

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-454 OL  
50-455 OL

1. In violation of 10 CFR Section 50.47 (b) (10), the evacuation plans for public and private schools within the EPZ do not provide for the evacuation of students within a period of time which will minimize their exposure to ionizing radiation. Inter alia, the plans do not adequately address the fact that these schools lack the communication systems necessary to initiate and coordinate an evacuation; that they lack a sufficient number of buses and

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) support personnel to conduct a safe evacuation; that they cannot coordinate their efforts during an evacuation in order to render mutual aid to each other; and that there is no reliable means of notifying school administrators that an evacuation should be conducted.

2. In violation of 10 CFR Section 50.47 (b) (10), Commonwealth Edison's "Evacuation Time Estimates for the Plume Exposure Pathway Emergency Planning Zone of the Byron Nuclear Generating Station" does not conform to NUREG 0654, Appendix 4 and will not provide accurate or useful guidelines for the choice of protective actions during an emergency because the study:

- (a) uses fallacious transient population figures;
- (b) does not indicate all of the actual assumptions which underlie the time estimates;
- (c) does not address the relative significance of alternative assumptions;
- (d) does not make evacuation time estimates for each <sup>separate</sup> ~~separate~~ facility on an individual basis;
- (e) does not consider the impact of peak populations, including behavioral aspects;
- (f) does not make any substantial recommendations for actions that could be taken to significantly improve evacuation time;
- (g) does not contain comments from the

their review of a draft time estimate study;

- (h) does not translate population data into auto-owning and transportation-dependent groups;
- (i) does not give attention to special services required by households not owning autos;
- (j) does not describe the means of transportation available to each special facility;
- (k) does not use site weather characteristics as presented in the FSAR;
- (l) falsely claims to have obtained mobilization and loading times for special facilities from administrators of those facilities;
- (m) incorrectly assumes that IPRA Byron, Revision 0 has made adequate provisions for the evacuation of special facilities and the general populace; and
- (n) makes further assumptions which contradict IPRA Byron, Revision 0, and the Byron Annex to the GSEP.

3. In violation of 10 CFR Section 50.47 (b) (12), the emergency planning for the ingestion exposure EPZ of the Byron Station does not sufficiently address the fact that there are inadequate medical facilities to provide the required bed space for an evacuation; that there is an insufficient number of medical and para-medical personnel to render medical assistance during an evacuation; that there are insufficient

procedures for the screening, treatment, and isolation of persons sustaining radiological injuries; and that there is an insufficient number of materials, supplies, equipment, and vehicles to provide for the transportation of injured persons during a radiological disaster.

4. In violation of 10 CFR 50.47 (b) (10) the emergency planning for the Byron Station fails to include an adequate means for protecting those persons requiring special transportation considerations. The proposed evacuation plans state that local school districts, the Oregon police, and the Oregon Ambulance Service will provide transportation for homebound and nursing home patients despite the fact that all three of these organizations are already burdened with responsibilities which overestimate their capabilities and overtax their resources. Furthermore, comprehensive lists of shut-in populations and their specific transportation needs are not available; there has been no analysis conducted regarding the feasibility of sheltering or a protective action. There are no provisions for relocation of those whose medical needs require hospitalization. There is no differentiation of host facilities to meet specific needs of individual populations. There are no provisions in the plans concerning the method to be used in distributing radioprotective drugs to mobility impaired individuals.

5. In violation of 10 CFR 50.47 (b) (1), (2), (3), and (12), the emergency planning for the Byron Station and the Byron Station EPZ does not include written agreements identifying the emergency measures to be provided and mutually accepted criteria for the implementation of procedures by support organizations having an emergency response role either inside or outside the EPZ.
6. In violation of 10 CFR 50.47 (b) (15), radiological emergency response training has not been provided to all response organizations and individuals who may be called upon to assist in an emergency, viz., directors and coordinators of the response organizations; first aid and rescue personnel; local support services personnel; medical support personnel; and those offsite organizations having mutual aid agreements with local agencies.
7. In violation of 10 CFR 50.47 (b) (7), emergency planning for the Byron Station has yet to include adequate dissemination of accurate information to the public regarding the effects of radiation, protective measures to be taken during an emergency, or the special needs of the handicapped; nor has adequate assurance been presented as to the method, manner, and text of the publications to be posted for the information of the transient populations.
8. In violation of 10 CFR 50.47 (b) (10), emergency plans are incapable of offering sufficient guidance for the choice of protective actions during an



emergency since applicant and state planners have yet to adequately determine the local protection afforded (in dose reduction) by various protective measures including evacuation, sheltering, and radioprotective prophylaxis.

9. In violation of 10 CFR 50.47 (b) (5) and (6), emergency planning for the Byron Station does not adequately provide for notification or communication of and between emergency response organizations and personnel so as to assure that communications necessary to timely and prompt evacuation can be implemented effectively.
10. The emergency planning relies too heavily upon volunteer personnel to effect an evacuation. The emergency plans fail to indicate the number of volunteer personnel who are necessary or available to perform the responsibilities assigned to them. Furthermore, the plans do not:
  - (a) assess the availability of volunteers during hours in which many are employed outside the EPZ;
  - (b) take into consideration inevitable personal conflicts in the responses of volunteers who have families in the EPZ; and
  - (c) give consideration to the possibility that some volunteers who might perform well in non-radiological disasters might refuse to participate in a radiological

11. The plan has not been revised on the basis of the results obtained from evacuation exercises.
12. Emergency planning beyond the EPZ is a recognition of the residual risk associated with major reactor accidents whose consequences could exceed those associated with so-called design basis events. Emergency plans proposed by the state and the applicant for the ten mile EPZ fail to meet the criteria of NUREG-0654 (p. 12) by failing to provide a substantial base for and analysis of expansion of responsible efforts in the event that this proved necessary due to worst-weather conditions and/or a core melt with breach of containment.
13. In violation of 10 CFR 50.47 (b) (1), the emergency plans, specific tasks, and responsibilities have been formulated without sufficient communication between planning officials and primary and support response organizations so as to enable said organizations to fulfill their assigned roles.

The Byron emergency planning and the current preparation for the August, 1983, evacuation test exercise do not comply with 10 CFR 50.47 (b) and NUREG 0654, as outlined above. These failures to comply render it impossible for the ASLB to make the findings of fact required by 10 CFR 50.47 (a), 50.57 (a) (3) (i) and 50.57 (a) (6) at the operating license stage. DAARE/SAFE and the Rockford League of Women Voters contend that a comprehensive reassessment of local evacuation needs, capabilities, and resources must be conducted with local input sufficient to render the plan capable of meeting

the specific needs of the intended evacuees.

By \_\_\_\_\_

Diane Chavez, DAARE/SAFE  
Representative

and

By Pat Morrison \_\_\_\_\_

Pat Morrison, League of  
Women Voters of Rockford  
Representative

February 21, 1983