

SUMMARY

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The New York Public Interest Research Group (NYPIRG) and Croton

Parents Concerned About Indian Point (PARENTS) contend that successful emergency planning must be undertaken from the ground up. The entire process, from planning through implementation, must be a joint endeavor of state and local (village, town, and county) government, and the public. A plan cannot work that is not firmly grounded in an intimate familiarity with local conditions, resources, and capabilities. Local officials, emergency personnel, and community residents cannot have confidence in plans that they have not created themselves, and a plan cannot work unless those who must implement it believe in it. The role of state governments must be to support and supplement the efforts and resources at the local level. The utilities must bear all the costs of radiological emergency planning incurred by local governments which are forced to prepare to protect their residents from the consequences of potential nuclear plant accidents. Beyond that, the role of utilities should be limited to on-site emergency response, bringing reactor accidents under control, and guaranteeing that there is no loss of off-site power during the emergency. Utilities should not be permitted to take over the traditional responsibility of local governments to protect their residents--before or during emergencies. Emergency planning at Indian Point--a detailed chronology of which is provided in the testimony--has been flawed from the outset because local control over the effort was lacking (until Rockland took things into its own hands). The top-down, outside-in approach to planning of Con Edison and PASNY and New York State is the direct cause of the present inadequacies in planning and preparedness at Indian Point. The role of the federal government should continue to be enforcement of emergency planning rules (NRC) and review and evaluation of planning and preparedness (FEMA). The role of FEMA must be enhanced through increased funding to enable the agency to assign sufficient personnel and resources to performing an enormous task properly. The role of the public must be enhanced, too, through institutionalized procedures for public involvement in FEMA's review process. Finally, NYPIRG and PARENTS

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object to suggestions that federal troops ("swat teams," "strike forces," etc.) should be assigned to protective response procedures in our communities. Such suggestions are more appropriate to a police state than to our civilian, democratic society.