DOCKETES

I Robert L. McTrusty M.D. as acting Ashtabula County FEB 25 P1:36

Medical Center's Disaster Planning Laison Physician deposes and says: as a practicing physician at FEE 07 SICRETAL years and have been chief of OB-GYN for several years and Chairman of the Utilization and Review Committee for 8 years.

In response to Dr. Linneman's affidavit of Feb. 5, 1985.

- 1) A patient is certainly radioactive if he has contamination from loose particles adhering to his body or clothing, and he certainly presents hazards to any attending response personnel. Radioactive contamination is easy to detect and decontamination is easily accomplished if one assumes that proper equipment and well trained personnel to interrept the equipment is available on a 24 hour basis.
- 2) If a radioactively exposed and injuried patient is treated as any other non-contaminated injury one risks the spread of contamination; to the detriment of any medical or paramedical attendents. To compare radiation contamination with caustic injury or infection is incoherant. Radiation contamination is a unique and particularly dangerous mode of injury and not treated by any form of drug or biological aid yet known.

- 4) Although it is true that radiation injuries are seldom immediately life threatening, this is not say that it is never life threatening or that it is not dangerous. To ignore the fact that even low dose exposure is life shorting is irresponsible.
- Nuclear plant with substantual off site realeases would not neccessitate large numbers of trauma induced injury beds. However substantial number of non-traumatic casualities would never-the-less be required according to the Sandia Laboratory Report of the NUREG/CR 2238 computer simulation of worse case accidents at Perry.

it postulates:

- 1) 5,500 earily deaths within 60 days.
- 2) 180,000 radiation induced injuries.
- 3) 14,000 cases of malignancy.
- 6) NO COMMENT.

Cavalier dismissal of radiation hazards is a sign of incompetency.

- 7) Present levels of medical resources available for treatment of radiation contamination at ACMC are so primative that even minimal numbers of injuried plant worker or public citzens is impossible.
- 8) 11) To my knoweldge and belief upon interviewing

various Emergency Room personnel the amount of training offered was only two hours which is insufficient for proficient medical care of radiation injured persons.

12) In my perusal of the 1984 and 1985 Joint Commission on Accreditation Manual for Hospitals, I could find no requirement necessary for the Emergency Managment of individuals who have actual or suspect a posure to radiation or radioactive contaminated materials. Also there is no Standard V as listed.

> Quell smit was Robert L. Mctrusty, M.D.

Subscribed and sworn before me this athis day of February, 1985.

My commission Expires: 4/17/25

SERL

CERTIFICATE OF SERVICE OF CERTAIN DOCUMENTSUSARC

I hereby certify that a copy of the following documents #8 25se 1e37 by me this 23rd day of February, 1985 by regular U.S. Mail, postage prepaid, upon the following parties, except that those indicated the continuous formular services were served by express mail on this date:

Sunflower's Motion for Enlargement of Time in Which to Respond to Motions for Summary Disposition;

Sunflower's Answer to Motion for Summary Disposition of Contention A;

Sunflower's Statement of Material Facts (Contention A):

Sunflower's Answer To Motion for Summary Disposition of Contention B;

Sunflower's Statement of Material Facts (Contention B);

Affidavit of Marianthe Boyd on Contention B;

Affidavit of William A. Brotzman on Contention B;

Affidavit in Support of Contention "B" (of Roland R. Louth),

Sunflower's Answer to Motion for Summary Disposition of Contention C;

Sunflower's Statement of Material Facts (Contention C);

Sunflower's Answer to Motion for Summary Disposition of Contention G;

Sunflower's Statement of Material Facts (Contention G):

Statement Submitted by Phillip M. Schmidt:

Sunflower's Answer to Motion for Summary Disposition of Contention H;

Sunflower's Statement of Material Facts (Contention H):

Sunflower's Answer to Motion for Summary Disposition of Contention I;

Sunflower's Statement of Material Facts (Contention I)

Sunflower's Answer in Opposition to Summary Disposition (Contention M):

Sunflower's Statement of Material Facts (Contention M);

Sunflower's Answer in Opposition to Summary Disposition (Contention P);

Sunflower's Statement of Material Facts (Contention P);

Affidavit of Robert L. McTrusty.

All of the foregoing were served on the persons or places appearing

on the attached Service List.

618/N. Michigan St., Suite 105

Toledo, Ohio 43624

(419) 255-7552

Counsel for Sunflower Alliance