

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

Administrative Judges:

Louis J. Carter, Chairman
Dr. Oscar H. Paris
Frederick J. Shon

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 Nos. 50-247-SP
50-236-SP

June 30, 1982

WEST BRANCH CONSERVATION ASSOCIATION'S REPLY TO INTER-
ROGATORIES OF LICENSEES

Enclosed is reply to some of the 182 interrogatories posed by the Licensees without specifying which is directed to WBCA. We have replied to those for which we are responsible in the phase of above captioned case involving Questions THREE and FOUR, as lead intervenors. We have also responded to any directed to WBCA specifically and to those we are doubtful about but are willing to reply since it may be that we are the only intervenors using those bases. We have gone beyond the call of duty in the latter regard because the references in the Board's Order of April 23 refer to contentions by number albeit not to the entire contention, as can be deduced by reading the questions framed by the Board. Licensees have stepped far beyond the Board's questions.

Those questions not shown by number in what follows are purposely omitted by WBCA as not germane.

We refer to witness by name and number in the compendium submitted by the Intervenors on June 7.

for West Branch Conservation Association
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New City, N.Y.
914/634-2327

Zipporah S. Fleisher
Zipporah S. Fleisher
by Zipporah S. Fleisher
Secretary

QUESTION 9

For all evacuation scenarios - the defects in the Plan are in Appendix A, page A-31 paragraph B. The numbers of vehicles are insufficient for those needing them. The supply of drivers of vehicles is not assured.

The defects in travel times described in Appendix A, pages A-3, 4 and 5, II, are illustrated by Parsons, Brinkerhoff (PB) charts Figures 26 and 27 in what is now Exhibit UCS #1, showing critical bottleneck links for "School In Session" and "Nighttime Scenario". Neither shows routes 306 and Little Tor Road as equal to or worse than other major routes for bottlenecks. Both maps show bottlenecks sufficient to override the travel time estimates. This is a defect due to PB.

QUESTION 10

There is no response to this in the Plan. Triage is not a consideration. The safety of all people on an equal basis is WBCA's contention.

QUESTION 17

This question does not apply to WBCA as Lead Intervenor. Noting the absence in the Plan of this matter the ASLB added 3.2 after the April 14 conference.

We hope to have a witness from Orange and Rockland Utilities (ORU) but they have put us off many times. We prepared a subpoena on June 25 for a judge's signature and the setting of a time. On June 25 Mr. Walter Fleisher, Vice-Pres. of WBCA spoke to Mr. Tom Griffin, Pres. of ORU. On June 29 Mr. Frank Fischer, a Vice-Pres. of ORU called and spoke to Mrs. Fleisher, Sec. of WBCA. We again requested testimony and a witness. If these are forthcoming they will be filed late through no fault of WBCA.

QUESTIONS 27 and 29

See testimony of Gladys Burger #63, Barbara Blattstein #59, John Moore #51.

We asked for more details from some of the witnesses but they don't seem to be known.

QUESTION 28

About 125 cards were returned from the brochure, out of a total population of disabled of about 16,000 in the 10 mile EPZ.

It is not clear how a person standing at a bus stop would know if the bus had been by or was yet to come. Notification by radio that a bus had completed its route would depend on hearing the route number correctly and on knowing it. Additionally, one would have to decide where to wait if no portable radio was available. Confusion could be bad enough for the able but exceedingly disturbing to the disabled.

For the above two reasons the brochure has not been read and understood and does not satisfy the requirements of 50 CFR 50.47 (b) (10).

See reply to Questions 27 and 29 above.

QUESTION 30

(a) Spanish (b) Don't know

QUESTION 33

50 CFR 50.47 (b) is deficient as it applies to Rockland County under (1) "each principal response organization has staff to respond and to augment its initial response on a continuous basis." Not so for Rockland County.

Same for (b)(5)

(b)(6) 75% of emergency personnel cannot be reached during the day. Witnesses Schnakenberg 27, Bower/43.

(b)(7) not done

(b)(9) Rockland County Health Department asks for 12 monitoring kits but was only promised 3 by NY State REPG on May 28, 1982 - see testimony of Rockland County witness James McGuire.

(b)(10) Not in Rockland County

(b)(11) " " "

(b)(12) " " " see testimony 41 and 42
King and Galdone

(b)(14) "major portions". There has been no drill of buses and individual automobiles.

(b)(15) is not

(b)(16) is not

QUESTION 34 See reply to 33 above.

QUESTION 35 see (b)(9) in reply to 33 above

QUESTION 54 see reply 33 (b)(14) above

QUESTION 55 There haven't been any in regard to roads.

QUESTION 58 See 33(b)(14) and 55 above.

QUESTION 68

There is no way of knowing how many buses will be available. See testimony of Rockland County witnesses Lebovsky and Bull.

QUESTION 69 See testimony witness Rochard Bower 43.

QUESTION 70 See maps of bottlenecks, Exhibit UCS-1

QUESTION 75

An effective drill would be one of the buses and autos to see how they would move on the roads without panic. WBCA contends that the road network and movement over it is the Achilles heel of the Plan. Until it is tested, nothing will be known that comes near it in importance.

QUESTION 85

WBCA knew the views in 1980 and 1981 of witnesses Seeger 26, Holland 29, Scurti 25, Schnakenberg 27, Tomkins 47 and Rockland County witness James Kralik.

QUESTION 86 See answer to 17 above.

QUESTION 96

Answer to 85 above. The road system in Rockland County is unusual in that North-South ridges discourage East-West traffic and conditions are exacerbated due to the density of population.

QUESTION 98 See reply to 85 above

QUESTION 107 Not a subject for Questions 3 and 4.

QUESTION 108

WBCA understood the PB model was developed for handling road system loading and was not designed for radiological emergencies. There has been no real live radiological accident to follow. The simulation is questionable.

QUESTION 109

Public reports of the Palisades Interstate Park Commission, later confirmed by data from Chief James W. Donnelly, Chief of the Park Police, on February 3. (This should have been an attachment to Robert Johnson's testimony 17, he will prepare it for submission July 6.)

The summer peak instant capacity is 59,800 people in Bear Mountain and Harriman State parks, plus 1,700 at Hi-Tor, 9,800 at Rockland Lake and 800 at Stony Point Battlefield. If one allows 3 persons to a car it would equal 50,000 cars. Additionally there could be up to 2,500 people brought to the park by the dayliner.

QUESTION 110 See testimony of Myles Lavelle 24, Chief Scurti 25, Stanley Brooker 151, Kenneth Ingenito 22.

QUESTION 111 See RERP Plan Appendix A-53, 54 & 55. Testimony of Holland 29 and Seeger 26 and Jan. 11 WBCA bases for Question 1.

QUESTION 121 Not enough East-West roads in Rockland. North-South is all that's left.

QUESTION 127

What is the definition of "Indian Point area"? If it is the ten mile EPZ then Caspar Hill Road is an example of topographic impossibility; as well as the infamous two right turns on Route 202 going south off 9W in West Haverstraw and Wayne Avenue in Stony Point. See brochures #8 and #9 routes to evacuate and also see WBCA January 11 contentions pages 6 and 7.

QUESTION 145

PB data supplied by Licensees shows no account for traffic entering major routes from the side streets and it does show bottlenecks which were not offered in the RERP Rev. 1 as called for in NUREG 0654-FEMA Rep 1 - Rev 1 page 4-9 regarding the area map.

QUESTION 158

Because there are no feasible off site procedures Rockland County rejected the Plan. Primary is our inability to discover in the Plan, or by interrogatory of the Licensees to PB, how many volunteers total that would be needed for an emergency and how many might be available, for such as directing traffic, drive buses and supply ambulance teams.

Emergency personnel in Rockland County have felt ill equipped and have no faith in the Plan made by PB. They do not work to enforce it. See testimony of Bower 43, Rev. Fred Johnson 32 and those listed in the replies above.

QUESTION 160

See bottleneck maps of PB Figures 26 and 27 in Exhibit UCS #1. All major evacuation routes excepting the Palisades Interstate Parkway would need widening and straightening to move traffic to the PB evacuation time standards. It is not feasible because no one has the money to pay for road

redesign.

The residents of Rockland County covet the rural character that still remains. They have voted down many road "improvements". See testimony of Rockland County witness William Chase and Fred Seeger 26.

Because it is impossible to make leveling and straightening roads a reality, the Plan offers only an unreality. On paper it might be possible to wish the changes made but it is eminently unrealistic to redesign Rockland County.

The reparations for damage to property; to remove homes on the curves of roads alone would be beyond the cost to which any agency would be willing to subscribe.

QUESTION 161

See reply to 85, 96, 108, 110, 121 and 160.

(a) as listed in RERP Appendix A, pages A-53-56, antiquated roads are routes 202, 306, 45, 9W, Middletown/Little Tor, Caspar Hill Road, Wayne Avenue, Kings Highway and Main Street in New City.

QUESTION 162

See testimony of Rockland County witness Ruth Wein, Gladys Burger 63, Barbara Blattstein 59 and John Moore 51. There are insufficient wheel chair tie downs, too little equipment to warn the deaf and the blind who may be alone at home. All within the 10 mile EPZ.

QUESTION 163 See reply to 162 above.

QUESTION 165

All persons should have equal opportunity for evacuation. No lives should be sacrificed. WBCA does not believe in triage. Certainly in weighing human life versus the supply of electricity there should be no such thoughts. Human life in its best or least advantaged condition is not for us to judge.

The density of population in Rockland County is also reflected in the number of handicapped, including the Helen Hayes Rehabilitation Center, the school conducted by the Association for Retarded Children, the Rockland County Center For the Physically Handicapped, the Rockland County Health Complex, the many nursing homes, and the many persons at home.

QUESTION 166 See Blattstein 59, Burger 63 and Rockland
County witnesses Ruth Northrup and Wein.

QUESTION 168 Lack of sufficient buses.

QUESTION 172 See reply to 166

QUESTION 173 See reply to 166

QUESTION 178 See reply to 166

QUESTION 180 See WBCA list submitted June 22 and testimony book.

QUESTION 181 WBCA is Lead Intervenor on 3.9 and 4.4

QUESTION 182 (e) see reply to 181 above.

AFFIDAVIT

I, Zipporah S. Fleisher, Secretary of West Branch
Conservation Association, being duly sworn, do hereby affirm
that the attached answers to Interrogatories of the Licensees
in above captioned case, are true and correct to the best of
my knowledge.

Zipporah S. Fleisher
Zipporah S. Fleisher

Sworn before me this
30th day of June 1982

Dolores Campione
Notary Public

DOLORES CAMPIONE
Notary Public, State of New York
No. 4627041
Qualified in Rockland County
Term Expires March 30, 1984

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Docket Nos. 50-247-SP

50-286-SP

June 30, 1982

CERTIFICATE OF SERVICE

This is to certify that I have this 30th day of June placed
in the U. S. Mails first class a copy of the REPLY TO INTER-
ROGATORIES OF LICENSEES to each of the parties listed below.

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