

PARENTS CONCERNED ABOUT INDIAN POINT

P.O. Box 125  
Croton-on-Hudson, NY  
10520

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USNRC

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November 15, 1982  
DOCKETING & SERVICE  
BRANCH

Chairman Nunzio J. Palladino  
Commissioner John F. Ahearne  
Commissioner Victor Gilinsky  
Commissioner Thomas M. Roberts  
Commissioner James K. Asselstine  
United States Nuclear Regulatory Commission  
1717 "H" Street, N.W.  
Washington, D.C. 20555

Re: Emergency Planning for the Indian Point  
Nuclear Power Station

Parents Concerned About Indian Point agrees with Commissioner Gilinski when he says, (on page 60 of the transcript of the public meeting of the Commission on October 21, 1982) "I think for these plants to operate we have got to have a judgment that the state of preparedness is adequate."

In spite of the concerns of several commissioners that the question of whether or not the plans can actually work must be addressed, FEMA asserts that evaluation of preparedness must await another exercise in the field. Parents Concerned About Indian Point disagrees with this formalistic, procedural approach, and we have prepared the enclosed documents, "The People's Review of the Radiological Emergency Preparedness for Indian Point, November, 1982," to give the Commission an accurate and thorough understanding of the state of emergency preparedness in communities surrounding Indian Point.

These local citizens and officials are the experts on whether or not the plans are capable of working.

We have evaluated the plans and current state of preparedness using the Planning Standards set forth in NUREG-0654/FEMA-REP-1.

For each Planning Standard, we have quoted the planning objective and included selected quotes from "RAC Comments on New York State County Radiological Emergency Preparedness Plans (CRERPs) Indian Point, August, 1981," and "Interim Findings on the Adequacy of Radiological Emergency Response Preparation of State and Local Governments at the Indian Point Nuclear Power Station, July 30, 1982," prepared by FEMA.

The bulk of the "People's Review" is made up of quotations from people who live and work in the area affected by Indian Point, including elected and appointed officials.

Parents Concerned About Indian Point  
Letter to the Commissioners  
November 19, 1982  
Page 2

Please take special note of the Appendix which we have attached to the "People's Review." The Appendix consists of resolutions passed by public boards, teachers' unions, Parent-Teacher Associations, and special groups. All of these resolutions express a fundamental belief that the Radiological Emergency Response plan cannot and will not work to protect the health and safety of people around Indian Point.

We hope that you will keep in mind the following comments of the Rev. Frederick F. Johnson, Rector of St. Paul's Episcopal Church in Spring Valley, New York, as you read "The People's Review:"

"Naturally everyone would like to believe in times of emergency the best that is in people will be brought to the surface and all would share a mutual concern for the good of all. I seriously question whether this would be the case at the present time...No one understands radiation very well but everyone is afraid of it. Unlike fire and flood, radiation cannot be seen and therefore people's fears that they might be receiving dangerous and even lethal doses invisibly would add to a panic-stricken determination to escape at all costs...The spiritual mood of the people is extremely relevant, it seems to me, to how they would respond to all the unknowns of a nuclear emergency situation."

In a similar vein, Dr. Kai T. Erikson has said, "The emergency plans for Indian Point are full of vague directives, but whether or not they can be implemented depends to a very large extent on the attitudes, intentions, and emotional reflexes of the people charged with carrying them out...Until we know a great deal more than we do now about these matters, we dare not assume that the present emergency evacuation plans provide any protection to the public."

Respectfully submitted,

Pat Posner

Pat Posner

Myra Spiegelman

Myra Spiegelman

Phyllis Rodriguez

Phyllis Rodriguez

Anna Reisner

Anna Reisner

Julianne FreeHand

Julianne FreeHand

Kathy Feit

Kathy Feit

for  
PARENTS CONCERNED ABOUT INDIAN POINT

THE PEOPLE'S REVIEW  
OF THE  
RADIOLOGICAL EMERGENCY PREPAREDNESS PLANS  
FOR  
INDIAN POINT  
NOVEMBER, 1982

NUREG 0654

Planning

Standard A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATIONAL CONTROL)

Planning Objective: "To assure that primary responsibility for emergency response in nuclear facility operator, State and local organizations within the Emergency Planning Zones have been assigned, that the emergency responsibilities of the various supporting organizations have been specifically established, and that each principal response organization is staffed to respond and to augment its initial response on a continuous basis."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD A.

"All private sector organizations have not been identified."

"The concept of operation for each organization has not been provided."

"The County Executive or Chairman of the Legislature must sign off on the letter under Appendix 1 which endorses each County plan."

"Specifically, there are no letters of agreements from bus companies, unions, volunteer fire departments and ambulance services, or EBS station managers for activation of the EBS. Mutual aid agreements with the other counties within the 10 mile EPZ for equipment and personnel resources should be considered."

"The State plan should include a complete set of agreement letters from support organizations."

"Revisions of the State REPP submitted to the RAC still contain a conflict in primary organizational responsibility for transportation."

"The state and counties' responses regarding backup staffing and equipment will be adequate to resolve the deficiency if effectively carried out; however, little specific information has been given on coordination of state and counties in this effort."

EVALUATION OF PLANNING STANDARD A. BY LOCAL CITIZENS AND OFFICIALS

Michael Kaminski  
Director Of Planning  
Department of Hospitals  
Westchester County

"The Commissioner of Hospitals does not have the authority to order a Hospital or Nursing Home to evacuate."

Frank C. Bohlander  
Commissioner  
Dept. of Public Works  
Westchester County

portation, indicated the evacuees were being taken to a location other than their wheelchairs."

Anita S. Curran  
Commissioner of Health  
Westchester County

"The role of the New York State Health Department Regional Office must be clarified. It was providing information to the decontamination centers although the Regional Office was not designated this role in the Response Plan."

Sam Gdanski  
Legislator  
Rockland County

"There are no letters of agreement in areas required for ambulance corps, schools that require it for congregate care or reception centers, bus companies, or the State of New Jersey...As long as the Indian Point facilities exist, whether they are operational or not, they pose a danger and a threat to the health and safety of Rockland County... There is no emergency plan which can be adequate or sufficient to fully protect the health and safety of all of our people. Even with tremendous infusions of money, equipment, and manpower, the roadway network in Rockland County is incapable of insuring a rapid evacuation if necessary."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Rockland County

"We suggest strongly that the laws regarding the power and authority of the Chairman's Office, the Office of Sheriff, the Village Mayors, Supervisors of Towns, as well as the Police Chief of each village and town in the County be specifically spelled out as to

whose authority and under what authority certain actions could be taken... We can honestly say that there is no coordination at present between the chiefs of police, the Sheriff's Department, and police...We would like to see the role of the Sheriff and the chiefs of police specifically defined... If a sheriff or chief of police sees a problem that some other command agency does not agree upon, whose responsibility is it to carry out on that problem?...The mission of the National Guard should be defined and its liaison with the various police agencies involved."

James McGuire  
Padiological Health  
Specialist  
Rockland County

"(The plan) also gives joint responsibility for a number of actions to the State as well as local government and it has yet to define whether or not the accident assessment should be the total responsibility of the local

agencies or whether it will be the total responsibility of the State agency. A major fault that I have had as the local agency is that it seems that we are not allowed any major interaction with the federal agencies. Everything must be screened through the State agencies...As far as the county and villages working together, they are still trying to identify the responsibility and command and control and reach joint agreements and written communications. There has been some question as to who will be in charge of the different villages and cities. For example, Peekskill wants the ability to make its own determinations."



Richard Dunne  
President  
Board of Education  
Yorktown

"What authority does a superintendent have in mandating that staff go on buses that are evacuating students? We believe that legally we cannot mandate this action if staff decided to be with their own children!"

David Siegel  
Superintendent of Schools  
Croton-Harmon S.D.

"People who have important roles to perform have not all been advised of their responsibility nor are there, to my knowledge, any laws which require these people to perform

the acts which the plan calls on them to perform."

Cleland S. Conklin  
Superintendent of Bldgs.,  
Grounds, & Transportation  
S. Orangetown Schools

"I do not know what authorities would or could order South Orangetown School District personnel to attend and assist in an evacuation to the school district (which is outside the 10 mile EPZ)."

John Roden  
President  
Yorktown Congress of  
Teachers

"Resolved that the YCT oppose implementation of these procedures and YCT participation in such procedures." Adopted 3/8/82  
SEE APPENDIX, "RESOLUTIONS OF LOCAL BODIES"

Vincent Rubeo  
Teacher  
Anne Dorner School  
Ossining

"Resolved that the Ossining Teachers Association (OTA) oppose approval of these procedures and oppose OTA participation in such procedures..." 4/27/82

Paula Meyers  
Teacher  
CET School  
Croton

"I am certain that I will be experiencing an extreme ethical and psychological conflict and at the present time I must candidly state that I don't believe I will stay with my school children." Mrs. Meyers

presents the Carrie E. Tompkins faculty petition: "As professionals dedicated to the care and education of children, we feel that we may not remain silent before a patently unfeasible plan...We must state that we believe that the children would not be best, or even adequately, served."

Maggie North  
Teacher  
CET School  
Croton

"My input was never solicited in preparing this terribly flawed scheme. Simply stated, I do not want this responsibility because I don't believe the evacuation plan is workable..."

Elizabeth Sekelsky, R.N.  
School Nurse, CET School  
Croton

"Has a medical pool been organized and given authority to treat students without parental consent? If so, school nurses in the ten mile radius should be informed of

this...While insurance will not be given for nuclear accidents, will school insurance be extended to cover accidents after school hours, or on the bus in transit?"

Jane Capon  
Owner-Director  
Nursery School &  
Day Camp, Pomona

"...Rockland County Emergency Response Procedure for schools dated August 1981" gave unclear instructions which left this non-public school administrator confused and concerned about her responsibilities."

Sister Colleen Murray  
Principal  
Holy Name of Mary School  
Croton

"I do not believe that I can rely on those buses to show up during an evacuation. I don't know what I will do if they don't show up...I can't force teachers to stay with the children."

Joan H. Fine  
President  
Girl Scouts of  
Westchester/Putnam

"To date neither Con Edison or any other agency has advised the Girl Scout council regarding the preferred steps to be taken, the responsibility that the leader will have to assume, and what legal ramifications both

the leader and the council are undertaking in trying to protect the children in our care in a time of potential danger."

Phyllis Rodriguez  
Artist & Teacher  
Croton

"Do I have the legal right to force a possibly unwilling child to go, even to try to keep him or her safe?"

Fern Narod-Shiek  
School bus driver  
Mahopac

"It is the lawful responsibility of the driver to transport the children from one location to another, never allowing them off the vehicle unless it is their designated location...So what is the driver to do if recalled for emergency proceedings?"

NUREG-0654  
Planning  
Standard

C.

EMERGENCY RESPONSE SUPPORT AND RESOURCES

"To assure that arrangements for requesting and effectively using assistance resources have been made, that arrangements for State and local staffing of the operators near-site Emergency Operations Facility have been made, and that other organizations capable of augmenting the planned response have been identified."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD C.

"Have all facilities and resources of non-government organizations been identified? Letters of agreement are not available for all organizations listed."

"Agreement letters from support organizations in state and county plans are missing."

"In Rockland County, local support organizations needed greater involvement in development of emergency plans."

"Revisions of the State REPP submitted to the RAC still do not adequately address State resources to support the Federal response."

"Provisions for...missing agreement letters are not addressed."

EVALUATION OF PLANNING STANDARD C. BY LOCAL CITIZENS AND OFFICIALS

Raymond Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"No arrangements exist addressing compensation issues for expenses incurred by the (bus) companies in the performance of their planned responsibilities...It is very reasonable to assume that these drivers are more likely not

to volunteer because they will place a higher priority on personally evacuating their own families rather than driving buses for strangers during an evacuation...Category C states 'if practical, women capable of reproduction should not take part in these actions' and Category D states, 'If practical, volunteers above the age of 45 should be selected.' While exact demographic statistics are not available, I am very concerned that a significant number of bus drivers would be excluded by one of these suggested guidelines."

Michael Kaminski  
Director of Planning  
Department of Hospitals  
Westchester County

"There is no legal relationship between the Westchester County Medical Center and the 35 ambulance companies in Westchester County, nor is there a legal relationship between the Westchester County Medical Center and the

Westchester EMS (Emergency Medical Services) Council, Inc., such that the Westchester County Medical Center can order ambulances into, out of, or around the 10 mile EPZ, to perform any emergency services."

William G. Borghard  
Commissioner, Dept. of  
Environmental Facilities  
Westchester County

"It is our expectation that should an evacuation be required, the sewage that reaches the plant and pumping stations would be discharged untreated into the nearest water course. If this is not done and a malfunction of equip-

ment occurs while the plants are unattended, there would be a overflow, and a backing up of sewage through the manholes and into the streets."

Sonny Hall  
Vice President  
Transport Workers Union  
Local 100

"This union will not allow any member of our Union to be involved unless each and every detail has been discussed with us and then, of course, with our members."

Leon Bock  
Superintendent  
Lakeland Central S.D.

"...until such provision for voluntary service (for driving and supervision) is determined, Lakeland District cannot state a feasible plan is in place for the safeguarding of the interests of our children."

Tom Turner  
Vanguard Bus Co.

"Drivers are not contracted to drive during an evacuation. There is no penalty if they don't show up. Most drivers live in the area;

they are part-time and mostly family people which will pose a problem to evacuation time because they will be primarily concerned with their own families. The drivers have had no emergency training for a radiological emergency. Buses, per the plan, are instructed to drive on parkways with bridges that the buses can't fit under."

Seth Corwin  
Chappaqua Bus. Co.

for late hour driving during railroad emergencies."

Fern Narod-Shiek  
School Bus Driver  
Mahopac

for a private industry and therefore I will not guarantee that I will be available for any emergency evacuation."

Seth Corwin  
Chappaqua Bus Co.

"It is impossible to state with any degree of certainty whether or not I will chaperone the school children."

Ruth R. Isaacs  
Teacher and Parent  
Carrie E Tompkins School

"I do not have the ordinary medication used by children who I know have special medical conditions, i.e., asthma, nor am I confident that I could deal with treating the children if so charged."

Breda Curran  
Teacher  
Carrie E. Tompkins School  
Croton

extreme stress and I cannot be counted on to care for the physical or emotional needs of my children during a nuclear accident evacuation."

Albert A. Johnson  
Resident  
Stony Point

"The Ambulance Corps has a difficult problem staffing, especially during working hours."

Edward J. Connelly  
Emergency Medical Technician and Member  
Ossining Volunteer  
Ambulance Corps

"When it comes to willingly going into an area of radioactive contamination, however, the considerations of survival and family have to come first. I will not respond to a nuclear emergency ambulance call."

Richard H. Bower  
Coordinator  
Rockland County Volunteer  
Ambulance Corps  
Suffern

"The most obvious source of outside volunteer ambulance help must come from New Jersey... To the best of my knowledge, to date there has been no acknowledgement, let alone discussion about, this topic of out-of-state expenses."

Robert W. Hare  
Pastor and Parent  
Scarborough Presbyterian  
Church

"I would not follow any such plan as has so far been given us."

Reverend David B. Wayne  
Rector and Parent  
St. Augustine's Episcopal  
Church  
Croton

"To my knowledge, no one in any of the Croton houses of worship, or in any of the Episcopal Churches in Westchester, has been contacted about evacuation plans...The instruction booklet leaves me confused as to what my response should be."



Michael A. Robinson  
Rabbi  
Temple Israel of Northern  
Westchester  
Croton

"There has never been a meeting with us... concerning any kind of disaster information. Neither have we received any specific information on any kind of responses we should make in case of an emergency."

NUREG-0654

Planning

Standard E.

NOTIFICATION METHODS AND PROCEDURES

Planning Objective: "To assure that procedures have been established for notification, by the facility, of State and local response organizations and for notification of emergency personnel by all response organizations; to assure that the content of initial and followup messages to response organizations and the public have been established; and to assure that means to provide early warning and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD E.

"The CRERPs do not satisfy the planning guidelines regarding the dissemination of information to the public using the EBS."

"The plans do not contain any detailed information concerning the method of coordination of all EBS messages among counties within the EPZ, as well as with the State."

"Announcements...should include information for residents of other counties."

"Separate announcements regarding school evacuations should be prepared."

"People should be provided with a rumor control number."

"Methods and procedures for notification of emergency response personnel, and for notification and instruction of the populace within the plume exposure pathway Emergency Planning Zone (EPZ) were found to be deficient in the plans and during the exercise."

"During the exercise, incomplete functioning of the siren system and lack of backup alerting indicated significant deficiencies in the counties."

"The improvement of the initial call-out system on Rockland County will depend on availability of additional funding and willingness of the county to participate in the planning process."

"The existing siren system requires further correction before it becomes fully operational."

EVALUATION OF PLANNING STANDARD E. BY LOCAL CITIZENS AND OFFICIALS

Raymond F. Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"It is our opinion that individuals who need assistance...will call our 682-2020 information number to find out what bus route to take for the evacuation. At present the Department's Information Bureau doesn't have

maps showing the evacuation routes overlaid on a street grid so that Information Assistants can advise callers which evacuation route is closest to their homes."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Services  
Westchester County

did work were not audible in many parts of the ten-mile EPZ."

Dr. Elsie Bull  
Assistant Principal  
Lime Kiln School  
Rockland County

"In February, 1982, I became aware of the distribution of a booklet entitled "INDIAN POINT EMERGENCY PLAN AND YOU" and wrote to the Four County Nuclear Safety Committee in White Plains for a copy...The answer to my letter was that I did not qualify for a booklet because of my address. Since I was still concerned about my responsibilities, I wrote again... I was shocked to learn that I should leave my school and my responsibility for the health and safety of so many children and simply go home."

Dr. A. Glen Everhart  
Superintendent of Schools  
North Rockland Central S.D.

"There would be no way of notifying parents of children from other districts attending school in North Rockland. There would be no way of notifying schools where the children from North Rockland attend out of the District. It is unclear as to how we would communicate with children and faculty supervisors on field trips or those participating in school activities outside the District."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"The main concern that we had was that there was no immediate notification of families, either within the ten mile zone of danger, or those outside as to the seven different locations in New Jersey where their children might be taken...The sirens that have been established to warn us in Rockland County have not performed well at this particular point, and no one has been able to assure us that they ever will...Many of the children have no one at home to guide them between the time school is out and the time their parents come home from work. Should there be an emergency during those hours, 3:30 to 6:30 p.m., for example, no instructions have been given to the families as to what these children should do."

Gerald T. Kapusinsky  
Attendance Supervisor  
No. Rockland Central S.D.

"I...have found many situations where students are home...with or without the knowledge of their parents...On any given day a probable figure of several hundred children being home... could cause a problem if an evacuation was necessary."

Kathy Pierpont  
Parent  
Croton-on-Hudson

"My children are without adult supervision from approximately 3:00 pm until 9:00 pm, as I work two jobs to support us. I have no faith that my children would be able to evacuate themselves as instructed...They have not been able to correctly remember the directions we have established for a fire emergency unless they are constantly reviewed."

Nancy Sheer  
Teacher and parent  
Croton-on-Hudson

"What of the half hour's time my children sometimes spend alone waiting for me after school? Who could be 'in charge' and evacuate them to safety? My return would doubtless be prevented by clogged roads."

Karen K. Ford  
Parent  
Croton-on-Hudson

"Unless I had information indicating that yes, both children were in transit to White Plains, I would probably become more inclined to return to Croton to see to their safety."

Barbara Blattstein  
President  
Rockland County Assoc.  
for the Hearing Impaired

"Any disaster plan must consider the fact that the deaf must be alerted via personal contact or by visual devices such as in-home signal lights."

Dominic Sbarra  
Maintenance Manager  
Patricia Apts, Ossining  
Grandparent

"My wife Caroline and I have been deaf since birth." As maintenance manager for an apartment building near Indian Point, Mr. Sbarra is responsible for the safety of others.

Clifford and Nancy Rowley  
President, NYC Assoc. of  
the Deaf, and President,  
Westchester Community  
Services for the Hearing  
Impaired

"It will take a determined search to notify all the deaf and hearing-impaired people of the emergency plans and of any special help which might be provided."

Oscar Cohen  
Principal  
Lexington School for the  
Deaf  
Jackson Heights, NY

"TV, radio and loudspeaker announcements would be made as well as sirens sounded. Deaf persons would not respond to any of these.... Should an evacuation be implemented, the deaf person would be at a loss concerning events, receiving directions, and in having basic needs met."

NUREG-0654  
Planning  
Standard F.

EMERGENCY COMMUNICATIONS

Planning Objective: "To assure that provisions exist for prompt communications among principal response organizations, to emergency personnel and to the public."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD F.

"It is not clear from the plan what the alternate method of communications is for notification and activation of the emergency response network."

"The plans have not provided for communications between contiguous States and counties in the 50 mile ingestion exposure pathway. In addition, provision for all alternate communications links between States and counties has not been clearly defined in the plans."

"How will communications be maintained with the field monitoring teams?"

"Alternate individuals for each emergency response agency have not been designated."

"The references that were reviewed did not satisfy the criteria for radios and land lines other than hot-lines."

"Provisions for prompt communications among principal response organizations to emergency personnel and to the public were found to be deficient in the plans and during the exercise."

"Means for communication with field teams should be described."

"Rockland, Putnam, and Orange Counties experienced failures of communication equipment. Westchester County depended heavily on a commercial telephone system."

"The exercise demonstrated the need for equipping of all evacuation buses with two-way radios capable of communicating with bus company dispatcher."

"Funding is not available at this time to take action on a number of the recommendations."

"The revision pages do not address the lack of important telephone numbers, field communications systems, and periodic testing."

"County responses to plan comments do not adequately address problems identified."

"Other communications improvements will require funds not currently available."

"Plan and exercise deficiencies still remain uncorrected and require corrective action."

EVALUATION OF PLANNING STANDARD F. BY LOCAL CITIZENS AND OFFICIALS

Raymond Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"Since a number of reception centers are outside the area of radio coverage, drivers will have to communicate with their dispatchers by telephone...This cumbersome communication procedure will require a dedicated phone at

each of the designated reception centers and will require dispatchers to operate both a radio and telephone communication system...Drivers getting lost...breakdowns, or accidents happening outside of the coverage area of the radios...will require the driver to abandon the vehicle in search of a telephone."

Leonard Scharf  
Assistant Superintendent  
Rockland County Board of  
Cooperative Educational  
Services (BOCES)

"Probably the single greatest problem, as foreseen by the school districts, is the matter of communications. While the plan mentions the use of radio communications equipment, there presently exist no such facilities linking the schools together or

linking the schools to the command center. The use of telephones to relay vital information will be totally inadequate."

George Schnackenberg  
Chief of Police  
Clarkstown

"It is strictly speculation for me to say how many we would have on duty in an emergency... In order to notify people to report in emergency situations it would require phone calls.

To mobilize the major part of the department would be a very difficult task...That is one of the fallacies the Chiefs Association felt was wrong with the plan, the whole communications system and the fact that there are no beepers available for this type of mobilization."



Richard Wishnie  
Supervisor  
Town of Ossining

will be subject to severe stress and must be very well informed about what they are supposed to be doing. We do not at present have a communication system adequate to the task."

Linda Co  
Member. Bd. of Directors  
Rockland County Girl Scouts

between this office and camp during an emergency of this nature by public phone lines is precarious at best."

Stephen Scurti  
Chief of Police  
Town of Stony Point

"In relation to the evacuation plan they lack training, equipment, especially radio equipment which is totally inadequate to meet any major emergency involving communication among several agencies. It would be advantageous to have a teletype system linking all the agencies involved. With it there would be a minimum of misunderstood messages because they would be written."

Richard Herbek  
Village Manager  
Village of Croton

"The Village Police Department has no radio communications with neighboring police departments such as Buchanan, Peekskill and Yorktown, as well as state and county police. No funding has been made available for the purchase of radio equipment which would facilitate interdepartmental communications."

Richard H. Bower  
Volunteer Ambulance  
Disaster Coordinator  
Rockland County

"Most of the success of the Plan depends on the present phone system's ability to function. Since much of the ambulance dispatch is dependent on fast available phone use, I am greatly concerned about its ability to handle the obvious overload that is bound to occur during a disaster... Lack of radio equipment for my disaster committee members...severely restricts their effectiveness."

Michael Kaminski  
Director of Planning  
Department of Hospitals  
Westchester County

"There is no current effective system to keep track of all ambulance movements, or vehicles in and out of service for mutual aid purposes...Communications between the EOC and ambulances in the northern part of the County is extremely unreliable because of equipment inadequacies...Telephone tie-ups during the drill created unexpected delays in patient movement...Other issues of a general nature include:... the lack of alert radios in nursing homes and hospitals throughout the County and the lack of adequate communication equipment to coordinate patient movement."

Frank C. Bohlander  
Commissioner, Dept. of  
Public Works  
Westchester County

"Several types of communication forms were distributed. No instructions have ever been given as to how, when, and why each form is to be used."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Services  
Westchester County

"County-wide communications between police departments is inadequate...All communications between reception centers, congregate care centers, and the Westchester County Emergency Operating Center must be by telephone or by volunteer amateur radio operators in the R.A.C.E.S. (Radio Amateur Civil Emergency Service) system."

Dr. Anita S. Curran  
Commissioner of Health  
Westchester County

"Direct contact could not be made with Dr. David Axelrod, New York State Commissioner of Health. It is essential for me to have frequent and uninterrupted conversations with

Albany to facilitate the decision making process on both sides...The ability to consult and exchange information with the Health Commissioners in Orange, Putnam, and Rockland Counties is essential for the same reasons. The ability to communicate with field monitoring staff only by means of police radio was cumbersome and inefficient. This could result in the unnecessary exposure of personnel to radioactivity should the wind direction suddenly shift...Our staff are in the field the majority of the time, and we would be unable to reach them promptly...The phone lines are not adequate to handle the traffic between (decontamination) centers and the Emergency Operations Centers."

Sheriff Daniel Guido  
Commissioner of Public  
Safety  
Westchester County

"If the telephone lines become swamped and go 'down', as well they might from an overload in an actual radiological emergency, the police coordinators will have no means of receiving feedback regarding events occurring

in the field...The telephone capacity at our county warning point, which has a burden of making all initial notifications to get the response mechanism implemented, is also inadequate."

Charles W. Bates  
Commissioner, Dept. of  
Social Services  
Westchester County

"We have as yet no adequate plan for staff notification in the event of an emergency outside of normal working hours...We also have concerns about communicating. Certainly the system used during the drill was less than adequate."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"As far as between county and county is concerned, they did decide to put in this Rex (RECS) Line or 'hot' line that was going right to the utilities to feed us the technical information...Since then, this Rex

(RECS) Line has degenerated to simply a one-way pipeline from the utilities to the different counties and the assessment teams have been moved away from control of the Rex (RECS) Lines and it also appears that a great deal of technical data is coming across the executive hot line between the county executives and the State Governor's office which the assessment teams do not have at their disposal."

Stephen Horowitz  
Finance Director,  
Masonic Camp 7  
Tallman, NY

"The only means of communication is by telephones, which, they assumed, would be jammed at that point, and even with that, there is no way to contact a good portion of those drivers during the day."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Rockland County

"There is a need for a direct link via telephone of all police agencies. This would be a back-up phone system in the event of a communications blackout...The present phone systems are totally inadequate."

Donald P. McGuire  
Deputy Director  
Officer of Emergency  
Services  
Rockland County

"Hopefully we would be able to contact everyone we were supposed to by phone and I say hopefully because we lack essential equipment and training...The Rex (RECS) phone system is inadequate at this particular time to provide information from the facilities

to the Radiological Office. For example, during the drill on March 3rd, we had to tape open a phone in order to keep that phone available for the person that Rockland County had at the Nuclear facility to transmit information back to our County EOC. We also had to place a person to help monitor the information that was going over the Rex (RECS) system. This is not adequate when dealing with the radiological disaster. When you have to try to get information second-hand, it just takes too long and it is not appropriate."

Dr. Glen Everhart  
Superintendent of Schools  
North Rockland Central S.D.

"The procedure does not address methods of communicating with parents of school children who reside or work out of the emergency zone. The telephone system is

inadequate for the so-called 'Storm Alert Fan-out.' Further, no backup communication system has been suggested. The telephone system would be totally inadequate for communicating with parents, contacting reception centers, and at the same time, carrying out the 'Storm Alert Fan-out' procedure (although not all of the procedures were tested during the recent drill, the telephone system proved inadequate, even on a limited basis). No plan is offered for communication with bus fleets...Not all busses are radio equipped."

NUREG-0654  
Planning  
Standard G.

PUBLIC EDUCATION AND INFORMATION

Planning Objective: "To assure that accurate and timely information is provided to the public on how they will be notified and what their initial actions should be; to assure that the principal points of contact with the news media for dissemination of information (including physical location or locations) are established in advance; and to establish procedures for coordinated dissemination of information to the public."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD G.

"There are no specifics regarding the public information program for permanent and transient populations of the plume exposure EPZ. What is the methodology to ensure that the public information program materials will be available to all permanent and transient populations?"

"The plans do not reflect a full understanding of the purpose of rumor control. Rumor control is primarily designed to provide the general public a point of contact to obtain answers to individual questions."

"Section II.B.6.b. merely assigns responsibility for the co-ordination of an annual news media program to acquaint the news media with the CRERP. A detailed program should be developed and presented in the plans."

"Public education program and procedures for dissemination of information to the public were found to be deficient in the plans and during the exercise."

"Information is lacking on distribution and follow-up of the public information brochure."

"During the exercise, interviews with EPZ residents indicated a lack of awareness of the notification system, the Emergency Response Planning Area (ERPA) designations, and their individual responsibilities."

"Comprehensive rumor control procedures were lacking."

"Implementation of a public education campaign must await funds and additional staffing."

"Although the State and county have made commitments to improve public education, particularly for transients, significant deficiencies remain regarding compliance with this planning standard until the remedial actions have been completed."

#### EVALUATION OF PLANNING STANDARD G. BY LOCAL CITIZENS AND OFFICIALS

Evaluation Criteria G.1: "Each organization shall provide for periodic dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency."

Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"Approximately 2,000 families in the Town of Haverstraw need the brochures to be printed in Spanish and their children have no instructions from their families as to how they will be reunited."

Luis Del Pilar  
Affirmative Action Coord.  
Rockland County  
West Haverstraw

"A major concern of mine is that the plan did not adequately address the needs and concerns of non-English-speaking residents and visitors in the area...To the best of my knowledge, no literature in Spanish was provided...The problem of language becomes even more acute during the summer months when thousands of non-English-speaking residents of New York City and northern New Jersey utilize public recreation areas that fall well within the evacuation area."

Betty Ramey  
Owner  
WRKL Radio  
Pomona

"We presume that our listeners are English-speaking and we broadcast only in English... Our records show that our role as provider of prompt local news may be somewhat compromised regarding notification" because of "delays" in reports of leaks at Indian Point Units 2 and 3.



Evaluation Criteria G.1. continued

Linda Co  
Member, Bd. of Directors  
Rockland Co. Girl Scouts

plan and presumably have not received mailings, would not know where to find them."

"Camp Addison Boyce is populated by children from all over the county, and occasionally groups from out-of-state and even from Canada. ...Their parents, who are not affected by this

Mabel Cronk  
President  
Peekskill Seniors

members of Peekskill Seniors still had not received brochures.

"Many of us did not get a leaflet or any notification as to where to go or what to do in an emergency...Many of us did not hear the sirens on March 3." As of 11/7/82, many mem-

Evaluation Criteria G.2. "The public information program describing this system is acceptable if the permanent and transient adult population within about 10 miles of the site is provided an adequate opportunity to become aware of this information annually."

I. The 10 mile limit is being imposed arbitrarily and unreasonably.

Dr. Elsie Bull  
Assistant Principal  
Lime Kiln School  
Rockland County

"How would parents from Spring Valley who lived outside the ten mile area know where to pick up their children? Like myself, they would not have received a booklet describing the evacuation plan."

A. Glen Everhart  
Superintendent of Schools  
North Rockland Central S.D.

"The plan for the children who live out of the EPZ but attend school in the EPZ and children who attend school out of the EPZ but live in the EPZ does not appear to be feasible."

Eleanor Kahn  
Special Ed. Teacher and  
Parent  
Robt. E. Bell Middle School  
Chappaqua

not know which of my students live in the evacuation area. There are not plans for them left at school, with their homes evacuated."

"In the event of an emergency during school hours, younger siblings of families in the West Orchard area would be evacuated, as would families who are at home. Older siblings in the middle and high schools would not be evacuated. As a teacher in the middle school I do

Ellen Burgher  
Parent  
Pleasantville

cliff Manor School system regarding evacuation plans."

"My daughter...along with 470 other Briarcliff High School students, is due to be evacuated... I live just beyond the ten-mile radius...We have received no information from the Briar-

Raymond Bowles  
Teacher and Realtor  
Pocantino Hills

ius...I have never received any instructions or information from Westchester County or any government agency with regard to protecting my family from a nuclear accident...As someone so close to the ten-mile cutoff, I assure you many of us plan to evacuate."

"Living just one-eighth of a mile from the Emergency Planning Zone, I feel extremely vulnerable in the event of a meltdown...I question the arbitrary cutoff point of a ten-mile rad-

Evaluation Criteria G.2. continued

Lois Jessup  
President  
Rockland County Conser-  
vation Association

"A considerable amount of my daytime and evening hours are spent within the ten mile zone of of the Indian Point nuclear plants. Since my actual residence is outside the zone, I have received no instruction as to the procedures I should follow if an emergency should develop while I am within this arbitrary evacuation area."

II. The public perceives the information distributed to date as containing specific errors.

Raymond S. Jurkowski  
Deputy Commissioner of  
Transportation  
Westchester County

"Page TR1-62 of the plan shows vehicular movement from the Saw Mill River Parkway (southbound) to I-287 eastbound--a vehicular movement that is not possible because there is no such ramp."

Anthony R. Marasco  
Director, Office of  
Disaster and Emer-  
gency Services  
Westchester County

"The pamphlets were published by the utilities with no input from the County. There are numerous errors, omissions, and the general instructions are vague. There are no maps showing the school reception centers and the evacuation bus routes do not show to

which reception center they are going. Some of the schools listed are no longer in existence, and most of the BOCES were left out...It has been noted that...the Coast Guard will respond to any radiation accident to protect the shipping and personnel on the Hudson River. We have requested verification of this response capability...We are in receipt of a letter... from (the) Captain of the Port, stating that he does not have the expertise or the protective equipment needed to safely carry out his assigned role."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Rockland County

"I also was specific about the fact that their calculations in the amount of people that would have to be moved are completely erroneous."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"We are well aware that there are a number of streets that are located as evacuation routes in the plan that are totally inadequate, and are definitely the wrong roads."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"Among the problems that struck us immediately was the fact that...the junior high school complex which actually houses all the students and staff involved in education through

grades 7 and 8, approximately 2,500 individuals, while they were included in the map at the centerfold of the document I refer to (Indian Point, Emergency Planning, and You) they in fact were nowhere involved in the emergency evacuation plan."

Evaluation Criteria G.2. continued

Shirley S. Gunn  
Director-Teacher  
Circle School  
Parent, Croton

"According to the plan book, the parents from the Croton area are assigned to a different reception center from their nursery and elementary school children."

Sylvia G. DeWard  
Art Teacher and Parent  
Croton

"I know of no plans to return the children at the BOCES Tech Center to Croton or to get the parents to the Tech Center. I wonder what plans have been made for all the after-school classes."

Sheila Salkin  
Director  
Temple Beth El Nursery  
School

"With regard to the emergency evacuation plan, our school does not have enough vehicles for transportation as listed in the booklet. We have an enrollment of 70, not the 30 as shown."

Sally Ziegler  
Executive Director  
Day Care Council of  
Westchester

"In (the Ossining area) out of twenty-three facilities, five do not appear in the plans. These overlooked agencies care for children as young as eight weeks...Few day care centers have known what arrangements they are expected to have...staff unprepared for an awesome responsibility and generally eager to reach their own children."

to make. This means that we

Eleonore Bronzo  
Directress  
Croton Montessori School

"According to your latest records, this nursery school has not been included in the emergency evacuation plans...We have never been contacted by anyone to work out an evacuation plan for our school."

Arlene Tift  
Parent  
Croton

"I received your pamphlet on Indian Point and evacuation plans, but, to my consternation, my daughter's nursery school, the Croton Montessori School, is not included in your evacuation plans. This omission is not acceptable; nor is the faulty system for warning local residents."

Linda Brown  
Tappan Zee Nursery School

"According to the information sent to us, our school would be provided with two vans for evacuating the children. Our response to this is that van full of children will be without a teacher to comfort and assure them."

Phyllis Helbraun  
Executive Director  
Rockland Council for Young  
Children

"The Indian Point Evacuation Plan omitted the following pre-schools: abc Nursery Group...190 children. Sonshine Day Care Center...25+ children. The caregivers...may not even know about the plan."

Katherine Feit  
Parent and Babysitter  
Croton

"I have read my evacuation plan and consider it full of errors."

Theodora Dyer  
Parent  
Croton

"My profession requires me to read maps on a regular basis...even I had trouble finding the 'planning area' assigned to my neighborhood."

Evaluation Criteria G.2. continued

III. An "opportunity to become aware" does not guarantee understanding, acceptance, or co-operation.

Sheriff Daniel Guido  
Commissioner, Dept. of  
Public Safety  
Westchester County

mechanisms can be mobilized and are in place."

"From past experience, it is predictable that a carefully orchestrated and controlled evacuation may not be possible. The effect... may be a situation wherein matters have gotten out of hand before adequate control

Bela and Inga Cseh  
Residents  
Croton, NY

and well thought out rules and regulations resulted in chaos with total breakdown of communications and transportation...We believe that the plan cannot and will not be executed as laid down and that evacuation is therefore impossible."

"Having lived in Europe during the second World War we are thoroughly familiar with evacuation procedures...Despite careful preparation there was a total loss of control

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Rockland County

"If the people themselves who are taking part in the operation don't feel comfortable, how do you intend to make the public feel comfortable and feel that they are in safe hands?"

Jamie Seedman  
President, Hillcrest  
Citizens Assn, Inc.  
Rockland County

"There is no possible evacuation plan for us and no amount of money can create a plan that will be both practical and effective for such a dense population."

Stephen Horowitz  
Finance Director,  
Masonic Camp 7  
Rockland County

"The drivers, at this point, have been told that if an evacuation takes place, they are to take the children home, which is far different than the evacuation booklet which states that they will be taken into New Jersey."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

stated that they would get into their cars and go after their children. They would refuse to wait to hear about them. They want to take immediate action regardless of any chaos that it would cause."

"The main problem we have is the reaction of the general public against it. People have thrown away their brochures, have derided the plan in front of their children. They have

Jerome Kagan, Ph.D  
Professor of Human Develop-  
ment  
Harvard University

irrational behavior is seriously enhanced."

"It is not possible to predict the degree to which the evacuation plan will be followed by the large population living within the area... Should a large number...decide not to follow the plan,...the probability of panic and



Evaluation Criteria G.2. continued

Loretta Brundage  
Grandparent and Parent  
Croton

"Because of this separation (of families) I know there will be chaos so great that it will be total disaster...Nothing is clear to me and because it is not, I am terrified."

Eileen McGovern  
Parent  
Tompkins Cove

"Being a mother of four children who attend different schools, I am far more comfortable relying upon my own ability to react to emergency situations...I will not be pacified

by...a fruitless attempt at developing an evacuation plan."

Susan M. Teasdale  
Parent  
Peekskill

"I never received the Con Edison booklet entitled 'Indian Point, Emergency Planning, and You.' A friend lent me her copy, and, after having read it, I must say that I never have in the past, nor do I now...plan to follow those directions."

Sheilah Rechtschaffer  
Parent  
Croton

"We have young children and from what they have expressed, they have no confidence in any such plan and the whole idea only brings more anxiety to their lives..."

Betsy Doepken  
President  
Yorktown PTA

"We have too many questions and no answers. In your booklet you state that the plan will 'enable officials to cope with emergency situations that may arise.' We feel

that the plan as it now stands will create many more emergency situations than we already have."

Daniela Misch  
Parent  
Croton

"We have in our possession the 'Indian Point, Emergency Planning and You' booklet but we do not feel safe or reassured by its content."

Lynn Kauderer  
Parent  
Croton

"If these planners can overlook an entire school and then, even after the error has been pointed out, continue to overlook it, how can I as a parent and as a citizen have

any confidence in their ability to evacuate an entire area?"

Toby Gersony  
Educational Director  
Ramapois Country Day School

"Would I, as director, believe the officials when, in my opinion, they have lost their credibility by calling this recent drill a success when we didn't even hear the sirens?"

Richard Altschuler  
Sociologist  
Statistics for Business

"The evidence of the survey conducted by my firm, Statistics for Business, is that the people of Westchester County would be ill-prepared to follow the emergency plans

in the event of a serious accident at Indian Point, because of the ineffectiveness of the public education effort made so far."

Evaluation Criteria G.2. continued

Don D. Smith, PhD.  
Professor of Mass  
Communication  
School of Journalism  
University of Iowa

different from those intended...Based on the contents of the material I have examined, in my opinion, one can expect large gaps in the emergency knowledge, preparation, and motivation of the Indian Point public."

Linda Puglisi  
Director  
Mohegan Colony Nursery  
School, Crompond

"Mere distribution of the information brochure is not in itself evidence of an informed, prepared, and motivated public. It is not uncommon for public information campaigns to fail, to only partially succeed, or to have results quite

"In theory we comprehended the plan, but in reality we had serious doubts as to the success of this procedure."

Agata Craig  
Parent  
Croton

"I barely glanced at the pamphlet I received in the mail."

Jane Courtney  
Parent  
Stony Point

"I ignored the booklet for a long time, and I know many people who have done the same thing."

Madeline and Marc Holzer  
Parents  
Croton

posed to do... Our sitter is  
and caring for our children."

"Because the booklet on the evacuation plan is at our home, if we were at work (in New York City) we would have absolutely nothing to remind us of what we were supposed to do... Our sitter is torn between wanting to be with her child and caring for our children."

Myra Spiegelman  
Parent  
Croton

"I also do not feel confident that a babysitter could safely evacuate my children...I have not even instructed them on the issue because I do not want them to take my children anywhere."

Mary P. Bulleit  
Parent  
Croton

is the responsibility of Con  
successfully."

"Nor do I believe that it is the responsibility of either a sitter or a ballet teacher to have to deal with how to evacuate children from a nuclear disaster area. It Edison, and they have not dealt with it

Lillian F. Moore  
Parent and Babysitter  
Croton

school, there is no way I can get home to supervise my children."

"I care for a two year old child...I have had no instructions from his parents as to their wishes in case of an emergency at Indian Point. If an emergency occurred after

## Evaluation Criteria G.2. continued

IV. Even those who have information regarding the plans cannot find an acceptable way to discuss the issue with their children.

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Arthur Zelman, M.D.  
Medical Director  
Center for Preventive  
Psychiatry  
White Plains

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"In order for an evacuation plan to have a chance to be effective, children must be told about the plan and the reasons for it...If the children are told...a more fundamental psychological problem arises... A prerequisite for adequate character foun-

dation is that the adults in their lives provide them with a secure, consistent environment. Where problems and dangers exist...the children only require that the adult community present them with the message and example that they are actively doing something to correct the problem or reduce the danger. What are the children to think, however, when confronted with the fact that their parents not only have not reduced the danger but have created it...(as) the cheapest way to get necessary energy."

Barbara Hickernell  
Parent  
Ossining

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"When I leave the house, my nine year old daughter asks what she and her twelve year old brother should do if the Indian Point siren comes on while I am

gone. I don't know what to say."

Karen Henes  
Parent  
Croton

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"After reading the booklet...I do not know what is the best advice to give my children in the event that an emergency should occur when I am not at home and they are."

Helen Balgooyen  
Health Worker  
Croton

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"Our son is so upset that he is considering an evacuation plan of his own, and it frightens me as much as the officially proposed plan...I feel the results of his

10 year old reasoning could have disastrous effects..."

Sherry Horowitz  
Parent  
Croton

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"I do not know what to tell my children to do in case of a nuclear emergency at Indian Point. I would advise them to leave school immediately and run home so that we

could evacuate together; however, I fear that if there is a radiation release they would be in great danger on the street...I would never leave the area without my children. I understand that this is counter to the instructions in the emergency planning brochure but these are my intentions."

Evaluation Criteria G. 2. continued

V. There should be a fundamental revision in the plans to ensure that families evacuate together.

T. Berry Brazelton, M.D.  
Professor of Pediatrics  
Harvard Medical School

"NO parent would be likely to leave a hometown without first locating his/her own child. NO parent would leave it to 'others' to evacuate his/her child. Hence, the chaos that will reign is predictable, but not organized planned behavior. The parenting instinct is stronger than any learned behavior I know of....So any plans had better take that into account."

Ervine Kimerling  
Psychotherapist  
Croton

"(My children) have been instructed to stick together in an emergency...I would certainly come back to get them--I would do anything I had to, to get my children."

David Churchill  
Teacher  
James A. Farley Middle  
School, Stony Point

"The problems that would likely occur if a mass evacuation of our school was needed due to a nuclear accident emergency...include...traffic congestion of parents driving to school to pick up their children."

Albert J. Sclnit, M.D.  
Sterling Professor of  
Pediatrics and Psychiatry  
Yale University

"A plan that does not incorporate the need for children and their parents to be evacuated together is unrealistic, psychologically unsound, and carries with it the great potential for damaging the child and his relationship to his parents and other important persons."

Helen Balgooyen  
Health Worker  
Croton

"I worry that I would never see my family again if there were an emergency. The proposed evacuation plan calls for members of my family to go to four different sites in three different areas based on our work and school locations...If my family could be safely evacuated, I wonder how we could ever be reunited...How would I ever manage to pick up my children from a school whose location I don't know and probably couldn't find?"



Evaluation Criteria G.4.a. "Each principal organization shall designate a spokesperson who should have access to all necessary information."

Patsy Chazen  
Parent  
Croton, NY

"I called Consolidated Edison (to find out about a siren on May 5, 1982). The woman answering the phone knew nothing and gave me an Albany number to call-- department of safety I think. The man answering knew nothing but called others and reported finally that Consolidated Edison had been given permission to test a new siren on Croton Point for three days."

Beth Waterfall  
Reporter, President  
Waterfall-McMullen  
Communications, Inc.

"I was a press observer for the Croton/Cortlandt News...during the March 3 drill... My colleagues and I ...were given press badges which were valid only in the fire station/press center...We were expected to stay at the press center waiting for officials and spokespersons to show up and address us on the progress of the drill. There was no press pool allowed to represent the press corps in actual observation of any of the developments...(The press was viewed as a conduit for controlled news and packaged information. No provision was made for a working press, a free press.)"

NUREG-0654  
Planning  
Standard H.

EMERGENCY FACILITIES AND EQUIPMENT

Planning Objective: "To assure that adequate emergency facilities and equipment to support the emergency response are provided."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD H.

"The plan must discuss both the adequacy of calibrations, and security from damage."

"The 'radiation monitoring emergency kits for county field teams' discussed in Appendix J, are really personnel support items which are not available in sufficient quantity for the anticipated personnel who will make up these teams."

"Attachment 16 lists emergency supplies, including rolls of dimes and nickels (purpose unspecified). There are no personnel dosimeters or permanent record device in this list."

"There is no radiological equipment available at this time. Specify anticipated acquisition time. Discuss the emergency use of the personnel, transportation, and communication equipment with respect to the various emergency response actions in the plan."

"The portion of the CRERPs referenced identify where field data will be collected and recorded, but the plans do not specify where field data will be analyzed and where sample media will be coordinated."

"The plan deficiencies noted related primarily to the coordination of field monitoring teams and field data. The State plan should be more specific on use of licensee radioiodine measurements and other field resources relied upon. Lists of emergency equipment need to be improved in all plans."

"Deficiencies were observed in instrumentation calibration procedures in Westchester County and in the space provided for accident assessment in Rockland Counties."

"The counties cite the need for additional funding for identification cards and training."

"Procedures for coordinated use of field equipment and data among federal, state, and county agencies is not adequately addressed. Responsibility for the Reuter-Stokes system should be clarified."

"New identification cards will be introduced only if the funds become available."

EVALUATION OF PLANNING STANDARD H. BY LOCAL CITIZENS AND OFFICIALS

Dr. Anita Curran  
Commissioner,  
Dept. of Health  
Westchester County

"Only a handful of employees have these vehicles (from the County motor pool) at their disposal on twenty-four hour basis. Therefore, on off-hours, while personnel might be reached at home in the event of

an emergency, transportation may or may not be available. Civil Defense monitoring equipment needs calibration by equipment we do not have."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Westchester County

"It would require hours to mobilize all the forces that would be necessary and since time is a major point in this evacuation, again we would say that that would have to be one of the weaker points of the plan...Regarding the calling in of police

officers, we strongly suggested the use of paging devices to key police personnel. This would cost money, but if they want the plan to work, they will have to spend money...They never really came across with any information regarding the protective gear that is needed...We've encouraged the need for motor scooters to be available to the police services and to the emergency service to get people in there for traffic control. We've discussed the possibility of four wheel drive vehicles. Certainly the helicopter service should be included..."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"We needed additional manpower and additional training and additional equipment to really implement the Health Department portion of the plan...I have been asked to protect the budgets which would be required

to implement this plan and that is listed under the CRERP budget for 1982 (exhibit E) which gives a long list of the equipment such as survey kits, monitors, dosimeters, chargers, anti-contamination suits, respirators, filters, potassium iodide, mobile radios, base station generators, pocket pagers for the people who must be notified, mobile phones for the security of transmitting information between the radiological health specialists to commissioners when we are in the field. Of course, there is additional gas, maintenance on this equipment, boat motor and trailer for monitoring of the Hudson...We also require miscellaneous equipment, desks, chairs, etc...The Emergency Operation Center itself definitely needs the upgrading. We need better communications equipment in there. We need more room to work with, more supplies, more telephones, more chalkboards, more typewriters..."

Stephen Horowitz  
Finance Director  
Masonic Camp 7  
Rockland County

"There is no type of plan that will work because there is not enough equipment."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"There is no emergency equipment in Rockland County to carry out the emergency plan. For example, dosimeters for safety and protective masks and suits in case of a radiological

hazard...This jeopardizes the willingness of volunteers to perform their assigned tasks and is a threat to the safety of the children...There appears to be a lot of resistance on the part of volunteers who feel neglected now because equipment which they are told they will need is just not being provided. For example, how many barriers will be needed to block roads, where are their protective suits, masks, intercoms, etc."

Sheriff Daniel Guido  
Commissioner, Dept.  
of Public Safety  
Westchester County

"We are sadly lacking in very necessary equipment to fulfill the responsibilities that will devolve upon us in the event of such an emergency."

NUREG-0654  
Planning  
Standard I.

ACCIDENT ASSESSMENT

Planning Objective: "To assure the adequacy of methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD I.

"It is unclear if these instructions have been developed in cooperation with the two organizations that will be doing the actual monitoring."

"Develop specific Standard Operating Procedures (SOPs) for each type of monitoring equipment and instructions on data and sample collection."

"Specify location or monitoring site maps which are sufficiently detailed to allow rapid arrival at destination by teams unfamiliar with the locations (i.e. DOE, county teams, newly trained NFO teams) and for the use of the county official to whom the teams are reporting their data."

"Discuss transportation arrangements for monitors."

"The notification means may be either landlines or radio but it is unclear as to how specific response personnel are notified."

"Transportation arrangements for monitoring teams are not discussed."

"There is little evidence of backup arrangements and no discussion of communication for field monitoring teams."

"No consideration has been given to information available from the licensee...The CRERPs should address means for interpreting licensee furnished data."

"The State REPP is insufficient in detail on use of field monitoring at each stage of an accident, allocation of facilities and resources to support a federal response and off-duty notification procedures. Since the State has no capability for monitoring radioiodine, plans for obtaining and analyzing such data should be described."

"Specific information is lacking on standard operating procedures, transportation, communications, sample collection procedures, backup systems, and field team coordination. Cross-referencing is also inaccurate."

"During the exercise, field data reported by county teams was not sufficient for correlation with dose projections. Equipment described in county plans was not used by the field teams. County teams used charcoal filters instead of silver zeolite filters for measuring radioiodine. Most county monitoring teams needed better training and improved equipment. Some of the response times for data collection and assessment were slow at the state and county EOCs. The state did not demonstrate independent field monitoring."

"The implementation of remedial actions will depend on availability of funds. Therefore, the deficiencies noted cannot be considered resolved until the remedial actions are completed."

EVALUATION OF PLANNING STANDARD I. BY LOCAL CITIZENS AND OFFICIALS

Dr. Anita S. Curran  
Commissioner of Health  
Westchester County

must be provided, whereby the liaison officer is notified by the utility each time the red phone is used by the utility. We need a means by which he can monitor each message as it is being transmitted."

Donald P. McGuire  
Deputy Director  
Officer of Emergency  
Services  
Rockland County

"An extremely serious communications problem was the delay in the receipt of data from the nuclear facility required to perform dose projection calculations...A procedure must be provided, whereby the liaison officer is notified by the utility each time the red phone is used by the utility. We need a means by which he can monitor each message as it is being transmitted."

"I feel that the people who make the assessments of an accident are not fully qualified at this point to make those assessments and we would have to rely on information as received by our people from the plants and from the State."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"There is no ability for the assessment team at the county seat to inquire as to the correctness of the information which is coming across the hot line from the utility."



PROTECTIVE RESPONSE

Planning Objectives: "To assure that a range of protective actions is available for the plume exposure pathway for emergency workers and the public, guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in use, and that protective actions for the ingestion exposure pathway appropriate to the locale have been developed."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD J.

"All CRERP response actions are predicated on the assumption of a release of radioactive materials which develops over a period of time. However, the facilities and means for monitoring emergency personnel and evacuees are inadequate or completely lacking."

"Discuss the conditions under which evacuation will no longer be a viable protective action, i.e. inclement weather, short-term duration of a high exposure plume."

"Since there is a potential for by-passing the reception centers, it is necessary to have registration, monitoring, and decontamination facilities at both types of centers."

"During an emergency of this nature, it is necessary to 'mandate' monitoring and decontamination activities, not 'encourage' them...Provisions must be made for the feeding of non-Red Cross emergency personnel working in the reception/congregate care centers."

"Specify the completion date for installation of permanent evacuation route signs."

"The vehicular evacuation times under adverse conditions for many ERPAs are much greater than the times for people to walk out of the EPZ. The circumstances under which vehicular evacuation ceases to be a viable protective action might be an appropriate inclusion for Appendix A."

"Decontamination action levels are given only for skin contamination, milk, and agricultural products other than milk. Specify levels for equipment. Not all plans contain action levels for skin contamination from alpha particles."

"Table III-4 should include dose as well as concentration values because protective actions are in response to projected dose commitment."

"None of the maps depict preselected radiological sampling and monitoring points."

"Sector maps should be superimposed over ERPA maps to facilitate coordination of protective response measures with contiguous counties in the plume EPZ and with the State."

"Means for notifying all segments of the transient and resident population are not adequate."

"The CRERPs do not address those individuals who are impaired or confined, but are not institutionalized."

"There appears to be no commitment referenced in the CRERPs that publicly and privately owned buses would respond upon call to transport personnel, if so ordered. (Are there agreements?) How many operational buses are available in each garage at any given time? Is augmentation necessary? Where will it come from?"

"Some of the relocation centers appear to be less than five miles beyond the boundary of the plume exposure EPZ."

"Insufficient information is furnished to determine adequacy of means for dealing with potential impediments to use evacuation routes, and contingency measures."

"The methodology for registering and performance of monitoring of evacuees at relocation centers in host areas could not be located."

"Actions to protect emergency workers and the public in the plume exposure EPZ were found to be significantly deficient in the plans and during the exercise."

"The state is heavily dependent on assistance from the licensee and the Federal government."

"The State REPP provides insufficient site-specific means for dealing with impediments to evacuation."

"Measures to be used by the State for protection of the ingestion pathway are inadequately described."

"Authority and capabilities for obtaining necessary information is not clearly defined. State and county procedures for monitoring of evacuees and control of contamination are not adequately described or referenced. County procedures for evacuation and alternative routes are not available where referenced."

"Evacuation of non-institutionalized mobility-impaired persons is not addressed. Commitments from private and public bus operators are not available; locations and numbers of buses are not given. Some relocation centers are located too close to the plume exposure EPZ."

"County actions to protect the mobility-impaired and to deal with impediments to evacuation could be improved. Some buses used in the simulated evacuation lacked radios and needed better maps and instructions concerning the routes and location of the reception centers."

"County-owned buses will be equipped with radios by 1984, assuming funding is available."

"Insufficient detail is provided in response to a number of the deficient items. Dates for remedial actions are not provided in some cases, and the State REPP revision pages do not provide the details necessary to correct plan deficiencies."

"Use of State resources is not adequately addressed in county plans."

"The implementation of remedial actions related to the exercise deficiencies will depend, in most cases, on availability of funds."

#### EVALUATION OF PLANNING STANDARD J. BY LOCAL CITIZENS AND OFFICIALS

Evaluation Criteria J.9. "Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria."

Frank C. Bohlander  
Commissioner of  
Public Works  
Westchester County

"Personnel participating from the Division of Road Maintenance have never been given adequate training by the consultant. Their response in an actual event remains questionable."

Evaluation Criteria J.9. continued

Sheriff Daniel Guido  
Commissioner of  
Public Safety  
Westchester County

"It was also made crystal clear, however, that whatever directions did issue from the emergency operating center, simply could not be implemented in the field because of a variety of deficiencies."

Charles W. Bates  
Commissioner, Dept. of  
Social Services  
Westchester County

"Our staff, along with other county employees will face a serious dilemma whether to respond to their jobs or attend to their family responsibilities. One indication of the response to this dilemma is that

only about fifty out of 1200 staff members responded to a recent request for Civil Defense volunteers."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Sheriff's Department  
Rockland County

"Again, the present number of police officers that now exist in Rockland County would be totally inadequate to handle the plan."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"Our ambulance personnel and the fire fighters are all volunteers and they work during the day...Should an emergency occur during the hours of 7 a.m. and

6:30 p.m. on a weekday, approximately 70% of the personnel would not be here to respond."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Services  
Westchester County

"Permanent evacuation route signs...have not been posted as required by the plan."

Lucien H. Conklin  
Supervisor  
Town of Stony Point

"There is little need to remind the commission if an evacuation was called the result would be utter confusion and extremely dangerous."

Richard F. Herbek  
Village Manager  
Village of Croton

"Consolidated Edison and the Power Authority of the State of New York drafted the Westchester County Radiological Emergency Response Plan with limited input from the Village...No funding has

been made available for the purchase of radio equipment which would facilitate inter-departmental communications."

Thomas F. Ryder, Jr.  
Director of Civil Defense  
Police Commissioner &  
Trustee, Haverstraw

"The safe evacuation of Haverstraw Village residents in the event of a nuclear mishap at this time is ..NOT POSSIBLE...at this time."

Charles Awalt  
Westchester Developmental  
Disabilities Services  
Office, Tarrytown

"I am not aware of any involvement on the part of WDDSO or individual residences in emergency planning for an accident at Indian Point. No supervisors have reported receiving information brochures and none have reported participation in the March 3 drill."

Evaluation Criteria J.9. continued

Lynn Doughty  
President  
Croton-Harmon  
Board of Education

"The Croton-Harmon Board of Education has taken the position that the evacuation plan is unworkable and cannot possibly meet its objectives."

Evaluation Criteria J.10.d "The organization's plans to implement protective measures for the plume exposure pathway shall include: means for protecting those persons whose mobility may be impaired due to such factors as institutional confinement."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Rockland County

"One of the major situations, the evacuation of the County Jail and other institutions like it within Rockland County, would have to be well developed before this plan can work."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"Our concern was also for handicapped individuals, how would they be transported being that the district has only one bus able to handle handicapped students, and it has to make a number of runs throughout the district."

Ruth Wein  
Director, Rockland  
County Ass'n. for  
the Visually Impaired

"In all, 116 non-institutionalized blind people are known to live in the northern swath of Rockland County nearest to, and most in danger of the consequences of an accident at, the Indian Point Nuclear Plant...

For those blind whose health does not impair mobility, proceeding from one's home to a specific bus stop is not necessarily realistic...This plan does not realistically address the plight of people with cataracts and accidental blindness and glaucoma and macular degeneration and optic atrophy and combinations of these conditions, exacerbated by related health limitations."

Richard Lang  
Executive Director  
Search for Change, Inc.

"To our knowledge, the majority of our residents do not own or drive cars. There has been no provision made for evacuation by public transportation. The necessity of insuring adequate supplies of

stabilizing medication...has not been taken into consideration...As the operator of community residences for emotionally disabled adults, we feel the current plan has failed to address the special needs of our residents."

Betsy Bergman  
Administrative Ass't.  
Keon Center  
Community Aid for  
Retarded Citizens

"The emergency planning booklet did not address the problem of evacuating 70 mentally retarded persons... Our clients are expected to ride the bus provided for the ordinary transportation dependent population... Since we have 72 dependent people, (we) would fill up a bus by ourselves."



Evaluation Criteria J.10.d. continued

Pat Bethge  
Resident Supervisor  
Putnam Association for  
Retarded Citizens

"In an emergency situation any group home with a special needs population would need even more staff to deal with the fear, tension, behavioral problems, and mental handicaps of these residents. If these special needs people are without trans-

portation, they are, according to the evacuation plan, supposed to wait on corners for public busses. I do not feel very confident that these 'undesirable' persons would be picked up. It has been my experience that handicapped people are not readily accepted by the community at large, and are stared at, teased, or ignored in public situations...Without their prescribed medications, their conditions would be unmanageable. Wherever special needs people are directed to congregate, if they are integrated with normal people without adequate supervision, this would be disastrous...Any center intending to service special needs persons would have to be somewhat separated from facilities for normal persons..."

Ronni and Paul Schwartz  
Director and Teacher  
Camp Rainbow, Croton

"The camp is a non-profit, residential, therapeutic community for 75 emotionally handicapped children from 6-12 years old...The evacuation of the camp would be a very difficult process...The

camp does not have sufficient vehicles in order to evacuate the population of 125 people...It is possible that many of our campers would not be able to deal with the trauma of an evacuation."

Evan Litty  
Mobility-impaired parent  
Mahopac

"I am confined to a wheelchair due to a condition called Spinal Muscle Atrophy...I certainly would want to evacuate, but I face two problems. I do not drive and would have to get the bus...In winter

or bad weather I could not get to the bus stop on my own. And if I did, the bus would have to be accessible to a wheelchair. In effect, I will be discriminated against because of my disability."

Gladys Burger  
President  
Disabled in Action

"The brochure that was sent out to homes was printed in such a fashion that many of the disabled did not realize that the card was supposed to be sent in...I have letters from disabled people

saying that a.) they did not get the brochure, b.) they did not understand the use of the card, or c.) they did not feel that the plan would work and therefore did not make out the card."

Hattie Coffey  
Member, Advisory  
Committee on Disabled

"Seniors around Peekskill do very well getting around on buses for nutrition programs, but that is a routine and very well understood procedure, with no upset or panic involved. I do not think all the seniors in Peekskill who do not have cars. I do not know whether the seniors' wheelchair van would be dispatched to pick me up."

Agnes Murphy  
Program Coordinator  
Senior Action Center  
Ossining

"Matters of serious concern to us are identification and arrangements for homebound blind, handicapped people with Life Support systems, people with respiratory problems, frail elderly and people in wheelchairs.....No knowledge of priorities for

moving segments of population. What delay time on pick-up is anticipated?"

Evaluation Criteria J.10.d. continued

Sari Eklund  
Volunteer for the  
Elderly  
Croton, NY

"I am a volunteer for the elderly...Many of them live alone. Most of them don't get around very well. They don't hear much and many don't see very well...They probably would refuse to leave their homes."

Samuel Anderson, PhD.  
President, NYS Coalition  
of People with Disabilities

(Discussing Considerations for Planning the Evacuation of Transportation-Handicapped Persons from New York City)

"Thus, if all available paratransit vehicles constituted just the ones now operated...their total recruitment for evacuation would require 15 days to totally relocate just the PTE ("para-transit eligible") subgroup, and a total of 55.9 days to evacuate the entire TH population."

Seymour Greenbaum  
Board of Directors  
Shepherd Center, Cortlandt

"From the initial surveys we can estimate that there are between 1200-1500 senior citizens who are homebound...The majority of this group could not walk to public transportation in the event of an

emergency as they are not even able to leave the house under normal conditions... This particular group would require special personnel whom they know and trust to give them institutional care in the event of an evacuation...In effect, the plan or lack of plan for our senior citizens is condemning many of them to death."

Susan Simon  
Public Health Nurse  
Westchester County

"Many senior citizens who are physically homebound are not in touch with current issues and many are sight and hearing impaired. I question how many people from this age group who would need to send

in the card indicating special transportation needs would be able to read and understand the booklet well enough to do so."

Evaluation Criteria J.10.g.: "The organization's plans to implement protective measures for the plume exposure pathway shall include: Means of relocation."

Leonard Spiegel  
Transit Coordinator  
Rockland County

"Q. Does Rockland County have arrangements or agreements with private bus companies for the use of their buses and drivers during a radiological emergency? A. No."

Ruth Northrup  
Deputy Commissioner  
Dept. of Social Services  
Rockland County

"The agency cannot in any way be responsible for informing or the removing of people receiving such home health care services to another area. 1. Our case workers are not aware of whether these persons have or have

not a telephone, we are not aware whether they can get in a car or not get in a car...For us to be able to meet their needs in an emergency is an impossibility at this particular juncture."

Evaluation Criteria J.10.g. continued

Raymond S. Jurkowski  
Deputy Commissioner of  
Transportation  
Westchester County

"Under the two wave evacuation scenario, the general public and special facilities' population will not be evacuated until all students have been evacuated to reception centers....The current plan does not identify: the names of the school districts responsible for supplying the buses, the number of buses needed, and what agency has the responsibility to notify them of the evacuation...In conclusion, there are just too many 'ifs', too many new problems surfacing while our original concerns remain unanswered."

EXCERPTS FROM STATE OBSERVER "CRITIQUE REPORTS":

NANCY KNOWLES: "In some cases not only could a bus not maneuver at certain places, but routes continued through dead end roads, wrong way down one-way streets, and at one point not much more than a footpath next to a pond. These evacuation routes for the most part seem impractical and should be revised."

JOAN GERACI: "Bus driver couldn't understand the map and thought it was all backwards, he said any bus driver who was unfamiliar with the territory would never find the stops..."

DANNY RAVITE: "The maps and routes provided to the bus company contained some discrepancies in street names."

PAT BRADLEY: "The 6th and 7th stops...had no designation signs (street name signs)."

Michael Kaminski  
Director of Planning  
Department of Hospitals  
Westchester County

and medications and supplies is a large task.

James McGuire  
Radiological Health  
Specialist  
Rockland County

"The nursing homes have identified a number of people they would have to move, but I do not think the transportation has been identified as of yet."

Stephen Horowitz  
Finance Director  
Masonic Camp 7  
Rockland County

"When contacting Deerkill Day Camp, Bob Rhodes indicated to me that he did receive a disaster booklet, that he was told to evacuate the children 1½ miles down the road. He indicated at that time...that he had ten buses on the camp grounds, but only five people qualified to drive them. He asked if it would be possible to arrange...drivers...for the other five buses...The head of the Radiological Emergency Plan...indicated that...there were no funds available (and) they had no responsibility in this regard...None of the drivers have been asked whether or not they would volunteer to come back into the county once out, or if they would make the first trip as opposed to taking care of their own families."

Evaluation Criteria J.10.g. continued

Leonard R. Scharf  
Assistant Superintendent  
BOCES  
Rockland County

districts who might be in attendance at North Rockland. The total transportation problem is severely compounded by these factors."

"Many children...are coming out of North Rockland School District and are attending BOCES (Board of Cooperative Educational Services) classes throughout the county... Conversely, there are children from those

Stephen Elkins  
Superintendent  
Recreation and Parks Dept.  
Peekskill

"It is a very serious responsibility to supervise this number of young people, and our department is not equipped to evacuate the children in our care."

Alex Gromack  
Senior Recreation Leader  
Parks and Recreation Dept  
Clarkstown

gency were to occur. Furthermore, as a member of T.A.C. (Transportation Advisory Council) we have no plans for taking care of these needs via public or private transportation."

"These programs and activities are attended by pre-school-age children...right up to Senior Citizens...Under no circumstances is any emergency transportation provided or anticipated for these people in case an emer-

William Rodriguez  
Director  
Recreation Department  
Croton

"The average number of children each adult is responsible for is 12. None of these adults has a specific evacuation plan. There is no guarantee that these adults would stay with the children during a radiological evacuation."

Kathe Saunders  
Croton Recreation Dept  
After School Program

a child might have a severe asthma attack; the rest of the children need to be taken care of, and my usual procedures (phone, doctors, back-up personnel) would be unavailable because of a radiological emergency."

"In the past I have had children in my programs who have handicaps, asthma, and behavioral problems. I do not know how I would be able to handle a situation where

Judy Kesselman  
Coordinator  
Tiorati Workshop  
Harriman State Park

way to deal with the children who are my responsibility? I have never received any information as to what I am supposed to do."

"Each day groups of up to sixty children come by bus...Sometimes the bus remains parked outside the building; at other times it...returns later in the day to pick up the children. What would be the safest

Helen Burnham  
Director  
Croton Free Library

be in the library when a nuclear emergency struck...No provision has been made for transporting the indeterminate number of children and seniors in the library at the time, nor has a reception center been designated as their destination."

"We have received no instructions from Con Ed, PASNY, the NRC, or the firm hired to develop the evacuation plan as to how to handle whatever dependent persons might



Evaluation Criteria J.10.g. continued

Vincent Savastano  
Director  
Hudson Valley Gymnastics  
School, Buchanan

transportation for our school. We feel that we should have been contacted immediately."

Shareane Baff  
Director  
Yorktown Gymnastics Center

that I nor any member of my staff would remain with the gymnastics students and not attend to our own families."

Charlyn Appolonio  
Teachers Aid  
Yorktown

"Children in this age group panic at the slightest change in routine. I would be impossible to load them on a bus with the supply of diapers, bottles, etc. that is needed

Margaret Davis  
Teacher, Day Care  
Croton, NY

frightening than anything I can imagine...I certainly am NOT satisfied with the present Indian Point Evacuation Plan."

Phyllis Mendelson  
Director  
Croton Community  
Nursery School

"Even if I could literally carry each frightened, screaming child onto the promised van (if it indeed arrived), I could not guarantee a helper...I do not think that I could handle all those hysterical children by myself."

Abby Perl  
Nursery School Teacher  
Croton

a strange place...would be an extremely traumatic experience for them."

Judith Glass  
Nursery School Teacher  
Croton

"As a teacher of small children, I am well aware of the many details that must be considered while caring for a large number of children, such as transporting, feeding, the availability of a toilet, as well as the emotional needs... A great deal must be done to insure the comfort and safety of our children in the event this catastrophe occurs."

Evaluation Criteria J.10.g. continued

Richard Alexander  
Transportation Director  
Board of Education  
Yorktown

"They have taken our fleet and sent it into 10 different unfamiliar areas and replaced the vehicles taken from us with 26 vehicles from Liberty, who are totally unfamiliar with our school locations and the reception

center locations. We have our buses; why must we give them away and then hope that someone will replace them? Why isn't Bedford Bus used? They are only 15 minutes away. Since our buses will now be involved in the latter, what happens to our students who are in numerous schools outside the EPZ? Our fleet is radio controlled. Assuming we had drivers, why send them out of range and lose control?"

Evaluation Criteria J.10.h. "Each organization's plans to implement protective measures for the plume exposure pathway shall include: relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone."

Michael Kaminsky  
Director of Planning  
Department of Hospitals  
Westchester County

"Schools in Dutchess County are designated as the receiving centers for some nursing homes in the EPZ, but as of the time of the drill, had no knowledge of this fact."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Service  
Westchester County

"In some areas where a family has children in elementary, middle, and high schools their children might be sent to school reception centers in Westchester, Putnam, and Dutchess counties, making family reunifications extremely difficult."

Dr. A. Glen Everhart  
Superintendent of Schools  
North Rockland Central S.D.

"Nothing is specified relative to what awaits children and teachers at reception centers...No mention is made of emergency medical care for those who might be physically or emotionally in need of such services. No mention is made as to how supervision would be provided (assumptions are that teachers would stay with students. It is unclear as to whether or not this is a safe assumption.)."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"At this date, letters of agreement with the reception centers have not even been effected. Since the reception centers are unaware of their role, they are not prepared

to receive our children nor are they equipped to decontaminate these students or staff, if needed...The problem of having more than one destination for neighboring schools presents many parents and children with extra travel time to be reunited and a real worry on the part of both parents and children to know if the others in the family are indeed safe."

Evaluation Criteria J.10.h. continued

Anthony J. Napoli  
Principal  
Port Chester Sr. H.S.

"First, my notification as to Port Chester High School being an evacuation site was made by telephone on the day of the drill. Secondly, at no time have I been directed as to the plans to be made in preparing for such a possibility. Thirdly, we have no idea as to the number of people who would be scheduled to report to Port Chester High School."

John Moore  
Coordinator  
J.J. Kaplan School  
Rockland County BOCES

"I had no knowledge that the Jesse J. Kaplan School had been designated as a School Reception Center during a radiological emergency...I have never been informed as to my role and responsibilities during an evacuation of the area around Indian Point."

John Iurato  
Asst. Principal  
Croton-Harmon H.S.

"We noted the following problems when we visited our designated reception center: 1. No training of staff...2. No emergency supplies on hand to care for our children who may not be quickly reunited with their families."

Joan Indusi  
Teacher  
Anne M. Dorner Middle Sch.  
Ossining

"The facility that my school will be evacuating to is listed in the Emergency Response Plan as the Church Street School... In fact, the Church Street School no longer operates as a school. The building is under a five year lease to the White Plains Day Care Association...I question the wisdom behind a plan which would bus nearly 900 people (possibly contaminated) to an operating day care center."

Robert T. Johnson  
Resident  
Stony Point

"The replies we have received so far indicate that the 'receiving' schools were asked to (or told to) participate in the Plan, but that further information or suggestions were not received as to housing, feeding, or registering evacuated children or for providing communication between these children and their families. Furthermore, there has been no financial provision for the school districts to meet the costs of operating these reception centers."

Lynn Gunzenhauser  
Resident  
Croton

"Are we to all set out to the designated 'host' area even though weather conditions dictate otherwise?"

Leonard Scharf  
Assistant Superintendent  
BOCES  
Rockland County  
more logical or realistic."

"The designation of certain schools as reception centers for children attending other schools or in other districts, raises a number of questions. It would appear that better designations might be made that are

Evaluation Criteria J.10.h.

Jack Petterson  
Superintendent  
Dept of Parks, Recreation  
& Conservation, Cortlandt

"I do not know if the reception centers are aware that the procedure we are to follow in the event of a nuclear emergency is to transport our campers to their site."

Richard Dunne  
President  
Board of Education  
Yorktown

"We have children in 14 schools located within the Emergency Planning Zone. They will be transported to ten different reception centers. Many families have students in two or more of the schools. Since they

will wind up in the triangle of White Plains, Hopewell Junction and the Connecticut border, how are parents expected to retrieve their children? Are we encouraging 'gridlock' on our narrow roadways?"

Evaluation Criteria J.10.i. and J.10.l. "The organization's plans to implement protective measures for the plume exposure pathway shall include: Projected traffic capacities of evacuation routes under emergency conditions and time estimates for evacuation of various sectors and distances based on a dynamic analysis..."

Alfred DelBello  
County Executive  
Westchester County

"What remains questionable, however, from either a planning, a resource, or a management standpoint, is the ability of the County or the State to conduct a 10 mile radius

evacuation of 130,000 people in Westchester County in seven hours in the face of possible or actual major offsite radiological release...Under any conditions and based on the recent drill, I do not believe we could evacuate all of the Westchester residents, the special populations of handicapped and disabled persons, the school children, the hospitals, nursing homes, and other immobile persons, all in 7 to 9 hours time... Under the best meteorological circumstances, under the best devised plan and with the recent drill experience behind us, I do not believe the County could evacuate major portions or all of the 10 mile radius EPZ in under something approaching 30 to 36 hours. I say that because of all the problems associated with a plan of major complexity, with such population density, our narrow roads, and limited resources available to evacuate. This militates against any rapid movement out of the area by car, bus, and special vehicle. A rapid evacuation would mean chaos. A completely pre-planned, yet slow, step by step evacuation is all that could be hoped for at best."

Sheriff Daniel Guido  
Commissioner, Dept.  
of Public Safety  
Westchester County

"A complicating factor is that the surrounding road system does not lend itself to the speedy movement of heavy traffic flows. Since we must first move buses in large numbers into this area to provide the means for this

large-scale evacuation, we simply don't have enough information at this point to judge whether or not such an exercise can be carried out at all, to say nothing of it being carried out quickly and safely."



Evaluation Criteria J.10.i. and J.10.l. continued

Raymond S. Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"Significant delays will occur in the evacuation of students because it is our opinion that the natural reaction of parents will be to drive to schools themselves to rescue their own children. We therefore envision

the possibility of buses tied up in traffic trying to get in and out of the schools...The Department still believes re-entry will be difficult and that buses will encounter contra-flow traffic travelling in the wrong lanes. Furthermore, it is uncertain at this time whether bus drivers will be willing to re-enter areas that people are evacuating... Without a verification as to which roads are or aren't negotiable, proper route maps and adequately 'marked' street signs, the probability of drivers getting lost and adding delay increases alarmingly, especially since many of them will be driving in unfamiliar territory at times of extreme emotional and environmental stress."

Michael Kaminsky  
Director of Planning  
Department of Hospitals  
Westchester County

"The quantity of traffic and flow patterns, may make it extremely difficult to move ambulances into and out of the EPZ."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Rockland County

"All of these roads that would come in from the Northern sections of the county and within the 10 mile EPZ are two lane roads and a simple fender-bender accident or a breakdown of a vehicle would clog up

these roads. That was another situation I don't believe they took into account...You have to realize that the present road system is not capable of handling an evacuation system within a short time as some of the scenarios in the plan call for...I doubt very much if it will go smoothly based on our past experiences in traffic control...So again, you take these two-lane roads, you put any amount of traffic on them, any amount of time more than a few minutes, and you are going to see roads that stop dead in their tracks, vehicles breaking down, people losing their tempers, police officers unable to get to the scene-- you are going to have the problems that we suggest will take place."

Dr. Bernard Flicker  
President, Rockland  
Families to Close  
Indian Point

"The first problem you will encounter - a normal everyday problem - will be to break into the flow of traffic on Route 45, since there is no light...My wife, while pregnant with our first child, had

to abandon her car when trying to negotiate a slippery hill entering Route 45 and walked several miles to our home because traffic was completely stalled in both directions and many drivers had abandoned their cars. If an emergency occurred today at Indian Point, I believe Route 45 would become a parking lot with no place to go."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"It is going to take time for somebody, and I am not sure who will get the responsibility to actually go out there and identify each one of these roads and determine just how many people can pass across them."

Evaluation Criteria J.10.i. and J.10.l. continued

Marie Tomkins  
Resident  
Tomkins Cove

"Rosetown Road, where I live, is a narrow twisting, hilly country road, and at its widest point of 17 ft. two cars cannot pass around a curve unless one backs into

a driveway to make room for the other."

Gertrude and Henry  
Gillette  
Residents  
Crugers, NY

"Access to our house--and our neighbors' houses--is by an old iron and wooden bridge over the railroad tracks--already designated as unsafe by our Highway Superintendent--and particularly precarious in

the winter snows due to the steepness of the inclined approach...After maneuvering over a pot-holed and constrained dead end road (we would) reach the main two-lane highway (Albany Post Road) already crowded with the confusion not only of fleeing residents but with all the inmates and personnel of the VA Hospital."

Gregory Carney  
Planning Board  
Rockland County

"I have in the past 16 years seen a constant build-up of traffic...This traffic causes traffic to be backed up from Haverstraw thru Stony Point and up to the Bear

Mountain Circle...With these transient people evacuating the area at one time and add the town residents this would cause 100 times the amount of traffic problems."

Linda Berker  
Law Student  
White Plains

"We contend that automobile evacuation, as called for in the plans, is impossible because of insufficient road capacity... The point at which traffic will probably

stop moving is near the intersection of Route 9 and Route 9A, in ERPA 22. Here, the ten evacuation groups proceeding south on Route 9 come to a place where their two lane highway curves sharply, goes under a bridge, and merges with Route 9A where three more groups of cars join them. But at the underpass, the road has a 'volume/capacity ratio' of .8...A 'volume/capacity ratio' of 1 would denote a breakdown of traffic flow, or a standstill. Thus it is likely that (ten) evacuation groups added to the average traffic flow at the underpass could bring traffic to a halt."

Robert L. Morris  
Consultant  
Transportation Planning  
& Traffic Engineering

"An emergency evacuation traffic analysis should be based on a worst case condition. As noted in the points listed above, P-B (Parsons-Brinckerhoff) has made assumptions that are inconsistent with emergency con-

ditions. For the purpose for which the reports were prepared, they have no validity. Standard traffic forecasting practice requires conservative assumptions to allow for unforeseen impediments to traffic flow in day-to-day operation. P-B's use of optimistic assumptions would be inappropriate in normal circumstances, and is particularly inappropriate in planning for an emergency situation."

Eileen Vinci  
Resident  
Mohegan Lake

"The main routes of escape are RT 6 and RT 202...Both these roads are small two lane roads, in places there is no shoulder to drive on either. Should everyone in the

area leave, it could take hours to evacuate (Peekskill) and surrounding areas."

Evaluation Criteria J.10.k. "The organization's plans to implement protective measures for the plume exposure pathway shall include: identification of and means for dealing with potential impediments to use of evacuation routes, and contingency measures."

Fred Seeger  
Superintendent of  
Highways  
Clarkstown

"We have enough equipment to handle a snow emergency. It takes an hour to mobilize the men and equipment during a snow emergency. We have to contact our employees by telephone. Even under reg-

ular circumstances, without an evacuation, with a lot of people trying to move in the snow you find people can't drive. Traffic jams keep maintenance people from their jobs and if we had panic conditions the whole thing would break down. I don't believe the Plan would work."

Michael Holland  
Chief of Police  
Village of Haverstraw

"The plan doesn't allow for road construction/repair activities, but there are major repairs projected right here in Haverstraw for 9W which is one of the

major routes out of the North Rockland area."

Richard Wishnie  
Supervisor  
Town of Ossining

"Our entire on-duty police staff gets tied up when a one-car accident occurs. Cars frequently break down on Route 9A, which is very hilly and has no pull-off lane.

If the roads are crowded with evacuation traffic, emergency equipment will have difficulty reaching a stalled vehicle. The complete back-up which would be caused by one stalled vehicle heading out of the 10 mile area on 9A will hamper evacuation efforts, causing severe concern by motorists and a breakdown in the system."

Ronald Goldfarb  
Chief of Police  
Village of Ossining

"There would definitely be big problems of the possibility of snow (and even heavy rains) on the Saw Mill and Bronx River Parkways. The magnitude of a mass

evacuation is far beyond local control and calls for tremendous co-ordination."

George Schnakenberg  
Chief of Police  
Clarkstown

"But as regards flow, right now Middletown Road is all torn up. The contractor has gone bankrupt and the traffic would move slower than usual. The repairs are at a

standstill...With the volume, a heavier flow of traffic, during an evacuation, we could certainly anticipate a greater number of accidents... People in general react very foolishly at times. Under stress people tend to come apart...So certainly if emotions were running high to start with and something happened...I think it would have an adverse effect because people have a tendency to panic. One or two accidents certainly have a tendency to jam things up pretty well."

Thomas F. Ryder, Jr.  
Director of Civil Defense  
Village of Haverstraw

"The Village of Haverstraw's Gurnee Avenue exit road passes through a tunnel that was built in ...1904. This 'horse and buggy' size tunnel is so narrow that only (1) car

can pass through it at a time. In the event of a mass evacuation, a very dangerous 'bottleneck' of vehicular traffic could occur at this tunnel..."

Evaluation Criteria J.10.k. continued

Richard F. Herbek  
Village Manager  
Village of Croton

"Bottlenecks which might develop on two of the evacuation routes listed for Croton (Rt. 9 and 129) invite a chaotic situation to occur in the event of a mass evacuation."

Evaluation Criteria J.10.j. "The organization's plans to implement protective measures for the plume exposure pathway shall include: control of access to evacuated areas and organizational responsibilities for such control."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Rockland County

"We foresee monumental problems with the ability of the police to deny access to contaminated areas...If you take into consideration the scenario that is to take place at 4 or 5 o'clock in the afternoon

on any given workday...you realize the amount of cars coming back into Rockland County. These are the parents of children for the most part; they are not going to be standing idly by at roadblocks without proper direction, without proper areas to put them to, they are going to be through those roadblocks, and the one or two police officers that are there are going to be hard put to stop these people, unless you want total outrageous use of police force to be carried out. They are not going to be able to stop some of these people from going back in and once the flow starts, you are not going to stop it."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"Traffic Management as per the plan depends on being able to communicate with the drivers of emergency vehicles, but the materials just do not exist."

Reginald Lambruschi, Jr.  
Chief of Police  
Village of Croton

"Roads are a big problem...How do you turn people back (South) at Croton Point Avenue? We can't arrest all the people wanting to come North because we have no place to put them."

place to put them."

Ronald Goldfarb  
Chief of Police  
Village of Ossining

"Since Rt. 9 in Ossining is under construction and will be for some time, traffic control would be virtually impossible under emergency conditions."

Michael Holland  
Chief of Police  
Village of Haverstraw

"Trying to enforce the roadblocks would be a major problem-it would take fifty-two people in Rockland, and we don't have them. The police would be unwilling to force families

to separate. If a father told me he was going to join his kids, I wouldn't stop him. There is no law that says the police can force people to evacuate."

George Schnakenberg  
Chief of Police  
Clarkstown

"Regarding the major arteries and their crossings such as at route 59 and Middletown Road, one officer is not enough to direct traffic under normal conditions."



Evaluation Criteria J.11. "Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs..."

Jamie Seedman  
President, Hillcrest  
Citizens Assn. Inc.

"What about the people outside of the ten mile radius? Am I wrong to suggest that the rains can carry radioactive materials to our food and water supplies for hundreds

of miles from the plant, causing cancer, birth defects, etc., along the way--- and for what?"

James McGuire  
Radiological Health  
Specialist  
Rockland County

"We have yet to incorporate any of the concerns of areas such as Nyack into the plan.. My last concern is the water supply in the Village of Nyack, which is obtained from Lake DeForrest, which is inside the 10 mile

radius. This is the only means of supplying water to the Village of Nyack. Now, they do have approximately two days water supply on hand, but if that reservoir did become contaminated in some way, that water could not be used and their supply would then be cut off."

NUREG-0654  
Planning  
Standard K.

RADIOLOGICAL EXPOSURE CONTROL

Planning Objectives: "To assure that means for controlling radiological exposures, in an emergency, are established for emergency workers and the affected population."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD K.

"There is no mention of permanent dose recording devices in any of the plans."

"Specify where dose records will be kept and for how long. It is unclear if the dosimeters are presently available on a 24 hour basis."

"The dose record form...as a field record log, should be revised to allow an individual to record periodic readings for one shift...Its present design is inappropriate either as a field or permanent dose record."

"Specify the person (by position title) authorized to permit emergency workers to receive higher exposures. Specify the qualifications of the individual."

"Action levels for decontamination are erroneously referenced...The procedure does not satisfy specific instrumentation to be utilized for measurement. The CRERPs do not state what level of contamination follow-up is necessary (e.g. bio-assay, nasal wipes, etc.)"

"Records that are to be kept on every individual who is surveyed should detail area of body surveyed and level of contamination. Records should also include means of decontamination attempted and results achieved by each step."

"Specify the 'means for radiological decontamination of emergency personnel, wounds, supplies, instruments and equipment, and for waste disposal.'"

"Describe medical treatment arrangements for personnel who have been contaminated or exposed to high levels of radiation. Discuss decontamination stations, especially locations, facilities available, and waste disposal means."

"Discuss source of teams needed to monitor emergency workers and evacuees."

"Explain or identify medical or radiological authorities to which contaminated personnel will be referred for additional consultation or treatment."

"The State REPP does not specify present capabilities or target dates for contamination monitoring equipment acquisition. State and county plans do not mention permanent dose-recording devices, nor specify retention of dose records."

"Monitoring equipment, first aid kits, and procedures for waste disposal should be described more completely."

"During the exercise, procedures for exposure control in Westchester County were considered deficient due to inadequate instrumentation (more sensitive self-reading dosimeters were needed) and inadequate decontamination procedures. No permanent record devices (e.g. film badges, TLDs) were available in the counties."

"Permanent record devices (TLDs) will be purchased when funds become available."

"The counties claim insufficient personnel and equipment resources for decontamination of personnel and equipment and waste disposal."

"Since the supply of permanent record devices is contingent on future funding, this deficiency cannot be considered resolved. The implementation of remedial actions for decontamination action levels, disposal of contaminated liquid and solid wastes and monitoring equipment are not adequately addressed or counties does not have the personnel and resources to properly implement these remedial actions."

"The revision page pertaining to this planning standard lacks details of the permanent record keeping process. In general, recommended remedial actions are not described in sufficient detail to allow resolution of the items considered significantly deficient."

EVALUATION OF PLANNING STANDARD K. BY LOCAL CITIZENS AND OFFICIALS

Raymond S. Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"It is my understanding that none of the reception centers have automatic washers... Added delay time will be encountered in washing the buses if they are needed for a second wave."

Michael Kaminski  
Director of Planning  
Department of Hospitals  
Westchester County

"Decontamination facilities for patients and vehicles must be established closer to the patient host facilities."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency Services  
Westchester County

"The present supply of dosimeters is inadequate, both in number and range."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"The decontamination stations require more equipment, we need some method to retain contaminated fluids so they can be checked to see that they are decontaminated and disposed of properly...To try to decontaminate or even survey 115,000 people that are in a panic state that are leaving a 10 mile radius which is required from us by the State Health Department before they go into New Jersey, would be a monumental task requiring our staff at each emergency decontamination station reception center to survey some 11,500 people each, in a short period of time. I believe it would take a minimum of 2 minutes just to survey a person with a monitor sufficiently. That does not take in the time that it takes to get the person there to do the paper work required during the survey to document this procedure and to keep a permanent record of the decontamination if there is any."

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Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"The decontamination centers are in no way presently equipped and prepared to do their work...Rockland Psychiatric during the March 3rd drill, offered a large pool. No substitute paper or other clothing or cold water fire hose for washing people down and a generally primitive panic-making lack of provisions resulted."

large pool. No substitute paper or other clothing or cold water fire hose for washing people down and a generally primitive panic-making lack of provisions resulted."

Frank C. Bohlander  
Commissioner  
Public Works  
Westchester County

"I would recommend sufficient geiger counters and radiation indicators as well as cleansing areas for contaminated personnel."

Dr. Anita S. Curran  
Commissioner of Health  
Westchester County

"Personal dosimeters are not available in sufficient number to equip the field teams called for in the plan. Moreover, those dosimeters which are available are not of the appropriate range...No provision for containing contaminated wastewater at decontamination sites is made in the plan."

not of the appropriate range...No provision for containing contaminated wastewater at decontamination sites is made in the plan."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Rockland County

"There has been no specific police headquarters location in the decontaminated areas for police personnel and where they can become decontaminated or checked...We have to clarify the assignment of dosimeters for police personnel. As everybody is aware, there is a lack of these..."

for police personnel. As everybody is aware, there is a lack of these..."

Donald P. McGuire  
Deputy Director  
Office of Emergency Svcs.  
Rockland County

"We have at the present time only one person on board who is with the county as a radiological health officer. This means that in the event of any type of nuclear disaster, this person would not have any relief should an incident last more than 12 hours until we got some help from the State."

incident last more than 12 hours until we got some help from the State."

MEDICAL AND PUBLIC HEALTH SUPPORT

Planning Objective: "To assure that arrangements are made for medical services for contaminated individuals."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD L.

"Was unable to locate any facilities with radiological evaluation and treatment capabilities in the ~~relocated~~ sections...No documentation is provided."

"Insufficient information is furnished to determine adequacy of the arrangements for transporting victims of radiological accidents to medical support facilities."

"The revision pages to the REPP submitted by the State in response to FEMA letter dated September 29, 1981 did not address deficiencies cited in the RAC plan review comments."

EVALUATION OF PLANNING STANDARD L. BY LOCAL CITIZENS AND OFFICIALS

James L. Murphy, MPH  
Public Health Specialist  
NYPIRG

"After review of these surveys, it is my professional opinion that the public health capability of the 4-county area surrounding Indian Point is inadequate to the task of

responding effectively to a major radiological emergency involving the Indian Point reactors. I base my opinion on the following: 1. Hospital emergency departments...do not have the equipment, personnel, and training to provide for even the most basic care and treatment for any substantial number of victims of a radiological emergency. 2. Ambulance services...lack the equipment and training necessary for an adequate response to a radiological emergency. 3. Residential health-care facilities within the 10 mile EPZ do not have the personnel or vehicles to relocate their clients safely outside the 10 mile EPZ during a radiological emergency."

Joan Harding King, R.N.  
New City

"On March 3, as part of the drill exercise of the Rockland County Radiological Response Plan (RERP)...I visited Good Samaritan

Hospital...They had received no official notification that the drill would take place...On May 26, 1982...I spoke to James Dawson, President of Nyack Hospital...When asked if they were equipped to handle radioactive contamination he said they had some provision...which includes a bathtub large enough for only one person at a time..."

Christopher Maxwell  
Director, Respiratory  
Therapy  
Community General Os-  
teopathic Hospital  
Harrisburg, PA

"Predictably, the conflicting responsibility to family and to work resulted in escalating staffing problems as the crisis continued... The staffing crisis was not restricted to professional or technical staff. Physician staffing reached critical levels in at least one institution, with one Emergency

Department physician noting that only six of more than 70 doctors remained available." (Discussing disaster response during TMI incident)



Elise Lentz, R.N.  
Northern Westchester  
Hospital  
Mt. Kisco, NY

"I also face a serious ethical and emotional dilemma because as a nurse charged with people who are already sick and dependent upon me, I am torn between my responsibility to them and to my children."

Julie Palmer, M.D.  
Family Practice &  
Psychiatry  
Piermont, NY

"It is a fairly consistent opinion of personnel with whom I discussed these plans that they 'appear adequate on paper' but that an actual incident would result in chaos, for the following reasons: 1. Medical personnel have no experience in this area (fortunately). 2. It is unlikely that hospitals are prepared to receive large numbers of people who might require treatment in such a situation."

Susan Scheffel  
Coordinator, Adult  
Career Guidance Center  
BOCES, Yorktown Hts NY

"I am concerned how my 6 year old daughter would manage without her bronchial dilator. She suffers from asthma and at certain times of the year is very dependent on the medication."

Ed Connelly  
Emergency Medical  
Technician  
Ossining Volunteer  
Ambulance Corps

"One must realize that there is strong likelihood that no emergency vehicle smaller than a firetruck will be used for its planned purpose. If the rightful users don't desert with them I am sure that mobs of people will commandeer them and

drive, with lights flashing and sirens blaring, all the way to safety."

Earle R. Ellefsen  
Captain, Ossining Vol-  
unteer Ambulance Corps

"I sincerely hope that a new, more realistic and responsible plan will be generated as soon as possible. Its formulation should reflect input from the various area emergency service organizations and provide for equipping and training them to properly implement the plan if necessary."

Richard H. Bower  
Volunteer Ambulance  
Disaster Coordinator  
Rockland County

"Unless a lot of pre-situation assessment is done ahead of time for known patients, a large amount of trust in the phone-caller requesting aid will be necessary...This kind of selection can only be done by the ambulance corps at the time of an evacuation under the guidance and direction of qualified medical supervision, if fairness and actual needs are to be met. Therefore, a requested list of transportation priority must be established so that chaos can be avoided. Another top medical decision priority is an explanation in layman's terms of what limits of radiation, if any, can be established for crewmen and ambulance rigs."

## Planning

Standard M.

RECOVERY AND REENTRY PLANNING AND POSTACCIDENT  
OPERATIONS

Planning Objective: "To assure that general plans for recovery and reentry are developed."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD M.

Anthony R. Marasco  
Director, Office of  
Disaster and Emer-  
gency Services  
Westchester County

"Recovery and re-entry operations, as described in the Emergency Response Plan, are inadequate inasmuch as they refer to the State plan, and no specific duties for emergency workers are described. Training for this aspect has been ignored."

Daniel M. Pisello, PhD.  
Asst. Prof. Physics  
NY Institute of Technology  
and  
Richard G. Piccioni, PhD.  
Asst. Prof. of Biology  
Hunter College

"These scenarios are by no means the most serious possible, but they do illustrate the expected long-term environmental contamination requiring relocation of large numbers of people, underscore the likelihood that large areas of land would become unavailable for agriculture, and indicate the possibility that the major source of

drinking water for New York City could be rendered unusable for several years. Because of the nature, extent, and duration of the contamination anticipated, no feasible decontamination can be implemented to mitigate these disasters."

Kathleen Toscani  
Parent  
Croton, NY

"The possibility of accidents with no solutions would leave the area devastated for decades."

Marie R. Tomkins  
Resident  
Tomkins Cove, NY

"Even if we could all be removed by some magic carpet, could we ever return to our homes? What would we have when we returned? Will our wells be contaminated? Our unsurable houses? The vegetation? Our land?"

Helga Ancona  
Journalist  
Stony Point

"Even if we could evacuate from our towns it would be many years if ever, until we could return to our homes and property. What would we live off in the meantime, how would we

replace our losses? The government would have to spend millions to shelter, feed and clothe all the displaced people, it would have to provide homes and jobs for us."

Myles Lavalle  
Councilman  
Stony Point

"Another inadequacy in the plan is the lack of reference to the length of time the area will be evacuated. Allowances are only made for a short duration. What if a

lengthy period is required? What type of protection will our homes and property receive?"

"No provision is made for nighttime testing, testing in various weather conditions, or unannounced testing."

"Funds for county participation in drills will be needed from the state legislature."

"The state plan does not adequately describe the conduct of drills and exercises."

"Revision pages to the State REPP provided to FEMA by the State in response to FEMA letter dated September 29, 1981 do not address deficiencies cited in the RAC plan review comments."

EVALUATION OF PLANNING STANDARD N. BY LOCAL CITIZENS AND OFFICIALS

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"We suggest that the drill of all bus routes be conducted and the drivers and buses alone, without riders, just test the routes, timing, and validating the paper plan."

Ronald Goldfarb  
Chief of Police  
Village of Ossining

"The March 3 drill went very poorly. An imaginary wind direction was used during the drill. It would have been better to use the actual wind direction for that given day. There was very little coordination between police, fire and emergency departments...Preparations for the March 3 drill were rushed by everyone concerned to meet federal licensing guidelines. We had a month's notice and very little preparation. In no way did it reassure us. I feel less prepared now because the drill went so badly."

Michael Holland  
Chief of Police  
Village of Haverstraw

"I think they should have a realistic drill-planned and scheduled in advance, with the public fully informed...For instance you could have a patrol car go through informing the people to evacuate. That way at least you'd know how long it would take to tell people to leave. We could test the mobilization of the ambulance corps. If we had realistic simulation, carefully planned and documented, we'd be in a better position to anticipate further problems."

Jannelise Galdone  
Photographer  
New City

"On March 3, 1982, I, as a member of the West Branch Conservation Association, observed a drill exercise conducted by the County of Rockland for its Radiological Emergency Response Plan at Rockland Psychiatric Hospital...It is my impression that their prepared advance notice gave us no way of knowing how long it might take to set up in the event of an emergency...It was incomplete even for a practice and proved very little excepting that it took too long to process people and had there been a real emergency the people outside would have been standing there possibly needing to be washed and failing to have timely treatment."

Nancy R. Elliott  
Supervisor  
Town of Yorktown

"The proposed 'drill' should be conducted using 'worst possible cases' and least passable roads in order to give a complete picture. We are not really interested in what can happen if everything goes right. We are, after all, dealing with a situation which has its genesis in everything going wrong."

Monya Berg Brown  
Artist and Teacher  
Croton, NY

"Three days is a mere guess as to how long people would stay away. There is no guarantee that life could ever resume here. The emotional effects on the adults and even more so the children will be permanent...This entire area, where I have lived off and on since I was two years old, will be worthless. No one will buy our house, we may not be able to live in it. We own only our home, if we lose it we lose all. The entire water supply will go bad, the Croton Dam a cesspool of radiation."

Clare Rosen  
School Psychologist  
Chappaqua

"The...evacuation plan currently contemplated will remove the children from their safe 'other' home and take them to a place unfamiliar to them and their teacher. This unfamiliarity and stress experienced by the teacher will be communicated to the children, thereby heightening their insecurity...No amount of preparatory explanation can alleviate the insecurity...The perceived benefits of continued operation of the Indian Point nuclear power stations are overwhelmingly negated by the certain damage to our children."

Robert J. Lifton, M.D.  
Foundations Fund Research  
Professor of Psychiatry  
Yale School of Medicine

"In none of the disaster literature with which I am familiar is there anything remotely resembling this permanent after-effect, this ineradicable sense of harboring within oneself an insidious, deadly process that at any moment may strike with mysterious ailments, deformity, or death to oneself or one's descendants. In a very real sense, a radiological disaster never ends for its victims. A few will develop post-traumatic stress disorders; more will be incapacitated by the Radiation Response Syndrome, which makes normal life and work impossible; but everyone who has been exposed is vulnerable to lingering anxiety and hypochondriacal overconcern about the functioning of the contaminated body."

NUREG-0654  
Planning  
Standard N.

EXERCISES AND DRILLS

Planning Objective: "To assure that periodic exercises are conducted to evaluate major portions of the emergency response capabilities, that the results of exercises form the basis for corrective action for identified deficiencies, and that periodic drills are conducted to develop and maintain key skills."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD N.

"There is no provision in the plans for the exercise to be conducted under various weather conditions or for unannounced exercises."

"The plans do not contain specific procedures for conducting the tests (of the communications systems.)"

"Insufficient information has been furnished to determine whether means exist for evaluating observer and participant comments. The plans do not assign responsibility for implementing corrective actions. Management controls to ensure that corrective actions are implemented as a result of acceptance of observer comments were not discussed."



Barbara Hirschman  
Teacher, CET School  
Croton

"During the day of the drill we could not even hear the signal. My children did come to school the next day very concerned and anxious after hearing their parents' concerns."

NUREG-0654

Planning  
Standard O.

RADIOLOGICAL EMERGENCY RESPONSE TRAINING

Planning Objective: "To assure that radiological emergency response training is provided to those who may be called upon to assist in an emergency."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD O.

"Detailed lesson plan outlines should be indicated..."

"A timetable for bringing training levels of emergency response personnel up to readiness levels should be furnished."

"Without having personnel assigned to specific duties one cannot determine: who needs the training...what training is necessary, and who will conduct training."

"Each off-site response organization shall participate in and receive training."

"Each organization shall establish a training program for instructing and qualifying personnel..."

"The CRERPs do not adequately provide for the initial and annual retraining of personnel with emergency response responsibilities."

"The plans lacked specific information on training of personnel and commitments to annual retraining."

"The state commented that additional funds will assist the counties in obtaining extensive training."

"The counties stated that funds have been requested to have additional personnel to conduct training."

"The counties are awaiting funds from the State before this task can be initiated."

"The implementation of remedial actions will depend on availability of funds."

EVALUATION OF PLANNING STANDARD O. BY LOCAL CITIZENS AND OFFICIALS

Raymond S. Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"To date, no satisfactory training of personnel required to implement the transportation component of this plan has taken place...The bus company managers and bus drivers who attended, all felt that

the presentation was too long; too technical; did not address what a bus driver is likely to encounter and most importantly would not have enlisted volunteers...Certainly no private bus company will solely bear the cost of paying hundreds of employees to attend daylong training sessions."

Michael Kaminski  
Director of Planning  
Department of Hospitals  
Westchester County

the type of decontamination training for ambulance personnel is inadequate...To date, the Department of Hospitals can not assure that it has the necessary trained staff to implement this plan."

Frank C. Bohlander  
Commissioner  
Public Works  
Westchester County

did the consultants attempt to provide any ongoing instructions during the drill."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Services  
Westchester County

"The level of radiological health training for all Emergency Medical Technicians (EMT's) servicing the EPZ is scant...Specific training is required for this type of emergency which has not been carried out...The level of and

"We recommend that those assigned to operate in the radio room be given detailed training and instructions upon what proper radio procedures are. No such training has ever taken place, nor

"Except for a brief period prior to the March 3, 1982 drill, there has been no assistance from the State for conducting training for emergency workers."

Dr. Anita S. Curran  
Commissioner of Health  
Westchester County

"There are not enough personnel trained to staff the field monitoring teams, or to provide second shift capability."

Sheriff Daniel Guido  
Commissioner  
Public Safety  
Westchester County

have had virtually no training or preparation for dealing with this kind of emergency."

"If we had a significant radiological emergency at Indian Point today, we in the law enforcement/public safety community could not mount a meaningful response because our officers throughout the county

Charles W. Bates  
Commissioner  
Social Services  
Westchester County

"Training and on-going training is necessary for our plan. This requires time and money."

James F. Kralik  
Chief Deputy Sheriff  
Patrol Division  
Rockland County

right decisions when they are under these stress conditions. They have to be trained."

"Until he is properly trained and has the proper information and the proper protective garb, I don't think we can really depend upon any personnel...to be fully capable of performing and making the

A. Glen Everhart  
Superintendent of Schools  
North Rockland Central S.D.

"No suggestions have been made for training employees."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"These people have not yet received the training necessary to implement this plan because of their other responsibilities... The 80 volunteers identified would be specifically used at the reception centers, and these volunteers would have to be trained in radiological survey... We only trained people for the jobs that they were specifically responsible for. At this time, we only have six people trained for monitoring. We only have seven people trained for the accident assessment room. We only have five people trained for the emergency worker decon station, and we only have two people who have been trained for the reception center decon station."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

"There has been no attempt to train staff, and staff, by the way, includes not only teachers, but bus drivers, custodians, cafeteria employees, maintenance employees, etc."

Leonard Scharf  
Asst. Superintendent  
Rockland County BOCES

"I would say that such a plan probably should be in terms of six to eight hours of orientation leading up to detailed instructions as to how to respond through various levels of emergencies at Indian Point site... If we looked at a full day of instruction for these people, I would estimate that the average teacher cost would be in the neighborhood of \$200 per day with support personnel in the range of \$75 to \$100 per day."

Earle R. Ellefsen  
Captain, Ossining  
Volunteer Ambulance  
Corps

"Unfortunately, I am of the opinion that in such a situation virtually all such personnel faced with the personal decision to remain behind and handle the plan's assignment or to gather up their families and run like hell will opt for the latter. I am confident, however, that this likelihood is reversible and stems from the fact that emergency service organizations, such as O.V.A.C., although eminently qualified to handle almost any disaster situation, have never been trained, equipped or even apprised of our responsibilities in the event of a nuclear disaster."

Stanley G. Booker  
Member  
Stony Point  
Ambulance Corps

"The Volunteer Fireman and the Volunteer Ambulance Corps, two services of very highly trained members, would be called upon to help, I am sure, but being human their first thoughts would be for the safety of their families. Next would be a meeting of all the Fire Companies and Ambulance Corps involved, asking for their participation to help them understand what they would be involved in and how to cope with it. Would they get extensive training and the proper tools and equipment plus the proper turn-out gear assigned to them for protection?"

Richard H. Bower  
Volunteer Ambulance  
Disaster Coordinator  
Rockland County

"We know that some training has been provided by the authorities and this is good and necessary. But there does exist in many minds the question that must be addressed -- Does it really matter?--Will it do any good? This is so important before a volunteer says 'yes.'"

Nancy R. Elliott  
Supervisor  
Town of Yorktown

"The sheer magnitude of the plan requires that a great deal of education and training is needed before it could operate. What are the provisions for this training? At the present time a viable educational and training program has not been put into place. No evacuation plan can possibly succeed without an intensive program for everyone from government officials to the ordinary citizen."

Joyce Zern  
Nursery School Teacher  
Ossining

"As a teacher of small children I am oriented toward developing their habitual responses for future development. To guide them thru a radiological disaster is not something I am well prepared to do. I would indeed appreciate training in how to cope with the actual evacuation as well as orienting the children's philosophy toward a future which may hold such a horrible happenstance."

Barbara Gochman  
Teacher  
Croton

"While I might be able to deal with this situation, I certainly have no training as to how to handle a radiological disaster regarding eleven children in my class."

Joan C. Livingston  
Teacher  
Croton

"We teachers have had no training- for en route supervision of children in a radiological disaster, nor for coping with special and everyday needs of our children should we successfully reach White Plains."

NUREG-0654

Planning

Standard P.

RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT,  
PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

Planning Objective: "To assure that responsibility for plan development, review and distribution of emergency plans are established and that planners are properly trained."

SELECTIONS FROM RAC COMMENTS AND INTERIM FINDINGS ON PLANNING STANDARD P.

"The training of individuals responsible for the planning effort was not addressed where cross referenced..."

"Who, by title, is responsible in each agency of the county for maintaining and updating emergency plans (i.e. telephone lists)?"



"The CRERPs do not contain a detailed listing of supporting plans and their sources."

"The CRERPs simply restate the wording in the NUREG 0654/FEMA REP-1 criteria element, rather than describing the method for accomplishing this criterion."

"The authority of county officials for planning is unclear, as is responsibility for maintaining and updating county plans. The county plans do not provide the methods for updating telephone numbers in emergency procedures."

"The County Legislature of Rockland County passed a resolution (Resolution 320) that prohibits the use of County employees and the expenditure of County funds for the further development of Federally mandated radiological response plans for commercial nuclear power plants located at Indian Point."

"The unilateral action on the part of Rockland County to discontinue participation with the other three counties in improving their preparedness in accordance with FEMA/NRC guidelines appears to seriously weaken the ability of the State to assure the protection of the health and safety of the residents of Rockland County. Moreover, withdrawal of Rockland County from this State/County coordinated planning process undermines overall off-site preparedness for this site."

"FEMA is concerned that Rockland County may be unable to implement that plan in the absence of commitment of resources for required equipment, and adequate staffing, and the lack of participation in training and drills and exercises."

EVALUATION OF PLANNING STANDARD P. BY LOCAL CITIZENS AND OFFICIALS

Raymond S. Jurkowski  
Deputy Commissioner  
of Transportation  
Westchester County

"I have deliberately referenced the State as the party responsible for negotiating and executing such arrangements because it is the State who has 'accepted' the Evacuation Plan for 'planning purposes,'

it is the State which has control over the resources to implement the plan, and it is the State, not the County, which has jurisdiction over school bus operators..."

Anthony R. Marasco  
Director, Office of  
Disaster and Emergency  
Services  
Westchester County

"Funds for protective clothing, dosimeters, thermoluminescent dosimeters (TLD's), communications equipment, identification cards, and additional staffing have not been received from the State."

James McGuire  
Radiological Health  
Specialist  
Rockland County

"There are the actification and notification lists. They must be constantly correlated with the people on them and updated to meet the telephone communications requirements to notify these people. I know that

some of the lists have changed...I think my major criticism of the plan has been that the county organizations have not been more involved in the actual development of the plan itself."

Dr. Arthur Lebofsky  
Vice President  
Clarkstown PTA Council

taken into account in the preparation of the emergency plan...The money from the State of New York is just inadequate to meet the elementary needs of the plan."

Leonard Scharf  
Asst. Superintendent  
Rockland County BOCES

relative to the use of school facilities, school equipment and staff, which may or may not be feasible or possible. In fact, some assumptions and expectations of the plan may not be legally acceptable."

Kenneth Ingenito  
Stony Point Town Council  
Rockland County  
Legislature

epidemic. Rockland County has shown leadership and will not bend under pressure...State and Federal officials are aware of our sincerity and determination. We have accepted responsibility for developing our own plan to handle emergencies of all types (not Indian Point) and we will still insist we are entitled to Federal and State funding and will continue to apply for it. Do we want our cake and eat it too - you bet we do because it is our lives we are talking about not some bureaucrat in Washington D.C."

Stephen Scurti  
Chief of Police  
Stony Point

participate in the County evacuation drill of March 3. I did not make this decision lightly but made it only after deciding that the drill was potentially misleading. Regardless of what drills and plans are made, the evacuation of Stony Point, as well as notification to its residents of an emergency at Indian Point, will be a difficult, if not an impossible task. The following are my reasons: lack of manpower, lack of information, and no protective clothing for the officers."

Michael Holland  
Chief of Police  
Haverstraw

if an emergency struck...I can't count on an informed public...I have not even been kept informed. When I finally learned, by accident, that there is a radiological plan, I asked for a copy. I took them two and a half months to send it to me. I had to ask several times...I can't recommend this plan to my town. I was asked to send two officers the day of the drill. I didn't send them because I wanted to make it clear I do not endorse the plan."

"Dr. VanWagenen (Superintendent of Schools) did report back to us that the superintendents had given significant input. However, a number of their considerations were not

"The school officials of Rockland County had little or no involvement in the development of the Radiological Response Plan. As a result, assumptions were made

"We have an incurable disease across the river (Indian Point) - we wish to surgically cut it out, not use a bandaid approach to prolonging its life, not knowing when this disease is going to spread and cause an

"My concerns over the prospect of evacuating the town of Stony Point are many. Based in part upon these concerns I made a decision earlier this year not to parti-

"I don't have enough cars (5) to handle an evacuation. I don't have a paging system. Of my force of eighteen, I might be able to call in three off-duty officers

APPENDIX

TO THE PEOPLE'S REVIEW OF THE RADIOLOGICAL  
EMERGENCY PREPAREDNESS PLANS  
FOR INDIAN POINT

EXCERPT FROM MINUTES OF REGULAR MEETING OF THE BOARD OF TRUSTEES OF THE  
VILLAGE OF BRIARCLIFF MANOR, NEW YORK, JUNE 17, 1982

WHEREAS, Consolidated Edison and the Power Authority of the State of New York each operate nuclear electrical generating facilities at Indian Point, Buchanan, New York; and

WHEREAS, the facilities are less than ten miles from Briarcliff Manor and therefore a nuclear accident would be likely to cause serious consequences to the citizens of Briarcliff Manor; and

WHEREAS, the Nuclear Regulatory Commission has promulgated a regulation which requires the development and implementation of a Radiological Response Plan for residences, each plan calling for evacuation of all within a ten mile radius of each plant; and

WHEREAS, the Radiological Response Plan developed for these plants has proved unworkable in the following areas, among others: control notification systems, public warning devices, trained personnel for implementation, and adequate infrastructure to provide safe and timely evacuation; and

WHEREAS, the Nuclear Regulatory Commission is about to undertake a study of said Plan and of other aspects of the facilities,

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Trustees of the Village of Briarcliff Manor wishes to record deep concern with these issues;

AND BE IT FURTHER RESOLVED THAT the Board of Trustees of the Village of Briarcliff Manor urges the Nuclear Regulatory Commission to strictly enforce all relevant statutes and regulations pertaining to the facilities.



# Village of Croton-on-Hudson, N.Y.

PO BOX 249,  
MUNICIPAL BUILDING, CROTON-ON-HUDSON, N.Y. 10520

Mayor  
ROBERT R. PRICE

Trustees  
JANET E. BUESSEM  
THOMAS K. BURNISTON  
VINCENT MATAI JR.  
WILLIAM J. POHLMANN



PHONE: (914) 271-4781-2

Village Manager-Clerk  
RICHARD F. HERBEK

Village Treasurer  
RICHARD J. CAMPBELL

Village Attorney  
SEYMOUR M. WALDMAN

Village Engineer  
PHILIP A. TULLY

June 7, 1932

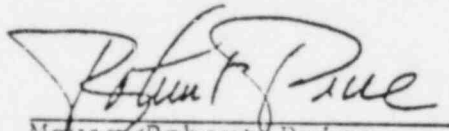
To: NRC

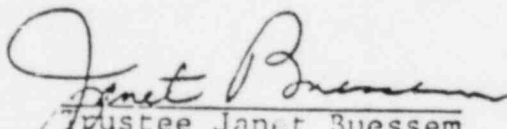
From: Croton-on-Hudson Village Board

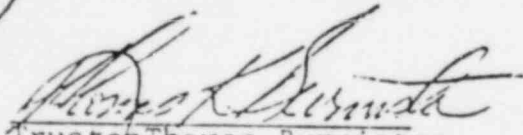
Re: Indian Point

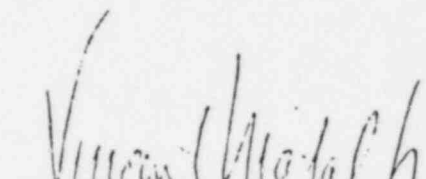
In April 1931, the Croton Village Board supported Mayor Price's statement: "If a workable evacuation plan cannot be developed, then Indian Point should be shut down." To date, a workable plan has not been formulated.

Our concern is for the health, safety, and general welfare of the people of the Village of Croton-on-Hudson. The current operation of the Indian Point plant and the absence of a workable evacuation plan seem inimical to that concern. The Croton-on-Hudson Village Board endorses the recent position taken by County Executive Alfred DelBello and asks that the NRC address the problem and come up with a solution--now.

  
Mayor Robert Price

  
Trustee Janet Buessem

  
Trustee Thomas Burniston

  
Trustee Vincent Matai

  
Trustee William Pohlmann

RESOLUTION OF  
OSSINING TOWN BOARD

Whereas, pursuant to Federal Regulations, the operators of the Indian Point nuclear power plant must establish an Emergency Response Plan in the event of a nuclear emergency for communities within a ten mile radius of the plant, and

Whereas, the Power Authority of the State of New York and Consolidated Edison Company of New York, Inc., have recently developed and tested an Emergency Response Plan designed to meet the needs of the affected communities in the event of a nuclear accident, and

Whereas, following this test it is readily apparent that the plan developed wholly fails to serve the needs of the communities in that

1. The communication and warning systems established are ill designed and wholly inadequate;
2. The local police, fire and other emergency services were not provided with the necessary equipment or training to cope with any such emergency; and
3. The proposals for evacuation of residents of our community especially our school children, handicapped and elderly are inadequate and would only serve to increase the risk of injury and confusion which the plan was designed to prevent, and

Whereas, the members of this Board have recently inspected the Indian Point plant and realize, now more than ever, the need for a comprehensive and workable emergency plan in the event of a potential nuclear accident,

NOW, THEREFORE, BE IT RESOLVED that the Town Board urges the Nuclear Regulatory Commission to stringently enforce the current regulations requiring an effective Emergency Response Plan to be developed; to work with the operators of the plant to design an effective Emergency Response Plan for our community, or in the event that such a plan cannot be developed to insure the future safety of the residents of our community, then to take such other and further action as may be necessary to protect the health, safety, and welfare of our residents including ordering that the plant be closed if an appropriate plan cannot be developed.

Resolution Adopted: June 29, 1982

Introduced by:

Hon. Herbert Reisman  
Hon. Kenneth ingenito  
Hon. Sam Zalman Gdanski  
Hon. Edward Gorman

Referral No. 6675  
May 18, 1982

RESOLUTION NO.                      OF 1982  
PROHIBITING THE EXPENDITURE OF COUNTY FUNDS  
OR USE OF COUNTY EMPLOYEES FOR THE  
FEDERALLY MANDATED ROCKLAND COUNTY RADIOLOGICAL  
EMERGENCY RESPONSE PLAN FOR INDIAN POINT,  
BUCHANAN, NEW YORK.

WHEREAS, Consolidated Edison of New York (hereinafter referred to as "Con Edison"), and the Power Authority of the State of New York (hereinafter referred to as "PASNY"), each operate nuclear electrical generating facilities at Indian Point, Buchanan, New York, and

WHEREAS, there are substantial inherent risks in the operation of the nuclear electrical generating facilities which pose threats to the health, safety and welfare of the citizens of Rockland County, and

WHEREAS, there have been numerous violations of safety requirements of the Nuclear Regulatory Commission at the Indian Point power facilities which pose substantial threats to the health, safety and welfare of the citizens of Rockland County, and

WHEREAS, there are more people located within a ten-mile radius of the nuclear electrical generating facilities at Indian Point than within the ten-mile radius of any other nuclear electrical generating facility in the United States, and

WHEREAS, it has been publicly acknowledged by the Nuclear Regulatory Commission members that present safety standards would prohibit the erection of nuclear generating facilities at or near the existing location of the Indian Point power plants, and

WHEREAS, the Nuclear Regulatory Commission has promulgated a regulation which requires the development and implementation of a Radiological Response Plan for all residents within an arbitrary ten-mile radius of each plant, and

(continued on other side)

Referral No. 6675  
May 18, 1982

WHEREAS, Con Edison and PASNY have developed, through the use of independent contractors, with the State of New York, a Radiological Emergency Response Plan for the inhabitants of the four counties who reside within an arbitrary ten-mile radius of the Indian Point nuclear facilities, and

WHEREAS, the aforesaid counties include the Counties of Rockland, Orange, Westchester and Putnam, and

WHEREAS, the Radiological Emergency Response Plan for Rockland County is unsatisfactory in that Rockland County has not been provided with sufficient communication equipment to inform public officials of safety hazards; sufficient warning devices to inform the general public of danger; and adequate training for the personnel required to implement the plan, and

WHEREAS, the existing roadway system of Rockland County is totally inadequate and would be unable to accommodate the safe and timely evacuation of the citizens of Rockland County within the affected area, and

WHEREAS, Rockland County officials, as well as officials of the Federal Emergency Management Agency (hereinafter referred to as "FEMA"), have criticized the Radiological Emergency Response Plan for Rockland County, and

WHEREAS, the County of Rockland has made a good faith effort, expended funds, and used its employees in an attempt to develop the aforesaid Radiological Emergency Response Plan for the inhabitants of Rockland County, and

WHEREAS, the County's continued participation in the Radiological Emergency Response Plan will require the continuous expenditure of County funds and personnel hours with little or no protective benefit to the citizens of the County of Rockland, and

WHEREAS, the Executive Law of the State of New York authorizes the County of Rockland to prepare a Disaster Preparedness Plan, and the County of Rockland, through its Office of Emergency Services, has and will continue to develop such plans as may be necessary to insure the health, safety and welfare of Rockland County citizens from all contingencies, and

WHEREAS, the Multi Services Committee of this Legislature has met, considered and approved this resolution, now, therefore, be it

RESOLVED, that the Legislature of Rockland County hereby authorizes, empowers and directs the Office of Emergency Services to continue to develop, in cooperation with our volunteer services and school officials, a Disaster Preparedness Plan for Rockland County, which program shall be funded by the County of Rockland, and be it further

RESOLVED, that the Legislature of Rockland County further directs the County Office of Emergency Services to develop a plan in response to a potential nuclear



Referral No. 6675  
May 18, 1982

accident occurring at the Indian Point Facilities and to utilize all sources of information in preparing such plan for the maximum protection of the citizens of Rockland County, such plan to be presented to the Legislature of Rockland County by December 31, 1982, and be it further

RESOLVED, that the Legislature of Rockland County hereby authorizes, empowers and directs the Office of Emergency Services, the Treasurer of Rockland County and/or the Chairman of the Legislature of Rockland County to pursue and accept all Federal and State monies, equipment and personnel training in connection with Rockland County's own Disaster Preparedness Plan and the Rockland County Nuclear Evacuation and Preparedness Plan for the purposes aforescribed, and be it further

RESOLVED, that the Legislature of Rockland County hereby prohibits the use of Rockland County employees or the expenditure of Rockland County funds in any manner concerning the further development of the Federally mandated Radiological Emergency Response Plan for the nuclear electrical generating facilities owned and operated by Con Edison and PASNY at Indian Point, Buchanan, New York, and be it further

RESOLVED, that the Legislature of Rockland County hereby directs the Chairman of the Rockland County Legislature not to assist FEMA, Con Edison and PASNY, their agents, servants or employees, in any manner concerning the further development of the Federally mandated Radiological Emergency Response Plan for the nuclear electrical generating facilities at Indian Point, Buchanan, New York, and be it further

RESOLVED, that in the event of a nuclear occurrence at the Indian Point Facilities, the Legislature of Rockland County hereby authorizes, empowers and directs its Chairman, notwithstanding this resolution, to take any and all action in coordinating and cooperating with any and all Federal and State agencies to protect the lives and property of the citizens of Rockland County, and be it further

RESOLVED, that the Legislature of Rockland County hereby requests the chief executive officers of the legislative bodies of the Counties of Orange, Westchester and Putnam to adopt similar resolutions prohibiting the use of their county employees or the expenditure of their respective county funds for the planning, development or implementation of Federally mandated nuclear Radiological Emergency Response Plans for the nuclear electrical generating facilities owned and operated by Con Edison and PASNY at Indian Point, Buchanan, New York and be it further

RESOLVED, that the Legislature of Rockland County urges the Nuclear Regulatory Commission to immediately suspend the operating licenses of the Indian Point nuclear facilities, and be it further

(continued on other side)

Referral No. 6675  
May 18, 1982

RESOLVED, that the Clerk to the Legislature of Rockland County be and she hereby is directed to send a copy of this resolution to Senators Alphonse D'Amato and Daniel Patrick Moynihan; Congressman Gilman; the Majority and Minority Leaders of the United States Senate and House of Representatives; Hon. Hugh L. Carey, Governor of the State of New York; Hon. Linda Winikow and Hon. Richard Schermerhorn, New York State Senators; Hon. Thomas Morahan and Hon. Eugene Levy, New York State Assemblymen; the Majority and Minority Leaders of the New York State Senate and the New York State Assembly; the chief executive officers of the Counties of Westchester, Orange and Putnam; the officials of PASNY, FEMA, NRC and Con Edison; and to such other persons as the Clerk, in her discretion, may feel proper in order to effectuate the purpose of this resolution.

MLP/bcm/mbr

Supervisors  
SALLIE SYPHER  
(914-526-2121)

Town Clerk  
PATRICIA PETERSEN  
(914-526-3280)

Town Attorney  
HERMAN TAUB  
(914-526-3050)



## TOWN OF PUTNAM VALLEY

R. D. 2, TOWN HALL  
PUTNAM VALLEY, NEW YORK 10579

N. KEVIN CAROSELLA  
Councilman

SAMUEL J. OLIVIERIO  
Councilman

SALVATORE SANTAMORENA  
Councilman  
Howard Aronow  
Councilman

### TOWN BOARD MEETING

June 23, 1982

Presented by Supervisor Sypher:

### RESOLUTION #R-205

WHEREAS the Nuclear Regulatory Commission issued regulations on August 19, 1980, requiring the development and implementation of a Radiological Emergency Response Plan for areas within a 10-mile radius of Indian Point; and

WHEREAS plans developed by two consulting firms hired by Consolidated Edison and PASNY were drafted without consultation with the affected officials in the Town of Putnam Valley or with those groups or persons whose paid or volunteer services would be required in the event of a general evacuation; and

WHEREAS the implementation of the emergency response plan presupposes the cooperation and deployment of a great number of paid and volunteer personnel, who lack training or experience in the roles they are expected to play; and

WHEREAS the warning devices that have been installed are in some areas inadequate to alert the population of Putnam Valley to the need for an emergency response; and

WHEREAS the "drill" conducted on March 3, 1982, involved only a very small part of the personnel or equipment that would be needed in Putnam Valley in the event of general evacuation; and

WHEREAS the booklet mailed by Consolidated Edison to Putnam Valley residents contained errors which require correction and implied the existence of a workable evacuation plan that was, in fact, incomplete; and

WHEREAS Putnam Valley has been given insufficient funding to provide equipment for and the comprehensive training of the paid and volunteer personnel needed in the event of a general evacuation;

NOW THEREFORE BE IT RESOLVED that the Town Board of the Town of Putnam Valley has determined that the Radiological Emergency Response Plan as it applies to Putnam Valley could not be effectively implemented at this time; and



DOCKET NUMBER 30-247/286 SP  
PROD. & UTIL. FAC.

# WESTCHESTER COUNTY BOARD OF LEGISLATORS

803 COUNTY OFFICE BUILDING  
WHITE PLAINS, NEW YORK 10601  
(914) 682-2326

ANDREW P. O'ROURKE  
Chairman

ANTHONY J. GIAMBRUNO  
Clerk  
and Chief of Staff

DOCKETED  
USNRC

SEP 24 11:10  
September 21, 1982

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Chairman  
United States Nuclear  
Regulatory Commission  
Washington, D.C. 20555

Dear Sir:

The attached resolution, Resolution No. 180-1982, was  
duly adopted by the Westchester County Board of Legislators  
in session on September 20, 1982.

Very truly yours,

Anthony J. Giambruno  
The Clerk of the County  
Board of Legislators and  
Chief of Staff

AJG/tws  
Attachment



RESOLUTION 180 - 1982

WHEREAS the Nuclear Regulatory Commission has ordered the suspension of the hearings being carried out by the Atomic Safety and Licensing Board into the safety of the Indian Point Nuclear Plants, and

WHEREAS immediately prior to such suspension the NRC had ordered the Atomic Safety and Licensing Commission to narrow the scope of the hearings, and

WHEREAS the effect of such actions by the NRC has been to deprive the public of a comprehensive and full ranging investigation into the issue of safety as it relates to the Indian Point Nuclear Plants, and

WHEREAS this Board, while not taking a position on the issues under consideration, desires only that all the relevant facts be made available in an orderly and impartial manner, now therefore be it

RESOLVED that the Westchester County Board of Legislators declares that the Nuclear Regulatory Commission acted inappropriately in narrowing the scope of the hearings by the Atomic Safety and Licensing Board and then by suspending them altogether, and be it further

RESOLVED that this Board requests in the strongest terms that the NRC immediately move to resume the hearings and that the judges conducting the hearings be allowed the proper latitude to carry out the proceedings in a comprehensive and definitive manner, and be it further

RESOLVED that this resolution be forwarded to the Nuclear Regulatory Commission, Westchester's representatives in the House and Senate, and to the President.

Sept 20, 1982  
Westchester County Resolution

TOWN OF YORKTOWN  
TOWN HALL  
363 UNDERHILL AVENUE - P.O. BOX 429  
YORKTOWN HEIGHTS, NEW YORK 10598  
PHONE: (914) 962-5722

WHEREAS, the Town Board of the Town of Yorktown was distressed by the discontinuation of the N.R.C. hearings, once again placing any resolution of the questions of safety of the Indian Point installation in limbo, and

WHEREAS, no final date has been set to give the answers to these questions,

NOW, THEREFORE the Town Board of the Town of Yorktown demands that the Indian Point nuclear plants be shut down until such time as the suspended public hearing process is reconvened and completed. The only grounds to re-open the plant shall be a conclusion demonstrating the safety of the facilities. If the conclusions are not satisfactory the facilities should remain shut.

A satisfactory conclusion shall include an evacuation plan to be re-designed in response to the deficiencies outlined in the August 2, 1982 FEMA Interim Report as well as any further deficiencies uncovered as a result of the reconvened public hearings.

Town of Yorktown  
September 2, 1982

Geraldine Schwalb  
TOWN CLERK

Office of Town Statutes  
TELEPHONE 914 862-5722

TOWN OF YORKTOWN  
363 UNDERHILL AVENUE  
YORKTOWN HEIGHTS, N. Y. 10598

*John C. Ed.*

Resolution adopted by the Town Board at its meeting held on November 5, 1980:

WHEREAS the Town Board of the Town of Yorktown expresses their grave concern with the events of the past weeks at Indian Point Plant #2, owned and operated by Con Edison, now therefore be it

RESOLVED that we hereby ask that the Nuclear Regulatory Commission keep the plant closed until such time as all questions of safety are settled and remedial action implemented, and be it

FURTHER RESOLVED that this is not a condemnation of nuclear power at this time but of this precise facility which has had a history of problems, and be it

FURTHER RESOLVED that we also feel indignant that Con Edison is passing on the cost of this incident to the consumer rather than having it absorbed by the stockholders.

*Geraldine Schwalb*  
Geraldine Schwalb  
Town Clerk

November 17, 1980

cc: Al Hammond  
Maurice Kurzman

Statement of Nancy Elliott, Supervisor of the  
Town of Yorktown  
before the  
New York State Assembly Committee on Nuclear Power Safety, September 2, 1982

I was invited here today to speak as a representative of the Westchester Association of Town Supervisors. I am going to review the reactions of the Yorktown Town Board to the Radiological Response Plan. The observations generally reflect the feelings of other towns in Westchester particularly those within a 10 mile radius.

Attached to this statement you will find a resolution passed by the Town Board of Yorktown. This resolution indicates the depth of concern over the nuclear plant issue. *Reflects only Yorktown Board's feelings*

The Town Board over the past one and a half years has been actively examining the proposed Radiological Response Plan. Numerous questions revealed that the plan as it presently exists is not realistic. It does not recognize the actual nature of the roads, transportation and communication systems within the Town of Yorktown. For these reasons the plan is inadequate.

The plan itself calls for theoretical actions on the part of citizens, transportation personnel, school children and parents. In the event of a disaster, such actions simply won't occur in the style the plan envisions. If people behaved as robots, the plan might work.

The basic problem with the response plan is that it will be difficult to execute in an area of high population density and limited available transportation. The Indian Point plants are unfortunately constructed in a difficult location, when one examines them in terms of evacuation. No tampering with an evacuation plan will alter this basic fault. Sheltering and other emergency actions required to protect the public from radio active exposure and contamination would have to be examined and designed by professionals in that field. The cost of such design and any resulting implementation would have to be borne by the utilities and considered an operating expense of the Indian Point nuclear facilities. The proposed cost of such plans should be considered by the N.R.C.

and the utility in determining whether or not the nuclear plants are economically



viable.

Prior to 1981, there was extremely poor communication between the Town of Yorktown and the operators of Indian Point plants. That situation has been greatly improved although there have been occasional lapses such as occurred two weeks ago when number 2 was shut down and no one was informed until it was leaked to the newspapers. The State itself would have to make a determination as to the quality of information it receives from nuclear power plants in emergency situations. We would be glad to share information.

There are some areas in which the Town of Yorktown could be better served. Any such plan must include such items as safety, equipment (clothing, etc.) monitoring devices, road blocks, loud speakers, manpower, training and especially local planning, and would certainly aid citizens in the event of a nuclear accident.

Funding for the implementation of the plan is inadequate. Similarly, an educational program for citizens of the area should be implemented if the plan is to be of any value at all. This is an additional expense to be borne by the utilities and the N.R.C.

The Town of Yorktown is not aware of any specific immediate recommendations that have been implemented. Lack of communications has been a continuing problem throughout this whole exercise.

In summary, as stated in our resolution, the Town of Yorktown's primary concern is the safety of its citizens in the event of a nuclear accident.

*Nancy R. Elliott*  
Supervisor  
Town of Yorktown.

We have reviewed the Westchester County Radiological Emergency Response Plan (WCRERP) and, although a great deal of thought and effort has gone into it, much more remains to be done before it can be considered an "implemented plan." We have two main areas of concern and criticism: the first is with the plan itself and the second is with the implementation of the plan.

The plan itself is deficient because it considers only the 10 mile emergency planning zone (EPZ). It is granted that the 10 mile EPZ meets the letter of the requirements of the Nuclear Regulatory Commission (NRC). The spirit of the NRC requirement is that the plan for each site accounts for the unique aspects of each. A major unique feature of this site is the enormous surrounding population. This must be considered in the plan as it may influence operations within the 10 mile EPZ. The plan does not do this. If there is a release of radioactive material from the plant requiring notification of the public, a great many people who do not live or work in the 10 mile EPZ are going to react. Their reactions will influence the events within the 10 mile EPZ. Therefore, the

plan should include a detailed consideration of the effects of a public announcement on the surrounding population, anticipate their possible reactions and the consequences thereof and include a public education/information campaign to mold these reactions in reasonable directions.

There is another aspect of the plan that we question. This is the designation of fixed egress routes for each emergency response planning area (ERPA). It seems reasonable to us to expect that the optimal egress route would depend on the meteorological conditions, whether the evacuation is partial (some ERPA's) or complete (all ERPA's), and the size and type of release from the plant. Are there provisions for tailoring the egress routes on the basis of these additional variables? The plan doesn't seem to contain any.

We also believe that a message exchange center should be part of the plan. The purpose of such a center would be to facilitate the reuniting of families separated in an evacuation. It would function by receiving and storing phone messages from anyone involved in the evacuation and by retrieving and

conveying the messages to anyone querying the system. Such a message center would relieve much of the anxiety caused by being urged to evacuate in other than family groups.

Our main concern about the plan centers on its degree of implementation. There are 5 areas that concern us and until these concerns are resolved we believe that the plan should not be considered implemented.

1. Agreements must be signed between the various agencies in charge of carrying out the emergency responses under the plan and the facility operators. These agencies must accept the responsibility for carrying out the actions delegated to them in the plan and they must believe that they have the means of doing so. Specifically some of these agencies are:

- a) the four county governments
- b) the bus companies and drivers
- c) the various school districts inside and outside the EPZ that would be involved
- d) the teachers, nurses and doctors
- e) the tow truck owners and drivers
- f) Conrail and its employees

## Statement By Federated Conservationists Of Westchester County

### CONCERNING

THE WESTCHESTER RADIOLOGICAL EMERGENCY  
RESPONSE PLAN PRESENTED TO THE INDIAN POINT  
ATOMIC SAFETY AND LICENSING BOARD AT THE  
HEARING JANUARY 14, 1982 IN CORTLANDT.

If an evacuation is necessary, many of these individuals will have conflicts of interest. They will be torn between helping in the evacuation and concern for being with and getting their own families out. We believe that enough of these people will participate in the evacuation but that they must be recruited and informed. Their commitment to help must be formalized or they cannot be counted on.

2. All necessary hardware (dosimeters, radios, protective clothing, maps, etc.) must be acquired, and be in workable condition.

3. Assurances must be given that necessary personnel have been trained and will always be available.

4. Sufficient funds must be made available to create and maintain the resources to carry out the plan. The \$250,000 assessment per plant under statute may be adequate for most sites in New York State but is undoubtedly inadequate for the Westchester and metropolitan area.

5. The public information/education program must be implemented. Six months have elapsed since the plan was to have been implemented and still there has been no distribution of informational materials.

In addition, a survey should be conducted after the first round of public education has been carried out. It is our feeling that the public informational program is inadequate and therefore the plan should be considered not implemented until 80% of the general public within the EPZ can:

- a) identify the ERPA of their residence and workplace (as it would be identified in a public announcement).
- b) cite the means and routes of egress from their residence and workplace.
- c) identify the means of egress and the destination (reception center, congregate care center or school reception center) that all members of their immediate family would use in the event of an evacuation on either a school or non-school day.

In conclusion, we believe that the WCREP was not implemented as of June 21, 1981 nor do we believe it is implemented or implementable now. If this means that the plants must be shut down, so be it.

**THE SAW MILL RIVER AUDUBON SOCIETY, INC.  
POSITION PAPER ON INDIAN POINT**

**FOR RELEASE OCTOBER 16, 1982**

The Saw Mill River Audubon Society, inc., an 800-member, non-profit citizen's group in Westchester County, N.Y., is gravely concerned about the suspension of the safety hearings on the Indian Point 2 and 3 nuclear power plants. We are particularly displeased with the new policies adopted by a narrow 3-2 vote of the Nuclear Regulatory Commission. These directives not only change the procedural ground rules in mid-course, but according to presiding Judge Louis J. Carter (who resigned in protest), they also "place an extremely unfair and heavy burden" on those opposing the continued operation of the plants. "The Commission's goal at Indian Point is to have the case come in the way they wanted."

Nor can we derive comfort from the recent appointment, by an identical 3-2 margin, of James P. Gleason as Judge Carter's replacement. Mr. Gleason was criticized for pro-industry bias by both environmentalists and a fellow panel member when he chaired the hearing board that granted a construction permit for California's highly controversial Diablo Canyon nuclear project.

We further object to the two principal restrictions imposed by the new NRC guidelines: (1) that any testimony relating to the potential consequences of an accident at Indian Point must also

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This statement was drafted for Saw Mill River Audubon's Environmental Action Committee by Dr. Stanley C. Wecker, Director of the Energy, Ecology, Environment Program at the City College of New York, New York, NY 10031. The Society maintains an office at 2660 Quaker Church Road, Yorktown Heights, NY 10598. The current President is Pamela V. Rubin.

consider the probability that such an accident will occur, and (2) that questioning by the intervenors must be confined to determining whether the reactors and the emergency evacuation plans meet existing standards. (It will no longer be permissible to challenge the adequacy of the standards themselves).

We oppose both of these limitations. Risk analysis is a multidisciplinary pursuit requiring a level of technical expertise normally only available to well-funded organizations. Moreover, while government studies provide a reasonable basis for evaluating the consequences of a major release of radioactive material, there is considerable disagreement regarding the potential causes of such an accident. With little consensus as to the particular malfunctions likely to be involved, it becomes even more difficult to assign probability values for a catastrophic event of this kind.

Indeed, it was this very uncertainty which prompted the passage of the Price-Anderson Act, the federal legislation which absolves operators of licensed nuclear facilities from extensive liability. When pressed to explain why the industry was not willing to accept responsibility along with risk, the proponents of nuclear power responded that while the danger of a serious accident occurring was inconsequential, the lack of "hard" data on plant operation would make it impossible for potential insurers to calculate meaningful premiums. However, if the Rasmussen report and other recent studies characterizing nuclear power as "low risk" are reliable (as the NRC maintains), there would seem to be little reason for opposing the immediate repeal of Price-Anderson. Given that the probability of a serious accident is said to be infinitesimally small, repeal (as an expression of self-confidence by the utilities) is long overdue. If



forthcoming, it might do much to assuage the fears of those living in the areas served by nuclear plants.

It is it unlikely, moreover, that technological advances will resolve this dilemma. On the one hand, industry spokesmen point out that no demonstrable physical harm has come to any member of the public since the present generation of reactors became operational. There have, however, been a disconcerting number of "near misses" during this same interval. No matter how perfect a concept is in theory, when one is dealing with human beings, the possibility of errors in execution can never be ruled out. The design flaws, defective parts, freak accidents, and sub-standard (and even fraudulent) quality control measures which have plagued the industry since its inception provide ample evidence of fallibility in this regard.

Who could have foreseen that a candle lit in a cable duct would have so damaged the electric circuitry of the Brown's Mills reactor that the entire emergency core cooling system was incapacitated? Was there any way of anticipating the mixup that caused the wrong blueprints to be used during the construction of the Diablo Canyon reactor? What of the serious accidents that totally disabled the Enrico Fermi breeder prototype in 1966 and Three Mile Island facility more than a decade later? Fortunately, none of these incidents resulted in loss of life, but the fact remains that a nuclear power plant is an enterprise which may become totally dependent upon the exercise of split-second judgments in high pressure situations. Under these circumstances, who is to say that a catastrophic event could never be a credible outcome?

•

To put the concept of risk assessment in its proper perspective, consider the likelihood, a priori, that a combination of human error and faulty switching equipment would so imbalance the electric power delivery system that it could result in blacking out the entire northeastern United States. The probability of such an event actually occurring would have been judged to be vanishingly small. As we all know, it not only did happen, but just a few years later, Consolidated Edison, the major utility involved, repeated the scenario and blacked out a substantial portion of the New York metropolitan area in the process. While nuclear power was not involved in either case, the example is hardly irrelevant. That two almost inconceivable incidents could involve the same utility and could occur within a relatively short period of time clearly demonstrates that even highly improbable events do come to pass! That New York City won a negligence judgment against Consolidated Edison, that the same company operates Indian Point 2, and that the NRC rated this facility "below average" in safety in both 1980 and 1981 provides little reason for complacency. Nor is our confidence bolstered by the the concession that the present siting guidelines would have precluded the construction of the Indian Point plants at their present location.

Finally, a report issued in September, 1982 by the NRC's technical staff reveals that eleven nuclear plants (including Indian Point 3) will require extensive modifications to guard against a potentially disastrous rupture of their reactor vessels. This event is believed to be a possible consequence of the progressive weakening of the walls of the reactor from prolonged neutron bombardment. Cracking of the brittle steel under thermal stress would trigger an uncontrollable release of cooling water, which is likely to generate a core meltdown. The report's conclusion that the danger is "not

imminent" is disputed by a number of knowledgeable individuals, including Demetrios Basdekas, an NRC safety engineer, who feels that there is simply not enough information to justify this contention.

Probability analysis techniques can provide useful input for defining the conditions under which Indian Point 2 and 3 should operate (if at all). But given Consolidated Edison's performance record and the unbelievably disastrous consequences of a major accident in an area as densely populated as our own, it should be equally obvious that no credible risk, however small, is too remote to even consider. It is hardly frivolous, therefore, to ask whether the benefits derived from the continued operation of these plants actually justify the potential hazards.

When cost-benefit analyses are performed, why isn't the cost of decommissioning and permanently sealing outdated plants taken into account? When environmental impact statements are prepared, why aren't the serious off-site pollution problems associated with uranium mining, fuel reprocessing, and the long-term storage and disposal of wastes also considered? What of the staggering cost of coping with serious accidents such as Three Mile Island? If nuclear power is the energy technology of the future, why are orders for new plants not being placed? Why are a significant number of plants already under construction being terminated with substantial loss of investment capital? Finally, how can the nuclear option be the most effective way to achieve energy independence, when the operating efficiency of most plants is notoriously low? While there has been some improvement in recent months, over an eight-year interval (1974-1981) Indian Point 2 averaged only 52% of its production capacity, with Indian Point 3 rated at 50% for the five-years from

According to the New York Times of October 10, 1982, "the once nuclear future has been delayed .... for a growing list of problems across the nation that have been stung by big nuclear repair bills."

The article cites the unexpectedly high costs associated with nuclear malfunctions and shutdowns, but does not include the additional costs which will be required to prevent pressurized thermal water reactors (see above). Indian Point is part of this economic squeeze.

New York State Consumer Protection Board has already refused to allow Consolidated Edison to pass a 3.8 million dollar surcharge along with other customers to cover the costs of a 1980 outage at Indian Point.

The adequacy of Indian Point's emergency evacuation plan is also a major concern. Given that almost 288,000 people live within ten miles of this facility, is any such strategy really feasible? What is there to believe that the effects of a major accident would be limited to this area? Since more than 10% of the entire population of the United States lives within 60 miles of the two plants, don't evacuation plans be required for these people also? If so, do they have any basis in reality?

These are legitimate questions, but the new NRC guidelines will provide testimony on the adequacy of the existing standards and regulations when the hearings resume. Given that a wide variety of standards and regulations pertaining to atomic energy have required revision, this regrettable ruling cannot remain unchallenged. A case in point is the dramatic fourfold increase in the collective radiation dose of American nuclear plant workers from 1969 to 1980. As



indicated in a report issued on October 10, 1980 by the General Accounting Office, this trend is causing "increasing concern" in Federal agencies and the nuclear industry. According to the GAO, "the continued rise in the collective dose and the 1979 accident at the Three Mile Island raise serious questions as to the adequacy of radiation protection programs at nuclear power facilities. At this time it is uncertain whether enough workers can be hired and trained, particularly in certain highly skilled professions, to safely operate and maintain future plants."

In the wake of the near tragedy at Three Mile Island, it is imperative that the anxieties of people living in the area served by Indian Point be freely and openly addressed. This cannot be achieved under the new NRC ground rules, which are actually counterproductive. Proceedings carried on under gag rule will further erode the public's already shaken confidence in the nuclear industry. The integrity of the regulatory process and the mandate of NRC to protect the public interest are in question.

Accordingly, the Saw Mill River Audubon Society supports the following positions:

- The safety hearings should be resumed as soon as possible under the original guidelines. These were fair to both sides and did not preclude considering the adequacy of existing standards and regulations.
- Keeping in mind the disastrous consequences of a major accident in a densely populated area, the revised emergency evacuation plans must be given the closest possible

scrutiny. The plants should not be allowed to operate in the absence of workable strategy.

- In light of the sharply reduced demand for electricity and Westchester County's intent to purchase alternative sources of power, the economic necessity for keeping Indian Point open should be seriously evaluated. If it can be demonstrated that this facility's contribution to the regional power supply is not now needed, the plants should be closed down immediately. If this is not the case, decommissioning should be implemented as soon as it proves economically feasible to do so.
  
- A combination of strong conservation measures coupled with the long-term development of "soft" energy alternatives such as solar power constitutes a far more benign solution to the energy crisis than the nuclear alternative. This is the essence of the balanced energy policy currently being sought by our parent organization, the National Audubon Society. It should be made a national priority.

# VILLAGE INDEPENDENT DEMOCRATS



## RESOLUTION TO CLOSE INDIAN POINT

WHEREAS, the Indian Point nuclear power plants pose a serious threat to the health and safety of the residents of the New York City metropolitan region, and

WHEREAS, serious safety problems such as corroding steam generator tubes and reactor vessel embrittlement resulting from aging and deterioration increase the likelihood of a catastrophic accident at Indian Point,

NOW THEREFORE BE IT RESOLVED, that the Village Independent Democrats favors the permanent closing of the Indian Point nuclear power plants, and urgently calls upon our elected officials to take immediate steps to accomplish this end.

### RATIONALE:

A newly released study prepared for the Nuclear Regulatory Commission by Sandia National Laboratories indicates that a worst-case accident at the Indian Point nuclear power plants could result in 50,000 early deaths out to 17.5 miles, 167,000 early injuries out to 50 miles, and financial loss of \$314 billion. Most of New York City lies within 50 miles of Indian Point and portions of the city could be rendered uninhabitable for decades by such an accident, or its water supply contaminated for years, according to scientists testifying in the NRC Indian Point hearings. Serious safety problems such as corroding steam generator tubes and reactor vessel embrittlement resulting from aging and deterioration increase the likelihood of a catastrophic accident at Indian Point.

Emergency planning and preparedness for the vicinity around Indian Point has been deemed deficient by the Federal Emergency Management Agency, and there are no evacuation or sheltering plans to protect residents of New York City from excessive doses of radiation in the event of an accident at Indian Point. The Indian Point plants have, in recent years, been out of service almost half the time, with no effect on electricity supply to the region, including New York City, and are presently shut down for refueling and repairs. The present and future electricity needs of the greater New York City metropolitan region can be provided through alternative energy sources if Indian Point is permanently closed.

**Democratic County Committee • New York County**  
**Herman D. Farrell, Jr. • County Leader**

November 18, 1982

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Nunzio Palladino, Chairman  
John Ahearne, Commissioner  
Victor Gilinsky, Commissioner  
James Asselstine, Commissioner  
Thomas Roberts, Commissioner

Dear Commissioners :

Please be advised that on November 18, 1982, the New York County Democratic Committee passed without dissent the following resolution :

RESOLVED, that the New York County Democratic Executive Committee favors the permanent closing of the Indian Point nuclear power plants, and calls upon our government officials to take immediate steps to accomplish this end.

The entire resolution is attached.

We urge you to insure that the Indian Point nuclear power plants remain permanently closed.

Yours truly,



Herman D. Farrell, Jr.  
Democratic County Leader

Attachment



RESOLUTION TO CLOSE INDIAN POINT

WHEREAS, the Indian Point nuclear power plants pose a serious threat to the health and safety of the residents of the New York City metropolitan region, and

WHEREAS, a newly released study prepared for the Nuclear Regulatory Commission by Sandia National Laboratories indicates that a worst-case accident at the Indian Point nuclear power plants could result in 50,000 early deaths out to 17.5 miles, 167,000 early injuries out to 50 miles, and financial loss of \$314 billion, and

WHEREAS, most of New York City lies within 50 miles of Indian Point and portions of the city could be rendered uninhabitable for decades by such an accident, or its water supply contaminated for years, and

WHEREAS, serious safety problems such as corroding steam generator tubes and reactor vessel embrittlement resulting from aging and deterioration increase the likelihood of a catastrophic accident at Indian Point, and

WHEREAS, emergency planning and preparedness for the vicinity around Indian Point has been deemed deficient by the Federal Emergency Management Agency, and

WHEREAS, there are no evacuation or sheltering plans to protect residents of New York City from excessive doses of radiation in the event of an accident at Indian Point, and

WHEREAS, the Indian Point plants have, in recent years, been out of service almost half the time, with no effect on electricity supply to the region, including New York City, and are presently shut down for refueling and repairs, and

WHEREAS, present and future electricity needs of the greater New York City metropolitan region can be provided through alternative energy sources if Indian Point is permanently closed,

THEREFORE BE IT RESOLVED, that the New York County Democratic Executive Committee favors the permanent closing of the Indian Point nuclear power plants, and calls upon our government officials to take immediate steps to accomplish this end.

Democratic County Committee • New York County  
Herman D. Farrell, Jr. • County Leader

November 18, 1982

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THEREFORE BE IT RESOLVED, that the New York County Democratic Executive Committee favors the permanent closing of the Indian Point nuclear power plants, and calls upon our government officials to take immediate steps to accomplish this end.

BRIARCLIFF MANOR UNION FREE SCHOOL DISTRICT

Board of Education

BRIARCLIFF MANOR, NEW YORK 10510

June 24, 1982

The undersigned, being the duly appointed District Clerk of the Briarcliff Manor Union Free School District, Briarcliff Manor, New York, hereby certifies that the following is a true and accurate copy of a resolution adopted by the Briarcliff Manor Board of Education at its meeting duly convened and held on June 24, 1982:

The motion by Mr. Dunkerton, seconded by Mrs. [redacted] and passed unanimously, it was

Resolved, that the following resolution is hereby adopted.

WHEREAS, Consolidated Edison and the Power Authority of the State of New York each operate nuclear electrical generating facilities at Indian Point, Buchanan, New York; and

- WHEREAS, the facilities are less than ten miles from Briarcliff Manor and therefore a nuclear accident would be likely to cause serious consequences to the citizens of Briarcliff Manor; and
- WHEREAS, the Nuclear Regulatory Commission has promulgated a regulation which requires the development and implementation of a Radiological Response Plan for Residents and a Radiological Response Procedure for Schools, (August, 1981), such Plan and Procedure calling for evacuation of all within a ten mile radius of each plant; and
- WHEREAS, this procedure requires the student body and personnel to be fragmented and dispersed to widely diverse areas far from their homes and vehicles, and
- WHEREAS, this procedure can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, and
- WHEREAS, this procedure will not work unless workers from areas outside the nuclear danger zone will voluntarily enter the danger zone to transport personnel and students at some hazard to their health and life, and
- WHEREAS, there is serious doubt as to the workability of this procedure, and
- WHEREAS, the Nuclear Regulatory Commission is about to undertake a study of said Plan and Procedure and of other aspects of the facilities,
- NOW, THEREFORE, BE IT RESOLVED THAT the Board of Education of the Briarcliff Manor Union Free School District wishes to record deep concern about the Plan and dissatisfaction with the Procedure with respect to the schools, and be it further
- RESOLVED, that the Briarcliff Manor U.F.S.D. Board of Education approve adoption of the Plan and implementation of the Procedure, and be it finally



- RESOLVED, that the Briarcliff Manor U.F.S.D. Board of Education urge the Nuclear Regulatory Commission and the Westchester County (New York) Executive to order the immediate development of alternatives to the present Plan and Procedure with respect to the schools which would cure the serious shortcomings in the present Plan and Procedure.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the district on the 24th day of June, 1982.

Susan A. Merritt  
Susan A. Merritt  
District Clerk

( S E A L )

BRIARCLIFF PARENT TEACHER ASSOCIATION STATEMENT  
IN REGARD TO INDIAN POINT POWER PLANT

It is the position of the B.P.T.A. that the plan of evacuation procedures is inadequate, unrealistic, confusing and dangerous to the students, parents, teachers and administrators of the Briarcliff Schools.

The inability to safely and effectively evacuate residents should an accident occur, creates a constant threat to the welfare of the community. Until the operational and functional problems are satisfactorily rectified, the Briarcliff P.T.A. requests that the Nuclear Regulatory Commission close Indian Point.

B.P.T.A.  
Carole Waygood  
Sally Solari  
Evelyn Cerrone  
Sue Lerner

BRIARCLIFF TEACHERS ASSOCIATION  
Briarcliff Manor, New York 10510

Motion: Opposition to the Radiological Emergency Response Plan

Whereas the procedures for evacuation of school district personnel and parents in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and

Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that it is the position of the Briarcliff Teachers Association that the plan of evacuation procedures is inadequate, confusing, fraught with risk and possibly dangerous to the students, parents, teachers and administrators of the Briarcliff School District and; be it further

Resolved that the Briarcliff Teachers Association opposes the plans set forth by the Four County Nuclear Safety Committee and; be it further

Resolved that the Briarcliff Teachers Association convey this position to the Superintendent of Schools and the Board of Education and solicit their agreement to this point of view; and be it further

Resolved that the Briarcliff Teachers Association notify government authorities charged with the implementation of this procedure of the position of this Association set forth in this resolution.

BRIARCLIFF TEACHERS ASSOCIATION  
Briarcliff Manor, New York 10510

Motion: Opposition to the Radiological Emergency Response Plan

- Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and
- Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and
- Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and
- Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that it is the position of the Briarcliff Teachers Association that the plan of evacuation procedures is inadequate, confusing, fraught with risk and possibly dangerous to the students, parents, teachers and administrators of the Briarcliff School District and; be it further

Resolved that the Briarcliff Teachers Association opposes the plans set forth by the Four County Nuclear Safety Committee and; be it further

- ✓ Resolved that the Briarcliff Teachers Association convey this position to the Superintendent of Schools and the Board of Education and solicit their agreement to this point of view; and be it further
- ✕ Resolved that the Briarcliff Teachers Association notify government authorities charged with the implementation of this procedure of the position of this Association set forth in this resolution.





CROTON TEACHERS ASSOCIATION INC., CROTON-ON-HUDSON,

NEW YORK, 10520

June 8, 1982

To Whom It May Concern:

Motion:

Opposition to Nuclear Emergency Procedures

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and vehicles, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, and

Whereas these procedures require workers from areas outside the nuclear danger zone to enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that the CTA oppose implementation of these procedures and CTA participation in such procedures, and be it further

Resolved that the CTA enlist support for this motion from other district employee unions, and be it further

Resolved that the CTA convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further

Resolved that the CTA urge the Westchester and Putnam County Executives to convene a committee consisting of school employees, parent, student, and administrative representatives to discuss and recommend alternatives to the present program.

Sincerely yours,

*Robert Ashkinaze*  
Robert Ashkinaze, President  
Croton Teachers Association

Approved at Executive Committee of Croton Teachers Meeting June 7, 1982

Special Education Placements A motion to approve the Special Education Placement of Students Nos. 306 to 311 was made by Ann Bickford and seconded by Patricia McIntyre.

On the question: Dr. Schilling stated that it should be noted that most of these placements are for decreased services.

Ayes 6 Absent 1 Motion Carried

Hearing of Citizens Mrs. Valentine asked for more information regarding letter to Mr. Andrew Harte.

Mrs. Kathryn Feit asked that the Board make a statement with regard to the flaws of the present evacuation policy. She further asked if a meeting could be set up with a representative from the County regarding this plan.

A motion to issue a statement concerning the inadequacies of the evacuation plan was made by Lee Sack and seconded by Patricia McIntyre.

Ayes 6 Absent 1 Motion Carried

Mr. Steve Jacoby and Mrs. Myra Spiegelman talked further about the present evacuation plan.

Adele Josiger stated that the PTSA members will be taking a poll with regard to the evacuation plan as it now stands.

Ms. Toscani asked that in the future Holy Name of March School be advised of all evacuation meetings.

Adjournment A motion to adjourn at 9:35 p.m. was made by Lee Sack and seconded by Curtis Schilling.

Ayes 6 Absent 1 Motion Carried

*Kathleen A. Geradi*

Kathleen A. Geradi  
District Clerk

kg

Approved: 3/8/82

4/1/82

The press release from  
David Seigel, Croton-Harmon  
Superintendent, accurately  
reflects the position of the  
Croton-Harmon Board of  
Education. Lynn Wright  
President

**CROTON-HARMON  
UNION FREE SCHOOL DISTRICT**  
CROTON-ON-HUDSON, N. Y. 10520  
914-271-4713

PRESS RELEASE

Statement from David S. Siegel, Superintendent of Schools

"The document which has been distributed by the Westchester County Department of Public Safety, Office of Disaster and Emergency Services, which calls for local public schools to participate in potential evacuation procedures, is, in my judgment, too weak to stand in its present form. The number of gaps in the plan ranging from lack of back-up communication, sound evacuation routing, and guarantees that contract transportation can be relied upon are far too serious to stand unchallenged.

We have communicated with staff and with parents to apprise them of what the county plan contains in terms of our school district.

This communication in no way suggests our endorsement of the county plan as it now stands. We have, over the past several months continually advised representatives of this county, and of the consulting firm that they have employed, of our misgivings with regard to their plan."

96 77

CROTON PARENT TEACHER  
STUDENT ASSOCIATION

P O BOX 267  
CROTON-ON-HUDSON N Y 10520

February 10, 1982

The P.T.S.A. has been requested by its members to take a vote on the proposed school evacuation plan in the event of a nuclear accident at Indian Point. The document is available for review at all three schools, the library, and the district office.

Please check the number of the statement that most closely reflects your feelings on this matter and return it before February 26th to:

Adele Josiger, PTSA President

2 Jacoby Street

Croton-on-Hudson, N. Y. 10520

The results of this survey will be made public at a later date.

- - - - -
- 2 1. The current evacuation plan is adequate.
- 54 2. The current evacuation plan is seriously flawed.
- 33 3. The current evacuation plan should be revised.
- 13 4. Abstain.

The PTSA was requested by certain members to take a vote on the proposed school evacuation plan.

The results of the survey are as follows:

Two felt the plan was adequate,  
Fifty-four felt the plan was seriously flawed,  
Thirty-three felt the plan should be revised, and  
Three abstained.

Over 180 ballots were sent out and seventy-seven were returned.

At this time, the Croton-Harmon PTSA does not see it change demand or conditions and any misrepresentation by state would not be appreciated.

Walter Gause, 5317

Student

6-1-82



NEW YORK STATE UNITED TEACHERS EDUCATIONAL DISTRICT #15  
RESOLUTION RECOMMENDED FOR ADOPTION BY ALL LOCALS

Motion: Opposition to the Radiological Emergency Response Plan

Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and families, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and

Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that the NYSUT locals in Westchester/Putnam oppose approval of these procedures and oppose local participation in such procedures, and be it further

Resolved that the NYSUT local members carefully consider the negative consequences of the plan before subjecting their children to it, and be it further

Resolved that the NYSUT local presidents convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further

Resolved that the <sup>local</sup> Presidents notify government authorities charged with approval of this plan that it is considered unrealistic, unworkable and unacceptable to the membership of the Westchester/Putnam NYSUT locals.

Resolution recommended for adoption by locals  
at NYSUT ED 15 meeting, May 25, 1982

OSSINING TEACHERS ASSOCIATION  
Ossining, New York 10562

Motion: Opposition to the Radiological Emergency Response Plan

Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and families, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and

Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that the Ossining Teachers Association (OTA) oppose approval of these procedures and oppose OTA participation in such procedures, and be it further

Resolved that the OTA members carefully consider the negative consequences of the plan before subjecting their children to it, and be it further

Resolved that the OTA convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further

Resolved that the OTA notify government authorities charged with approval of this plan that it is considered unrealistic, unworkable and unacceptable to the OTA membership.

Resolution approved by the OTA membership April 27, 1982.

POCANTICO HILLS TEACHERS ASSOCIATION  
Bedford Road  
North Tarrytown, New York 10591

- Motion: Opposition to the Radiological Emergency Response Plan
- Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and
- Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and families, and
- Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress, and confusion, and
- Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and
- Whereas there is serious doubt as to the possible success of these procedures, and
- Resolved that the NYSUT local in Pocantico Hills oppose approval of these procedures and oppose local participation in such procedures, and be it further
- Resolved that the NYSUT local members carefully consider the negative consequences of the plan before subjecting their children to it, and be it further
- Resolved that the NYSUT local president convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further
- Resolved that the local president notify government authorities charged with approval of this plan that it is considered unrealistic, unworkable and unacceptable to the membership of the Pocantico Hills NYSUT.

Resolution adopted June 16, 1982 by  
Pocantico Hills Teachers Associaton

Motion: Opposition to the Radiological Emergency Response Plan

Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and families, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and

Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

*United Staff Association, Local 2072*  
Resolved that the NYSUT ~~locals in Westchester/Putnam~~ oppose approval of these procedures and oppose local participation in such procedures, and be it further

*United Staff Association, Local 3072*  
Resolved that the NYSUT local members carefully consider the negative consequences of the plan before subjecting their children to it, and be it further

*United Staff Association, Local 3072*  
Resolved that the NYSUT local presidents convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further

*local*  
Resolved that the <sup>local</sup> Presidents notify government authorities charged with approval of this plan that it is considered unrealistic, unworkable and unacceptable to the membership of the Westchester/Putnam NYSUT locals.

Resolution (as amended) adopted by the Putnam/Northern Westchester BOCES Teachers Association, June 1, 1982

PUTNAM VALLEY - PUTNAM COUNTY STATEMENT  
=====

1. PUTNAM VALLEY SCHOOL BOARD

Resolves that the Putnam Valley Board of Education feels that the current Putnam County Nuclear Evacuation Plan as proposed is unworkable in its current state and needs immediate attention and revision.

And, be it further resolved that all federal, state and county agencies involved in drafting the plan should be notified of our feelings.

[6/16/82]



PUTNAM VALLEY - PUTNAM COUNTY STATEMENT  
=====

1. PUTNAM VALLEY SCHOOL BOARD

Resolves that the Putnam Valley Board of Education feels that the current Putnam County Nuclear Evacuation Plan as proposed is unworkable in its current state and needs immediate attention and revision.

And, be it further resolved that all federal, state and county agencies involved in drafting the plan should be notified of our feelings.

[6/16/82]



# VALHALLA TEACHERS ASSOCIATION

300 COLUMBUS AVENUE,  
LOCAL 3075

VALHALLA, NEW YORK 10595  
NEW YORK STATE UNITED TEACHERS  
AMERICAN FEDERATION OF TEACHERS-AFL-CIO

Motion: Opposition to the Radiological Emergency Response Plan

Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with minimal consideration for those people most affected by it, and

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and families, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, stress and confusion, and

Whereas these procedures assume that workers from areas outside the nuclear danger zone will enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that the Valhalla Teachers Association (VTA) oppose approval of these procedures and oppose VTA participation in such procedures, and be it further

Resolved that the VTA members carefully consider the negative consequences of the plan before subjecting their children to it, and be it further

Resolved that the VTA convey this motion to the Superintendent of Schools and the Board of Education and request their support of similar resolutions, and be it further

Resolved that the VTA notify government authorities charged with approval of this plan that it is considered unrealistic, unworkable and unacceptable to the VTA membership.

# YORKTOWN CENTRAL SCHOOLS

2723 CROMPOND ROAD

YORKTOWN HEIGHTS, NEW YORK 10598

(914) 245-6028

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## BOARD OF EDUCATION

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STEVEN WILLS

## BOARD OF EDUCATION STATEMENT ON THE INDIAN POINT RADIOLOGICAL EMERGENCY RESPONSE PLAN

After carefully reviewing the Radiological Emergency Response Plan, and after sponsoring a district-wide meeting with representatives of the Power Authority of the State of New York, the Yorktown Central School District Board of Education believes that the present evacuation plan is neither feasible nor does it represent a workable option which would be considered viable for the protection and safety of the students, staff and residents in our district. Our conclusion, therefore, is that the proposed plan be eliminated.

In view of its many errors, the evacuation plan further serves at this time only to undermine the credibility of the utilities with regard to the safe operation of Indian Point. This document which has been proposed without consultation with local school districts is both unacceptable and functionally non-operable. Due to the nature of the highly populated communities surrounding Indian Point and the inadequate roads, the Board of Education has serious doubts whether any workable evacuation plan can actually be developed for this area.

Since ~~one of~~ our prime responsibilities is to protect the health and safety of our students, the following ten points represent some of the more glaring problems which as yet remain unresolved by PASNY:

1. What authority does a superintendent have in mandating that staff go on buses that are evacuating students? We believe that legally we cannot mandate this action if staff decided to be with their own children.
2. What arrangements have been made for food, blankets, medical supplies, public health facilities and radiological detection equipment for personnel at the reception centers?
3. If parents come to school to get their children during an evacuation, do we refuse them that right? As parents, we wouldn't want to be refused, but who will take care of the major traffic jams on major roads and on school sites when parents and buses arrive at the same time? New York City uses the word "gridlock" to describe stalled traffic, and we believe that word would apply here. The plan does not deal with a realistic concern: what are the radiological exposure dangers to our children stranded in traffic jams? Are they really safer on buses attempting to leave the area?

4. We have children in 14 schools located within the Emergency Planning Zone. They will be transported to ten different reception centers. Many families have students in two or more of the schools. Since they will wind up in the triangle of White Plains, Hopewell Junction and the Connecticut border, how are parents expected to retrieve their children? Are we again encouraging "gridlock" on our narrow roadways? How long would students be at the triangle, and what happens to them after they arrive there?
5. Over a year ago we notified those in authority that the French Hill School was deleted from the plan. That school which houses BOCES students and a number of ours is still deleted.
6. We see no arrangements for severely handicapped (wheelchair) students. BOCES has approximately 25 and we have 9.
7. On Table 1, Page SCL-7, Item #5, PASNY has 45 students scheduled for two 15-passenger vans. On Page SCL-15, Item #13, PASNY has 28 students scheduled for one 15-passenger van.
8. PASNY has taken our bus fleet and sent it into ten different unfamiliar areas and replaced the vehicles taken from us with 26 vehicles from Liberty Bus Company who are totally unfamiliar with our school locations. If we have our buses, why must we give them away and then hope that someone will replace them?
9. The plan indicates the use of 75 buses from the Vanguard Yorktown fleet. Since only 45 exist, this means that approximately 1600 students will be stranded. How will they be evacuated?
10. Most of our drivers are parents of children in our schools. Is it reasonable to assume that they would leave the area in lieu of transporting their children out of the area?

These deficiencies and the continual malfunctioning problems occurring at Indian Point, coupled with the inability to safely and effectively evacuate residents should an accident occur, create a constant threat to the welfare of the community. Until the operational and functional problems are satisfactorily rectified, the Board of Education requests that the Nuclear Regulatory Commission close Indian Point.

In reviewing whether a workable plan can be developed, we request that input by school, town and community representatives be mandated. We further suggest that on-site visits be made to both receiving and sending districts to ensure that the number of students slated to go to those particular receiving stations can indeed be accommodated without the necessity of separating the family unit.

We, the Yorktown Heights Central Schools Board of Education, charge the Nuclear Regulatory Commission with the responsibility to take appropriate action that is consistent with the concerns voiced by the affected communities.

For release May 12, 1982

Statement by John F. Roden, President YCT

At a YCT general membership meeting held on March 8, 1982 YCT members unanimously voted to endorse a resolution in strong opposition to the proposed nuclear emergency evacuation procedures. I would urge the Board to join us in opposition for the following reasons:

- 1) The plans, which impact heavily on school district personnel, parents and students were developed with no participation by representatives of our Board, unions representing workers or any parent or student groups.
- 2) I believe this plan violates the rights of parents in this district to determine the appropriate response to an emergency for their family members. The plan could conceivably separate family members to at least three different locations making the reuniting of a family virtually impossible during a potentially life threatening emergency. As a parent, I would not tolerate the mandatory separation of my family members during such an emergency.
- 3) I believe this plan violates the rights of children to remain with their families and siblings in time of emergency. At a time when political administrations decry the lack of stability in families, it seems most unwise to tear family units asunder, during an emergency, when they should be participating in one of their closest relationships. A plan which can separate siblings to widely disparate areas does nothing to alleviate the pressure felt in an emergency.
- 4) I believe this plan violates the rights of employees within and without affected school districts.  
Within our district, any requirement that staff leave their cars and board busses with children to distant locations, destroys that staff members ability to use his or her auto in an attempt to join with his or her family or to leave the nuclear danger zone on their own. The plan will invite confrontations between staff and parents who prefer to take their children rather than have them board buses if any are available.  
Additionally, the plan requires bus drivers from outside the nuclear danger zone to enter the potentially lethal zone to pick up students and faculty. I believe all these situations represent activities beyond what could reasonably be called "professional" obligations.



- 7/
- 3
- 5) Lastly and most importantly, I believe we should oppose the plan because it simply WILL NOT WORK.

Anyone who has driven on Route 202 in Yorktown between 5-7PM or on Route 6 heading to Westchester Mall on any Saturday is aware of the horrendous traffic jams with no emergency in progress. Do we seriously believe there will be less traffic on these major "escape routes" in the event of a life threatening emergency?

I view the plan as a panacea to lull the public into a false belief that there is a way for them to escape from a nuclear disaster. It is reminiscent of those days when I was in high school when the government suggested we build bomb shelters to escape nuclear bombs. I did not build a bomb shelter then and I will not give the YCT imprimatur to a patently absurd plan, now.

YORKTOWN CONGRESS OF TEACHERS

Motion:

Opposition to Nuclear Emergency Procedures

Whereas the procedures for evacuation of school district personnel and students in the event of a nuclear accident at Indian Point were developed with no teacher union input, and

Whereas these procedures require students and personnel to be dispersed to widely diverse areas far from their homes and vehicles, and

Whereas these procedures can result in separation of children and parents in the same family to widely varying locations at a time of potential crisis, and

Whereas these procedures require workers from areas outside the nuclear danger zone to enter the danger zone to transport personnel and students at some hazard to their health and life, and

Whereas there is serious doubt as to the possible success of these procedures, be it

Resolved that the YCT oppose implementation of these procedures and YCT participation in such procedures, and be it further

Resolved that the YCT enlist support for this motion from other district employee unions, and be it further

Resolved that the YCT convey this motion to the Superintendent of schools and the Board of Education and request their support of similar resolutions, and be it further

Resolved that the YCT urge the Westchester and Putnam County Executives to convene a committee consisting of employee union, parent, student and administrative representatives to discuss and recommend alternatives to the present program

Motion passed March 8, 1982 YCT General Membership meeting

# *Yorktown Heights PTA*

2723 CROMPOND ROAD  
YORKTOWN HEIGHTS, NEW YORK 10598

I am Betsy Doepken, President of the Yorktown PTA. Each of our 722 members has been issued a card signifying membership. On the back of this card there is a statement setting forth the objectives of the PTA. I would like to share just two of these objectives with you. The first is that the PTA will "promote the welfare of children and youth in home, school, community, and place of worship." One other states that the PTA will work "to secure adequate laws for the care and protection of children and youth." It is for these two reasons that we feel the evacuation plan is inadequate.

According to the plan as presented to the community in the booklet "Indian Point, emergency planning and you" we are to assume that enough bus drivers will come into this area to transport over 4000 school children to safe areas. What is to become of the children for whom no bus comes? Our teachers have families that they will be concerned about. Who is going to demand that these teachers wait with their classes, rather than go home to tend to their own family's needs? Will the schools have to forbid parents from coming to the schools and getting their own children?

Let's suppose for a minute that the children are bussed to the "safe areas". Will the teachers be forced to go with their classes? Who will be at the reception areas to insure the safety and well being of the children there? Do we have any assurance of the

proper supervision necessary with such large numbers of children?  
You are asking too much of responsible parents and school personnel.  
How can we put trust into such a plan?

Was this plan made with any input from the schools, police, fire department, or ambulance corps? Did anyone speak to the Director of Transportation of the Yorktown Schools, who has the responsibility of these children 180 days a year?

We feel that the plan was made with little or no attempt to guarantee the safety and welfare of the children in our schools. We have too many questions and no answers. In your booklet you state that the plan will "enable officials to cope with emergency situations that may arise." We feel that the plan as it now stands will create many more emergency situations than we already have.

Betsy Deeken  
2147 Van Cortlandt Cir  
Yorktown Hgts NY  
10578

# Opinions differ on nuke safety: U.S., state vs. local officials

By JON CRAIG  
Staff Writer

State and federal officials say serious flaws in emergency plans for the Indian Point nuclear plants can be remedied by December. But local officials, mindful of the millions of dollars it would cost, are skeptical.

The officials were among those who testified at a hearing Thursday before a special committee of the state Assembly. The hearing was part of an effort to determine whether current plans meet the requirements of the state Emergency Radiological Preparedness Act of 1981.

Representatives of citizens' groups contended that some aspects of the plan would never be workable, while spokesmen for utilities said they believe the plans are adequate.

Westchester County Executive Alfred B. DelBello said the emergency plans, which federal watchdog agencies have cited for "significant deficiencies," can only be corrected with more funds. Even then, he said, he could not assure a safe and speedy evacuation of the public during a nuclear accident.

The emergency act allows the state to assess operators of nuclear plants annual fees of about \$250,000 for emergency planning. The assembly's Special Committee on Nuclear Power Safety is considering whether it should ask for more money.

But, DelBello said, "We do not have the resources in hand or even on the way from the state to put us in the position to fully accomplish the tasks and objectives detailed in the plan."

Indian Point's two active reactors are located in Buchanan, 24 miles north of New York City. The 19 mile area around the plant is inhabited by 270,000 people, making it the most densely populated area surrounding any nuclear power plant in the nation.

After the March 1979 accident at Three Mile Island in Harrisburg, Pa., the NRC required nuclear plants to submit plans for the sheltering or evacuation of residents living within 10 miles of a plant.

In an interim report released in July, the Federal Emergency Management Agency said existing emergency plans for Indian Point do not meet federal standards. The Nuclear Regulatory Commission has ordered the plants' operators to correct the deficiencies by early December or face penalties such as fines, a shutdown or revocation of operating licenses.

Roger B. Kowieski of FEMA said, "These significant deficiencies are correctable through the commitment of resources, implementation of proposed training (and) updating of plans."

Donald Davidoff, director of the state's Radiological Emergency Preparedness Group, said his group also believes "the majority of the significant deficiencies will be corrected well within the (next) 90 days."

John Grant, chairman of the Rockland County Legislature, disagreed. "Our legislature felt the plan simply cannot work. Our road network just cannot accommodate this traffic."

"I don't think all of the money in the state treasury can make an evacuation possible in Rockland County," Grant said.

Still, he assured the assemblymen that

Rockland County officials are working hard to come up with their own emergency evacuation plan. Earlier this summer, Rockland condemned current versions of the plan and called for a shutdown of the nuclear power plants.

Officials from Con Edison and the state Power Authority, which operate the two Indian Point reactors, told the committee they have spent more than \$10 million on drawing up emergency plans, installing sirens and participating in a March 3 drill. The utility officials said they think any revisions in what they say are already adequate plans can be made without more money.

PASNY's Phillip Bane said Indian Point is equipped with more extensive safety devices than other nuclear plant to compensate for the area's high population density. "Depending on the nature of the emergency, simply staying indoors may be the most appropriate response," Bane said.

Steven S. Sholly of the Union of Concerned Scientists said he is afraid that much of the public might not be adequately alerted by or even hear warning sirens. An accident, he said, would require protection of people and food far beyond radius of the 10-mile emergency planning zone.

"Increased funding should not be viewed as a cure-all for the problems with emergency planning," Sholly said, calling Indian Point a "horrendously risky site."

Town of Yorktown Supervisor Nancy Elliott, president of the Westchester Town Supervisors Association, said, "The plan that presently exists is not realistic. If people behaved as robots the plan might work."