

**Emergency Preparedness
Survey Of
Childcare Facilities
Located Near
Three Mile Island Nuclear Facility**

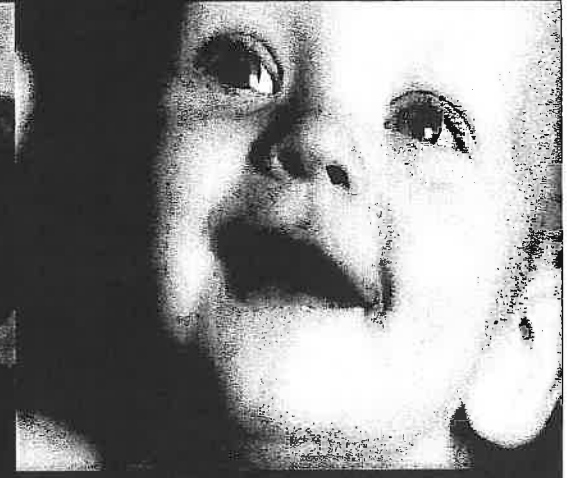


Exhibit 10



PURPOSE AND PROTOCOL OF SURVEY

The EFMR Monitoring Group, a nonpartisan community based organization established in 1992, conducted a Radiological Emergency Preparedness survey of child care facilities located in the 10-mile Emergency Planning Zone (EPZ) established around the Three Mile Island (TMI) Nuclear Power facility.

Federal law requires that state and local officials protect people in the custody of institutions such as schools, nursing homes and prisons. Child-care facilities were not included in the state's emergency plans.

In the event of nuclear evacuation, the Commonwealth of Pennsylvania passed legislation in July, 2004, that requires emergency preparedness plans at licensed, for-profit child care facilities. According to Governor Rendell, 183,000 children (2/3 under supervision) in licensed nonprofit or family-care entities are not covered under this new law. Further, this law requires the child care facilities to do their own emergency planning.

This survey was conducted to insure preschool children located inside the 10-mile EPZ were provided the required radiological emergency services by the appropriate state and local agencies as federal law requires.

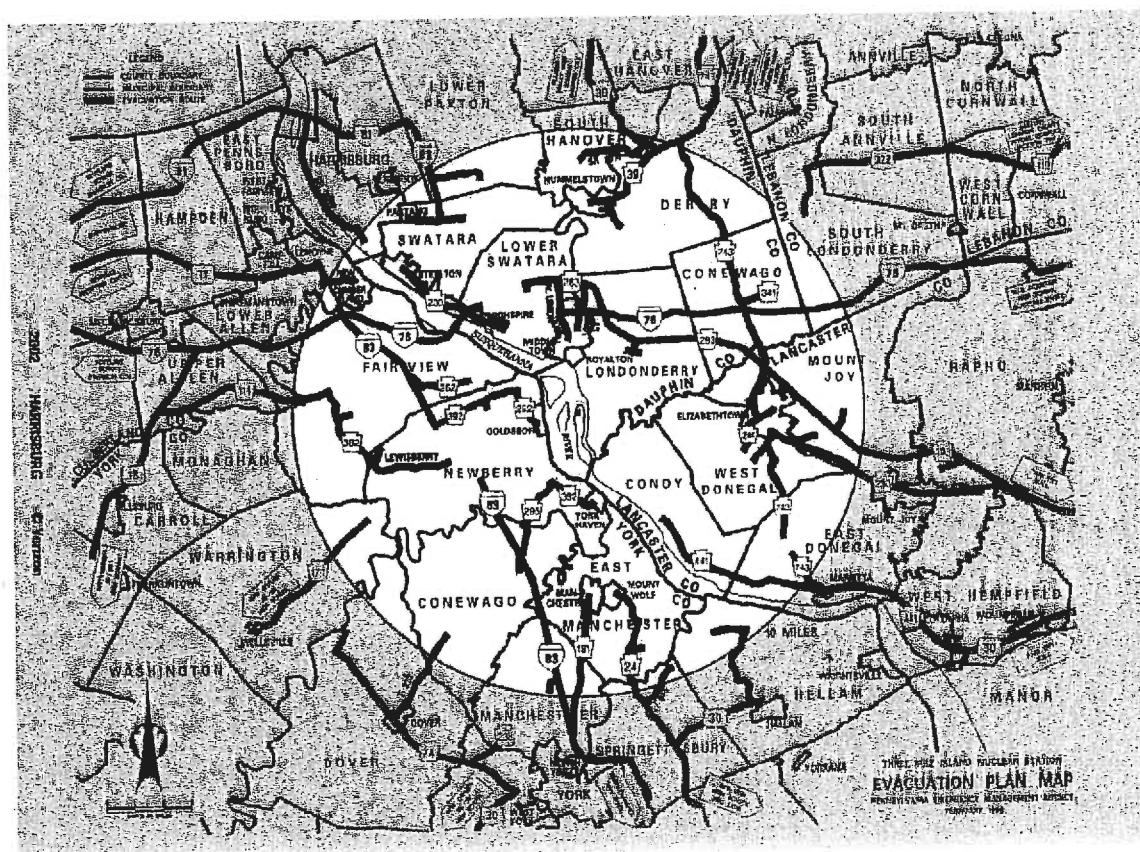
The EFMR Monitoring group is a nonpartisan community based organization established in 1992. EFMR monitors radiation levels at Peach Bottom and Three Mile Island nuclear generating stations, invests in community development, and sponsors remote robotics research. www.efmr.org

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PURPOSE AND PROTOCOL OF SURVEY

Map shows the 10-mile Emergency Planning Zone located around the Three Mile Island Nuclear Power Plant.





BACKGROUND ON RADIOLOGICAL EMERGENCY PLANNING

December 1979, due to the accident at Three Mile Island nuclear power facility, President Carter directed FEMA and the NRC to implement Radiological Emergency Response Plans (RERPs) for all populations located near operating nuclear power stations under Presidential Executive order 12148.

Since then, each utility that owns a commercial nuclear power plant in the United States is required to have a Radiological Emergency Response Plan (RERP) as a condition of maintaining a license.



SPECIAL POPULATIONS

The Radiological Emergency Response Plan (RERP) is required to have in place "means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

These special populations are defined in the following Federal Guidance documents: GM EV-2 "Protective Actions for School Children" and FEMA GM 24 "Radiological Emergency Preparedness for Handicapped Persons"

They include, preschool and nursery school children, populations in nursing homes, group homes for the mentally impaired, hospitals and prisons.



WHO'S RESPONSIBLE

The organizations responsible for supplying the required emergency services are outlined in 10 CFR Part 50 and are defined as: **the appropriate State, local, and Federal agencies.**

PENALTIES FOR VIOLATION

The penalties for violating these Federal Laws are loss of state nuclear power license within four (4) months of determination of noncompliance.



MINIMUM REQUIREMENTS

The following must be included in the off site Radiological Emergency Response Plan (RERP):

1. Identification of organization and officials responsible for both planning and effecting the protective action; and
2. Institution-specific information; and
3. Means of effecting protective action; and
4. Specific resources allocated for transportation and supporting letters of agreement if resources are provided from external sources; and
5. Name and location of relocation centers, and transport routes if applicable; and
6. Means for alerting and notifying appropriate persons and groups associated with the schools and students.

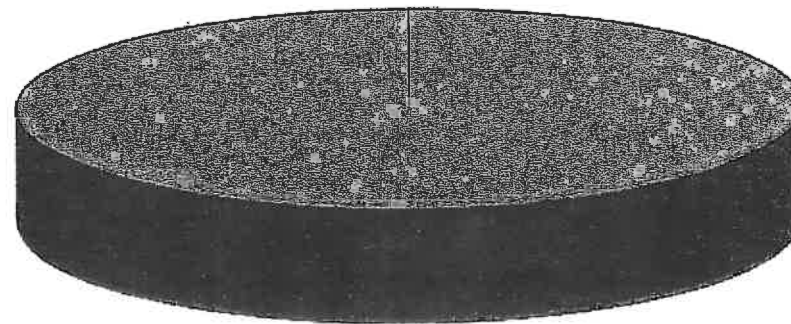
Section 3

Survey Results



1. Does your child care facility
reside within ten miles of a nuclear
power plant?

100% Said Yes



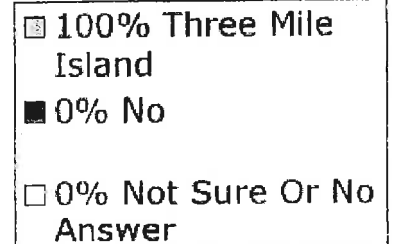
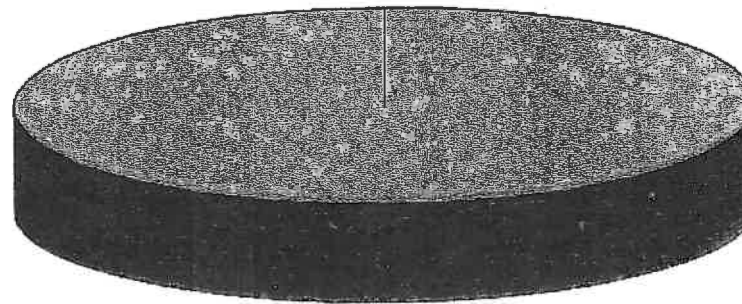
<input checked="" type="checkbox"/>	100% Yes
<input type="checkbox"/>	0% No
<input type="checkbox"/>	0% Not Sure Or No Answer

Comment about Question 1 from respondent: "No way you're going to evacuate the area...I told them I was not going to participate. Why bother doing an emergency evacuation plan you can't carry out" (Y; P)



2. If YES, please identify the nuclear power plant.

100% Said Three Mile Island

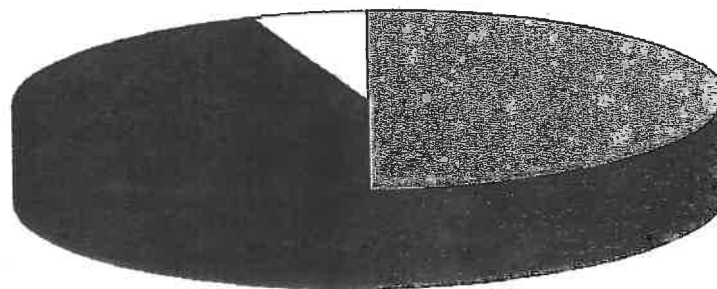


Comment about Question 2 from respondent: "We do have an evacuation plan. We however did not receive anything from other agencies". (D; P)



3. Have State or Local Agencies provided your facility with emergency planning in the event of radiological incident?

45% Said No



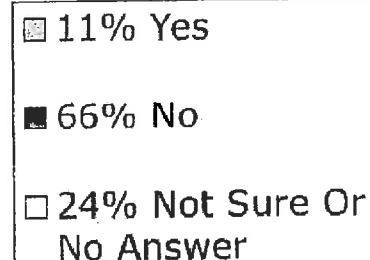
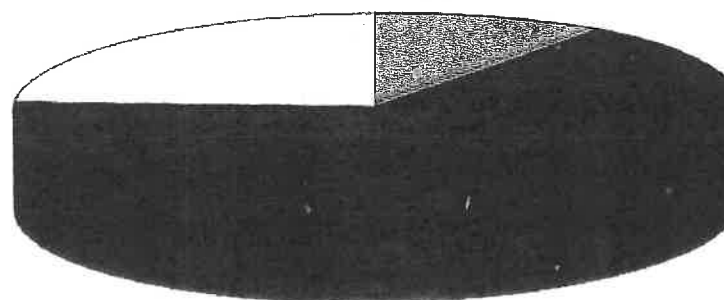
<input type="checkbox"/>	50% Yes
<input checked="" type="checkbox"/>	45% No
<input type="checkbox"/>	5% Not Sure Or No Answer

Comment about Question 3 from respondent: "Only to ask how many people they would have to provide transportation for." (D; P)



4. Have State or Local Agencies provided transportation vehicles for your facility for a radiological evacuation?

66% Said No

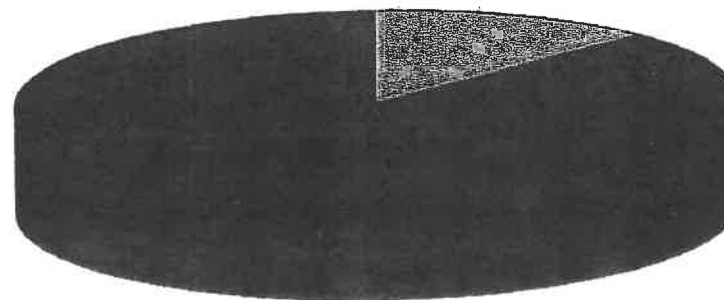


Comment about Question 4 from respondent: "Our local agency representative did meet with us and inform us we were on his list of vulnerable facilities." (L; NF)



5. If YES, who will be providing the vehicles and how many have been provided?

87% Could Not Answer



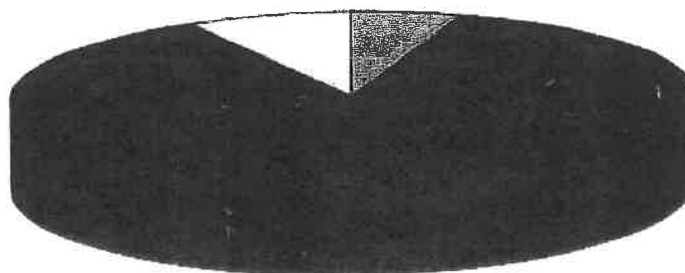
13% Able To Answer
87% Not Sure Or No Answer

Comment about Question 5 from respondent: "Not sure how many."
(Y; NF)



6. Have State or Local transportation providers sent you supporting letters or agreements that they have planned for and will provide emergency transportation for a radiological evacuation?

87% Had No Supporting Letters From Transportation Providers



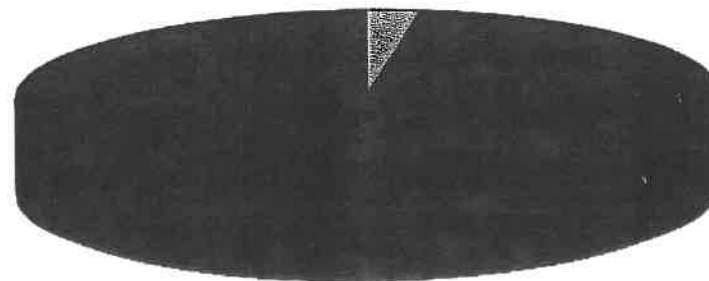
- ☐ 5% Yes Had Supporting Letters Of Agreement
- ☒ 87% Had No Supporting Letters Of Agreement
- ☐ 8% Not Sure Or No Answer

Comment about Question 6 from respondent: "We made our own plan." (L; P)



7. If YES, please identify the date of the letter.

97% Could Not Identify The Letter's Date or Were Not Sure



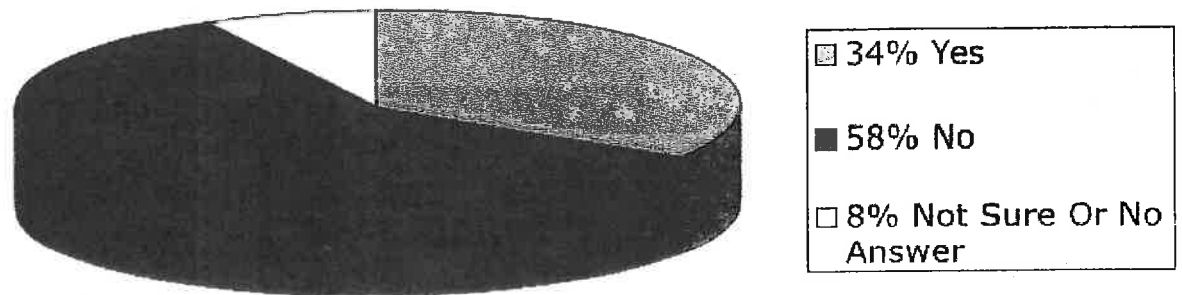
■	3% Able To Identify Date of Letter
■	97% Not Sure Or No Answer

Comment about Question 7 from respondent: "Can't locate @ this time but do send update letter annually for us to update." (D; NF)



8. Have State or Local Agencies provided directions and assignments to a prearranged relocation centers five to 10 miles outside of the 10-mile Emergency Planning Zone for a radiological evacuation?

58% Said No

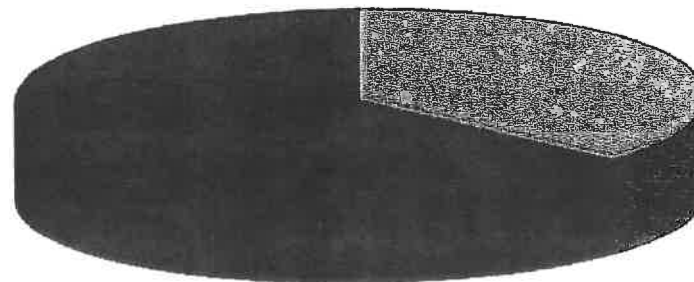


Comment about Question 8 from respondent: "State indicated we can call if we need help on the day of the emergency if our plan fail[s]...We hired & paid for a group to develop a plan for us before we were told nonprofits were exempt". (L; NF)



9. If yes, where is your relocation center.

63% Were Not Sure or Unable to Answer



□ 37% Knew Where Their Relocation Center Was
■ 63% Not Sure Or No Answer

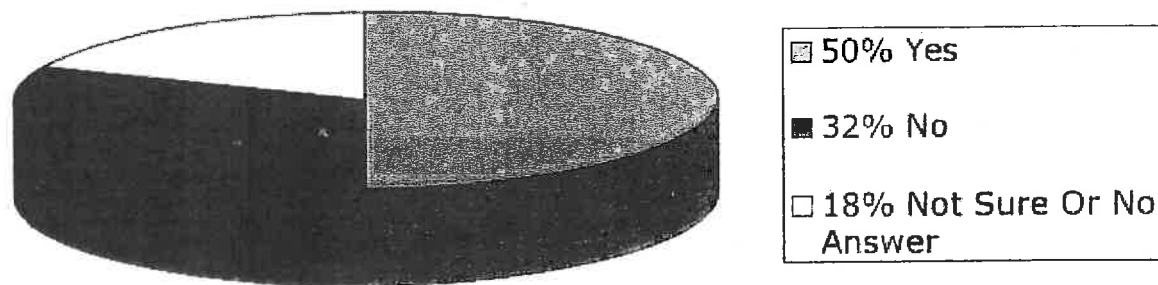
Comment about Question 9 from respondent: "Most facilities with a plan also identified a relocation site outside of the evacuation zone."

Some responses were more dramatic: "Bunch of crap too. If this thing melts down...Ten mile radius is not enough." (Y; P)



10. Have State or Local Agencies provided prearranged emergency notification for protective actions in the event of radiological emergency?

32% Said No

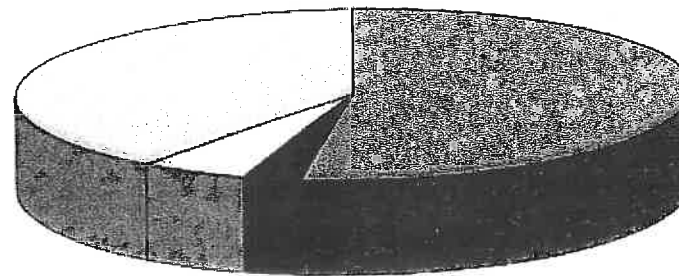


Comment about Question 10 from respondent: Responses were split evenly between for-profits and not-for-profits. One not-for-profit stated that one support agency, "Indicated they would not phone us." (L; NF)



11. How many years has your child care facility been provided planning for a radiological evacuation?

39% Were Not Sure



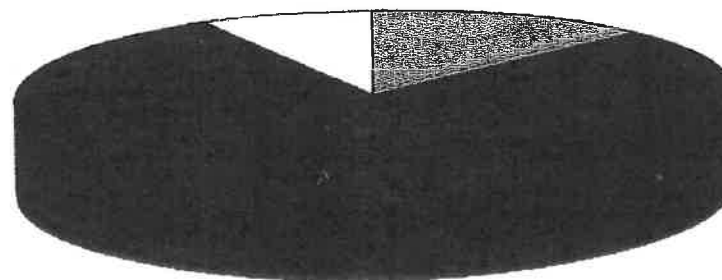
■	53% Less 5 Years
■	3% More Than 5 Years
□	5% Have No Plan
□	39% Not Sure Or No Answer

Comment about Question 11 from respondent: "Of those sites with plans in place, only 5 out of 34 (14%) facilities have had a plan in place for more than 24 months."



12. Have any State or Local Agencies refused to provide any of these protective actions in the event of a radiological emergency?

13% Said Yes



<input checked="" type="checkbox"/>	13% Yes
<input checked="" type="checkbox"/>	79% No
<input type="checkbox"/>	8% Not Sure Or No Answer

Comment about Question 12 from respondent: "We weren't sure who to ask".
(C; NF)

"I have been having difficulty arranging appropriate transportation for the children in our care...No one seems to be willing to help. If you have any contact persons...please let me know. Thanks!" (D; P)

"[No]. Only if bus employees show up to work." (L; NF)

"What's the difference? [between a for-profit and a non-profit]...That's ridiculous!" (Response from a non-profit in York County who was told that they weren't required to have an evacuation plan.)

Exhibit 11