

TOWN OF YORKTOWN

TOWN HALL

363 UNDERHILL AVENUE - P. O. BOX 429
YORKTOWN HEIGHTS, NEW YORK 10598

PHONE: (914) 962-5722

Nancy R. Elliott
Supervisor



May 19, 1983

50-247/286

Nuclear Regulatory Commission
1717 H Street NW
Washington, DC 20005

Re: NRC Order Dated 5/5/83 # CLI-83-11

Dear Sirs:

Enclosed you will find copies of statements that have been presented by various citizens of the Town of Yorktown, including governmental, educational and private citizens groups.

I believe they stress the fact that there is great concern in our community for both the safety of the plant and the flawed evacuation plan.

We would appreciate your careful review of the enclosed and consideration of the views of these entities.

Thank you for your attention.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Nancy R. Elliott".

Nancy R. Elliott
Supervisor

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enc.

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Statement of Nancy R. Elliott, Supervisor
Town of Yorktown

Fink Hearings held 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.

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 h.g. 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 utilities 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.

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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

YORKTOWN CENTRAL SCHOOLS

2723 CROMPOND ROAD

YORKTOWN HEIGHTS, NEW YORK 10598

(914) 245-6028

BOARD OF EDUCATION

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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 SC1-7, Item #5, PASNY has 45 students scheduled for two 15-passenger vans. On Page SC1-15, 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.

6/7/82

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 set 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 Deppen
2147 Van Cortlandt Cir
Yorktown Heights NY
10598

To: Nuclear Regulatory Commission

From: Yorktown Parents Concerned About Indian Point

Ever since Three Mile Island, the possibility of a radiation disaster has been recognized. Even you have acknowledged that the once far-fetched probability had become a demonstrated reality. You even went so far as to add a new requirement to your regulations, immediately following the TMI accident: that for every 10-mile zone surrounding every nuclear power plant, there must be an evacuation plan.

Little did the unsuspecting public know that you meant "plan" literally, and that you didn't necessarily mean that the "plan" must work!

If public officials know that evacuation plans for the Indian Point emergency planning zone are designed to fulfill paper requirements rather than to protect each citizen from disaster, then it is their responsibility to point that out and to reject such deception.

Yorktown Parents Concerned About Indian Point applauds our Town Supervisor, Town Board, Board of Education, school superintendent, teachers' union, and Parent Teachers Association for recognizing that this community is not protected by the Indian Point emergency response plan and for speaking out on behalf of public health and safety.

May 18, 1983