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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 ROBERT W. PETRILAK ON
BEHALF OF THE MT. SINAI
BOARD OF EDUCATION AND
SUFFOLK COUNTY REGARDING
CONTENTIONS 25.C AND
25.D - ROLE CONFLICT

Q. Please state your name and position.

A. My name is Robert W. Petrilak. I am Vice President of the
Mt. Sinai Board of Education.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to supplement my testimony
dated November 18, 1983 regarding Contentions 25.C and 25.D, to
address changes made to the LILCO Plan in Revision 3 of the
Plan.

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Q. Have you reviewed those portions of Revision 3 that relate to protective actions for school children?

A. Yes. I have reviewed pages II-10 to 10a, II-19 to 21, and IV-169 to 171 of Appendix A. The LILCO Plan, as amended by Revision 3, now states that schools inside the EPZ will be advised to implement an early dismissal only if no protective action is recommended for the general public. This is a change from the previous versions of the Plan which assumed schools would institute an early dismissal under all circumstances. Revision 3 now states, however, that if sheltering is recommended for the general public, schools are expected to shelter their students in the school buildings; if evacuation, or a combination of sheltering and evacuation is recommended for the general public, schools are now expected to relocate their students to unidentified reception centers outside the EPZ.

Q. Do you believe that those changes in the LILCO Plan would mitigate the adverse effects of role conflict that are likely to be experienced by school personnel in the event of an accident at Shoreham, as you stated in your November 18 testimony?

A. No. In the case of either an evacuation of students to relocation centers or sheltering students in their schools, the

number of instances of teachers, administrators and other staff choosing to leave their schools in order to care for their own families would be increased over that in the case of an early dismissal.

Q. Why?

A. First, a school staff member who experienced role conflict would, in deciding whether to stay at school or to attend to his or her family, consider the length of time he or she would have to remain away from his or her family if he or she decided to remain at school. The time involved in implementing an early dismissal would be less than the time required to evacuate children to relocation centers or to shelter children in schools. If an evacuation and relocation of school children were attempted, it would be necessary for school personnel not just to supervise children until buses arrived to transport them away from school, but rather to accompany students to relocation centers and to supervise them until the emergency ended or their parents arrived. This would take time beyond that required to place children on buses, as is necessary in an early dismissal. Similarly, if sheltering were attempted, school personnel would have to remain to supervise and care for the students, instead of the staff members' families, until the

emergency ended, not just until buses arrived. That is, in connection with the new proposed protective actions, school personnel would have to remain away from their families for a much greater length of time than they would in connection with an early dismissal.

Second, the new LILCO proposals would require school personnel with families inside the EPZ in effect to abandon their families during the most serious part of the emergency by evacuating or sheltering while separated from their families.

The additional time during which school personnel would be separated from their families under the new LILCO proposals, and the necessity to evacuate or shelter without their families, means that a higher percentage of the school staff would resolve role conflict by attending to the safety of their families or their own personal safety, than would be the case in the event of an early dismissal. Therefore, the LILCO proposals to shelter children in schools or to evacuate and relocate children outside the EPZ would meet with even less success, due to role conflict, than would an early dismissal recommendation, which, as I already have testified, would not adequately protect the health and safety of the students.