by foot or by schoolbus) and wherever they are normally released at the end of a school day. It is up to the parents to instruct and drill their children about what to do and where to go if Mommy and Daddy are not home. (Attachments K-1 and K-2; also see Attachment J-2.)

There is little or no planning going on in Rockland (or the other counties) for FAST MOVING accidents, largely because school administrators and other local

*Early dismissal will be announced on local radio stations. Working parents in New York City will receive word when rumor or news spreads to the City. Phone lines and roads are soon likely to become impenetrable as anxious parents attempt to reach their children.

officials have been assured that there will always be plenty of time to get parents and children together at home before any evacuation would be necessary. (Attachment L)

Sheltering. NYPIRG has found that where the sheltering option appears at all in school and school district emergency procedures, it has been designed not to protect children from radiation exposure, but merely to keep children in place. As far as we can determine, no school building has been professionally examined and evaluated to ascertain either its rate of air-exchange or its efficacy as a radiation barrier.

Only 6 of the 18 school districts whose documents NYPIRG has reviewed to date have any specific sheltering procedures. These consist simply of moving students to the nearest available indoor space; closing windows, vents, and doors; and drawing the shades and draperies. (Attachments M-1 and M-2)

CONCLUSIONS

On June 9, 1983, three of five Commissioners voted to permit continued operation of the Indian Point plants despite continuing inadequacies in emergency planning and preparedness. Undoubtedly, the Commission majority was influenced by emphatic promises for rapid and significant correction of remaining "deficiencies."

The Commission's decision--as we and others warned at the time--signalled to all parties involved in emergency planning (1) that the Commission majority has no intent to enforce its emergency planning regulations and (2) that the agency will be satisfied with a good faith show of commitment to progress.

Put simply, on June 9, 1983 the heat was off, the threat removed. And since then, emergency planning efforts have relaxed and preparedness has slipped significantly.* In some planning areas there have been slight improvements, in

* It is our conviction that had an exercise been held on or before March 9, 1984, this relaxation would have been evident.

others nothing has changed, but in the case of planning to protect school children, matters have gone from bad to worse.

As a result of our document searches to date,^{*} NYPIRG has turned up very few detailed school or school district implementing procedures for a radiological emergency; some are considerably out of date, some provide only for one response option. We have no hesitancy in asserting that at the school and school district level there currently exists little if any capability to implement the three emergency response options outlined for schools in the State and County Radiological Emergency Response Plans. The present state of planning and preparedness for school children in the vicinity of Indian Point does not meet the standard required by 10 CFR 50.54 (s)(2): "reasonable assurance that appropriate protective measures can and will be taken in the event of a radiological emergency."

According to 10 CFR 50.54 (s)(3), "the NRC will base its findings on a review of FEMA findings... Nothing in this paragraph shall be construed as limiting the authority of the Commission to take action under any other regulation or authority of the Commission..." Our April 6, 1984 Petition for Suspension and this Supplement assists the NRC review of FEMA's findings regarding emergency planning and preparedness at Indian Point by pointing out that FEMA has not conducted an independent investigation or verification of school planning. Nor has FEMA included evaluation of school planning as a separate section in any of its assessments, reports, findings, or comments. Several significant deficiencies which impact heavily on schools have been identified by FEMA, however, notably a lack of letters of agreement and inadequate public education and information programs. These deficiencies, as they relate to school planning have not been corrected.

* Documents attached to our Petition and this Supplement represent only a tiny fraction of the material we have collected to date regarding school emergency planning. They are provided as samples to illustrate our points.

In their response to our Petition, Con Edison and the Power Authority imply that NYPIRG "inhibits the emergency planning efforts of the school county, state and federal governments." To the extent that disagreement about the "perfection of emergency planning for school children" leads to "activity directed towards further plan improvements," NYPIRG is happy to "foster discord." The Commission recognizes, we feel sure, that our efforts to bring to its attention the results of our research--revealing non-conformity with crucial safety regulations--are "entirely normal and desirable parts of the democratic and dynamic process" of nuclear oversight and have no effect on our standing to petition the Commission.

SUMMARY

Our April 6, 1984 Petition together with the supplemental material included herein presents new information and raises unlitigated questions about the current state of emergency planning and preparedness to protect more than 55,000 school children in the area affected by Indian Point:

- ** The effect of the choice of response option for schools on the implementation of other elements in the Radiological Emergency Response Plans. (See Attachment N)
- ** The failure of FEMA to evaluate school planning as a discrete and crucial component of the Indian Point Radiological Emergency Response Plans, and not merely a part of the transportation component.
- ** The extent to which school administrators have not been provided with complete and accurate guidance, instruction, and training about their responsibilities since the close of the ASLB hearings and to this date.
- ** The continuing failure of schools, school districts, and the State to conduct demographic, attitudinal, and feasibility studies essential to a serious planning effort.
- ** The unresolved status of executive decision-making regarding the choice of possible radiological emergency response options.
- ** The incomplete and contradictory information which has been distributed to parents.

- ** The recently confirmed likelihood that many children will be sent home to houses with no adult present if routine go-home procedures are implemented during a radiological emergency.
- ** The incomplete status of transportation planning for school children despite reassurances from the Licensees, prior to the Commission's June 9, 1983 decision, that contracts and training for bus drivers were imminent.
- ** The widespread lack of detailed or up-to-date written procedures at the school and school district level to implement a range of protective responses outlined in State and County RERPs to safeguard school children in the event of an accident at Indian Point.

As recently as December 7, 1983, a New York State school official responsible for emergency planning stated:

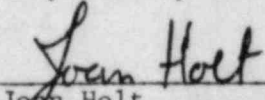
"Most school districts do not have fully developed plans and procedures for responding to large scale emergencies which involve single or multiple County areas particularly those emergencies involving explosions, toxic chemical spills and nuclear accidents."

(Attachment E, April 6, 1984 Petition)

That statement is as true now as it was in December, and parents still have no assurance that adequate or appropriate measures can and will be taken to protect their children in the event of an accident at Indian Point.

The Commission must, in good conscience, grant our Petition for Suspension of Operation of Indian Point Units 2 and 3 in order to assure the protection of more than 55,000 school children.

Respectfully submitted,



Joan Holt

New York Public Interest Research Group, Inc.
9 Murray Street
New York, New York 10007
(212) 349-6460

Dated: June 9, 1984
New York, New York

The New York Public Interest Research Group, Inc. is joined in this Supplement by the following co-petitioners:

Pat Posner/jh
Pat Posner

THE SCHOOL TASK FORCE OF THE
ALLIANCE TO CLOSE INDIAN POINT
P.O. Box 699
Ossining, New York 10562

Phyllis Rodriguez/jh
Phyllis Rodriguez

CROTON PARENTS CONCERNED ABOUT
INDIAN POINT
Box 125
Croton-on-Hudson, New York 10520

Barbara Hickernell/jh
Barbara Hickernell

GREATER OSSINING NEIGHBORHOOD ACTION
GROUP
12 Terrich Court
Ossining, New York 10562

Ellen + Dale Saltzman/jh
Ellen and Dale Saltzman

YORKTOWN PARENTS CONCERNED ABOUT
INDIAN POINT
3091 Hickory Street
Yorktown Heights, New York 10598

Francesca Burgess/jh
Francesca Burgess

NORTH ROCKLAND ALLIANCE ON NUCLEAR
DANGER
R.R. #2, Box 80
Stony Point, New York 10548

Bernard Flicker/jh
Bernard Flicker

ROCKLAND FAMILIES TO CLOSE
INDIAN POINT
49 South Mountain Road
New City, New York 10956

Zipporah Fleisher/jh
Zipporah Fleisher

WEST BRANCH CONSERVATION ASSOCIATION
443 Buena Vista Road
New City, New York 10956

LIST OF ATTACHMENTS

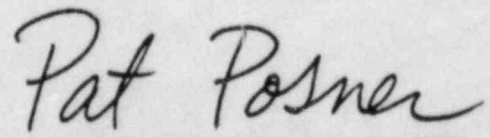
- A-1 Statement that School Task Force of the Alliance to Close Indian Point is a party to NYPIRG April 6, 1984 Petition for Suspension of Operation of Indian Point 2 and 3. Signed by Pat Posner.
- A-2 Statement that Parents Concerned About Indian Point is a party to the Petition. Signed by Phyllis Rodriguez.
- A-3 Letter from Greater Ossining Neighborhood Action Group stating that G.O.N.A.G. is a party to Petition. Signed by Barbara K. Hickernell.
- A-4 Statement that Yorktown Parents Concerned About Indian Point is a party to the Petition. Signed by Dale Saltzman and Ellen Saltzman.
- A-5 Statement that North Rockland Alliance on Nuclear Danger is a party to the Petition. Signed by Francesca Burgess
- A-6 Letter from Rockland Families to Close Indian Point. Signed by Dr. Bernard Flicker.
- A-7 Letter stating that West Branch Conservation Association is a party to the Petition. Signed by Z. S. Fleisher.
- B Memorandum re "Discussion of emergency planning for schools around Indian Point" from Joan Holt, NYPIRG, to Frank Petrone, Regional Director, FEMA. Dated February 27, 1984.
- C-1 March 8, 1984 Freedom of Information request letter from NYPIRG to New York State Department of Education asking for "access to certain records pertaining to radiological emergency planning for schools..."
- C-2 March 20, 1984 Freedom of Information letter from NYPIRG to Westchester, Putnam, Orange, and Rockland Counties requesting "access to certain records pertaining to radiological emergency planning for schools..."
- C-3 March 27, 1984 letter to School District Superintendents explaining NYPIRG's school emergency planning research and our perspectives on this matter, and attaching Freedom of Information letter requesting "access to certain records pertaining to radiological emergency planning for schools..."
- C-4 April 11, 1984 Freedom of Information letter from NYPIRG to the Radiological Emergency Preparedness Group of the New York State Department of Health requesting "access....," etc.
- C-5 May 3, 1984 Freedom of Information letter to School District Superintendents including a form listing details of evacuation, sheltering, and early dismissal procedures (the three options included in State and County RERPS) and asking Superintendents to "please indicate whether or not you have specific implementing procedures by checking "YES" or "NO" for each item listed below." (We already know the answers for most school districts, but want to provide Superintendents with a very concrete, and uniform, framework for finalizing their responses to our document search. We are asking for back-up documentation of all "YES" answers.)

- D-1-3 Sample letters from Rockland schools illustrating administrators' need for guidance, information, and resources for preparing for radiological emergencies.
- E January 4, 1984 letter from Westchester County Executive, Andrew P. O'Rourke to Lieutenant Governor Alfred B. DelBello reaffirming Westchester's intent to "retain in the plan the concept of school evacuation..." (Note that at this date school evacuation procedures for Westchester schools are two-three years out of date and parental information is similarly out of date. The newly developed transportation procedures for the County have not been finalized or incorporated as plan revisions, and contracts, letters of agreement, and bus-driver training is still largely lacking.)
- F Reprint of April 15, 1984 article about NYPIRG's April 6, 1984 Petition with reaction from Con Edison and Westchester spokespersons. Article appeared in the Westchester County Sunday edition of The New York Times.
- G Reprint of article appearing Sunday, May 8, 1984 in The Citizen Register on the anniversary of the Commission's May 5, 1983 threat to close Indian Point because of inadequate emergency preparedness. The article, headlined "Working on nuke evacuation plans nets more problems than solutions," reviews the current status of attempts to correct emergency planning and preparedness problems. Articles F and G reveal that Westchester officials do not disagree with NYPIRG's assertion that schools are currently unprepared. Plans are now being promised for November.
- H-1-5 Documents illustrating that Rockland County's public elementary and high schools are seriously planning only for the Early Dismissal response option.
- (D-1 & D-2) a second reference to these documents is made here to illustrate that pre-school nurseries and day-care centers are planning to hold children until parents pick them up.
- I-1 & I-2 (plus reference to Attachment J of April 6, 1984 Petition) are documents relating to the expected absence of adults from the homes of school children in the event of an early dismissal. Note that Attachment I-2, a letter from the Executive Director of the Rockland Council for Young Children (the umbrella group for Rockland's pre-school--or, early childhood--facilities) raises a number of other significant emergency planning difficulties of which the Commission should be aware.
- J-1 & J-2 Documents illustrating that some Rockland school districts have "deleted the necessity of calling parents at the K-6 (kindergarten through 6th grade) level before releasing students" in the event of a radiological emergency.
- K-1 & K-2 (also J-2) Documents illustrating that in the event of an early dismissal because of a radiological emergency (a) children will be sent home on foot, unattended, if they routinely walk to school, (b) attempts will be made to bus normally bused children to their normal bus stop (not home or to a pre-designated alternative refuge), (c) parents will not be notified by phone of the early dismissal, but announcement will be made on local radio, and (d) it is the parents' responsibility to instruct "and drill" their children about what to do and where to go if they are released from school early and nobody's

at home. If the Commissioners are not shocked into action by this last point alone, we wonder if they are capable of imagining or caring about the five or six year old who does not remember what Mommy and Daddy said and may wander off alone during a radiological emergency.

- L This attachment is included to illustrate the point that school administrators have been lead to believe that they need only plan for a slow-moving accident. If a survey of school administrators--and all the other people who have been "trained" or without training would have to respond to an accident at Indian Point--were performed, we feel sure that the single most common belief (or "mind-set") that would emerge would be the widespread conviction that any accident at Indian Point would take many, many hours before there could possibly be any danger to the public. This conviction has been carefully fostered in informational material, training sessions, public statements, and in a myriad of other ways by licensee, state, and federal emergency planning personnel.
- M-1 & M-2 These attachments are provided to illustrate how scanty the planning for school sheltering is where it exists at all. In addition to the matters raised in our Supplement regarding sheltering, it is clear that no provision has been made for the possibility that communications to and from schools may be blocked (jammed phone lines) or impossible (if there is a loss of off-site power) during a "sheltering" phase of emergency response to an accident at Indian Point. Such contingencies have not been planned for. Schools are not equipped either to monitor for radiation or cope with that possibility.
- N The entire concept of the Early Dismissal radiological emergency response option rests on two assumptions: (1) that any accident that occurs at Indian Point will be slow-moving, presenting no danger to the public for many hours, and (2) that during the Alert stage of an emergency the reactor operator has the capability to accurately predict the severity and speed of any developing accident. The schools, remember, are to be notified at the Alert stage to undertake early dismissal. We have tried to question these assumptions on a number of occasions, and attach here a copy of a latter on this matter which we sent on April 2, 1984 to Dr. R. Savio, Senior Staff Engineer of the ACRS, in order to provide the Commission with a full articulation of our concerns. Though we have expressed these concerns in conceptual terms we believe that they have a technological underpinning of which we are not capable but which we believe has not been addressed.

I have been working as a volunteer with various organizations since 1977 to stop the proliferation of nuclear technology in the United States. For a time I was on the staff of the New York Public Interest Research Group (NYPIRG) Indian Point Project. Currently I am a member of Croton Parents Concerned About Indian Point, a member-group in the Alliance to Close Indian Point. The Alliance has established a School Task Force, on which I serve. The Alliance School Task Force joins and supports the NYPIRG Petition for Suspension of Operation of Indian Point Units 2 and 3 dated April 6, 1984.



Pat Posner

May 15, 1984

P.O. Box 125
Croton-on-Hudson, N.Y. 10520


May 11, 1984

STATEMENT TO BE INCLUDED WITH NYPIRG
PETITION TO NRC RE: CLOSING
OF INDIAN POINT REACTORS

Parents Concerned About Indian Point is a grass roots organization made up of a range of community members including parents, teachers, local officials, etc. It was formed in 1980 with the purpose of intervening in the safety hearings conducted by the Atomic Safety and Licensing Board.

Throughout the hearing procedure I and others were officially authorized to sign communications, as I was to sign the recent NYPIRG petition to the Nuclear Regulatory Commission. Neither the name of our group nor its membership has changed since then.

We would like to note that the response of the Power Authority has not addressed any of the substantive issues raised in the NYPIRG petition but has instead focused on details not basic to the question of the safety of the population surrounding Indian Point or the workability of emergency plans. The safety of school children residing within the 10-mile EPZ - the most vulnerable age group - is passed over.


Phyllis Rodriguez
Parents Concerned About
Indian Point

GREATER OSSINING NEIGHBORHOOD ACTION GROUP
c/o BARBARA K. HICKERNELL
12 TERRICH COURT
OSSINING, NEW YORK 10562
914-941-7349

May 14, 1984

Nuclear Regulatory Commission
Washington, DC

Gentlemen:

This is to confirm that the Greater Ossining Neighborhood Action Group is a party in a petition filed with the NRC regarding the Indian Point nuclear reactors in Buchanan, New York.

We authorized the New York Public Interest Research Group to include our organization in the above-mentioned petition because of our continuing concern regarding the Indian Point situation.

We were not intervenors in the Indian Point hearings which were held in 1982-83, although a number of our members were individual witnesses. I personally gave a deposition and was not an intervenor.

The Greater Ossining Neighborhood Action Group was formed in May 1982 by a group of Ossining citizens concerned with the lack of realistic evacuation plans for Indian point and concern for the health and safety of themselves, their families, and their community.

Please contact me should there be any questions with regard to our being a party in the above-mentioned petition.

Sincerely,

Barbara K. Hickernell

Barbara K. Hickernell
Chairman

- May 15, 1984

This is to inform you that Yorktown
Parents Concerned about Indian Point
is a group that is party to the
N.Y. P.I.R.G. petition to suspend
operation of Indian Point because
of inadequate evacuation plans for
the school children in our area

The group was in existence before
the hearings, but was not an
intervenor nor were they and a
witness at the hearings

Edie Sattman

Ellen Sattman

To whom it may concern:

The New York Public Interest Research Group, NYPIRG, represented by Joan Holt, was authorized to list our group, the North Rockland Alliance On Nuclear Danger, NORAND, on their petition of April 4th, 1984. This group was not an intervenor in the hearings held by the NRC, but several of its members made Limited Appearance statements before the Licensing Board during the hearings. NORAND is a citizen's organization and has been active during the past four years in north Rockland on the issue of security related to the proximity of the Indian Point nuclear plants.

FRANCESCA BURGESS

Francesca Burgess
representative for the North Rockland Alliance
on Nuclear Danger

dated: May 17th, 1984

49 South Mountain Rd.

New City, N.Y. 10956

May 14, 1984

Nunzio J. Palladino, Chairman
Nuclear Regulatory Commission

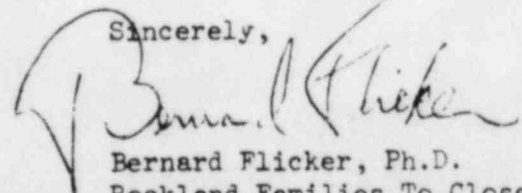
Dear Mr. Pallidino:

I am responding to the Con Edison and Power Authority of the State of NY response to the NYPIRG petition for suspension of operation of Indian Point Units 2 & 3. In Footnote #2 on Page 2, the statement is made that I did not sign the petition and that the names of certain groups represented have been changed since the Licensing Board hearings.

1. My signature on this letter shall represent my signature on the petition.

2. My name and organization name have not changed since the Licensing Board hearings.

Sincerely,

A handwritten signature in cursive script that reads "Bernard Flicker". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Bernard Flicker, Ph.D.
Rockland Families To Close
Indian Point

2

WEST BRANCH CONSERVATION ASSOCIATION

443 BUENA VISTA ROAD
NEW CITY N Y 10956

May 17, 1954

Hon. Members
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen: Re: Dockets SP 50-247 and 50-286

In response to the paper sent to you on the 4th of May by Consolidated Edison and the New York Power Authority suggesting that only NYPIRG was the mover of the April 6 petition, I wish you to know that the West Branch Conservation Association hereby states that it contributed to the petition and was in every way a party to it.

It should not surprise the Commission to receive from the Indian Point utility owners a statement in purple prose which is self-serving and not factual. At no time did they attempt to ascertain West Branch's degree of participation nor in any way communicate with us. Therefore, their claims are purely products of their imaginations.

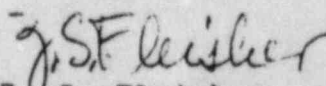
If there was another who attended the hearings with more diligence (and for less pay!) than West Branch, I do not know who it was.

Lessons learned, among others, was that attorneys for the utilities seem to blur fact and fancy and consider it all a natural part of representing their clients. Exaggerations and untruths are passed off with the phrase "I misspoke."

The paper from the utilities to you dated May 4 is larded with misspokenes.

The ASLB record will show that West Branch cross examined the State of New York's Radiological Emergency personnel closely to ascertain that no survey had been made and no knowledge backed up their assertions that school children would be properly sheltered in Rockland County. No attempt has been made to this very day to comply with the EPA regulations and shelter conditions. FEMA has played its standard role of approving the fact that we have plans but the word "workable" seems to have slipped from their vocabulary as has NUREG 0654.

Sincerely yours,


Z. S. Fleisher
Secretary



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

9 Murray St. ● New York, N.Y. 10007
(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse, Utica

February 27, 1984

To: Frank Petrone

From: Joan Holt

Re: Discussion of emergency planning for
schools around Indian Point

I think it may be useful to indicate briefly the main points we would like to discuss with you today, so that we will not range all over the map, and so that we can leave your office feeling that we have accomplished something more than just venting our concerns and frustrations about what we perceive as the prevailing practice and attitude of neglect regarding the safety of schoolchildren in the vicinity of Indian Point.

Though we continue to find many other serious shortcomings with emergency planning at Indian Point, and maintain that the state of preparedness to cope with a severe radiological accident is grossly deficient, we insist that the problems relating to protective measures for schoolchildren are unique:

- ** It has been neglected from the start despite consistent complaints, criticisms, and protests from parents, school personnel, and other concerned individuals.
- ** It has been treated as a non-issue: school evacuation is simply an aspect of transportation planning in the eyes of many.
- ** FEMA has failed to devote resources to a systematic evaluation of either planning or preparedness with respect to the schools; instead, it has relied upon representations and assurances made to it by State and County officials.
- ** Despite the fact that school emergency planning has been confused all along, and is currently largely unresolved and chaotic, FEMA has never identified this aspect of Indian Point emergency planning as "significantly deficient," but rather has, in the eyes of the public, already approved the current state of affairs as adequate to assure public health and safety.
- ** School emergency planning is not a side issue, for if the residents of the communities surrounding Indian Point do not have great confidence that their children will be protected above all others during a radiological emergency, all other planned protective responses are doomed to collapse the moment that emergency occurs.

The above are our basic contentions--our starting point, if you will.

Below are some of the questions we would like to ask you.

1. In evaluating the adequacy of planning and preparedness for schools and other child-care facilities which may have to respond to a radiological emergency at Indian Point
 - a. what standards, criteria, guidelines, instructions, etc. exist to guide both planners and evaluators? What are FEMA requirements?
 - b. what measures has FEMA undertaken to evaluate school planning and preparedness?
 - c. what steps had FEMA taken to verify that written procedures exist at child-care facilities and schools; that such procedures are known and understood by child-care personnel, parents and children; and that procedures have been practiced and demonstrated to be implementable under emergency conditions?
2. What procedures actually exist in writing, and has FEMA seen these and evaluated them? If not, does FEMA intend to play an active role in doing so, or is it FEMA's intent to continue to rely on assurances from State and County officials that all is well?
3. Is FEMA prepared to commit itself to undertaking a special program of concentration on school planning and preparedness problems at Indian Point which would include a commitment of resources and a willingness to identify school emergency planning and preparedness as a significant deficiency should FEMA determine, as we believe it must, that school children cannot currently be adequately protected should an accident occur?
4. Is FEMA willing to work with parents, teachers, school administrators, and other concerned people to confront this difficult, and as yet neglected, problem which currently jeopardizes the safety of tens of thousands of children?

NYPIRG's Indian Point Project is eager to work closely with FEMA in its future efforts to evaluate emergency planning and preparedness for the schools and other child-care facilities around Indian Point.



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

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Offices in: Albany, Binghamton, Buffalo, Cortland, I. ndonia, Long Island, New Paltz, New York City, Syracuse

March 8, 1984

Records Access Officer
New York State Department of Education
University of the State of New York
Albany, New York 12230

Dear Sir/Madam:

I am writing pursuant to the New York Freedom of Information Law (Article 6 of the Public Officer's Law) to request access to certain records pertaining to radiological emergency planning for schools which may be in the possession of the Department of Education. In late February, I spoke with Mr. Brian Walsh, Administrator of Educational Facilities and Management Services, who provided me with some information on this matter over the telephone. In an effort to fully document this conversation, and to determine if additional information on radiological emergency planning for schools exists on paper, I am formally requesting access to the following:

1. All records, in any physical form whatsoever, pertaining to radiological emergencies at each of the following nuclear power plants which might require protective response actions by the New York State Department of Education or any school district or facility under its jurisdiction:
 1. Indian Point
 2. Nine Mile Point
 3. R. E. Ginna
 4. J. A. FitzPatrick
 5. Shoreham

Records should include, but not be limited to, memoranda, guidelines, educational materials, policy statements or letters, plans, statutes, rules, regulations, and any other written requirements or procedures.

2. All records, in any physical form whatsoever, pertaining to radiological emergencies at each of the above listed nuclear power plants which might require protective response actions by any school or school district affected by these plants. Records should include, but not be limited to, memoranda, guidelines, educational materials, policy statements or letters, plans, statutes, rules, regulations, and any other written requirements or procedures.
3. All records, in any physical form whatsoever, which have been provided by the New York State Department of Education to advise or guide local schools or school districts involved in radiological planning and preparedness. Records should include, but not be limited to, letters, memoranda, notifications, advisories, questionnaires, guidelines, or instructions.

4. (a) All records, in any physical form whatsoever, in the possession of the New York State Department of Education which have been received from any and all school districts within or without the 10-mile emergency planning zone around each of the above listed nuclear power plant sites in New York State regarding their roles and responsibilities in a nuclear plant accident during school hours.
- (b) All records, in any physical form whatsoever, in the possession of the New York State Department of Education which have been received from any and all school districts within or without the 10-mile emergency planning zone around each of the above listed nuclear power plant sites in New York State regarding their roles and responsibilities in radiological emergency planning drills and exercises.

Such records should include, but not be limited to, requests for guidance or instruction, plans and procedures (in draft or final form) for radiological emergency response, replies to correspondence from the New York State Department of Education, copies of letters of agreement or memoranda of understanding between schools or school districts and other agencies to provide services during a radiological emergency.

5. All records, in any physical form whatsoever, pertaining to radiological emergency planning which clarify the roles, responsibilities, and lines of authority among the various State Department of Education officials and local boards of education, superintendents of schools, building principals, teachers and bus companies.
6. Written procedures, guidelines, and regulations pertaining to review, evaluation, updating, revision, and/or completion of school and school district radiological emergency response plans.
7. Any compilation or list of the school districts and schools within the emergency planning zone of each of the above listed nuclear power plant sites in New York State. The meaning of schools should include, but not be limited to, public, private, special educational institutions, vocational schools, nursery schools, and day care facilities.
8. Any breakdown of the number of students within each emergency planning zone for each of the above listed nuclear power plant sites in New York State.
9. All records, in any physical form whatsoever, in the possession of the New York State Department of Education pertaining to radiological emergency planning and preparedness for schools which have been received from the following: Federal Emergency Management Agency, the Nuclear Regulatory Commission, the New York State Disaster Preparedness Commission, the New York State Radiological Emergency Preparedness Group, the New York State Department of Health, the New York State Department of Naval and Military Affairs, the New York State Department of Transportation, county executives, county departments of health, county disaster preparedness commissions, county police agencies, city, town and village executives and police agencies, the Red Cross, bus companies, and nuclear facility operators. Records should include, but not be limited to, correspondence, memoranda, notifications, advisories, questionnaires, guidelines, instructions, procedures, and any other written policies, regulations, or requirements.

10. Any correspondence between the State Department of Education and schools or school districts outside the 10-mile emergency planning zones around the above listed nuclear power plant sites in New York State which have been assigned a role in any radiological emergency response plans such as reception centers or congregate care centers.
11. (a) All records, in any physical form whatsoever, concerning the effectiveness of school buildings to shelter students and staff from ionizing radiation. Such records should include, but not be limited to, studies, evaluations, reports, and recommendations.

(b) All records, in any physical form whatsoever, pertaining to in-school sheltering in the event of a radiological emergency which have been sent by the New York State Department of Education to any local school or school district. Such records should include, but not be limited to, instructions, advisories, guidelines, procedures, correspondence, or information.

(c) All records, in any physical form whatsoever, in the possession of the New York State Department of Education pertaining to in-school sheltering in the event of a radiological emergency which have been received from any school or school district.
12. Any draft or proposed legislation, regulation, rule or rule change pertaining to or affecting radiological emergency plans and procedures.
13. In accordance with Section 87 (3) (c) of the Freedom of Information Law, please provide "a reasonably detailed current list...of all records" in the possession of the New York State Department of Education pertaining to radiological emergency planning and preparedness for schools.
14. All other records pertaining to radiological emergency planning and preparedness for schools not included above.

If there are any fees imposed for searching or copying the materials I have requested, please inform me before filling out the request.

I would appreciate your handling this request as rapidly as possible. As I am sure you are aware, Section 89 (3) of the Freedom of Information Law requires that you make the information I have requested available or furnish a written denial within five business days. If you choose to deny access, I would like to know specifically what is being denied, in accordance with Section 89 (3), and the legal basis under Section 87 (2) for such denial.

If there are any questions pertaining to this request, please feel free to contact me at 212/349-6460 during business hours. Thank you very much for your prompt attention to this request.

Sincerely,

Joan Holt
Project Director

cc: Brian Walsh



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Offices in: Albany, Binghamton, Buffalo, Cortland, Fredonia, Long Island, New Paltz, New York City, Syracuse

(Sent to Records Access Officers of Westchester, Putnam, Orange, and Rockland Counties)

March 20, 1984

Dear Sir/Madam:

The New York Public Interest Research Group is undertaking to document the current status of radiological emergency preparedness for schools affected by Indian Point. Accordingly, I am writing pursuant to the New York Freedom of Information Law (Article 6 of the Public Officers Law) to request access to certain records pertaining to radiological emergency planning for schools which may be in the possession of the county.

In all cases, this request letter covers all definitions of "records" contained in Public Officers Law §86.4, and additionally but not exclusively pertains to guidelines, statutes, advisories, questionnaires, instructions, notifications, procedures, requirements, statutes, educational materials, and policy statements.

I am formally requesting access to and copies of the following:

1. All records which have been provided by the county to advise or guide local schools or school districts involved in radiological emergency plans and preparedness.
2. (a) All records in the possession of the county which have been received from any and all school districts within or without the 10 mile emergency planning zone (EPZ) around the Indian Point nuclear power plants site regarding their roles and responsibilities in a nuclear plant accident during school hours.
 (b) All records in the possession of the county which have been received from any and all school districts within or without the 10 mile EPZ around the Indian Point nuclear power plants site regarding their roles and responsibilities in radiological emergency planning drills and exercises.
3. All records pertaining to radiological emergency plans which clarify the roles, responsibilities, and lines of authority among county officials, the New York State Department of Education, and local boards of education, superintendents of schools, building principals, teachers, and/or bus companies.

4. Written records (a) provided by the county to schools or school districts or (b) received by the county from schools or school districts pertaining to review, evaluation, updating, revision, and/or completion of school and school district radiological emergency response plans.
5. All lists of (a) schools (public and private; nursery, elementary, middle, and high) and day-care centers currently operating in the county's EPZ for Indian Point and (b) enrollment figures for each.
6. (a) Any records provided by the county to bus companies or bus drivers (including bus driver unions) pertaining to their roles and responsibilities in case of a nuclear accident at Indian Point and during radiological emergency drills and exercises.

(b) Any records provided by the bus companies and bus drivers (including bus driver unions) pertaining to their roles and responsibilities in case of a nuclear accident at Indian Point and during radiological drills and exercises.
7. All records in the possession of the county pertaining to radiological emergency planning and preparedness for schools which have been received from or sent to the following:
 - a. Federal Emergency Management Agency
 - b. Nuclear Regulatory Commission
 - c. New York State Disaster Preparedness Commission
 - d. New York State Radiological Emergency Preparedness Group
 - e. New York State Department of Health
 - f. New York State Department of Education
 - g. New York State Department of Transportation
 - h. New York State Department of Naval and Military Affairs
 - i. New York State Governor's or Lt. Governor's Office
 - j. other county executives
 - k. any county legislature
 - l. any county department of health
 - m. any county disaster preparedness commission
 - n. any county police agency
 - o. any city, town or village executive or board
 - p. any city, town or village police agency
 - q. the Red Cross
 - r. nuclear facility operators
 - s. Four-county Nuclear Safety Committee
8. Any correspondence between the county and schools or school districts outside the 10 mile EPZ around the Indian Point nuclear power plants site which have been assigned a role in any radiological emergency response plans, such as congregate care centers or reception centers, about their responsibilities in such plans.
9. (a) All records concerning the effectiveness of school buildings to shelter students and staff from the effects of ionizing radiation.

(b) All records pertaining to in-school sheltering in the event of a radiological emergency at Indian Point which have been sent by the county to or received by the county from any school or school district.

- (c) All records pertaining to in-school sheltering in the event of a radiological emergency which have been received by the county from any source whatsoever.
10. Any draft or proposed county legislation, resolution, regulation, rule or rule change pertaining to or affecting radiological emergency plans and procedures for county schools.
 11. All other records pertaining to radiological emergency planning and preparedness for schools not listed above.

In accordance with § 87.3(c) of the Freedom of Information Law, please provide a "reasonably detailed current list...of all records" in the possession of the county pertaining to radiological planning and preparedness for schools.

If there are any fees imposed for searching or copying the materials I have requested, please inform me before filling out the request.

Please note, however, that I am requesting this information as a member of a non-profit organization with over 150,000 concerned citizen supporters in New York State. Since this information will primarily benefit the public, please waive all fees associated with this request.

I would appreciate your handling this request as rapidly as possible. As I am sure you are aware, § 89.3 of the Freedom of Information Law requires that you make the information I have requested available or furnish a written denial within five business days. If you choose to deny access, I would like to know specifically what is being denied, in accordance with § 89.3, and the legal basis under § 87.2 for such denial.

If there are any questions pertaining to this request, please feel free to contact me at 212/349-6460 during business hours. Thank you very much for your prompt attention to this request.

Sincerely,

Joan Holt
Project Director



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

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(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse, Utica

(Cover letter sent to School District Superintendents
along with FOI letter to School District Records
Access Officers)

March 27, 1984

Dear Superintendent,

The New York Public Interest Research Group has been monitoring emergency planning for a possible accident at Indian Point for more than four years. We have published a number of studies and have testified on this matter before the New York State Assembly, the United States Congress and the Nuclear Regulatory Commission.

During the recently concluded NRC investigation of Indian Point, NYPIRG and other public intervenor groups presented evidence that despite utility, state, and FEMA claims to the contrary, emergency planning and preparedness around Indian Point is grossly deficient. Among other things, we contended (and still do) that radiological emergency planning for school children; for the aged, the disabled, and other mobility-impaired people; and for other especially vulnerable segments of the population is gravely inadequate.

School personnel, parents, and town and county officials testified during the hearings that plans to evacuate school children to "reception centers" outside the 10-mile EPZ in the event of an accident at Indian Point during school hours would not work. Insufficient buses, reluctant or unavailable drivers, role conflicts for teachers and other child-care personnel, and separated families were among the problems witnesses raised.

The highly critical testimony presented was so compelling, that mid-way through the hearings county and state officials suddenly announced a "solution" to the many intractable school evacuation problems: schools within the EPZ would be notified of an accident before the general population and children would be dismissed early.

It was immediately obvious to many that this new "go home" plan was fraught with risk and based on numerous questionable assumptions (a) about the ability of the Indian Point operators to accurately predict--at the "site alert" stage--the severity and speed of the accident, (b) the ability of school districts to rapidly mobilize sufficient numbers of buses and drivers to transport all children home in the middle of a school day, and (c) the ability of school personnel to notify all parents (or their emergency substitutes) that the children are being sent home early. Other questions were raised about what would happen if the speed and severity of an accident were to suddenly escalate while children were en route home, some on foot, others to empty homes.

NYPIRG and other intervenor groups formally requested the Atomic Safety and Licensing Board to order feasibility studies, statistical surveys, and other documentation regarding school planning and preparedness, for we did not have either the financial or the personnel resources to gather such evidence ourselves. Unfortunately--and, we believe, irresponsibly--our motions were denied.

Now, almost a year since the close of the hearings--and three full years beyond the NRC's original deadline for the implementation of emergency plans adequate to protect the public in the event of an accident at Indian Point--most school districts, schools, and other child-care facilities still lack written procedures for implementing early dismissal or other radiological emergency response measures should an accident occur at Indian Point during school hours. Parents have received little or no information about such procedures, and to our knowledge only one or two schools have elicited from parents specific instructions for a radiological emergency (which may differ considerably from parental instructions for other types of emergencies). Most schools have had no radiological emergency drills or exercises, but where a drill was conducted, by a Westchester school, a simultaneous phone survey revealed that over 53% of the students' homes had no adult present.

NYPIRG is convinced that this widespread lack of preparedness to protect school children is not the result of negligence on the part of school districts or schools, for they have not been provided with the guidance, training, equipment, buses, personnel, or financial resources to enable them to develop, practice, and implement radiological emergency response procedures. Furthermore, many school administrators, teachers, and other child-care personnel are deeply skeptical--along with parents--about their ability to provide rapid and adequate protection for the children in their charge should a radiological accident occur during school hours. Some county, state, and federal officials maintain that schools are prepared to execute at least three different response options: early dismissal if an accident is slow-moving, evacuation to reception centers if an accident is fast-moving, or in-school sheltering if a radiation release has already begun or is imminent. But the workability of these options has been seriously questioned at many PTA, teacher union, and school board meetings in the 10-mile EPZ.

In an effort to document the current status of school planning and preparedness for a nuclear accident--which the recent NRC investigation failed to do--NYPIRG is undertaking a systematic study of radiological emergency planning to protect school children in the EPZ. We have already submitted Freedom of Information requests to the State and to the Counties of Westchester, Rockland, Putnam and Orange for all documents and records pertaining to this matter. In the same manner, we are now submitting to all school districts in the EPZ the enclosed Freedom of Information request.

We know that it may not be easy for all school districts to comply with the formal provisions of the New York State F.O.I. Law, and we regret having to inconvenience you about a difficult matter not of your making. We are eager to cooperate with you and to assist you in fulfilling our request.

Sincerely,

Joan Holt, Project Director



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

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(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Cortland, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse, Utica

(Sent to School District Records Access Officers
with cover letter to School District Superintendents)
March 27, 1984

Dear Sir or Madam

The New York Public Interest Research Group is undertaking to document the current status of radiological emergency preparedness to protect children in the event of an accident at Indian Point during school hours. Accordingly, I am writing pursuant to the New York Freedom of Information Law (Article 6 of the Public Officers Law) to request access to certain records pertaining to radiological emergency planning for schools and other child-care facilities which may be in the possession of your School District.

Specifically, I am formally requesting access to the following:

1. Lists of schools (public and private; nursery, elementary, middle, high, and "special", and day-care and after-school centers currently operating in the School District, together with the addresses, phone numbers, names of principal administrators, and enrollment figures for each facility.
2. Lists of "school reception centers" for schools and other child-care facilities in the District, and all written procedures, correspondence, and records* pertaining to notification, activation and staffing of and communication with such reception centers during a radiological emergency
3. The District's written procedures for responding to an accident at Indian Point, including but not limited to all records and other written materials pertaining to (a) responsibilities, roles, and lines of authority among District and school officers and personnel, town, county, state, and federal officers and agencies insofar as these pertain to protective measures for school children during a radiological emergency; (b) County-District-School radiological emergency notification procedures; (c) parental radiological emergency notification procedures; (d) evacuation, sheltering, early dismissal,

* In all cases, requests for written materials in this letter are intended to cover all definitions of "records" contained in Public Officers Law §86.4, and additionally but not exclusively pertains to guidelines, rules and regulations, statutes, advisories, questionnaires, instructions, notifications, procedures, educational and informational materials, letters, memoranda, and policy statements.

and other radiological emergency response measures planned for the protection of school children; (e) procedures for communication between the District, schools, school buses, school reception centers, and relevant local, county, and state emergency response agencies and personnel; and (f) procedures for on-going monitoring, supervision, follow-up or wrap-up of the District's responsibilities and response procedures during a radiological emergency.

4. Written radiological emergency procedures provided to the District by any schools, day-care centers, or after-school facilities in the District, including written procedures for in-school sheltering, from-school evacuation, early dismissal (or "go home"), or other measures which may be taken in the event of an accident at Indian Point during school hours. Include any written procedures for notification of parents and guardians in the event of early dismissal.

5. All records in the possession of the District pertaining to the transportation, movement, and care en route of children between school (day-care center, etc.) and school reception center, or between school and home, in the event of a radiological emergency. Include all written procedures for staffing buses or otherwise accompanying children during any early dismissal or evacuation. Include, also, lists of transportation providers (e.g., bus companies); numbers of drivers, buses, vans, cars, and other vehicles committed to the District by each provider; and capacity of vehicles committed to the District and to each school or facility. Include, also, all letters of agreement, memoranda of understanding, or contracts between the District (or the County on behalf of the District) and any public or private agency regarding provision of services to the District during a radiological emergency (especially agreements with bus companies and bus drivers).

6. Any written information (guidelines, criteria, rules and regulations, memoranda, correspondence, etc.) which has been provided to the School District regarding radiological emergencies (e.g., possible accident scenarios, sheltering standards) and the District's roles and responsibilities in radiological emergency planning, preparedness, or response by each of the following:

- a. County officers and/or agencies, departments, or commissions
- b. State officers and/or agencies, departments, or commissions
- c. Federal officers and/or agencies, departments, commissions
- d. City, Town, or Village officers and/or agencies, departments, or commissions
- e. Utilities
- f. Bus companies or bus driver unions
- g. Other sources

7. Any written information (guidelines, criteria, rules, regulations, memoranda, correspondence, etc.) pertaining to the preparation, review, evaluation, updating, revision, and completion of school and school district radiological emergency response plans (a) between the above officers and agencies and the the District, and (b) between the District and schools and other child-care facilities within the District.

8. Any written materials which have been sent by the District to any federal, state, or local officer or agency, to any bus company or bus drivers union, to the Red Cross or other service agencies, to other school districts or educational facilities, or to the Indian Point utilities requesting or providing information regarding the roles and responsibilities of the District

and/or the educational and child-care facilities within the District in a radiological emergency during school hours.

9. Any written information provided to or by the District pertaining to radiological emergency response drills or exercises of District and/or school emergency response procedures. Include any information pertaining to past or planned radiological emergency response drills or exercises in the District.

10. Any written information provided to parents of children in the District regarding provisions for their children during natural or man-made emergencies which might occur during school hours. Include any written information (handbooks, notices, newsletters, instructions, etc.) pertaining to non-radiological or radiological emergencies.

11. Any questionnaires, forms, cards, or other requests for emergency information or instructions sent to parents from the District or any school or child-care facility within the District pertaining to possible emergencies during school hours (i.e., emergency health cards, parental notification instructions, substitute emergency contacts, early dismissal instructions and/or permission, etc.).

12. Any written procedures, guidelines, manuals, etc. pertaining to the training and preparation of District and school personnel to implement radiological emergency response measures. Please include any written records pertaining to past or planned training for radiological emergencies.

13. Any demographic studies or statistical compilations containing numbers or percentages of homes without adults present during school hours (due to the absence of working mothers and fathers, etc.).

14. Any studies or physical surveys of schools or/and other child-care facilities regarding their sheltering capabilities during a radiological emergency. Please include any data in the possession of the District regarding air-exchange times, ventilation, air-conditioning and heating systems which bear directly on the ability of school and child-care buildings within the District to provide proper sheltering from air-borne radiation.

15. Any lists of equipment, transportation, personnel, and other needs provided by schools to the District or by the District to state or local officers or agencies, or to the utilities in connection with the District's radiological emergency response program. Include any relevant budget or cost estimates.

16. Any minutes or other written records of School Board discussions or other meetings involving District personnel or officers pertaining to radiological emergency response planning and preparedness. Please include any resolutions, statements of position, or decisions adopted by the Board regarding emergency planning for an accident at Indian Point.

17. Written records pertaining to any and all "early dismissals" which have occurred in the District (District-wide or any individual facilities) during the past 10 years. Please include dates, reasons for the early dismissals, and any information pertaining to the actual carrying out of the dismissals (time taken for bus mobilization, parental notification, transportation home of children, evaluations, and information regarding any hitches or glitches).

I would appreciate your handling this request as rapidly as possible. Section 89.3 of the Freedom of Information Law requires that you make the information I have requested available or furnish a written denial within five business days. If you choose to deny access, I would like to know specifically what is being denied and the legal basis under Section 87.2 of the Law for such denial.

In accordance with Section 87.3(c) of the Freedom of Information Law, please provide a "reasonably detailed current list...of all records" in the possession of the District pertaining to radiological emergency planning and preparedness for the schools and other child-care facilities in the District.

If there are any fees imposed for searching or copying the materials I have requested, please inform me before filling out the request. Please note, however, that I am requesting this information on behalf of a non-profit organization with over 150,000 concerned citizen supporters in New York State. Since this information will primarily benefit the public, please waive all fees associated with this request.

If there are any questions pertaining to this request, please feel free to contact me at (212) 349-6460. Thank you very much for your prompt attention to this request.

Sincerely,

Joan Holt
Project Director



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

9 Murray Street • New York, N.Y. 10007
(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Cortland, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse

April 11, 1984

Records Access Officer
Radiological Emergency Preparedness Group
New York State Department of Health
Empire State Plaza
Tower Building, Room 1750
Albany, New York 12237

Dear Sir/Madam:

The New York Public Interest Research Group is undertaking to document the current status of radiological emergency preparedness for schools affected by Indian Point and other nuclear power plants in New York. Accordingly, I am writing pursuant to the New York Freedom of Information Law (Article 6 of the Public Officers Law) to request access to certain records pertaining to radiological emergency planning for schools which may be in the possession of the Radiological Emergency Preparedness Group (REPG).

In all cases, this request letter covers all definitions of "records" contained in Public Officers Law §86.4, and additionally but not exclusively pertains to guidelines, statutes, advisories, questionnaires, instructions, notifications, procedures, requirements, educational materials, and policy statements.

I am formally requesting access to and copies of the following:

1. All records pertaining to radiological emergencies at each of the following nuclear power plants which might require protective response actions by the REPG or any school district or facility under its jurisdiction:
 1. Indian Point
 2. Nine Mile Point
 3. R. E. Ginna
 4. J. A. FitzPatrick
 5. Shoreham
2. All records pertaining to radiological emergencies at each of the above listed nuclear power plants which might require protective response actions by any school or school district affected by these plants.
3. All records which have been provided by the REPG to advise or guide local schools or school districts involved in radiological planning and preparedness.
4. All records in the possession of the REPG which have been received from any and all school districts within or without the 10-mile emergency planning zone around each of the above listed nuclear power plant sites in New York State regarding their roles and responsibilities in a nuclear plant accident during school hours.

The New York Public Interest Research Group, Inc., (NYPIRG) is a not-for-profit, nonpartisan research and advocacy organization established, directed and supported by New York State college and university students. NYPIRG's staff of lawyers, researchers, scientists and organizers works with students and other citizens, developing citizenship skills and shaping public policy. Consumer protection, energy, fiscal responsibility, political reform and social justice are NYPIRG's principal areas of concern.

5. All records in the possession of the REPG which have been received from any and all school districts within or without the 10-mile emergency planning zone around each of the above listed nuclear power plant sites in New York State regarding their roles and responsibilities in radiological emergency planning drills and exercises.
6. All records pertaining to radiological emergency planning which clarify the roles, responsibilities, and lines of authority among the various officials and local boards of education, superintendents of schools, building principals, teachers, and bus companies.
7. Any compilation or list of the school districts and schools within the emergency planning zone of each of the above listed nuclear power plant sites in New York State. The meaning of schools should include, but not be limited to, public, private, special educational institutions, vocational schools, nursery schools, and day care facilities.
8. Written procedures, guidelines, and regulations pertaining to review, evaluation, updating, revision, and/or completion of school and school district radiological emergency response plans.
9. Any breakdown of the number of students within each emergency planning zone for each of the above listed nuclear power plant sites in New York State.
10. All records in the possession of the REPG pertaining to radiological emergency planning and preparedness for schools which have been received from the following: Federal Emergency Management Agency, the Nuclear Regulatory Commission, the New York State Disaster Preparedness Commission, the New York State Department of Health, the New York State Department of Education, the New York State Department of Naval and Military Affairs, the New York State Department of Transportation, county executives, county departments of health, county disaster preparedness commissions, county police agencies, city, town and village executives and police agencies, the Red Cross, bus companies, and nuclear facility operators.
11. Any correspondence between the REPG and schools or school districts outside the 10-mile emergency planning zones around the above listed nuclear power plant sites in New York State which have been assigned a role in any radiological emergency response plans such as reception centers or congregate care centers.
12. (a) All records concerning the effectiveness of school buildings to shelter students and staff from ionizing radiation.

(b) All records pertaining to in-school sheltering in the event of a radiological emergency which have been sent by the REPG to any local schools or school districts.

(c) All records in the possession of the REPG pertaining to in-school sheltering in the event of a radiological emergency which have been received from any school or school district.

13. Any draft or proposed legislation, regulation, rule or rule change pertaining to or affecting radiological emergency plans and procedures.
14. All other records pertaining to radiological emergency planning and preparedness for schools not included above.

In accordance with § 87.3(c) of the Freedom of Information Law, please provide a "reasonably detailed current list...of all records" in the possession of the REPG pertaining to radiological planning and preparedness for schools. I understand that the quantity of material in the possession of the REPG may be quite voluminous. Providing this list will eliminate any unnecessary reproduction and will help to expedite this request.

If there are any fees imposed for searching or copying the materials I have requested, please inform me before filling out the request.

Please note, however, that I am requesting this information as a member of a non-profit organization with over 150,000 concerned citizen supporters in New York State. Since this information will primarily benefit the public, please waive all fees associated with this request.

I would appreciate your handling of this request as rapidly as possible. As I am sure you are aware, § 89.3 of the Freedom of Information Law requires that you make the information I have requested available or furnish a written denial within five business days. If you choose to deny access, I would like to know specifically what is being denied, in accordance with § 89.3, and the legal basis under § 87.2 for such denial.

If there are any questions pertaining to this request, please feel free to contact me at 212/349-6460 to during business hours. Thank you very much for your prompt attention to this request.

Sincerely,

Joan Holt
Project Director



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

9 Murray Street • New York, N.Y. 10007
(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Cortland, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse

(Sent to School District Superintendents)

May 3, 1984

Dear Superintendent,

On March 27, 1984, the New York Public Interest Research Group, Inc. (NYPIRG) sent Freedom of Information letters to all 23 school districts and BOCES within the 10 mile Emergency Planning Zone (EPZ) surrounding Indian Point. From the tremendous amount of documents which we have reviewed we have found one group of documents to be consistently missing: school and school district implementing operating procedures for emergency response plans. In other words, exactly what actions would your school district and each school within the district take if an accident occurred tomorrow at Indian Point?

Because we have rarely received such documents we are reaching the conclusion that school and school district emergency response plans for an accident at Indian Point do not exist at most school districts within the EPZ. In our continuing effort to chronicle emergency response planning for the schools we are now formally asking you to provide the specific written operating procedures that the schools within your district and the school district itself will use in the event of an accident at Indian Point.

You can simply use the following Freedom of Information request letter as a check list to save yourself time and better inform us of exactly what information you do and do not possess. But please note once more that we are asking for the emergency response plans (implementing procedures) for the schools within your district and the school district itself - not the procedures for State and County officials found in the State and County plans.

Accordingly, pursuant to the New York Freedom of Information Law (Article 6 of the Public Officers Law) I am requesting access to certain records pertaining to radiological emergency planning for schools and other child care facilities which may be in the possession of your School District. I would appreciate your handling this request as rapidly as possible. Section 89.3 of the Freedom of Information Law requires that you make the information I have requested available or furnish a written denial within five business days. If you choose to deny access, I would like to know specifically what is being denied and the legal basis under Section 87.2 of the Law for such denial.

Please indicate whether or not you have specific implementing procedures by checking "YES" or "NO" for each item listed below.

I. Evacuation of children from school to reception centers outside the EPZ, including

- A. Notification procedures. YES _____ NO _____
B. Transportation procedures (buses, drivers, accompanying staff, routes).
YES _____ NO _____
C. Lists of reception centers for each school. YES _____ NO _____
D. Personnel allocation plans. YES _____ NO _____
E. Other procedures pertaining to evacuation. YES _____ NO _____

II. Sheltering in school, including

- A. Designation of each school building's optimal sheltering locations.
YES _____ NO _____
B. Procedures for closing windows, ventilation system, etc. YES _____ NO _____
C. Lists of food, water, and other supplies maintained in schools for use during sheltering. YES _____ NO _____
D. Procedures for release of children to parents during or following sheltering phase. YES _____ NO _____
E. Other procedures pertaining to sheltering. YES _____ NO _____

III. Early Dismissal or "Go Home", including

- A. Parental notification procedures. YES _____ NO _____
B. School bus notification, leading, dispatching, and staffing procedures.
YES _____ NO _____
C. Procedures for children who normally walk to and from school.
YES _____ NO _____
D. Procedures for children whose parents and alternative emergency contacts cannot be reached by phone. YES _____ NO _____
E. Other procedures pertaining to early dismissal. YES _____ NO _____

If there are any questions pertaining to this request, please feel free to contact me at (212) 349-6460. Thank you very much for your prompt attention to this request.

Sincerely,

Joan Holt
Joan Holt
Project Director



CAMP HILL ROAD • POMONA, NEW YORK 10970 • 354-2755 • JANE CAPON, OWNER / DIRECTOR

October 13, 1983

Mr. Mort Tractenbroit
East Ramapo Central School District
50 A South Main Street
Spring Valley, N.Y. 10977

Dear Mr. Tractenbroit:

The following is the information requested in your letter of September 16th:

1. Woodlands Playgroup, Inc.
Camp Hill Road
Pomona, N.Y. 10970
2. Estelle Burdige - Educational Director 354-2755
Jane Capon - Owner - 354-2789
3. We have 40 children on site at any given time plus 5 Staff.

With regard to "Go Home, Shelter and Evacuation Plans", we plan upon notification of an alert to inform parents that their children are to be picked up by them at school. We will provide supervision until each child has been picked up. We will use our snow emergency plan to notify parents. We have on file emergency telephone numbers for all our children.

We have no definitive shelter plan, other than remaining at school with the children. We feel that no sound workable information has been provided us should an emergency occur and it would be irresponsible for us to inform our parents that we have appropriate health and/or safe shelter provisions for their children. We believe these are questions that the authorities who are concerned with keeping Indian Point open must deal with. Needless to say, we are not at all secure in the current plans for a Radiological Emergency.

Sincerely yours,

Estelle Burdige
Estelle Burdige
Educational Director



COUNTRY DAY SCHOOL
MOUNTAIN ROAD, POMONA, N.Y. 10970

OCTOBER 11, 1983

MR. MORT TRACHTENBROIT
ASSISTANT TO THE SUPERINTENDENT
EAST RAMAPO CENTRAL SCHOOL DISTRICT
50A SOUTH MAIN STREET
SPRING VALLEY, N. Y. 10977

DEAR MR. TRACHTENBROIT:

THE FOLLOWING IS THE INFORMATION YOU REQUESTED IN YOUR LETTER OF
SEPTEMBER 16TH:

A. NAME AND ADDRESS OF SCHOOL :

RAMAQUOIS COUNTRY DAY SCHOOL
MOUNTAIN ROAD
POMONA, N. Y. 10970

B. DIRECTOR:

TOBY GERSONY
354-2800

C. OWNER :

ARTHUR KESSLER
354-1600

D. ENROLLMENT:

MON, WED, FRI	A.M.	-	<u>72</u>
TUES, THURS	A.M.	-	<u>60</u>
STAFF	A.M.	-	<u>12</u>

MON, WED, FRI	P.M.	-	<u>80</u>
TUES, THURS	P.M.	-	<u>75</u>
STAFF	P.M.	-	<u>13</u>

CONTINUED.....

ARTHUR KESSLER: Owner/Director
TOBY GERSONY: Educational Director

E. GO HOME, SHELTER & EVACUATION PLANS:

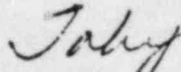
UPON NOTIFICATION OF A "GO HOME" ALERT, WE WOULD INFORM PARENTS THAT SUCH AN ALERT HAS BEEN ENACTED AND THAT THEIR CHILDREN ARE TO BE PICKED UP BY THEM AT SCHOOL. WE WILL PROVIDE SUPERVISION UNTIL EACH CHILD HAS BEEN PICKED UP. WE WILL HAVE TWO EMERGENCY NUMBERS ON FILE FOR EACH CHILD. IN THE EVENT OF SUCH AN ALERT, WE WILL ATTEMPT TO REACH EACH CHILD'S PARENTS BY PHONE.

WE HAVE NO DEFINITIVE "SHELTER" PLAN, OTHER THAN REMAINING AT SCHOOL WITH THE CHILDREN. WE HAVE RECEIVED NO GUIDANCE AS TO THE APPROPRIATE MEASURES AND PRECAUTIONS TO TAKE SHOULD SUCH AN EMERGENCY OCCUR. THE QUESTIONS THAT ARISE REGARDING THE ADEQUACY OF OUR ABILITY TO:

1. CONTACT ALL PARENTS - (ONLY 2 PHONES IN OUR OFFICE)
2. PROVIDE SAFE FOOD AND WATER.
3. TO OFFER APPROPRIATE PUBLIC HEALTH AND PSYCHOLOGICAL SUPPORT TO OUR STUDENTS.

- TO NAME JUST A FEW - ARE AMONG OUR CONCERNS AT THIS TIME. WE DO NOT FEEL SECURE IN THE PLANS FOR A RADIOLOGICAL EMERGENCY, SHOULD ONE OCCUR.

SINCERELY,



TOBY GERSONY
EDUCATIONAL DIRECTOR

TG/JO



CONGREGATION OHR YISRAEL

JEWISH COMMUNITY CENTER
250 North Main Street
Spring Valley, New York 10977
(914) 366-3710

December 21, 1983

RECEIVED
JAN-5 1984
EDUC. MGT. SERV'S.

RECEIVED
DEC 20 1983

COMMISSIONER
OF EDUCATION

Mr. Ambach, New York State Education Commissioner
The Towers
Albany, New York

Dear Sir:

The Jewish Community Center of Spring Valley does not believe that it can secure the building nor provide for the safety of its youngsters in the event of a nuclear incident. Therefore, we request that you provide a safe and secure location, transportation and plan for the protection of our children. Thank you for your cooperation in this matter.

Sincerely yours,

Mal Cutler

MAL CUTLER
School Board President

CC: Superintendent Anderson of the East Ramapo Central School District
Sheila Abramowitz, Nursery School Principal
Ira Blassberg, Hebrew School Principal
Harold Lazar, Congregation President

RECEIVED

JAN 5 1984

Admin's
Education
and Management Services

Dr. Alan J. Yuter, Rabbi

David Rosenzweig, Cantor



Westchester County

ANDREW P. O'ROURKE
County Executive

January 4, 1984

The Honorable Alfred B. DelBello
Office of the Lieutenant Governor
Albany, New York 12224

Dear Lieutenant Governor DelBello:

Westchester County is involved in an intensive review of the Indian Point Emergency Response Plan. We are in consultation in this matter with the appropriate authorities in Orange, Putnam and Rockland Counties as well as with local education officials. In conjunction with the latter, a very informative emergency evacuation drill was conducted recently with the Hendrick Hudson School District.

With regard to the matter of children in school it is obvious that the preferable options are sheltering and the Go Home Plan. However, since these two options do not cover all contingencies and, since the system of school reception centers represents a valuable resource to have in reserve and, since (in accordance with 44CFR350) any substantive or conceptual changes to the plan require State concurrence, Westchester County elects to retain in the plan the concept of school evacuation and the system of school reception centers.

Among the contingencies which suggest that the retention of the school reception centers is a prudent policy are: a) children in a school which is not in the path of a radioactive "plume" while their homes are so endangered; b) children already embarked in buses at the time an evacuation is ordered; c) the difficulties inherent in feeding and otherwise caring for children sheltered for three or four days (assuming time to evacuate the schools but not enough time to assure reuniting with families prior to a necessary evacuation time).

The Hon. Alfred B. DelBello
Page 2

Westchester County deeply appreciates your concern in this matter and will continue to work in harmony with yourself, with the New York State Disaster Preparedness Commission's Radiological Emergency Preparedness Group and with our subsidiary governments and school districts in improving the Westchester County emergency response plan.

Regards,



Andrew P. O'Rourke
County Executive

AOR/jan

cc: Donald B. Davidoff, Director, Radiological Emergency Preparedness Group
James D. Papile, Radiological Emergency Preparedness Group
Michael McBride, Four-County Coordinator, Emergency Response Plan
Anthony Marasco, Director, Office of Disaster & Emergency Services
William A. Murphy, Westchester County Coordinator, Indian Point
Emergency Response Plan

The New York Times

Sunday, April 15, 1984

Evacuation Plan Attacked

By JOHN B. O'MAHONEY

PLANS for the evacuation of the 55,000 schoolchildren within a 10-mile radius of Indian Point in event of a nuclear accident there are still far from workable, according to a petition sent to the Nuclear Regulatory Commission on April 6 by the New York Public Interest Research Group and seven local community organizations. The petitioners have asked the commission to suspend the operating licenses of Indian Point Units 2 and 3 "until and unless" the problems with the evacuation plan can be resolved.

With the N.R.C. commissioners soon to conduct a final review of last October's decision to allow the Indian Point nuclear power plants to remain in operation — despite flaws in emergency evacuation plans — the petitioners have attempted to document claims they have made throughout the hearing process, to the effect that school-evacuation planning has been "negligent and irresponsible" from the start.

"This is a most critical stage in the proceedings," said the Public Interest Research Group spokesman, Kathleen Welch, referring to the upcoming decision that will close the special-inquiry process that began in September 1979 when the research group and the Union of Concerned Scientists first petitioned the N.R.C. to consider safety issues at Indian Point.

"The N.R.C. has made clear by its actions that it doesn't plan to enforce its own emergency-planning regulations; there are no teeth in them," Miss Welch said. "We are hopeful that this additional documentation will be compelling evidence that the

N.R.C. needs to take decisive action."

The petition is critical of the evacuation options now open to officials, charging that "very little in the way of guidance, instruction, policy decisions, planning criteria, training or financial resources have been provided by county, state or Federal officials, or by the utilities, to help school districts prepare to meet their obligations in the event of a nuclear emergency at Indian Point during school hours."

Copies of letters between Lieut. Gov. Alfred B. DelBello and County Executive Andrew P. O'Rourke, letters from area school board members and officials, and internal memorandums among State Education Department officials are attached to support the 21-page petition. What these materials document, according to Miss Welch, is that "planning is, indeed, chaotic, and that everyone is confused about how to implement the options available."

Claire Palermo, spokesman for County Executive O'Rourke, said of the plans: "Westchester County is not satisfied with them either." She added that the county had never accepted the plans as they are and that it was working to correct deficiencies in the plans that were first drawn up by consultants to the plant operators, Con Edison and the New York Power Authority.

Miss Palermo said that the county was "custom-designing plans for each school district," beginning with the Hendrick Hudson and Croton-Harmon school districts.

All three options now at the disposal of officials are inadequate, the petitioners argue, because school planners don't have the basic research data — demographics on

households; attitude surveys among parents, teachers and school staff and feasibility testing — necessary to formulate and conduct a successful evacuation.

The petition — in which the Public Interest Research Group is joined by such organizations as the School Task Force of the Alliance to Close Indian Point, Croton Parents Concerned About Indian Point, and the Greater Ossining Neighborhood Action Group — states: "School emergency planning is not a side issue. If residents of the communities surrounding Indian Point do not have great confidence that their children will be protected above all others during a radiological emergency, all other planned protective responses are doomed to collapse the moment that emergency occurs."

The three options are: sheltering students at the schools in case of occurring or imminent radiation release; evacuation to reception centers outside the 10-mile zone if an accident is expected to involve the rapid release of radiation; and early dismissal, or sending children home using ordinary early-dismissal procedures if an accident involves the slow release of radiation.

The Federal Emergency Management Agency is criticized in the petition for not identifying the school emergency planning as "significantly deficient."

A spokesman for Con Edison, the operator of Indian Point Unit 2, said that the utility was only responsible for on-site safety plans, and that the off-site plans were developed by the county and state. "We have supported the development of these plans and believe they are appropriate and workable," said Dan Walden, the spokesman. ■

THE CITIZEN REGISTER

Working on nuke evacuation plans nets more problems than solutions

By Jon Craig
Staff Writer

Nearly one year after a threatened shutdown of the Indian Point nuclear power plant, officials striving to improve emergency evacuation plans have uncovered more problems than solutions.

Still unresolved are the two major concerns that led the Nuclear Regulatory Commission to threaten to close the Buchanan reactors last May 5:

- A lack of training for Westchester County bus drivers who, under the county's plan, would then have to commit themselves to evacuate residents living within 10 miles of the plant.

- The absence of permanent emergency plans for Rockland County, which for the time being would have to rely on state and utility company officials to direct an evacuation during a serious accident.

"Clearly, if there's an accident, Westchester is not prepared, to say nothing of

New York City and its 8 million residents," said Rep. Richard L. Ottinger, D-Mamaroneck, chairman of the House Subcommittee on Energy, Conservation and Power, which has jurisdiction over the NRC.

Frank P. Petrone, regional director of the Federal Emergency Management Agency, which evaluates emergency plans for areas near nuclear reactors, declined to speculate how much both counties' evacuation plans may have been improved since the threatened shutdown. The only way to gauge the plans' reliability, he said, is to test them and the next major drill won't occur until at least November.

He said there is "reasonable assurance" that existing evacuation plans, upgraded in response to last year's shutdown threat, would work. But he added, "That doesn't mean we're assuring public health and safety."

Westchester County Executive Andrew P. O'Rourke, who has been directing de-

velopment of evacuation plans for Westchester, says his administration has taken significant steps to ensure the safety of the 130,000 residents living within the 10-mile zone. Those steps include an evacuation plan for school children that has become a national model for other communities with nuclear reactors.

"We are safer now than we were in the very beginning of this process," said O'Rourke, who called the county in "the forefront of nuclear preparedness in the United States."

Nevertheless, recent interviews with federal, state and county planners revealed that both counties' efforts to strengthen their evacuation plans have not progressed as quickly as the planners had hoped.

- Key officials disagree whether West

Please see **PLANS**
on page A13

chester County could protect in an emergency the 29,500 children attending schools within the 10-mile zone.

- A \$242,000 study to produce training manuals and detailed road maps for Westchester bus drivers to use in an evacuation is approximately three months behind schedule. The original maps were inaccurate but have since been corrected and improved.

- A list of potential bus drivers to use those maps is also several months behind schedule. Approximately 1,800 drivers from private companies were expected to have taken by March a required 12-hour course outlining their role in an emergency, ultimately resulting in about 500 volunteers. But only 40 drivers have taken the training.

Indian Point almost became the first commercial reactor to be shut down by federal officials for inadequate evacuation plans after a March 9, 1983, drill involving Westchester, Putnam, Rockland and Orange counties. All have sections within 10 miles of the reactors, the most densely populated area near a nuclear power plant in the country.

The drill, which underscored Westchester's problems with its bus drivers and Rockland's lack of an evacuation plan, led FEMA's Petrone to conclude last April: "FEMA cannot assure that public health and safety can be protected in the 10-mile emergency planning zone around Indian Point."

To avert a threatened June 9 shutdown, O'Rourke secured tentative agreements with three private bus companies. They agreed to provide up to 1,000 buses to evacuate 42,000 residents — including 29,500 school children — living within 10 miles of the plant who would be dependent on buses during an evacuation. And 1,050 drivers from the bus companies attended a two-hour orientation course on radiation.

Meanwhile, Rockland officials, who thought the evacuation plan being used by the four counties was inadequate, reluctantly agreed to let state and utility officials help develop a plan for them.

As a result, the NRC decided to keep the plant open pending results of an Aug. 23 drill in Westchester and an Aug. 24 drill in Rockland.

The August tests were judged a success by federal officials and on Oct. 3, the NRC voted unanimously to permit the reactors to remain open.

Since that time, officials such as Ottinger, Petrone and O'Rourke have admitted that Westchester's and Rockland's efforts to continue to improve their evacuation plans have slowed without the threat of a shutdown.

But O'Rourke insisted that the county is working "very hard" to upgrade its plans in time for the next four-county drill.

O'Rourke spokeswoman Claire Palermo blamed the early problems with evacuation maps for the fact that only 40 bus drivers have been trained so far. She predicted the county will have 500 fully trained drivers by the drill, a requirement for it to be deemed a success, according to Petrone.

But not all county officials think the 500 drivers will be ready in time for the fall drill.

"How in the hell are we going to train all these bus drivers? Who's going to pay for it?" wondered Robert Buckley, the county's radiological officer.

And Michael Sanders, principal planner in the county's transportation department, doubted drivers are "going to show up (for training) out of the own goodness of their hearts. Obviously somebody's going to have to pay."

Officials for Westchester, Rockland, and Consolidated Edison and the New York Power Authority, the two utilities which operate reactors at Indian Point, are expected to negotiate paying for the cost of the training.

But perhaps the most significant point of contention is whether Westchester County children attending schools within 10 miles of the plant can be evacuated or protected in an emergency. Such concern prompted the New York Public Interest Research Group, an organization opposed to nuclear power, to ask the NRC last month to shut the plant immediately.

Noting plans that look good on paper will not work in reality, NYPIRG's Joan Holt said, "They're making all these assumptions as if the accident is going to appear on a computer, as if they have a crystal ball."

Under O'Rourke's so-called "Go-Home" plan, which has become a model for other communities with nuclear reactors, school children would be sent home the same way they normally travel to and from school. There, they would be met by a parent or guardian who had been notified by school officials by telephone.

But if a massive radiation leak were imminent, students would be sheltered in their schools or, given enough time, evacuated by bus to reception centers, such as other schools, outside the 10-mile zone. "Hand-tailored" plans for each of the eight school districts within the 10-mile zone will be drawn up before the November drill, O'Rourke said.

Asked whether it might be impossible to telephone up to 30,000 parents or guardians, particularly if phone lines failed, O'Rourke said it was unlikely that all 75 schools would be dismissed at once. Some students could be kept at their schools, others could be evacuated by bus and still others sent home, he said. "We have a lot of options," he added.

But during a Dec. 14, 1983, drill of the "Go-Home" plan at the Blue Mountain Middle School in the Hendrick Hudson school system, 55 percent of parents were not home when county officials tried to call them.

Lt. Gov. Alfred B. DelBello, a former Westchester County executive who oversaw creation of the interim state evacuation plans for Rockland, said O'Rourke's confidence in Westchester's ability to protect school children during an emergency was misplaced.

DelBello said it was impractical to think that county officials could hope to safely send some students home, bring others to reception centers and be prepared to evacuate everyone else during a general evacuation.

"That's why parents are upset... Very simply, they (Westchester officials) are (deceiving) you because those plans don't work," said DelBello, who has grudgingly adopted O'Rourke's "Go-Home" plan for Rockland because he said it is the only alternative.

"I can answer any one of these problems with enough resources, with enough buses. But you can't buy 300 more school buses and let them sit there," DelBello said.

But O'Rourke insists that the county is moving toward an effective evacuation plan.

Indeed, vigorous lobbying by O'Rourke and Westchester police chiefs led to an \$853,365 state grant for sophisticated radio equipment that will enable county police departments to communicate with one another after the system is in place early next year. The state hopes to provide similar equipment to Rockland by the end of this year.

"I think we've made a lot of progress in the last year," said O'Rourke, who noted that the county now has 3,500 trained emergency workers, including state and county police, volunteer firefighters, health workers, highway crews and bus drivers.

"We are safer now than we were in the very beginning of the process," he said. "This takes an awful lot of time. There is always one other problem out there."

Even DelBello, after saying, "I hope nothing happens while kids are in school," admitted that evacuation plans for the four counties are "better than any other in the country."

ATTACHMENT H-1

The following three forms were submitted in March 1984 in response to a New York State Education Department survey. They are from the Ramapo Central School District, the East Ramapo Central School District, and the Clarkstown Central School District, all in Rockland County.

DISASTER PREPAREDNESS
QUESTIONNAIRE

The Education Department is interested in determining the extent to which emergency plans exist in local school districts. This questionnaire is designed to obtain a preliminary assessment of school emergency planning.

1. How many school districts fall within your jurisdiction?

2. How many of those districts already have or are currently in the process of developing disaster preparedness plans with county officials?

_____ Yes

3. How many school districts in your jurisdiction have detailed plans for the following protective actions:

- 1. school cancellation
- 2. early dismissal (go-home)
- 3. sheltering (retain students at school)
- 4. evacuation (remove student body to another location)
- 5. others (please list)

No

↓

4. How many school districts in your jurisdiction have detailed plans for responding to the following types of large scale emergencies (involves two or more schools):

- a. flood
- b. severe storm
- c. tornado
- d. earthquake
- e. explosion
- f. fire
- g. toxic spill
- h. radiological emergency

No

↓

DISASTER PREPAREDNESS
QUESTIONNAIRE

The Education Department is interested in determining the extent to which emergency plans exist in local school districts. This questionnaire is designed to obtain a preliminary assessment of school emergency planning.

1. How many school districts fall within your jurisdiction? _____
2. How many of those districts already have or are currently in the process of developing disaster preparedness plans with county officials? In Process
3. How many school districts in your jurisdiction have detailed plans for the following protective actions:
 1. school cancellation Yes
 2. early dismissal (go-home) Yes
 3. sheltering (retain students at school) No
 4. evacuation (remove student body to another location) No
 5. others (please list) _____

4. How many school districts in your jurisdiction have detailed plans for responding to the following types of large scale emergencies (involves two or more schools):
 - a. flood No
 - b. severe storm No
 - c. tornado No
 - d. earthquake No
 - e. explosion No
 - f. fire Yes
 - g. toxic spill No
 - h. radiological emergency No

Clarkstown

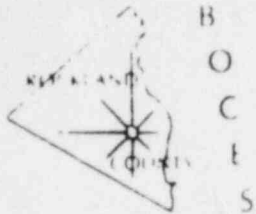
DISASTER PREPAREDNESS
QUESTIONNAIRE

✓

The Education Department is interested in determining the extent to which emergency plans exist in local school districts. This questionnaire is designed to obtain a preliminary assessment of school emergency planning.

1. How many school districts fall within your jurisdiction? _____
2. How many of those districts already have or are currently in the process of developing disaster preparedness plans with county officials? _____
3. How many school districts in your jurisdiction have detailed plans for the following protective actions:
 1. school cancellation _____
 2. early dismissal (go-home) _____
 3. sheltering (retain students at school) _____
 4. evacuation (remove student body to another location) _____
 5. others (please list) _____


4. How many school districts in your jurisdiction have detailed plans for responding to the following types of large scale emergencies (involves two or more schools):
 - a. flood _____
 - b. severe storm _____
 - c. tornado _____
 - d. earthquake _____
 - e. explosion _____
 - f. fire _____
 - g. toxic spill _____
 - h. radiological emergency _____



INTER-OFFICE COMMUNICATION

DATE: August 2, 1983

TO: Patrick Carlo
Joseph Gibson
James Stowell

FROM: Leonard R. Scharf 

RE: Emergency Go-Home Dismissal Plan

According to the structure of the County Emergency Response Plan involving the school districts, the main element appears to be each individual district's "Go Home Plan." It is absolutely essential that such a plan be in place and designed for maximum effectiveness.

I would appreciate it if you would review the plan or plans that presently are in effect involving BOCES students and staff and make any necessary revisions that you feel are appropriate.

As you know, there is a meeting scheduled for Tuesday, August 23rd, at 10:30 A.M., to be held in building #3 with representatives from the State. I would appreciate it if you would get a copy of the plan which will be in effect for 1983-84 to me no later than Friday, August 19.

LRS:ncw

cc: Lowell Smith
Robin Wilkins

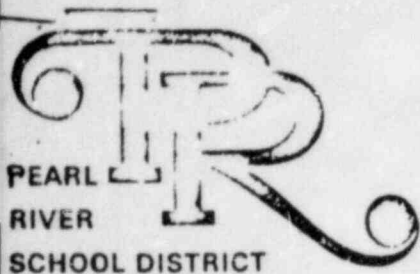
LRS1-B03

1/4/84

Nuclear Emergency ResponseSchool Execs.

1. Send-home, no phone, safe haven.
2. Some use phone - hold children if no contact.
3. Emergency cards for whom to go to in event of no ~~at~~ parents at home.
4. Development of alternative places for students to go.
 - a. Home
 - b. Alternative location
 - c. Some other place
5. Components in letter to community
 - a. Plan in place
 - b. State direction
 - c. Cooperation
6. Just "go home". We shouldn't need to bother with "shelter" & "evacuation"
7. Some districts will send out letters w/i month or so.
8. Not to be a common letter in the county.
9. Our November 1983 "Your Schools" article is tantamount to a letter (?)

NOTE - The above hand-written notes are those of Dr. Ticknor B. Litchfield, Assistant Superintendent of the Ramapo Central School District. They were taken at a meeting of "School Execs." January 4, 1984. See, especially, item 6.



ATTACHMENT H-4

ADMINISTRATIVE OFFICES
37 Franklin Avenue
Pearl River, New York 10965
Phone: (914) 735-4091

Arthur R. Williamson
Superintendent

August 23, 1983

Fellow Educator: .

It is the responsibility of the local public school superintendent to provide you with information concerning the Radiological Emergency Response Plan.

Attached is a memo from Brian Walsh of the State Education Department who is coordinating the activities of schools with other public officials. You will be receiving further information on the procedures. This is merely the preliminary plan. Since radiological emergencies usually develop slowly, it is apparent that the non-public schools need to be concerned only about the first alert which is the "go-home" plan.

I have been advised that it is my responsibility to forward this directive from State officials. You will be also advised of an alert through the hierarchy for your organization. I must advise you, however, that the directive coming through the local superintendent from the State (or county) authority must be responded to without delay.

If you have further questions, feel free to contact Dr. Salvatore Sansone, who is coordinating this program for the Pearl River School District, myself, or Mr. Walsh of the State Education Department.

Best wishes as you begin your 1983-84 school year.

Sincerely yours,

Arthur R. Williamson
Superintendent of Schools

TO: Board of Education
FROM: Dr. Everhart
DATE: January 27, 1984
RE: Parent Meetings on "Go Home" Plan

In keeping with your verbal commitments, you have been scheduled to attend meetings as follows:

Tuesday, February 7 - Mrs. Gunby
Mr. Julian
Mr. Johnson
Mr. Cavallo
Mrs. Nardi
Mrs. Roper

Wednesday, February 8 - Mrs. Gunby
Mr. Julian
Mr. Johnson
Mr. Cavallo

Monday, February 13 - Mrs. Gunby
Mr. Julian
Mr. Johnson
Mrs. Nardi
Mrs. Roper
Mr. Reiner

It is important to keep in mind that our objective in all of these meetings is to hear the concerns/issues that parents think should be taken into consideration in the refinement and extension of our "Go Home Plan." Since we do not have all the answers and solutions and since some want only to debate the merits of any proposed solutions, it might be best just to listen and record issues.

Concerns Expressed-to-Date

1. Athletes and other students on trips
2. Special Education students (BOCES and other schools)
3. BOCES (occupational education students)
4. Private schools (attending out of district/county)
(attending in our district but residing elsewhere)
5. Supervision/provision for "latchkey" children
6. Work to educate parents (offer assistance)
 - (a) involve P.T.A.'s
 - (b) get volunteers for "safe" homes (located in neighborhoods)
7. Get parents to assume responsibility for welfare of children

8. Restrict delivery of children to regular bus stops (no changes in drop-offs)
9. Telephone parents of "latchkey program" children and children attending school out of their attendance areas.
10. When plan is complete:
 - (a) send simple brochure explaining plan to parents
 - (b) include "checklist" of 4/5 essential rules for children to follow
11. "Safe" home program should not be abused.
12. Have only "one plan"; one name ie. "Go Home Plan."
13. District is not prepared/equipped to deal with the issue of sheltering other than short term sheltering under Civil Defense procedures.
14. Keep the plan simple - merely an extension of the existing plan. The only additions would be:
 - (a) the "Safe" home for the children who may not find parents at home
 - (b) the offer to assist parents in setting up "Safe" homes (provision of decals, school staff to help organize)
 - (c) the offer to help make parents more aware of their responsibilities for caring for their own children in event of an emergency.

AGE/cd

RAMAPO CENTRAL SCHOOL DISTRICT
Hillburn, New York

January 9, 1981

Information
about
SINGLE-PARENT FAMILIES AND IMPACT UPON SCHOOLS

It has become increasingly evident over the past several years in our school district and throughout the nation that more children are attending schools who come from single-parent families, as well as from families which have both parents working. The implications for the schools and the impact upon program and services are apparent. It is important that we as a school district give attention to these phenomena and address problems and situations which might arise as a result.

During the fall of 1980, a short survey was completed by the elementary classroom teachers in the school district to determine the number of students in single-parent families and with both parents working. A copy of the survey form used is attached along with the results by primary and intermediate grade level and school.

Also enclosed for information are several articles related to the schools and single-parent families. This information should serve as a catalyst for discussion about this important issue.

T. B. Litchfield

Based upon these data from study, it may be inferred that:

1. 45 to 55 % of students are from homes in which both parents work.
2. 10 to 20 % of students live in single-parent homes

NOTE - the above hand-written notes appear on the document supplied to NYPIRG; they are not ours.

ROCKLAND COUNCIL FOR YOUNG CHILDREN, INC.

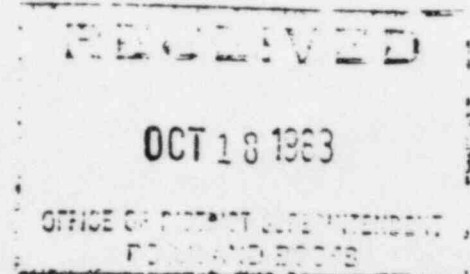


185 NORTH MAIN STREET, SPRING VALLEY, NEW YORK 10977

(914) 425-0009

Executive Director
PHYLLIS HILBRAUN

October 14, 1983



Dr. Anthony Campo
District Superintendent of Schools
The University of the State of New York
61 Parrott Road
West Nyack, NY 10994

Dear Dr. Campo:

We have received a copy of Brian P. Walsh's memo of August 15, 1983 to All School Officials in Rockland County regarding New York State Radiological Emergency Response Interim Plan, etc. Enclosed is a copy of our most recent Directory of Preschool Facilities for your use in determining which preschools are in the 10-mile zone.

Day Care and Nursery School Directors have asked me to convey some of their concerns.

The first has to do with the use of telephones. Almost all preschools have only one phone number. A GO HOME Plan for preschool children involves the extensive use of the telephone. In addition, there would be the unplanned use of phones by parents. The school phones would be jammed. Can the local switchboards really accommodate each school Plan? The telephone network includes preschools outside the 10-mile zone. Why, - given the phone problem?

GO HOME - Day Care and Nurseries do have emergency family numbers. However, they do not automatically send children home in the event of snowstorms, etc., because most parents of preschoolers are working. Preschoolers cannot be sent to empty, locked homes. Therefore, many preschools in snow emergencies remain open with some staff members on hand until parents arrive, or until the end of the workday.

SHELTER - Most Day Care Centers and Preschools are housed in churches, and renovated school and public buildings. Some of them are not adequate for use as Shelters, and have other uses during the day. Plans for their proper use must be developed with the individuals who own or are responsible for the buildings.

EVACUATION - We understand that the school districts are responsible for Evacuation. The Preschool Directors are very concerned about its traumatic impact on tots. Evacuation to a Reception Center, without staff members, is emotionally damaging.

BOARD OF DIRECTORS: Sheila Abramowitz, Jewish Community Center Nursery School • Francine Apotheker, Consumer • Phyllis Brunson, Community Playgroup, Piermont • Gwen Canfield, National Council of Jewish Women • Christina Carver-Pratt, National Association of Social Workers • Fawne Clay, Leitchworth Clinic • Arlene Chinkscale, Superintendent, Nyack School District • Kathleen DiLiso, New York Telephone • Ellen Gainsky, Bank Street College • Kathi Gardner, Public Relations • Inbv Cersony, Ramaquois Country Day School • Maureen Haberer, Rockland Community College • Harriet Kestin, Secretary, Licensed Family Day Care Mother • Roberta Klingher, Mental Health Association • Jill Lagnado, Nuneen School Teacher • Pauline McDermott, Community Representative • Ann Meckler, Grants Coordinator, Ramapo College • Alberia Mehr, NOW, Elementary School Teacher • Joan Orazio, Treasurer, Gary Goldberg & Co., Vice President • Ann Ostroff, Psychologist / Lee Ostroff, Dentist • Ronald Priskie, Vice President, Nanuet National Bank • Irma Ramirez, HEP Day Care Center • Audrie Reichter, Cricket Town Nuneen School • Marselle Rogers, President, Inter-Community Relations Council • Marcia Scheer, Early Childhood Consultant • Marian Schlachter, West Point Preschool • Hon. Bernard Stanger, Family Court • Adelaide Stella, Vice President, Director, Suffern YMCA • Ted Wolf, North American Group.

contact agency of ROCKLAND COMMUNITY COLLEGE

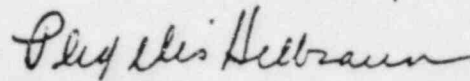
Dr. Anthony Campo

October 14, 1983

For Day Care and Nursery Directors there is an additional responsibility to the parents. Children do not have to attend these schools; this is no law that says they must. These are private enterprises, and the parents are more turned into policy and decision making because they have a choice in where they place their children. All the above steps must be explained to them, and we are suggesting an Informational Meeting for December 5, 1983, 8:00 P.M., at the Fire Training Site.

We must be sure that the plans which are projected for children under five years are do-able, practical, and protect the special needs of this young population.

Sincerely yours,



Phyllis Helbraun
Executive Director

PH:gr
encl.

cc: Herb Reisman
Judy Kessler
Mort Trachtenbroit
Don McGuire

NYACK PUBLIC SCHOOLS

Arlene W. Clinkscale, *Superintendent*
John L. McDowell, *Assistant Superintendent*
Roberta R. Zampolin, *District Treasurer*

AMENDMENT TO RADIOLOGICAL EMERGENCY RESPONSE PROCEDURES FOR NYACK UNION FREE SCHOOL DISTRICT:

The Board of Education of the Nyack Union Free School District amended this plan and deleted the necessity of calling parents at the K-6 level before releasing students.

ATTACHMENT J-2

RAMAPO CENTRAL SCHOOL DISTRICT
MOUNTAIN AVENUE
HILLBURN, NEW YORK 10931

Tentative

OFFICE OF THE
SUPERINTENDENT

January, 1984

Dear Parent:

Because there are so many instances of homes with no adult there during school hours, school officials try very hard to avoid early school dismissals or other instances of sending students home at unexpected times. However, there is always the risk of unforeseen circumstances, such as snow storms or power failures, forcing early school closings. The possibility of a radiological emergency at the Indian Point power plant, as described recently by state and local officials, is another situation in which early school dismissal might be required.

Because of the possibility, regardless of how small it may be, that students might need to be sent home at times other than regular dismissal hours, parents should make appropriate plans. The essential element for parents in this planning is to have an arrangement with a neighbor or friend who is at home during school hours and who is willing to care for your child until a parent arrives home. We suggest that the designated person be someone to whose home your child can easily and safely walk from his or her bus stop. Parents should instruct and frequently remind their children of who that designated person is; school records do not and need not include this information.

In the event of an early school dismissal, regardless of the reason, students will be brought to their regular bus stops by school buses. If weather, road, or other conditions make it unsafe for students to walk from their school bus to their home, they will not be permitted to leave the bus; in such cases youngsters will be brought back to the school principal and parents or emergency contact persons will be notified by telephone.

In the event that it is necessary to send children home from school early, district officials will notify local radio stations in order that public announcements may be aired. You may listen for emergency announcements on these radio stations:

WRKL-AM	910	New City	WALL-AM	1340	FM 92.7	Middletown
WGRC-AM	1300	Nanuet	WFAS-AM	1230		White Plains

We will also seek the assistance of local and area shopping centers to request that public announcements be made at those facilities. School principals and bus drivers will remind children that they are to proceed to the home to which they have been instructed to go by their parents.

Because of the possible confusion and potential for limited supervision of students at home in the event of an early school closing, district officials will make every effort to avoid implementing this action. However, since it is always a possibility, we strongly encourage parents to make plans ahead of time.

NOTE - please note that the words

Sincerely yours,

"parents or emergency contact persons will be notified by telephone" above in this "tentative" letter were deleted from

the article in the newsletter which is what was actually sent to parents. Ticknor B. Litchfield
Acting Superintendent of Schools

RAMAPO CENTRAL SCHOOL DISTRICT
MOUNTAIN AVENUE
HILLBURN, NEW YORK 10931

OFFICE OF THE
SUPERINTENDENT

February 2, 1984

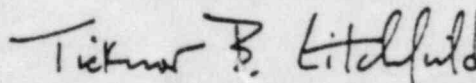
Mr. Zacharie Gordon
Lt. Governor's Office
99 Church Street
White Plains, New York 10601

Dear Mr. Gordon:

Enclosed is a copy of the November edition of "Your Schools," our periodic newsletter. Please note the article on the next to last page entitled, "Plan Ahead for Possible Emergency Dismissal." This article has served in lieu of a letter to parents. The newsletter is sent to all district residents.

I am sending this to you at the request of Dr. Campo.

Sincerely yours,



Ticknor B. Litchfield
Acting Superintendent of Schools

mtm
Enclosure
Copy to:
Dr. Campo

3. Request a change in the records where there is a question about the accuracy of a fact. Hearing procedures exist for requesting changes if disagreements exist regarding the accuracy of a fact.

4. File complaints with the Family Education Rights and Privacy Act Office, Department of Education, Washington, D. C.

Plan Ahead For Possible Emergency Dismissal....

Because there are so many instances of homes with no adult there during school hours, school officials try very hard to avoid early school dismissals or other instances of sending students home at unexpected times. However, there is always the risk of unforeseen circumstances, such as snow storms or power failures, forcing early school closings. The possibility of a radiological emergency at the Indian Point power plant, as described recently by state and local officials, is another situation in which early school dismissal might be required.

Because of the possibility, regardless of how small it may be, that students might need to be sent home at times other than regular dismissal hours, parents and resi-



District Director of Libraries Clair Burgeson, Sloatsburg librarian Anne Clark, District Director of Computers Ron Gindick and Sloatsburg students display the winning entries in the district-wide contest to design covers for the elementary school computer handbooks. All three winning designs were submitted by Sloatsburg School students.



Montebello School sixth graders make use of the school's tire playground while supervised by physical education teacher Michael Waples and sixth-grade teacher William Malone.

dents should make appropriate plans. The essential element in this planning for parents is to have an arrangement with a neighbor or friend who is at home during school hours and who would be willing to care for your child until a parent arrives home. We suggest that the designated person be someone to whose home your child can easily and safely walk from his or her bus stop. Parents should instruct and remind their children of who that designated person is; school records do not and need not include this information.

In the event of an early school dismissal, regardless of the reason, students will be brought to their regular bus stops by school buses. If weather, road, or other conditions make it unsafe for students to walk from their school bus to their home, they will not be permitted to leave the bus; in such cases youngsters will be brought back to the school principal.

In the event that it is necessary to send children home from school early, district officials will notify local radio stations in order that public announcements may be aired. We will also seek the assistance of local and area shopping centers to request that public announcements be made at those facilities. School principals will remind children that they are to proceed to the home to which they have been instructed to go by their parents. (continued on the next page)

Plan Ahead (Con't)

Because of the possible confusion and potential for limited supervision of students at home in the event of an early school closing, district officials will make every effort to avoid implementing this action. However, since it is always a possibility, we strongly encourage parents to make plans ahead of time.

Search Continues For New School Superintendent....

The School Board's search for a new superintendent of schools continues this fall, and Board of Education members hope that the process will be completed by shortly after the first of the year. Dr. Ticknor B. Litchfield, Assistant Superintendent for Curriculum, is serving as acting superintendent until a new superintendent of schools is employed.

The School Board is using a team of three consultants, headed by Dr. Robert W. Heller of Buffalo, New York, to assist in the selection of a new superintendent. Through advertising and contacts with educational institutions, the consulting team attracted well over 100 applicants for the job in Ramapo.

The search process calls for the consultants to screen and speak to the applicants

and present our School Board with a slate of three to six of the candidates best meeting the criteria established by the Board of Education. School Board members will interview the individuals selected by the consultants and any applicants from the current district staff. From that group the School Board will select one or two finalists who will visit our schools and meet members of our community and staff. Shortly thereafter, the Board of Education will make its final selection of a new superintendent, with that person starting work in the district as soon as possible.



These Cypress Road School first-grade students are checking books out during their trip to the Suffern Free Library.

Your Schools

EDITOR - WILLIAM A. LATHROP

RAMAPO CENTRAL SCHOOL DISTRICT

Hillburn, New York 10931

U. S. POSTAGE

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Permit No. 59

Suffern, N.Y.

NON-PROFIT ORGANIZATION

NANUET PUBLIC SCHOOLS

Administrative Offices 24 HIGHVIEW AVENUE NANUET, N.Y. 10954 PHONE (914) 623-1430

LAURA R. FLIEGNER
Superintendent of Schools

March 15, 1984

Dear Parents,

Because weather emergencies or other natural or human-created disasters may threaten student safety, each school district is required to have plans for an emergency dismissal. As part of New York's "State Radiological Emergency Preparedness Plan" schools may be ordered to utilize these emergency dismissal plans in the event of a radiological mishap.

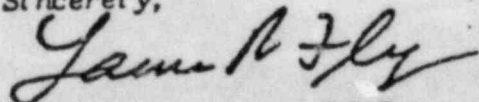
As school officials, we have no more say in the operation of nuclear plants than we do in the face of hurricanes or floods; we must stand prepared to obey the law and use our best efforts to ensure the safety of our youngsters in case of a civil emergency. If we receive the "automatic dismissal" order from the Lieutenant-Governor or his designee, the dismissal plan will be as follows: we shall make every effort to transport your child to his/her return bus stop. (Walkers will follow their regular procedures.) It is very important that you establish with your youngster(s) the location of a friend, neighbor or relative near your own home or near the home where your child is usually dismissed in which your child(ren) may find a "safe-haven" if your own home is empty or cannot be entered. Neighbors working together may want to establish 2 or 3 homes on any one street where children may stay until the return of their parents. After establishing the location of your preferred "safe-haven" with your youngster(s), be sure to remind him/her periodically of that choice to keep it fresh in mind.

If you have any questions regarding our dismissal plan, please contact your building principal.

George W. Miller Elementary School	- Mr. Peter Smith	- 623-8570
A. MacArthur Barr Middle School	- Mr. Frank Rizzuto	- 623-1266
Nanuet Senior High School	- Mr. John Burke	- 623-1667

Let us continue to work together to make the best decisions regarding our students' health, safety and education.

Sincerely,



Laura R. Fliegner, Ed.D.
Superintendent of Schools

rd

(Document supplied by Rockland Board of Cooperative Educational Services)

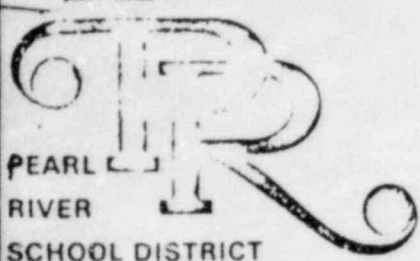
DRAFT

TO: ALL PARENTS OF STUDENTS ATTENDING KAPLAN AND LINCOLN SCHOOLS

DEAR PARENTS:

Rockland County, under the direction of the Governor, has a responsibility to develop an Emergency Response Plan in the event of a radiology emergency coming from Indian Point. A portion of this plan calls for Go Home procedures. A Go Home procedure is no more than sending students home earlier than the normal dismissal time. If a Go Home plan is put into effect, the various radio and television media will broadcast these activities. It is therefore incumbent upon you to be sure that an adult is available at the home to meet your returning child. If no one will be at the home when an early dismissal is held, please contact your child's teacher to inform them as to where your child should be left off the bus. In addition to identifying the place you should identify which adult will then be responsible for your child.

It is possible that during the month of October a Go Home drill will be held. In the event that this drill will be held, we will let you know prior to the date it is being held to assure that somebody will be there to meet your child. If you have any questions concerning this, please contact your child's Principal. If your child attends the Kaplan School, the Principal is Mr. Reginald Warren. Mr. Warren can be contacted at 623-3828. If your child attends the Lincoln Alternative Learning Center, please contact Mr. John Moore. Mr. Moore's phone number is 735-5056.



ATTACHMENT L

ADMINISTRATIVE OFFICES
37 Franklin Avenue
Pearl River, New York 10965
Phone:: (914) 735-4091

Arthur R. Williamson
Superintendent

August 23, 1983

Fellow Educator:

It is the responsibility of the local public school superintendent to provide you with information concerning the Radiological Emergency Response Plan.

Attached is a memo from Brian Walsh of the State Education Department who is coordinating the activities of schools with other public officials. You will be receiving further information on the procedures. This is merely the preliminary plan. Since radiological emergencies usually develop slowly, it is apparent that the non-public schools need to be concerned only about the first alert which is the "go-home" plan.

I have been advised that it is my responsibility to forward this directive from State officials. You will be also advised of an alert through the hierarchy for your organization. I must advise you, however, that the directive coming through the local superintendent from the State (or county) authority must be responded to without delay.

If you have further questions, feel free to contact Dr. Salvatore Sansone, who is coordinating this program for the Pearl River School District, myself, or Mr. Walsh of the State Education Department.

Best wishes as you begin your 1983-84 school year.

Sincerely yours,

Arthur R. Williamson
Superintendent of Schools

EMERGENCY SHELTERING

GENERAL INSTRUCTIONS

The purpose of SHELTERING is to insure that all staff and students remain inside the school building. During SHELTERING, windows and draperies should be closed and ventilation systems should be shut down; ingestion of food and water should be prohibited.

1. Sound AIR RAID SHELTERING signal.
2. Children and teachers will respond for the normal AIR SHELTER DRILL.
3. Close all windows, doors and curtains.
4. Custodians will turn off all ventilation systems and put up curtains in multi-purpose room.
5. Upon verbal directions teachers will take children to the following assigned areas.

KINDERGARTEN AND GRADE 1 - Cafeteria

GRADES 2 AND 3 - Boys Gym

GRADES 4 AND 5 - Girls Gym

6. Teachers are to have children sit quietly in their assigned areas and wait for further instructions.

(Stony Point Elementary School,
North Rockland Central School
District, 9/83)

SHELTERING OF STUDENTS

The signal for sheltering students will be the intermittent buzzing on the P. A. system.

During a sheltering drill, all students vacate the classrooms and line up by the classrooms in the hallways. All doors and windows should be closed.

If a shelter drill occurs during lunch hours, students and teachers* in the lunch rooms and on the playground are to return to their homerooms immediately and follow procedure outlined in paragraph two above.

Should the drill be of long duration, students may sit on the floor.

The all-clear signal will be a continuous buzzing on the P. A. system.

Students are to be supervised by teachers throughout the drill.

*Monitors on duty at this time will also assist in supervising students after returning them to the homerooms.



NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

9 Murray Street • New York, N.Y. 10007
(212) 349-6460

Offices in: Albany, Binghamton, Buffalo, Cortland, Fredonia, Long Island, New Paltz, New York City, Niagara Falls, Syracuse, Utica

April 2, 1984

Dr. Richard Savio
Senior Staff Engineer
Advisory Committee on Reactor Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Savio,

Thank you for clarifying for me the role of the ACRS with regard to Indian Point. Naturally, I would prefer to see the ACRS take an active interest in emergency planning at Indian Point, if for no other reason than to assess any assumptions, implicit or explicit, in the PRA regarding consequence mitigation as a function of emergency response capability and effectiveness.

Short of a comprehensive examination of emergency planning and preparedness, I would like to request that the ACRS consider the following question:

Given operational definitions of the "Alert" stage and examples of initiating conditions such as those appearing in NUREG-0654 (attached), during the Alert stage of an emergency does the operator have the capability to accurately predict the severity and speed of any and all developing accidents?

1. Background. During the course of the ASLB hearings on emergency planning and preparedness at Indian Point, considerable testimony was submitted regarding plans to evacuate children directly from their schools to "reception centers" outside the EPZ (Emergency Planning Zone) should an accident occur during school hours. For example, evidence was presented about the insufficient number of buses and drivers available in Westchester and Rockland Counties to evacuate over 50,000 school children in fewer than two, and in some districts three, bus runs.

Mid-way through the ASLB inquiry, Westchester County Executive Andrew O'Rourke put forth his "solution" to problems relating to evacuation of school children. In testimony before the Board on March 24, 1983, Mr. O'Rourke described his Early Dismissal Plan (otherwise known as the "Go Home" or "O'Rourke" plan):

"Instead of waiting until an evacuation order for the general populace, school children will be sent home during the alert stage, or the beginning stages of any potentially serious accident at Indian Point."

--Transcript, p. 2, following p. 11520

In brief, when first announced the early dismissal plan was as follows:

- ** All schools in the 10-mile EPZ around Indian Point would be notified of any developing accident at the Alert stage, two stages prior to the General Emergency stage
- ** Schools would immediately begin early dismissal procedures, calling in buses and drivers

2. The current situation. Subsequent to the close of the ASLB hearings, further information about revised plans for the protection of school children gradually came to light. As questions were raised by parents, school administrators, reporters and others details emerged which revealed that proposed school plans were far more complicated than previously indicated.

It now appears that early dismissal is not THE plan, but rather one of three sets of response options schools are expected to be prepared to implement when an emergency at the plant reaches the Alert stage.

1. Sheltering - if a radiation release is occurring or imminent children are to be sheltered in school.
2. Evacuation - if the accident is expected to be fast-moving children are to be evacuated (according to the original two or three wave bus plan) from school to reception centers outside the EPZ.
3. Early Dismissal - if the accident is predicted to be slow-moving children are to be sent home early.

Though it has generally been stated that the choice of procedure will be communicated as an order from the County Executive to School District Superintendents, this and other details are currently unclear. Materials obtained by NYPIRG through Freedom of Information requests reveal that there is considerable on-going debate among officials about responsibilities and procedures for (a) decisions, (b) school and bus notification, (c) parental information and notification, (d) insurance, cost, and other liabilities, and (e) legal matters relating to staffing, use of school buildings and vehicles, etc. Indeed, it is apparent that much remains to be worked out before schools will be prepared to implement any of the above options smoothly or effectively.

These issues, as vital as they are, go beyond the specific question we are asking the ACRS to consider at this time, namely, the capability of the operator to assess at the Alert stage the severity and speed of a developing accident.

3. Significance. NYPIRG maintains that the significance of this question bears not merely on the ability of officials to select the response option which will best guarantee protection of school children, though clearly that is a sufficient basis for concern. The fact is that the potential effectiveness of the entire Radiological Emergency Response Plan for Indian Point is at stake, since the response option selected for the schools will directly affect the subsequent measures undertaken for the general population.

Consider the following:

The school response (sheltering, evacuation, or dismissal) may have to be selected and initiated prior to full activation of the County EOC (Emergency Operation Center), prior to mobilization and dispatching of emergency personnel, prior to the sounding of sirens, and thus prior to the first emergency broadcast messages.

The school response will serve as a trigger, setting in motion a chain of events and creating a set of conditions that will affect all subsequent emergency measures: notification of the population (the children will, in effect, be the sirens), use of the phone system and the ability to muster emergency personnel, traffic patterns in and out of the EPZ, availability of buses, and so on.

If early dismissal procedures are undertaken, parental notification will require a minimum of 50,000 to 75,000 phone calls and possibly two to three times that number (in a recent phone survey conducted during a drill by Westchester County, there was no adult present in 53% of the homes called). Within minutes, parents calling spouses, schools, neighbors, and the police will put additional strain on local phone systems, inadequate under normal circumstances. This fact alone will severely impact on the ability to mobilize the region's emergency forces needed to implement the full range of protective measures for the general population. Furthermore, many parents will take to the roads to pick up their walking children (only those normally bused to school will be bused home) or begin self-evacuation out of the area. Other parents will create traffic into the EPZ as they attempt to get home to their children from work locations outside the zone.

If it is decided to shelter children in their schools, parents are not likely to stay away. Whether they are inside the EPZ (presumably being instructed either to evacuate or to stay indoors) or outside it, many parents are going to attempt to reach their children and then to evacuate with them. Traffic will be affected into and out of the EPZ, most severely around the schools themselves. Phone systems will be overwhelmed as above with the same consequences.

If it is decided to evacuate children to reception centers, immediately or following an initial period of sheltering, all the difficulties which led to consideration of the Early Dismissal Plan in the first place will come into play. Most importantly, because buses are in such scarce supply, two or three trips will have to be made to get all the school children out before buses become available to evacuate other transportation-dependent segments of the population (the mobility-impaired, people without cars, etc.).

Put simply, the choice of response option for the schools (sheltering, evacuation, or dismissal) will set everything else in motion. And because that choice must be made on the basis of information provided at the Alert stage to State and County officials by the plant operators, everything depends on the technical capability of the plant operators to correctly assess--at the Alert stage--the nature of the accident and to accurately predict its course, severity, and speed. NYPIRG's question to the ACRS is what is that capability?

Respectfully,

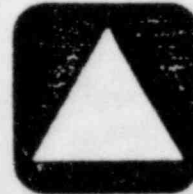
— Joan Holt, Project Director .

Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

U.S. Nuclear Regulatory
Commission



Federal Emergency Management
Agency



Class

ALERT

Class Description

Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any releases expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

Purpose

Purpose of offsite alert is to (1) assure that emergency personnel are readily available to respond if situation becomes more serious or to perform confirmatory radiation monitoring if required, and (2) provide offsite authorities current status information.

Licensee Actions

1. Promptly inform State and/or local authorities of alert status and reason for alert as soon as discovered
2. Augment resources and activate on-site Technical Support Center and on-site operational support center. Bring Emergency Operations Facility (EOF) and other key emergency personnel to standby status
3. Assess and respond
4. Dispatch on-site monitoring teams and associated communications
5. Provide periodic plant status updates to offsite authorities (at least every 15 minutes)
6. Provide periodic meteorological assessments to offsite authorities and, if any releases are occurring, dose estimates for actual releases
7. Escalate to a more severe class, if appropriate
8. Close out or recommend reduction in emergency class by verbal summary to offsite authorities, followed by written summary within 8 hours of closeout or class reduction

State and/or Local Offsite Authority Actions

1. Provide fire or security assistance if requested
2. Augment resources and bring primary response centers and EBS to standby status
3. Alert to standby status key emergency personnel including monitoring teams and associated communications
4. Provide confirmatory offsite radiation monitoring and ingestion pathway dose projections if actual releases substantially exceed technical specification limits
5. Escalate to a more severe class, if appropriate
6. Maintain alert status until verbal closeout or reduction of emergency class

EXAMPLE INITIATING CONDITIONS: ALERT

1. Severe loss of fuel cladding
 - a. High offgas at BWR air ejector monitor (greater than 5 ci/sec; corresponding to 16 isotopes decayed 30 minutes)
 - b. Very high coolant activity sample (e.g., 300 uci/cc equivalent of I-131)
 - c. Failed fuel monitor (PWR) indicates increase greater than 1% fuel failures within 30 minutes or 5% total fuel failures.
2. Rapid gross failure of one steam generator tube with loss of offsite power
3. Rapid failure of steam generator tubes (e.g., several hundred gpm primary to secondary leak rate)
4. Steam line break with significant (e.g., greater than 10 gpm) primary to secondary leak rate (PWR) or MSIV malfunction causing leakage (BWR)
5. Primary coolant leak rate greater than 50 gpm
6. Radiation levels or airborne contamination which indicate a severe degradation in the control of radioactive materials (e.g., increase of factor of 1000 in direct radiation readings within facility)
7. Loss of offsite power and loss of all onsite AC power (see Site Area Emergency for extended loss)
8. Loss of all onsite DC power (See Site Area Emergency for extended loss)
9. Coolant pump seizure leading to fuel failure
10. Complete loss of any function needed for plant cold shutdown
11. Failure of the reactor protection system to initiate and complete a scram which brings the reactor subcritical
12. Fuel damage accident with release of radioactivity to containment or fuel handling building
13. Fire potentially affecting safety systems
14. Most or all alarms (annunciators) lost
15. Radiological effluents greater than 10 times technical specification instantaneous limits (an instantaneous rate which, if continued over 2 hours, would result in about 1 mr at the site boundary under average meteorological conditions)
16. Ongoing security compromise

17. Severe natural phenomena being experienced or projected
 - a. Earthquake greater than OBE levels
 - b. Flood, low water, tsunami, hurricane surge, seiche near design levels
 - c. Any tornado striking facility
 - d. Hurricane winds near design basis level
18. Other hazards being experienced or projected
 - a. Aircraft crash on facility
 - b. Missile impacts from whatever source on facility
 - c. Known explosion damage to facility affecting plant operation
 - d. Entry into facility environs of uncontrolled toxic or flammable gases
 - e. Turbine failure causing casing penetration
19. Other plant conditions exist that warrant precautionary activation of technical support center and placing near-site Emergency Operations Facility and other key emergency personnel on standby
20. Evacuation of control room anticipated or required with control of shutdown systems established from local stations