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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)
Unit 1))
_____)

Docket No. 50-322-OL-3

(Emergency Planning)

SUPPLEMENTAL DIRECT TESTIMONY
OF DR. GEORGE JEFFERS AND
ANTHONY R. ROSSI ON BEHALF OF
THE MIDDLE COUNTRY CENTRAL
SCHOOL DISTRICT AND SUFFOLK
COUNTY REGARDING CONTENTIONS
25.C AND 25.D

Q. Please state your names and positions.

A. I am Dr. George Jeffers, Superintendent of the Middle
Country Central School District.

I am Anthony R. Rossi, Director of Transportation for the
Middle Country Central School District.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to supplement our testi-
mony dated November 18, 1983 concerning Contentions 25.C and
25.D, in order to address changes contained in Revision 3 to
the LILCO Plan with respect to proposals concerning schools.

Q. Have you reviewed Revision 3 to the LILCO Plan?

A. Yes, we have reviewed those portions of Revision 3 that concern schools. These sections are pages II-10 to 10a, II-19 to 21, and IV-169 to 171 of Appendix A. Revision 3 proposes three general alternatives to provide for the safety of the students in the EPZ should there be an emergency at the Shoreham Nuclear Plant. In addition to early dismissal which we addressed in our November 18 testimony, the Plan now states that schools inside the EPZ may be advised to shelter or to relocate their students, depending on the recommendation made to the general public. Also, according to Revision 3, school districts such as ours, which have no school buildings in the EPZ but which do have students who live in the EPZ, would be advised to retain those students at their schools beyond the end of the school day, if any protective action is recommended for the general public.

Q. Do these changes affect your opinion concerning the likely effect of role conflict on the workability of the LILCO proposals?

A. No. Indeed, LILCO's new proposal would create a more severe role conflict problem for the Middle Country Central School District staff. Contrary to the situation with an early

dismissal, when staff is necessary at the schools until children board buses, and bus drivers drive their regular routes, under the new LILCO proposals, our staff would be expected to remain with students for an indeterminate amount of time, keeping them from their responsibilities to their own families for a longer and indefinite period. And, any loss of personnel due to role conflict would be more detrimental to children's safety under LILCO's new proposals, because implementing those proposals would require even more school personnel than would be required to implement an early dismissal.

Our district has approximately 1200 to 1300 students who reside within the 10 mile EPZ. They attend a total of at least 18 schools -- five in-district schools, and 13 additional schools outside the district. At the end of the school day, attempting to dismiss part of the school district (i.e., students who live outside the EPZ), while retaining students living within the 10 mile EPZ would lead to confusion and problems in accountability and safety.

Additional confusion would be caused by parents attempting to get their children and remove them from the premises. An increase in staff (over that required for a normal or early dismissal) may be required to process such a special partial

dismissal, and to secure the building to prevent parents, students and staff from attempting to use exits (entrances) not sanctioned for that purpose. If additional staff were not available to guard all exits (entrances), people would be able to enter or leave at will, and the school staffs could not assure the accountability or safety of the children.

In addition, as noted in our November 18 testimony, we transport children to private and parochial schools both within and beyond the 10 mile EPZ and are concerned about the responsibility for caring for these students. Should any of these schools be advised to evacuate and relocate their students as proposed in Revision 3, they would not have the capability to transport them. That would be the responsibility of our district. Even if we were able to get to the schools and evacuate such children to a relocation center outside the EPZ, parents would be concerned as to where they would be able to pick up their children. In addition, presumably our district would also be responsible for supervision of those children until their parents arrived. This would be an additional obligation imposed upon our staff; not only would we have to provide bus drivers, but we would also have to send teachers or other staff members on the buses to the schools so they could then accompany and supervise the children during the trip to, and once they

arrived at the relocation centers. If we were expected to pick up those students at schools and transport them to relocation centers, bus drivers and other staff members would be faced with a role conflict. We believe that their concern for the safety of their own families as well as for their personal safety would keep large numbers of them from entering the EPZ and therefore the LILCO proposals for evacuation and relocation could not be implemented.

The point is that LILCO's new proposals for protecting school children contained in Revision 3, make the problem of role conflict even more serious. Because our staff would be expected to remain at schools or otherwise away from their families for an even longer period of time than required for an early dismissal as discussed in our November 18 testimony, we believe an even larger number of our staff members would be likely to attend to their own families rather than perform the jobs required to implement the LILCO proposals. And, as we have discussed, the new plans would require even more staff to implement them. Therefore, the effects of role conflict would make the new LILCO proposals even less workable than the prior LILCO proposal of early dismissal.