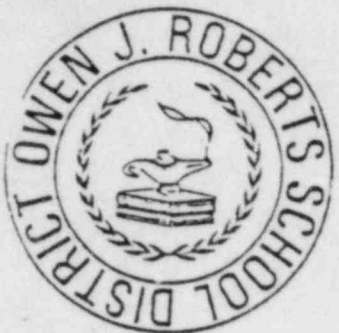


50-3500 D

I-LEA Exhib. E-29
11/08/84



EA-29



Owen J. Roberts School District

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

NUCLEAR REGULATORY COMMISSION

Docket No. 50-352-OL Official Ex. No. LEA E-29
In the matter of Phila. Elec. Co.

May 1, 1984

Staff	IDENTIFIED	_____
Applicant	RECEIVED	<u>X</u>
Intervenor	REJECTED	_____
Cont'g Off'r	DATE	<u>28 Nov 84</u>
Contractor	DATE	<u>Panel</u>
Other	Witness	_____
Reporter	<u>Ace-Federal Reporters, Inc.</u>	

Mr. John McNamara
Chester County Department of Emergency Services
14 E. Siddle 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.

8605080360 841128 PDR
PDR ADDCK 05000352 PDR
G

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 2

In reference to Mr. Clark's letter of March 13, 1984, I believe the Citizens' Task Force identification 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 evacuation 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.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 3

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.

May 1, 1984

Mr. John McNamara, Chester County Department of Emergency Services

Page 4

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

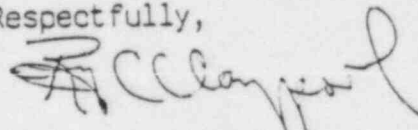
In addition to traffic controllers, I raise a serious question as to the traffic controlling activities that will take place at the intersection of Routes 23 and 100, Route 100 and Cadmus Road, and Route 23 and the exit from Owen J. Roberts. My personal interaction with a number of parents indicates 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