

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

before the ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of :

Consolidated Edison Company of

New York (Indian Point Unit 2) : Docket Number 50-247SP

Power Authority of the State of

New York (Indian Point Unit 3) : Docket Number 50-286SP

June 21, 1982

PARENTS CONCERNED ABOUT INDIAN POINT
REORGANIZATION OF WITNESSES
TO PROVE CONTENTIONS 3.7 & 4.7

Witnesses necessary to prove contentions for which Parents is the lead intervenor are listed herein and grouped according to the major points addressed in their testimonies. This is not meant to and does not limit the testimony of any witness to the specific point under which he or she is listed. Numbers in parenthesis refer to the witness numbers as listed in "Index of Witnesses Presenting Testimony on Behalf of the Intervenors: UCS, NYPIRG, RCSE, WBCA, Parents, WESPAC, FOE/ Audubon and on behalf of the Attorney General of the State of New York.

Because we anticipate that many of our witnesses will not be available during the summer months due to vacations and other previous commitments, we are unable to eliminate witnesses because we do not know who will be able to testify on any given date.

3.7 THE PROBLEMS OF EVACUATING CHILDREN FROM THREATENED AREAS
HAVE NOT BEEN ADEQUATELY ADDRESSED IN THE PRESENT EMERGENCY
PLANS

- I. Some parents do not have transportation at their disposal at all times. Parents who have to evacuate by public transportation will have special problems.

Agata Craig (11)	Loretta Brundage (55)
Jamie Greene (12)	Evan Litty (56)

- II. The reception centers designated to receive our children have not been adequately prepared to meet even basic needs and certainly not emergency needs.

Robert Johnson (18)	Anthony Napoli (89)
John Moore (51)	John Indusi (124)
Vince Rubeo (86)	

- III. Public officials are not convinced that the evacuation of school children by bus will work.

Richard Wishnie (33) Richard Herbeck (34)

- IV. Families and people who care for children with special needs cannot successfully evacuate.

(a) emotionally disturbed children
Ronnie Wilkin Schwartz (54)

(b) handicapped parents
Evan Litty (56)*

(c) children with medical conditions
Evan Litty (56)*
Susan Scheffel (123)

(d) children home alone
Gerald T. Kapusinsky (80)
Nancy Sheer (112)

- V. People who are directly responsible for carrying out emergency plans and ensuring the safety of children have not been adequately prepared and have expressed doubts about their willingness to participate.

(a) Day care center operations and babysitters have indicated their concerns about caring for the children of others in a radiological emergency.

Phyllis Hilbraun (99)	Kathy Feit (167)
Sally Zeigler (100)	Linda Puglisi (161)
Lillian Moore (130)	

(b) Bus drivers have no training, equipment or contracts, and are not familiar with the evacuation routes.

Fern Narod Sheik (105)	Sonny Hall (39)
Tom Turner (107)	

- (c) The police do not have adequate equipment, training or personnel; therefore, lack of confidence that they can communicate effectively and ensure public safety.

Ronald Goldfarb (34) Reginald Lambruschi (37)

- (d) Ambulance corps personnel have expressed reservations about their ability to meet the medical needs of the public in a radiological emergency.

Earle Ellefson (85) Edward Connelly (150)
Albert Johnson (108)

- (e) Fire fighters are concerned about massive congestion and communication problems.

Stanley Brooker (151)

VI. Special facilities will have extensive problems in attempting evacuation of children.

- (a) Schools have many problems in evacuating children which are not addressed by the plan.
- (b) Teachers, whose lives are dedicated to the welfare of children, have pointed out the following inadequacies in the plan:

- (1) Teachers have reliable knowledge about the needs of their students, but have not been consulted by the planners and their input has not been incorporated into the plan.

Paula Myers (158)

- (c) School administrators are uncertain that the plan can be implemented.

David Siegel (81)	Toby Gersony (90)
Leon Bock (95)	Cleland Conklin (98)
Richard Dunne (82)	Colleen Murray (109)
John Iurato (87)	Lynn Doughty (110)

- (d) No contractual or economic provisions have been made with bus companies or drivers.

Dick Alexander (83)

- (e) Teachers cannot be depended upon to stay with the children.

John Rodin (84) Vincent Rubeo (86)

- (f) Children participating in off premises programs during school hours are not covered by the evacuation plan.

Ray Bowles (85)

- (g) Teacher training does not include a response to a radiological emergency.

John Livingston (114) Ruth Isaacs (117)

- (h) Teachers do not have medical supplies for a radiological emergency.

Barbara Gochman (115)

- (i) Teachers have indicated that children will not respond to their instructions to evacuate because parents have given other instructions.

Barbara Hirschman (116)

- (j) Some teachers have medical problems which may prevent them from fulfilling the role assigned to them.

Breda Curran (118)

- (k) Lack of confidence in the plan will interfere with teacher cooperation.

John Indusi (124)

- (l) Children reflect the anxiety of parents who lack confidence in the evacuation plan, and teachers cannot reassure them.

Maggie North (119)

- (m) Teachers and students in school districts which border the 10-mile EPZ will have special problems.

Eleanor Kahn (120)

- (n) The evacuation plans regarding adolescent children are unrealistic and inadequate.

Mary Lou Gohring (125) David Churchill (127)

- (o) The evacuation plans regarding very small children are unrealistic and inadequate.

Phyllis Mendelson (155) Charlyn Appolonio (162)
Abby Perl (156) Margaret Davis (163)
Judith Glass (159)

- (p) Health personnel are not equipped with sufficient medical supplies necessary to maintain treatment for children with chronic medical problems.

Elizabeth Sekelsky (88) Clare Rosen (121)

- (q) The evacuation plan does not cover all schools and in some cases has given inappropriate instructions to other schools.

Eleonore Bronzo (91) Arlene Tift (92)
Lynn Kauderer (93)

- 2) The plan does not provide for evacuation of children in camps and parks.

Ronnie Witkin Schwartz (54)* Judy Kesselman (71)
Linda Co (75)

- 3) Public after school recreation programs have not been provided for in the evacuation plan.

Kathe Saunders (73) Helen Burnham (79)
Syd Ginsberg (78) William Rodriguez (102)
Stephen Elkins (69)

- 4) Private recreation programs with large student enrollments are not provided for in the evacuation plan.

Vincent Savastano (94)
Shareane Baff (111)

- 5) Private recreation programs that offer individual or small group instruction are not provided for in the evacuation plan.

Joan Fine (74) Monya Brown (77)
Phyllis Rodriguez (76)

- 6) Churches have received no instructions for evacuating children attending services or classes

David Wayne (97) Robert Hare (96)
Michael Robinson (101)

VII A panel of parents will testify on the following problems posed by the plan and its evacuation of children:

- a) children home alone

Nancy Sheer (112) Kathy Pierpont (112)
Elise Lentz (136) Ervine Kimmerling (115)

- b) lack of confidence in plan and ability of officials to implement it

Mary Bulleit (131) Helga Ancona (135)
Jane Courtney (134)

- c) disregard of school evacuation by parents

Betsy Doepken (122) Susan M. Teasdale (133)

- d) anxiety of children

Daniela Misch (129)

- e) children with babysitters

Madeleine and Marc Holzer (141)

f) parents with children in different schools

Eileen McGovern (114)

Karen Ford (140)

g) children who live outside the evacuation zone but go to school within the EPZ

Ellen Burgher (138)

VIII In order for any evacuation plan to work it must be thoroughly explained to all participants and rehearsed, but such preparations will be damaging to the emotional lives and healthy development of children.

Dr. Arthur Zelman (10)

IX The plan makes untenable assumptions about the responses of parents outside the 10-mile EPZ about emergency workers, and about children.

Dr. Julie Palmer (153)

Dr. Kai T. Erikson (148)

Dr. David Elkind (104)

Dr. T. Berry Brazelton (128)

X Psychologican and social damage will result if families are separated during an evacuation.

Dr. Albert J. Solnit (154)

Dr. Jerome Kagan (103)

Sheilah Rechtshaffer (132)

Sherry Horowitz (146)

- 4.7 The present emergency planning brochures and present means of alerting and informing the population of an emergency do not give adequate attention to problems associated with persons who are deaf, blind, too young to understand the instructions, or who do not speak English.

I. Incomplete notification of the public by brochure and siren in case of nuclear emergency will result in failure of emergency plan.

- a) Not all members of the general public have received the correct brochure or heard the sirens during testing..

Feralyn Woods (5) Mabel Cronk (6) Lynn Gunzenhauser (8)

Pat Chazen (13) Gertrude and Henry Gillette (14)

Joan Livingston (114) Mary bulleit (131)

- b.) No special provisions have been made for notification of citizens who are disabled by virtue of being,

1) Deaf

Clifford and Nancy Rowley (58)

Oscar Cohen (58a)

Barbara Blattstein (59)

2) Elderly

Seymour Greenbaum (62)

- c.) People who spend a considerable amount of time within the 10 mile EPZ but live elsewhere would not know what to do in the event of emergency.

Raymond Bowles (85)

Lois Jessup (126)

- d.) The brochure is ambiguous as to how non-public schools should evacuate.

Jane Capon (164)

11. Not all people who have received the emergency planning brochure understand what they are expected to do in the event the plan is implemented.

- a.) the general population is uncertain of the procedure they are expected to follow.

Richard Altschuler (3) Amy Kriveloff (4)

Myra Spiegelman (137)

- b.) The emotionally and developmentally disabled are incapable of effectively understanding the brochure

Charles Awalt (49) Richard Land (50)

Pat Bethge (52) Betsy Bergman (53)

- c.) Parents are unable to explain the plan th their children in a meaningful manner.
Barbara Hickernell (7) Karen Henes (9) Micheal Holland (29)
Daniela Misch (129)
 - d.) The elderly are unsure of the steps they must take under the plan.
Seymour Greenbaum (62) Susan Simon (65)
Sari Eklund (143)
 - e.) The physically disabled do not understand how they are to follow the brochure8s directives.
Gladys Burger '63)
Hattie Coffee (64)
 - f.) Public information is not prepared in any language other than English. The non English speaking population will be confused by and ill prepared for a radiological emergency.
Michael Holland (29)
111. The content of the brochure is incomplete and misleading.
Kathleen Toscani (139)
Theodora Dyer (147)

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JUN 25 1987
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