

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Louis J. Carter, Chairman
Mr. Frederick J. Shon
Dr. Oscar H. Paris

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In the Matter of

Consolidated Edison Company of
New York (Indian Point Unit 2)

Power Authority of the State of
New York (Indian Point Unit 3)

Docket Numbers 50-247SP
50-286SP

May 3, 1982

WESPAC'S INTERROGATORIES FOR

POWER AUTHORITY, STATE OF NEW YORK



On April 23, 1982 the Atomic Safety and Licensing Board issued a Memorandum and Order Formulating Contentions, Assigning Intervenor, and Setting a Schedule for the above-captioned proceeding. The Board ordered that formal discovery was to begin on April 26, and that all interrogatories on "matters under Commission Questions 3 and 4" be filed by May 3, although "discovery on matters to be heard later than the week of June 22 shall continue." (Board 4/23 order at 22, footnote 5). WESPAC received this order on the evening of April 28, two working days before the filing deadline.

We have put together a number of discovery interrogatories which are asked within this filing. Since hearings on matters relating to Commission Questions 3 and 4 will undoubtedly take longer than the week of June 22, we would like to be able to ask interrogatories on these issues after this initial May 3 filing deadline.

Our questions for the Power Authority concern a few issues relating to PASNY specifically, but mostly address matters which are of mutual and equal relevance to both licensees. We are not rigid in requiring answers from both Con Ed and PASNY for questions which bear upon both licensees. If we receive a complete answer from one utility, and the other wishes to adopt the identical answer by reference, that is perfectly all right with us.

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WESPAC hereby requests that the Power Authority of the State of New York answer each of the following interrogatories in accordance with the foregoing and in line with the Federal Rules of Civil Procedure as soon as possible, but in no event later than May 31, 1982.

- 1(a) What is the "Four-County Nuclear Safety Committee" (FCNSC) whose name and address is on the brochure (the "Brochure") entitled "Indian Point, emergency planning, and you."?
- 1(b) Supply copies of any records, contracts, or financial transactions between PASNY and this FCNSC.
- 1(c) Who paid for the printing and mailing of the booklets, for telephones, and for the staff work involved in operation of this committee?
- 1(d) Does the FCNSC have any direct relationship with any governmental bodies, or is it strictly a creature of Con Ed and PASNY? If so, describe the relationship.
2. Supply copies of any contractual arrangements between PASNY or the FCNSC and Parsons, Brinkerhoff, Quade, and Douglas relating to emergency planning for Indian Point. How much money was paid by PASNY to these consultants, and what were they asked to do? How much of these obligations have been completed, and how much remains?
3. Supply copies of any contractual arrangements between PASNY or the FCNSC and EDS Nuclear relating to emergency planning for Indian Point. How much money was paid by Con Edison to these consultants, and what were they asked to do? How much of these obligations have been completed, and how much remains?
4. Supply copies of records, reports, and correspondence between PASNY or the two above-named consultants ("Consultants") and FEMA, the NRC staff, the N.Y. State Health Department, Westchester County, and/or other governmental bodies relating to the efficacy, practicality, and/or deficiencies in the emergency plans.

- 5(a) Does PASNY consider the New York State Radiological Emergency Plan for Indian Point (and its subsidiary County Plans) ("the Plan") to be in satisfactory state of preparedness and implementability?
- 5(b) If PASNY considers the plans to be unsatisfactory or incomplete, specify the respects in which such is the case, and any remedies the Authority intends to implement.
- 6(a) Supply copies and records of any correspondence, reports, or telephone conversations had by PASNY, its two consultants, and/or the FCNSC pertaining to Indian Point emergency planning with:
- (i) The New York State Department of Corrections or the Ossining Correctional Facility.
 - (ii) The U.S. Veterans Administration or the Franklin D. Roosevelt Memorial Veterans Administration Hospital in Montrose.
 - (iii) the City of Peekskill or the Peekskill Community Hospital.
 - (iv) Asthmatic Childrens Home in Ossining.
- 6(b) What plans exist for the protection and evacuation of inmates and employees of Ossining Correctional Facility? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for continued staff support of inmates who are "sheltered" in that facility?
- 6(c) What plans exist for the protection and evacuation of patients and employees of the FDR VA Hospital? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are drug-dependent, have psychiatric problems, or are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of an evacuated "hospital?" What plans are there for continued staff support of patients who are sheltered in that facility?

- 6(d) What plans exist for the protection and evacuation of patients and employees of Peekskill Community Hospital? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of an evacuated "hospital." What plans are there for continued staff support of patients who are sheltered in that facility?
- 6(e) What plans exist for the protection and evacuation of patients and employees of the Asthmatic Childrens Home? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of patients who are sheltered in that facility?
- 7(a) What assumptions have been made with regard to the number of persons in special facilities (hospitals, nursing homes, jails, special schools, schools, day care centers, etc.) who are transit-dependent? Please list each such facility, giving the following information:
- (i) The name, address, and telephone number of the person(s) at the facility who are responsible for carrying out its role under the emergency plan.
 - (ii) The number of transit-dependent people at the facility, and the specifics of their individual needs (wheelchairs, kneeling ambulances, buses, etc.).
 - (iii) The number of people at the facility who cannot be moved.
 - (iv) Copies of any contracts, agreements, reports, memoranda, or telephone conversations between PASNY, the Consultants, the FCNSC, and the facility.
 - (v) Any contracts or arrangements with public or private bus companies or other transportation carriers regarding their role in evacuating the facility, including numbers of buses, special buses, ambulances, and drivers required and the notification and time commitment for the drivers.

- 8(a) Supply a map of the EPZ and surrounding area on the east side of the Hudson River which shows the locations of all evacuation routes, reception centers, and congregate care centers, and which shows the bus routes set forth on Page 13 of the various editions of the "brochure." If one such map does not exist, a series would be satisfactory if it shows each entire bus route.
- 8(b) Supply copies of any contracts or agreements with bus, ambulance, or other public or private companies to provide this transportation. For each company, provide the following information (if not included in the agreement):
- (i) How many vehicles are to be provided? For how long?
 - (ii) How many drivers are to be provided? For how long?
 - (iii) How many special (kneeling, wheelchair, ambulance, etc.) vehicles are to be provided? What assumptions are made about their reliability?
 - (iv) How are the drivers and the vehicles to be notified when they are needed to participate in an emergency?
 - (v) What assumptions are made about the time required for a vehicle and driver to become available to participate in an evacuation?
 - (vi) What is to be done with passengers who are already on a bus when it is needed?
- 8(c) For each bus route, supply the following information:
- (i) How many people are expected to be carried?
 - (ii) How many buses, and at what time intervals, are expected to cover the route?
 - (iii) Which company is responsible for the route?
 - (iv) How many trips is each bus expected to make, and how much time is allowed between trips?
9. With respect to the statement on the inside back cover of the "brochure" regarding residents who "may need special attention because of transportation problems or physical impairments:"
- 9(a) Describe the plans for giving special attention to all categories of persons who have the need thereof because of transportation problems or physical impairments.

- 9(b) Describe all studies or surveys which seek to identify the persons and problems referred to in (a), and attach copies thereof.
- 9(c) How many Business Reply Cards from the "brochure" were returned in each of the transportation or accomodation categories indicated on the card? How many such people called the phone numbers in the "brochure?"
- 9(d) Does PASNY have any other information about people with special requirements for emergency assistance? If so, what?
- 9(e) Identify the place where the information referred to in (9c) and (9d) is presently located, together with the name and address of the custodian thereof.
- 9(f) Set forth all steps taken to address the needs of each such person or to arrange for special attention thereto.
- 9(g) What steps is PASNY taking to locate people with special emergency assistance requirements who did not return the reply card?
- 9(h) Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:
 - (i) Wheelchair disabled
 - (ii) Confined to bed
 - (iii) Sight-impaired
 - (iv) Psychologically or emotionally unable to react to their role in the emergency plan.
 - (v) Dependent on life-support equipment.
- 10. With respect to persons who are hearing-impaired or have one of the other conditions enumerated in 10(i) and thus will not hear or understand the sirens or the radio announcements which are integrals part of the notification system:
 - 10(a) Describe the plans for notifying such groups and individual persons of their role in the Plan.
 - 10(b) Describe the methods for notifying them, during an emergency, of the responses they are to take, and of the fact that an emergency exists.
 - 10(c) Provide copies of all studies or surveys which seek to identify such persons and problems.
 - 10(d) How many Business Reply Cards from the "brochure" were returned for people with notification problems? How many such people called the phone numbers in the "brochure?"

- 10(e) Does PASNY have any other information about people with special requirements for notification? If so, what?
- 10(f) Identify the place where the information referred to in (10d) and (10e) is presently located, together with the name and address of the custodian thereof.
- 10(g) Set forth all steps taken to address the needs of each such person or to arrange for special attention thereto.
- 10(h) What steps is PASNY taking to locate people with special notification requirements who did not return the reply card?
- 10(i) Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:
- (i) Hearing-impaired
 - (ii) Spanish-speaking
 - (iii) Other non-English speaking
 - (iv) Emotionally or psychologically unable to comprehend their role under the emergency plans.
 - (v) Without radios (outdoors, in parks, or otherwise unable to tune in the Emergency Broadcast System).
 - (vi) Unable to hear sirens (because sirens are not loud enough, people are indoors, other noises interfere, sirens malfunction).
- 10(j) What steps are being taken to ensure timely notification of each of the types of persons listed in 10(i) above?
11. What backup provisions exist to support telephone system malfunctions during a Site Emergency with regard to the following aspects of the Plan:
- (a) Notifying State and County officials of developing conditions at Indian Point?
 - (b) Notifying school principals of their responsibilities?
 - (c) Notifying bus companies, special facilities, and others who would normally be notified by telephone?
12. Supply copies of any memoranda, contracts, or correspondence between PASNY, the FCNSC, or the consultants and any schools, other facilities, or agencies (including the American Red Cross) which will be used as or to support reception or congregate care centers, including the following information:

- (i) The name, address, and telephone number of the person(s) at the facility who are responsible for carrying out its role under the emergency plan.
- (ii) The number people who will be received or cared for at the facility, and the time (notification, duration) which the facility will be used for.
- (iii) The number of staff people from the facility who will be involved in the plan, the training they have been or will be given (including any written materials used in that training), and the time they will be expected to work (notification and duration).
- (iv) Copies of any contracts, agreements, reports, memoranda, or telephone conversations between PASNY, the consultants, the FCNSC, and the facility.
- (v) For Congregate Care centers, the provisions for housing and feeding people at the facility for a period of more than one or two days.

13(a) Supply copies of any memoranda, reports, or telephone conversations with the New York Telephone Company relative to its capacity to handle communications during an emergency, as relates to page 6 of the "brochure" which says "Avoid using the telephone, so lines will not be overloaded."

13(b) How many calls can the telephone system handle at one time?

13(c) Are there provisions for increasing this capacity during an emergency?

13(d) How will the telephone system be kept operational during an emergency? For example, how will repairs be made to lines which are downed due to automobile accidents; how will substations without electric power be supported, etc.?

14. How will radiological screening be done?

14(a) When, where, and by whom?

14(b) What procedures will be followed?

14(c) How many people can be handled, and in what time span?

14(d) What training and equipment are available for this process?

15. What provisions are there for updating the Emergency Plan and keeping its information accurate and current with regard to:
- (i) Changes in school enrollment?
 - (ii) Personnel and staff changes at schools?
 - (iii) Personnel changes at special facilities?
 - (iv) Personnel changes at reception and congregate care centers?
 - (v) Transportation (road) network changes, both temporary and long-term?
 - (vi) Personnel and resource changes at bus companies?
 - (vii) People with special requirements who move into the EPZ or stay in transient facilities (e.g. motels, hospitals) and do not know of their roles?
- 16(a) How many automobiles are projected for each road planned for use during an evacuation, and what is the basis for such projections?
- 16(b) How many people are expected to be carried in each automobile?
- 16(c) How many cars per hour, both average and peak, are expected to be moving over each evacuation route from each ERPA subdivision (zone)?
17. Supply copies of all reports, memoranda, correspondence, agreements, or telephone conversations with governmental agencies (including quasi-public transportation authorities) with responsibility over road traffic, including:
- (i) The name, address, agency, and telephone number of the person supplying the information, and the date of the contact.
 - (ii) The capacities supplied for each road or intersection discussed, and the bases for these estimates, including weather, accidents, etc.
 - (iii) Any attempts to obtain traffic capacity information which have been unsuccessful.
 - (iv) Personnel allocations for controlling traffic distribution during an emergency.

18. How does the Plan address itself to:
- (i) The effects of traffic accidents on traffic flow?
 - (ii) Traffic control at exits from principal evacuation routes?
 - (iii) The need for refueling (gas) for cars and buses during an evacuation?
 - (iv) The effect of intersections, traffic signals, malfunctioning traffic signals, and other factors which impeded the normal flow of traffic?
 - (v) Adverse weather conditions?
 - (vi) Road closings due to construction, accidents, etc.
 - (vii) Additional traffic on evacuation routes outside the EPZ as others self-evacuate along major roads?
19. What assumptions were made about traffic-carrying capacities of roadways and intersections in optimum conditions? In each of the abnormal conditions mentioned in (18) above?
20. What mailing list was used for distribution of the "brochures?" What provision is made for ensuring that the following categories of people are cognizant of their responsibilities under the Plan:
- (i) People who live in the area but are not on the mailing list?
 - (ii) Visitors to the area (in hotels., parks, etc.)?
 - (iii) Individuals who spend a significant part of their time in the EPZ (such as those who work there), but live elsewhere?
 - (iv) Students who live in the EPZ but go to school outside it?
 - (v) Students who live outside the EPZ but go to school within it?
 - (vi) Children at day care centers and nursery schools who fall within categories (iv) and (v) above?
21. What provisions are made for parents of young children (who are to be picked up at day care centers or nursery schools) who have one or more of the following problems:
- (i) They work outside the EPZ?
 - (ii) They are a teacher, bus driver, traffic control officer, or other person with a designated role under the emergency plan?
 - (iii) For whatever reason, they don't pick up their child within a long period of time?

22. Does the Plan anticipate restrictions in traffic flow within the EPZ beyond those which will be caused by high density? Will traffic be prevented or discouraged from entering the EPZ or driving in directions opposite to the flow of evacuating vehicles? Will lanes or intersections be closed, and will lanes or roads have their normal directions of traffic flow changed?
23. How much money has PASNY spent on emergency planning and preparedness in each of the past five years? How much do you expect to spend per year between now and when Indian Point Unit III is decommissioned?

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Charles A. Scheiner', with a long horizontal flourish extending to the right.

Charles A. Scheiner
Co-Chairperson

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges;

Louis J. Carter, Chairman 82 MAY -5 411:28

Mr. Frederick J. Shon

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In the Matter of

Consolidated Edison Company of
New York (Indian Point Unit 2)

Power Authority of the State of
New York (Indian Point Unit 3)

Docket Number 50-247SP

Docket Number 50-286SP

May 3, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of Interrogatories from WESPAC to the following parties in this proceeding:

- NRC Staff
- Consolidated Edison
- Power Authority of the State of New York
- Westchester County Executive
- Village of Buchanan
- Metropolitan Transportation Authority
- Port Authority of New York and New Jersey

in the above-captioned proceeding have been served on May 3, 1982 by first class mail, postage prepaid, on the following:

Louis J. Carter, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing Board
7300 City Line Avenue
Philadelphia, Pennsylvania 19151

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Janice Moore, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Brent L. Brandenburg, Esq.
Assistant General Counsel
Consolidated Edison Company
of New York, Inc.
4 Irving Place
New York, New York 10003

Ellyn R. Weiss, Esq.
William S. Jordan, III, Esq.
Harmon and Weiss
1725 I Street, N.W., Suite 506
Washington, D.C. 20006

Phyllis Rodriguez, Spokesperson
Parents Concerned About Indian
Point
P.O. Box 125
Croton-on-Hudson, New York 10520

Renee Schwartz, Esq.
Botein, Hays, Sklar and Herzberg
Attorneys for Metropolitan
Transportation Authority
200 Park Avenue
New York, New York 10166

Honorable Ruth W. Mossinger
Member of the Council of the
City of New York
District #4
City Hall
New York, New York 10007

Greater New York Council
on Energy
c/o Dean R. Corren, Director
New York University
26 Stuyvesant Street
New York, New York 10003

Geoffrey Cobb Ryan
Conservation Committee Chairman
Director, New York City
Audubon Society
71 West 23rd Street, Suite 1828
New York, New York 10010

Lorna Salzman
Mid-Atlantic Representative
Friends of the Earth, Inc.
208 West 13th Street
New York, New York 10011

Mr. Donald L. Sapir, Esq.
60 East Mount Airy Road
RFD 1, Box 360
Croton-on-Hudson, New York 10520

Thomas R. Frey
General Counsel
PASNY
10 Columbus Circle
New York, N.Y. 10019

Stanley B. Klimberg, Esq.
General Counsel
New York State Energy Office
2 Rockefeller State Plaza
Albany, New York 12223

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Honorable Richard L. Brodsky
Member of the County Legislature
Westchester County
County Office Building
White Plains, New York 10601

Zipporah S. Fleisher
West Branch Conservation
Association
443 Buena Vista Road
New City, New York 10956

Mayor
Village of Buchanan
236 Tate Avenue
Buchanan, New York 10511

Judith Kessler, Coordinator
Rockland Citizens for Safe Energy
300 New Hemstead Road
New City, New York 10956

David H. Pikus, Esq.
Richard F. Czaja, Esq.
330 Madison Avenue
New York, New York 10017

Ms. Amanda Potterfield, Esq.
P.O. Box 384
Village Station
New York, New York 10014

Andrew S. Roffe, Esq.
New York State Assembly
Albany, New York 12248

Marc L. Parris, Esq.
Eric Thorsen, Esq.
County Attorney
County of Rockland
11 New Hempstead Road
New City, New York 10956

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Joan Holt, Project Director
Indian Point Project
New York Public Interest Research
Group
5 Beekman Street
New York, New York 10038

Jim Murphy
Westchester Coordinator
Indian Point Project
New York Public Interest Research
Group
240 Central Avenue
White Plains, New York 10606

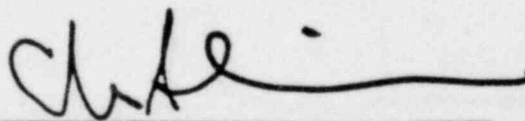
Jeffrey M. Blum, Esq.
New York University Law School
423 Vanderbilt Hall
40 Washington Square South
New York, New York 10012

Charles J. Maikish, Esq.
Litigation Division
The Port Authority of New York
and New Jersey
One World Trade Center
New York, New York 10048

Charles Morgan, Jr.
Morgan Associates
1899 L Street, NW
Washington, D.C. 20036

Ezra I. Bialik, Esq.
Steve Leipzig, Esq.
Environmental Protection Bureau
New York State Attorney
General's Office
Two World Trade Center
New York, New York 10047

Alfred B. Del Bello
Westchester County Executive
Westchester County
148 Martine Avenue
New York, New York 10601


Charles A. Scheiner