

STATEMENT SUBMITTED BY :

Phillip M. Schmidt
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USNRC

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To: NRC AT SUMMARY DISPOSITION FEB. 20, 1985

IN SUPPORT OF SUNFLOWER ALLIANCE/PERRY LEGAL DEFENSE CENTER OFFICE OF HEARINGS
PNPP RADIOLOGICAL EMERGENCY PLAN IS NOT ADEQUATE DOCKETING & SERVICE BRANCH

PERSONAL BACKGROUND

I, Phillip Schmidt, have been a resident of the Geneva, Ohio area for approximately 20 years, am married and have 3 children, the oldest being 13. I am an active church leader and also active in my community, presently filing for candidacy for Geneva City Council Member. I graduated from Ohio State University College of Engineering and was employed as an engineer by a major nuclear submarine building shipyard for more than 5 years. I presently am the co-owner of a small manufacturing firm in Geneva Township. In March 1983 I was appointed by the Ashtabula County Commissioners to represent Geneva Township on the Citizen's Advisory Committee established by the Commissioners to provide input into the development of the subject Emergency Response Plan for the Perry Nuclear Power Plant. There were 6 citizens on this committee initially, and initially we all took our responsibilities seriously and worked hard trying to contribute to the development of the "best possible plan". At this time I am the only one who has not quit in disgust. I am submitting this statement in hopes that some much needed changes in the PNPP Emergency Plan may result. The plan is presently not adequate.

OBJECTIONS

1.) The Plan I reviewed (Control Copy #DSA-111 available in the Geneva Library) was UNOFFICIAL (because it had not been officially approved and signed by any one of the 3 Ashtabula County Commissioners -

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the signature page was simply blank lines) and the Plan was INCOMPLETE, (none of the 57 SOP's were available at the Geneva Library, and there were blank pages where there should have been Letters of Agreement to the SOP's by the organizations involved, and where there should have been information describing the evacuation time study. Also, there is no information relating to the PNPP Emergency Information Handbook.)

For the entire time I have been involved in the development of this Plan, the SOP's have always been recognized as the "heart" of the Plan. I believe the SOP's are missing because only a few of them have any real detail in them and many of the organizations they relate to have refused to date to sign and accept them. In other words, I believe, the writers of the Plan wrote out the SOP's to the extent (and only to the extent) that the SOP describes in general terms what the Plan writers want the organization to do, and how the organization will be notified if they are to do it. I believe that many of the organizations have not developed the necessary step-by-step procedures to actually do what is requested, and I believe they have not stated they will, or can, do it!

2.) Every one of the members of the Citizen's Advisory Committee, the Geneva Township Trustees, at least one Geneva Area School Board member and nearly everyone I have talked to agrees the Plan is completely unacceptable and inadequate unless the following provisions are included:

(a) Independent real-time monitoring of radioactive emissions - by an agency other than CEI - preferably either the Lake or Ashtabula County Disaster Services Agency. As the Plan now is written, all agencies and individuals must rely solely on information provided by the utility. For years utilities have repeatedly been found guilty of not promptly or honestly reporting releases of radioactive material. Independent real-time monitoring has many benefits:

1. It can help the utility detect a problem they honestly may

not know they have, as when radiation monitors at a nuclear submarine yard in Connecticut detected emissions coming from the Millstone Point Nuclear Plant that the power plant operators were unaware of...

2. It can detect a problem the utility may know it has, but doesn't want to admit...
3. It can verify - or bring into question - claims that normal plant operations only involve minimal emission of radio-activity...
4. It can help determine and track the path of radioactive clouds emitted by the plant so people in its path can be given warning quicker and more reliably.
5. It can help determine if an unexpected large accidental release of radiation has exposed any people to levels where they should take radio-protective drugs.

The need for this type of monitoring is one of very strong and universal agreement among members of the Citizens Advisory Committee and also local agencies and governments!

(b) The availability of Potassium Iodide - there is a specific and clear requirement in NUREG 0654 that the Plan include provisions for the use of radioprotective drugs - particularly for emergency workers and institutionalized persons within the plume exposure EPZ. Yet this Plan specifically states they will not be available nor used. The basis for this non-use is an out-of-date letter written in 1980 in which the writer states that "in the absence of FDA guidelines" he feels the drug should not be used. However, in 1982 the FDA did issue guidelines and they specifically urge that potassium iodide be used!

To not make this drug available to emergency workers, bus drivers, etc., is a betrayal of their trust and is inexcusable! They may need this drug to protect them from cancer of the thyroid!

(c) School children should be allowed to be taken out of school or called home by their parents at the "Alert" stage and evacuated at the "Site Area" Emergency Level as a precautionary measure, since they are so much more susceptible to the effects of radioactivity, could be more easily united with their families, and because we love them so much we want to give them this extra protection. Also, evacuating the schools early would free up the buses sooner so they could be used to evacuate other people in the event a general evacuation was called for. This is a point that there is practically universal agreement. If it is not planned for, people will flood the schools in a disorganized mob scene. I will take my children out of school at the "Alert" stage because I don't have any confidence in this plan.

(d) Keep the EPZ at a 10-mile radius and if a General Emergency arises and conditions permit, evacuate the entire 10-mile EPZ area. Universal agreement here also.

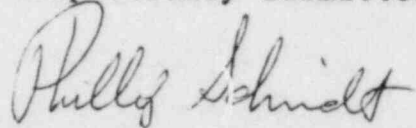
- 3.) There does not appear to be any capability in the Ohio Dept. of Health to do the determinations they are being counted on to do.
- 4.) The pick-up points for non-auto owning people are too far apart in Geneva Township.
- 5.) The public should be notified whenever an "Alert" level accident occurs and reminded of what they may have to do in the event the situation becomes more serious. This will not cause panic. Some people may evacuate voluntarily as a result, but this would be beneficial.
- 6.) Geneva doesn't have enough firemen to quickly do everything they are supposed to do.
- 7.) There are not enough tow trucks available to keep the roads clear.
- 8.) There are no provisions to reimburse the County, cities, and townships for the considerable cost of participating in annual drills and the ongoing updates, etc. This may lead to the refusal of some

Ashtabula and Lake County agencies to participate, just as has already occurred in the Davis-Besse plant area. This is a very considerable yearly cost to area governments!

SUMMARY

In summary, for the preceding reasons and others not stated, but which I would be willing to state if you are interested, I am convinced this Plan is not, and will not be, adequate until the deficiencies I have herein objected to have been corrected.

Respectfully submitted,



Phillip M. Schmidt, P.E.

*Lauren Massucci
Notary Public
696 E. Main, Geneva*

**Lauren Massucci, Notary Public
STATE OF OHIO
My commission expires June 29, 1998**

No specific upper limit is given for thyroid exposure since in the extreme case complete thyroid loss might be an acceptable penalty for a life saved. However, this should not be necessary if respirators and/or thyroid protection for rescue personnel are available as the result of adequate planning.

The implications for the local governments' refusals to use potassium iodide are obvious as well as ominous.

Lake County proposes the fantasy that it will not establish any decision chain authorizing any person, emergency or otherwise, to exceed 25 rems whole-body exposure. FEMA Interim Report at 15. This is inconsistent with pre-existing State commitments. Geauga County does not prescribe any decisional chain for authorizing excessive exposures of over 25 whole-body rems.

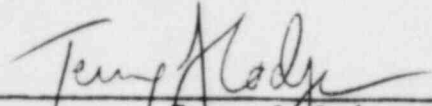
All three of the counties' plans are unacceptable in that, while each may be forced to delineate a decision-making chain to determine whether exposure limits may be exceeded, there is no relevant discussion explaining how the Ohio Department of Health, CEI Department heads, and county officials will be able to render dozens, hundreds or thousands of such decisions allowing excess exposures in the cataclysmic moments following a breach of containment or other consequential pluming radiation. In this and other respects, the critical moments after major radiation leakage are viewed by planners with severe roseate ocular distortions.

Ironically, the affidavit of John Mauro, accompanying Applicant's motion for summary disposition on Contention G, notes (at 9) that historically overestimated radioiodine source terms "provide compelling reasons to look toward other more effective methods for protecting offsite radiation workers." Applicant argues that it is not required to have respirators available to offsite emergency workers; it argues that potassium iodide need not be stockpiled; all this while posed by its own experts with evidence that some radiation exposure will occur to the offsite population.

Applicant has failed to resolve these inconsistencies by motion.
Therefore, summary disposition must be denied.

Respectfully submitted,

By



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