

February 5, 1985

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF THE
SECRETARY

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
THE CLEVELAND ELECTRIC)	Docket Nos. 50-440
ILLUMINATING COMPANY)	50-441
)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

APPLICANTS' STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NO
GENUINE ISSUE TO BE HEARD ON CONTENTION Q

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of Contention Q in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Current total enrollment in EPZ schools is approximately 19,802 students. Affidavit of Gary Winters on Contention Q ("Winters Affidavit"), ¶3.

2. The actual number of buses needed to evacuate plume exposure pathway emergency planning zone ("EPZ") schools in a single trip is 384 buses. Winters Affidavit, ¶ 4.

3. While the schools in the EPZ do not have sufficient bus capacity to evacuate their students without assistance, Standard Operating Procedures developed with school districts

in the three counties provide for the use of resources (school buses and drivers) from outside the EPZ to evacuate schools within the EPZ in an emergency. Letters of agreement are being obtained for the use of these resources. Winters Affidavit, ¶ 5.

4. Adequate numbers of buses are available to evacuate all school students from the EPZ in a single trip. Indeed, there is a surplus of 277 buses available within the three counties, over and above the buses needed to evacuate the schools in the EPZ. Winters Affidavit, ¶ 5.

5. There is a pool of 718 licensed school bus drivers available within the three counties to support evacuation in the event of an emergency at Perry -- many more than needed to drive the 384 buses needed to evacuate the schools within the EPZ in a single trip. Winters Affidavit, ¶ 6.

6. The principles of emergency worker response have been well established through three decades of social science research on human response to emergencies. These principles would be applicable in the event of an emergency at a nuclear facility such as the Perry plant. Affidavit of Dennis S. Miletì on Contention Q ("Miletì Affidavit"), ¶ 2.

7. While it is to be expected that emergency workers would experience some "role strain" during an emergency at Perry, they would not abandon their emergency roles because of it. Research conducted on the actual behavior of people with defined organizational responsibilities in emergencies has

established that emergency workers who have a clear idea of their emergency roles do their emergency jobs. Mileti Affidavit, ¶¶ 3, 4.

8. In times of emergency, an "emergency consensus" develops. In this consensus, people become altruistic, and protection of the community becomes the highest priority. This temporary shift in values simplifies the role obligations of people, and greatly reduces the potential for role strain. Mileti Affidavit, ¶ 5.

9. People who know in advance of an emergency that they have emergency roles to play (should one ever occur) are able to make informal family contingency plans in advance of the emergency, to free the emergency worker to fulfill assigned emergency roles. Mileti Affidavit, ¶ 6.

10. Role strain between family and organizational responsibilities would be a mental process in an emergency; it would not result in role abandonment or interfere with the ability of emergency organizations to do their emergency work. Emergency workers would need to feel assured that their families can tend to their own safety. Historically, emergency workers have performed their emergency roles at the same time they have sought assurances of the safety of their families through ad hoc, informal channels. Mileti Affidavit, ¶ 7.

11. Emergency workers fulfill their role obligations in emergencies because of the cohesiveness of the work group. People with knowledge of their emergency roles do not wish to let their co-workers down. Mileti Affidavit, ¶ 8.

12. The potential of role strain for reducing the effectiveness of emergency response is minimized by the organizational and occupational assignment of emergency responsibility. Further, assigning clear responsibility makes it clear to emergency workers that they have responsibilities to their co-workers. In addition, advance knowledge of one's emergency role allows the emergency worker to arrange to avoid role "conflict" and to make informal family contingency plans for emergencies. Miletic Affidavit, ¶ 9.

13. Emergency worker performance levels are ensured by training, which: (a) gives the emergency worker a clear understanding of his role; (b) makes the worker aware of the advantages of making family contingency plans in advance of an emergency; (c) makes the worker aware that the community and his co-workers depend on him; and (d) informs the worker about the nature of the radiation risk and about the procedures to be used in dealing with that risk, such as dosimetry. Miletic Affidavit, ¶ 10.

14. Each of the three county plans provides for the training of emergency workers, including bus drivers. The training provided to each bus driver prior to fuel load includes, at a minimum, (a) an explanation of basic radiation concepts, (b) an overview of the offsite emergency plans, and (c) instruction on each driver's specific duties. In addition, the training makes the bus drivers aware of the advantages of informal pre-emergency family contingency planning. Winters Affidavit, ¶ 7.

15. By providing the worker with means to assess the risk to which he is exposed, the availability of dosimetry provides further assurance that emergency workers will fulfill their functions in a nuclear emergency. Mileti Affidavit, ¶ 11.

16. All school bus drivers assisting with the evacuation of schools within the plume EPZ in the event of an emergency at Perry would be provided with personnel dosimetry, both self-reading and permanent record types. Winters Affidavit, ¶ 8.

17. While it is possible that some few drivers might be found who would swear in advance that they will not drive their buses to assist with school evacuation in an emergency, in a real radiological emergency, the drivers generally would perform their assigned functions. Mileti Affidavit, ¶ 14.

18. Due to the formation of the "emergency consensus," in actual emergencies, people conform to prosocial behavior patterns and assume their roles under the emergency plan, even where they have earlier asserted that they would not do so. Mileti Affidavit, ¶ 14.

19. While role abandonment may be theoretically possible, it is certainly extremely rare, and consequently it does not reduce organizational effectiveness. Indeed, the typical problem in emergencies is not that too few workers report for duty, but rather that too many persons volunteer. Mileti Affidavit, ¶ 15.

20. The offsite plans for the Perry EPZ are designed to facilitate the expeditious evacuation of school children, directly from their schools within the EPZ to predesignated receiving schools (reception centers) outside the EPZ. In the event of an emergency at Perry, many school children would already be enroute to receiving schools by the time parents could receive and react to notification of an evacuation and travel to their children's schools. Winters Affidavit, ¶ 10.

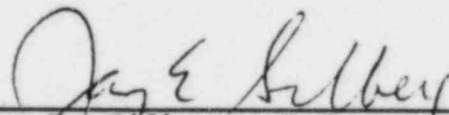
21. Both the public information brochure and the Emergency Broadcast System ("EBS") announcements for broadcast in the event of an evacuation will advise parents of the evacuation of the schools, and of the location to which each school's students are being evacuated. Parents are instructed not to attempt to pick up their children at school, but rather to pick them up at the appropriate receiving schools outside the EPZ. Winters Affidavit, ¶ 9.

22. The provision via EBS of information about the relocation of school children assures that, in the event of an evacuation due to an emergency at Perry, few -- if any -- parents would attempt to pick up their children at their schools within the EPZ. Mileti Affidavit, ¶¶ 16-19; Winters Affidavit, ¶ 12.

23. Even if some parents did go to the schools to pick up their children in an emergency, school evacuation would not be seriously impeded. Any parents who did attempt to pick up their children at school would conduct themselves in an orderly

manner. Normal school dismissal procedures would be followed, including the stationing of school personnel to direct buses out of the loading areas, and to prevent extraneous traffic from entering the loading area, if necessary. Winters Affidavit, ¶ 11; Mileti Affidavit, ¶ 16.

Respectfully submitted,



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