Owen J. Roberts School District

Administration Building
R.D. 1, Pottstown, Pennsylvania 19464
Telephone (215) 469-6261

June 27, 1984

Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Incomplete Inadequate Nuclear Evacuation Plan For The Owen J. Roberts School District Within The Limerick Nuclear Planning Area

Dear Sir:

Nineteen (19) months ago the Owen J. Roberts School District established a Citizens' Task Force for the purpose of the development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency at the Limerick nuclear facility.

This Citizens' Task Force is comprised of representatives from the seven (7) townships comprising the School District; township supervisors; NORCO Fire Company; Technical School; employee union representatives from custodial, secretarial, teachers. and cafeteria; parent representatives from all of our schools; and a number of concerned citizens. All of the task force meetings have been advertised in the local newspapers and open to the general public.

On June 6, 1984, the School Board held an open forum on the status of the nuclear evacuation plan. This meeting was widely advertised in the local media.

The Citizens' Task Force presented its status report which, in summary, states they have identified the human and other resources needed for an evacuation; the actual available resources on hand; the unmet needs; and the alarming fact that the County Department of Emergency Services has not been able to meet any of the identified unmet needs.

The Task Force made the following recommendation to the Board of School Directors. "We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency."

Citizens were then given an opportunity to comment on the status of the evacuation plan and to give additional input. Between two and one-half (2 1/2) and three (3) hours of testimony was received by the Board of School Directors. A summation of the input revealed unanimous agreement by all present to the following: the identified human and other resources needed for a nuclear evacuation as presented are real; the calculations and procedures identified by the task force over a nineteen (19) month period to identify unmet needs are valid; and, the School District must look beyond the county to both state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

I am attaching a copy of the testimony presented by the Citizens' Task Force and also by my office.

We solicit your aid in notifying all governmental agencies of our unmet needs and the serious deficiencies in the overall master plan for a general nuclear evacuation for the citizens and children of this School District.

Both members of the Citizens' Task Force and I are prepared to give testimony on this most serious matter.

Your immediate attention and response will be appreciated.

Respectfully,

Roy C. Claypool, Ed.D.
District Superintendent

Attachment
/ho

OWEN J. ROBERTS SCHOOL DISTRICT
R.D. #1, POTTSTOWN, PA. 19464

TO: Board of School Directors
Owen J. Roberts School District

FROM: Citizens Task Force for Development of School Emergency Planning Guidelines

Joseph Clark

RE: Interim Progress Report on Development of Emergency Radiological Response Plan

DATE: June 5, 1984

This communication will inform you of the current status of the development of the Radiological Emergency Response Plan. As you know, the Citizens Task Force has worked seriously and conscientously over the past nineteen (19) months in an honest effort to develop our District Emergency Plan. All activities of this Task Force have been completed within guidelines established by the Emergency Planning Act, the Pennsylvania Emergency Planning Agency, and the Department of Emergency Services.

As directed by these agencies, the primary objectives of the Task Force were to identify resources needed for student evacuation or sheltering; determine existing District resources; and then report all unmet resource needs to the Chester County Department of Emergency Services. The role of the Chester County Department of Emergency Services is to locate and identify additional resources required for a school district evacuation. These resources would then be appropriately documented and attached to our District and County Radiological Emergency Response Plans.

The following outline will summarize the results of the needs assessment completed by the Citizens Task Force and subsequent recommendations for Board consideration.

I. Findings of Fact

A. Resources Needed for Evacuation

1. Fifty five (55), seventy two (72) passenger buses
2. Fifty five (55) bus drivers
3. One hundred fifty six (156) student supervisory personnel
4. Twenty two (22) traffic coordinators
5. Establishment of an appropriate host school site

B. Current District Resources Determined After Extensive Study, Training, and Survey of District Personnel

1. Thirty (30), seventy two (72) passenger buses

2. Eighteen (18) bus drivers

3. Sixty five (65) student supervisory personnel

4. No available traffic coordinators

5. No agreement has been reached regarding the establishment of a host school site

C. Unmet Resource Needs Confirmed by the Citizens Task Force at a Meeting Held on June 4, 1984

1. Twenty five (25) additional school buses

2. Thirty seven (37) additional school bus drivers

3. Ninety one (91) additional student supervisory personnel

4. Twenty two (22) traffic controllers

D. Documentation of this Needs Assessment

1. Meeting on subject of District transportation needs and resources with representatives from the Chester County Department of Emergency Services - March 1983

2. Teacher survey - May 1983

3. Bus driver survey - May 1983

4. Joint sub-committee of Roberts Education Association and Citizens Task Force during the month of July 1983

5. Teacher and bus driver training program - November 1983

6. Teacher survey - November 1983

7. Bus driver survey - December 1983

E. Documentation of Communications Regarding Establishment of Unmet Resource Needs

1. Meeting with representatives of Department of Emergency Services - March 25, 1983

2. Letters to Chester County Department of Emergency Services dated July 20, 1983, March 13, 1984, and May 1, 1984

3. A representative of the Department of Emergency Services has attended all but two (2) regular meetings of the Citizens Task Force of the Owen J. Roberts School District and participated in all discussions of resources.

4. Letter from Department of Emergency Services informing our Task Force that additional resources have not been identified - May 25, 1984

F. Conclusions of Fact

1. As a result of thorough investigation and study of resources, the unmet resource needs of the Owen J. Roberts School District are real and valid.

2. None of our unmet resource needs have, as of this date, been identified and documented for us by the Chester County Department of Emergency Services.

3. Our emergency planning cannot move forward until all identified resource needs are provided by the Chester County Department of Emergency Services. Any statements regarding the location of these additional resources must be thoroughly documented in detail including letters of agreement with transportation providers, school bus drivers, supervisory personnel, traffic coordinators, host school arrangements, and all other needs established as real and valid by the Citizens Task Force.

3. If our responsibility is to provide for the safety and welfare of our students during a developing radiological emergency, it is also then our obligation to have assurance that all resources of additional equipment and personnel are of sufficient quality to evacuate our students within adequate parameters of time and safety.

II. Recommendations of the Citizens Task Force

A. We cannot submit the current draft of the Owen J. Roberts School District Radiological Emergency Response Plan for approval. As it currently exists it is not adequate and will not be effective in the event of a developing radiological emergency.

B. Since the Philadelphia Electric Corporation is scheduled to begin on-line operations of the Limerick Nuclear Power Generating Station in April of 1985, it is necessary to take an aggressive approach toward resolving the aforementioned emergency planning issues. We, therefore, recommend that communications be initiated with the Federal Emergency Planning Agency informing them of our detailed review of unmet resource needs and the lack of any response by the Chester County Department of Emergency Services.

C. We also recommend that no Emergency Response Plan be submitted for Board approval without complete and thorough drill and exercise. If the unmet resource needs are eventually identified, we would ask that at least one planned drill be scheduled during the school day with movement of all internal and external resources to determine if emergency procedures and resources will adequately provide for student safety and welfare. In addition, we believe that at least one unscheduled drill be attempted to provide further assurance of the adequacy of the Emergency Plan.

D. We also recommend that the Citizens Task Force for School Emergency Planning Guidelines continue to function until all emergency planning issues are resolved and the Emergency Response Plan is determined to be adequate to provide for the protection of the student enrollment of the Owen J. Roberts School District.

EXECUTIVE SUMMARY REPORT
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Prepared and Presented By
Dr. Roy C. Claypool,
District Superintendent
June 6, 1984

The statements contained within this Executive Summary Report have not been shared, in total, with anyone prior to their release tonight. They are my statements, and I stand accountable and ready to defend them as Superintendent of Schools.

In the Summer of 1982, the School District received a directive from the Department of Education establishing a need for a Radiological Emergency Response Plan for the Owen J. Roberts School District. Shortly thereafter, on August 31, 1982, the Chester County Department of Emergency Services sent a communication to the School District offering its services.

At the following September 20, 1982, School Board Meeting an open discussion took place on the need for the School District to develop such a plan. The Board sought input from citizens and at the next School Board Meeting October 18, 1982, the School Board established a Citizens' Task Force for the purpose of development of school emergency planning guidelines involving potentially hazardous conditions including a nuclear emergency. At the same meeting the School Board requested financial support from the Philadelphia Electric Company for the additional costs which would be incurred by the School District in the development of such a plan.

The Board also insisted that the task force meetings be open to the public and therefore, by resolution passed a motion advertising in the newspapers the first meeting of the task force would take place on November 30, 1982.

Representatives from the following agencies met on November 30, 1982. Department of Education, Harrisburg; PEMA; Chester County Department of Emergency Services; Emergency Coordinators from the seven (7) townships comprising the School District; NORCO Fire Company; Emergency Consultants, Inc.; Northern Chester County Tech School; Friends of the Arts; PTA and PTO's from all schools; employee union representatives from custodial, secretarial, teachers, and cafeteria; township supervisors; parents; and a number of concerned citizens.

During these nineteen (19) months this task force has been extremely active in attempting to accomplish their task. This task force has made a supreme effort to honestly appraise both human and other needs.

On July 20, 1983, seven (7) months into the planning process, this committee informed the Chester County Department of Emergency Services of the number of human resources and vehicles required for an evacuation plan.

From that point until March 13, 1984, sixteen (16) months into the plan, this committee attempted to realistically identify the number of employees who would participate and the actual number of vehicles which would be available during an emergency. This information was then sent to the Chester County Department of Emergency Services indicating unmet needs.

On May 1, 1984, I, as Superintendent of Schools, sent a communication to the Chester County Department of Emergency Services identifying additional unmet needs, and requested a detailed response by June 1st on how these needs would be met.

On May 25, 1984, the Chester County Department of Emergency Services informed the District that the identified needs have not been met at this point in time. On Monday, June 4th, I met with the Citizens' Task Force for a period of approximately two (2) hours for the purpose of reexamining the additional unmet needs as identified by my office on May 1, 1984. At the conclusion of that meeting all previously identified unmet needs were classified as real and valid.

As we have heard this evening, the task force is recommending that they continue their efforts.

The nuclear plant is tentatively scheduled to go on-line within the next ten (10) months. The agency responsible for meeting our unmet needs [the Chester County Department of Emergency Services] has been unable over the past four (4) months to meet any of our unmet needs. Can a limited operation such as the Chester County Department of Emergency Services [given even the most dedicated and competent staff] meet our unmet needs within the next ten (10) months??

Can they deliver the additional buses? Can they provide the additional human resources? Will they train these people for the specific functions needed such as bus drivers, traffic coordinators, and adult volunteers? Do they have sufficient funds to meet these unmet needs? Both my analytical mind and my intuition say no to all of the above.

These unmet needs have been public knowledge for at least five (5) weeks. To date not one governmental body, regulatory agency or individual has contacted my office to challenge the validity of these needs. I can only assume that there is either concurrence on these needs or a deliberate decision has been made to ignore these documented unmet needs.

I will not recommend any plan that first, does not meet these documented unmet needs; second, does not guarantee parents access to their children; third, does not address the resolution of the added expense to this School District; and fourth, does not answer the following additional questions.

Why are school age children not included in a selective evacuation along with preschool age children?

When an order to prepare for an evacuation occurs, our switchboard will be rendered useless in the first five minutes. We rely solely on telephones for both internal and external communications. Can the switchboard handle this overload and can the general telephone utility cover the overload?

Serious challenges to sheltering as a safety option have been raised with no satisfactory answers. If PEMA orders sheltering, how safe, how long before contamination and/or rays penetrate? Parents will surely converge on our schools to gain access to their children.

Is Twin Valley, our alleged host school, far enough away? Is it not in the ingestion exposure pathway?

What provisions are being planned by municipalities for alternative routing in the event of inclement weather such as ice, snow, etc. Routes 23 and 100 usually provides us with one or two accidents delaying our bus runs.

Whose time frames are we going to use to determine the absolute minimum time needed to properly evacuate students and employees?

Where in this country has a greater effort been made over a nineteen (19) month period to develop an adequate evacuation plan?

As the time draws nearer for the opening of the plant, parents are feeling and exhibiting increased stress over the health and safety of their children. We will not compromise either the health or safety of our children or employees in order to have an evacuation plan that is not adequate and implementable.

What are the legal liability exposures of the School District, the School Board, individual School Board members, District Superintendent, employees, and volunteers? If additional liability insurance is needed, who will pay for the insurance?

State and federal planners have been quick to identify, in detail, local responsibilities both financial and legal, but no visible effort to meet any of our unmet needs.

It is my opinion that we must look beyond Chester County to both the state and federal governments for immediate help in not only meeting our unmet needs, but to also demonstrate to those empowered with the authority to make change the serious deficiencies in the overall master plan for a general evacuation of this School District.

Let us not spend these next few months debating how to rearrange the chairs on the deck of the Titanic. Instead, join forces with the task force in seeking a resolution to our unmet needs, as well as educating those in a decision making role the serious deficiencies in the existing planning structure, and the attitude that given an emergency of this magnitude citizens will rise up and solve the problem.

[signature] 6/6/84

Signature Date

Owen J. Roberts School District

Administration Building
R. D. 1, Pottstown, Pennsylvania 19464
Telephone (215) 469-6261

May 1, 1984

Mr. John McNamara
Chester County Department of Emergency Services
14 E. Biddle Street
West Chester, PA 19380

RE: ·Need for Detailed Response to Citizens Task Force Letter Dated March 13, 1984
·Request to Respond to Additional Unmet Needs As Perceived By District Superintendent As Contained Within This Document

Dear Mr. McNamara:

Over the past couple of months, I have had extensive interaction with the Board of School Directors, individual Board members, and Joseph Clark, Administrative Representative to the Citizens' Task Force for School Emergency planning for the Owen J. Roberts School District. Last Friday, April 27, I spent three (3) hours with Mr. Clark reviewing in detail the status of Draft 7. During this session Mr. Clark informed me that he had telephoned your office to see if any response was forthcoming in reference to his letter of March 13, 1984.

Since my meeting with Mr. Clark I have spent an additional six (6) to eight (8) hours thoroughly reviewing Draft 7, and Mr. Clark's communication to you dated March 13, 1984.

I met with the Board of School Directors last evening, April 30th, to present my concerns which will be amplified in this communication. I, therefore, request that a detailed response be presented, in writing, to both the Citizens' Task Force letter of March 13th, as well as my additional concerns identified herein.

The Owen J. Roberts Citizens' Task Force has spent approximately a year and a half examining this most difficult concept. Prior to the end of this fiscal year I am requesting that the Board of School Directors meet with the Task Force for a thorough and complete update of the proposed Emergency Response Plan. Therefore, it is imperative that we receive from you a written communication no later than June 1, 1984.

Before presenting my concerns, I realize the difficult function you must perform, but I am also aware of Murphy's Law in an emergency situation.

In reference to Mr. Clark's letter of March 13, 1984, I believe the Citizens' Task Force identificiation of needs are minimal and reflect optimum conditions. That is to say, after thorough review and investigation I believe their needs are in some cases understated. In order to expedite your communication, I will restrict my identification of unmet needs to vehicles required for evacuation, bus drivers needed for evacuation, teachers and employees needed for evacuation, traffic coordinators, and last, but not least, the fact that Owen J. Roberts does not have a host center.

Until such time as these unmet needs identified herein are thoroughly delineated by your agency as being available under the most adverse conditions, no valid evacuation plan [in my opinion] could possibly be feasible. A general statement that these unmet needs will be resolved, or have been resolved without specific details involving how these needs have been met will be unacceptable due to the seriousness of the situation, and our complete reliance on outside resources to conduct an evacuation under the most optimum conditions.

SEVENTY-TWO (72) PASSENGER VEHICLES NEEDED FOR EVACUATION

ALL PERSONNEL AND STUDENTS

- Total Vehicles Needed, Fifty-Five (55) Seventy-Two (72) Passenger Buses.

  Vehicles available thirty (30). Please note this is smaller number than that identified by the consultant and the District Task Force. This figure is reduced by ten (10) vehicles for the following reason. A number of contracted drivers keep school buses at home. If this evaucation should take place between the period of 9:30 A.M. and 1:30 P.M., it is very likely that at least fifty percent (50%) of these buses will not be operating because the driver either cannot get back to the bus or has elected to take care of higher family needs. Therefore, I conclude the unmet vehicle needs amount to twenty-five (25) buses.

  Please identify where these twenty-five (25) buses will be coming from, as well as, will the twenty-five (25) drivers bringing the buses into our District drive these buses during evacuation??

BUS DRIVERS

- The initial survey indicated that twenty-five (25) of our District drivers will drive a school bus during a radiological emergency. However, many of these drivers did preface their statement stating that their families would come first, and they must be assured that their particular children had been taken care of. Knowing Murphy's Law in emergency situations, I believe that the twenty-five (25) figure more realistically would be a maximum of eighteen (18).

  Therefore, I conclude that our unmet driver needs to be thirty-seven (37) drivers. If you are successful in acquiring twenty-five (25) buses and twenty-five (25) drivers from outside our area, there is still a need for twelve (12) additional drivers. Please identify where these drivers would be coming from.

TEACHER NEEDS EVACUATION

As you are aware, the Task Force did survey our teachers at least twice. The second survey coming after an extensive inservice on the duties and responsibilities of teachers during an evacuation.

Our teachers were very open, and I believe honest, in their responses to this survey. Human nature is to first of all secure unmet family needs.

Sixty-six percent (66%) of our professional staff responded to this survey. This sixty-six percent (66%) response equates to one hundred thirty-seven (137) individuals. Please be advised, however, that only sixty percent (60%) of those responding signed the document. Therefore, a more realistic teacher need will be based on the number who signed the survey.

A summary of the survey is as follows:

QUESTION: Will you be willing to accompany students by bus to the host center or mass care center?

The number who signed the document equates to approximately thirty-eight (38) teachers.

QUESTION: Will you be willing to drive your own vehicle [without students] to the host school or mass care center to provide supervision for our students?

The number who signed the document equates to approximately fifty-six (56).

Teacher absences were not factored into the estimate. During November, for example, we had a daily absence of 13.5 teachers.

From the data available, I would conclude that, again giving Murphy's Law, human reaction to emergency situations and family needs, that internal staff resources accompanying students and attending to students at host centers will be more in the neighborhood of sixty (60) to sixty-five (65) teachers.

Our total teaching staff to date is two hundred eight (208) teachers to supervise our current enrollment. If we were to reduce our supervisor ratio by twenty-five percent (25%), we would still have a total need for approximately one hundred fifty-six (156) teachers. With only sixty-five (65) anticipated local teachers, there is a definite need for at least ninety-one (91) adult volunteers to assist students by bus or by car to the host school or mass care center. Who are these ninety-one (91) volunteers and where will they be coming from?

I have not attempted to address the issue of sheltering for I believe we need to have the resources determined for evacuation and if they be resolved, then sheltering would be resolved.

TRAFFIC COORDINATORS

As the time draws near for the opening of the plant, it is quite clear that our citizens have every intention of coming directly to our facilities in order to pick up their children in the event of an emergency. In no way will the School Administration prevent parents from picking up their children. Therefore traffic controllers will be an absolute must at each of our educational centers.

I predict the need for the following traffic controllers, in addition to school employees, at each of the following educational centers:

WARWICK ELEMENTARY CENTER	3 Traffic Controllers
FRENCH CREEK ELEMENTARY CENTER	3 Traffic Controllers
VINCENT ELEMENTARY CENTER	3 Traffic Controllers
EAST COVENTRY ELEMENTARY CENTER	3 Traffic Controllers
NORTH COVENTRY ELEMENTARY CENTER	4 Traffic Controllers
CENTRAL CAMPUS	a minimum of 6 Traffic Controllers
TOTAL	22 Traffic Controllers

In addition to traffic controllers, I raise a serious question as to the traffic controlling activities that will take place at the intersection of Routes 23 and 100, Route 100 and Cadmus Road, and Route 23 and the exit from Owen J. Roberts. My personal interaction with a number of parents indicates that the first response will be to converge on our educational centers for the purpose of gaining access to their children. Unless this need is met, we will experience mass hysteria, confusion, and total blockage of any possible evacuation from our school facilities by school buses.

HOST SCHOOLS

As of this date we still do not have any agreement with another school district in the case of an evacuation.

I request your immediate attention to these most serious questions. Members of my staff and I would be more than happy to sit down with you, at your convenience, to discuss in detail our concerns as well as the content of this communication.

Respectfully,

Roy C. Claypool, Ed. D.
District Superintendent