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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

Docket No. 50-322-OL-3

(Emergency Planning)

DIRECT TESTIMONY OF DR. GEORGE J. JEFFERS AND
ANTHONY R. ROSSI ON BEHALF OF SUFFOLK COUNTY
REGARDING CONTENTIONS 24.E, 24.F, 61.C, 69, 70 AND 71

INTRODUCTION

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.

We are submitting this testimony to express the concerns
of the Middle Country Central Board of Education.^{1/}

^{1/} See Attachment 1 to our previous testimony (ff. Tr. 3087)
for the official statement by the District Board of

(Footnote cont'd next page)

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to address Contentions 24.E, 24.F, 61.C, 69, 70 and 71 and state our conclusion that the LILCO Plan provides inadequate protection to school children.

Q. Are you familiar with the LILCO Plan?

A. We have reviewed those portions of the LILCO Plan that contain LILCO's proposals for protecting school children in the event of a radiological accident at Shoreham.

CONTENTION 24.E - AGREEMENTS WITH SCHOOLS

Q. Are you familiar with Contention 24.E?

A. Yes, and we agree with the assertion in Contention 24.E that LILCO's proposed protective actions for schools are unlikely to be implemented because LILCO has obtained no agreements from schools or school districts to implement the LILCO proposals in the event of a Shoreham emergency.

(Footnote cont'd from previous page)

Education of its opposition to the LILCO Plan and its authorization for us to present the District's position in this proceeding.

To our knowledge, LILCO has no such agreements. The Middle Country Central School District has not entered into an agreement with LILCO concerning implementation of the LILCO proposals for schools, nor does it intend to. Indeed, many districts, including ours, have stated that they do not believe LILCO's proposals could be implemented in a way that would provide adequate protection for children.

CONTENTION 24.F - AGREEMENTS TO PROVIDE SCHOOL BUSES

Q. Have you reviewed Contention 24.F?

A. Yes, we have. The portions of Contention 24.F that concern schools are 24.F.2 and 24.F.3. They assert that most full-size buses in the vicinity of the 10-mile EPZ would be unavailable to LILCO in the event of an emergency, despite LILCO's agreements with various bus companies.

Q. Do you agree with subparts 2 and 3 of Contention 24.F?

A. Yes, we do. LILCO proposes to use buses to evacuate persons without access to cars, nursery school children, many special facility patients and most of the handicapped residents of the EPZ. (See Appendix A at IV-74b, IV-171, IV-175; OPIP 3.6.5.) LILCO apparently has entered into contracts with several bus companies to obtain buses. 24.F.2 is correct in

its assertion that LILCO would have access to only a small fraction of the number of buses nominally provided by those agreements. It is our understanding that LILCO's agreements with bus companies state that the bus company's provision of buses to LILCO is subject to the prior rights of the local school districts with which the company has contracts. One of the bus companies with which LILCO has contracted is United Bus Corp. ("United"). The Middle Country Central School District has a contract with United which obligates United to provide us with 32 buses during the period September 1 to June 30. During school sessions it appears that most of United's other buses are also in use because there have been occasions in our experience when we have been unable to obtain extra buses for special purposes such as field trips. We have found on such occasions that the companies that provide buses to schools and school districts in the vicinity of our district had committed all their buses to various schools.

Further, as noted in Contention 24.F.3, the provisions of LILCO's Plan exacerbate the problem. If schools and school districts were to attempt to implement early dismissals or evacuations, as proposed by LILCO, they would need all the buses they could get. It would be especially bad in an evacuation, because most schools and school districts do not provide

bus transportation for all their school children. Therefore, they do not have enough buses to carry all their school children, and in an evacuation they would have to obtain even more than they normally use.

CONTENTION 61.C - SHELTERING

Q. Are you familiar with Contention 61.C.1?

A. Yes. Contention 61.C.1 asserts that LILCO's proposals to protect school children by keeping them in their schools would not work. We agree with Contention 61.C.1.

Because our district does not have any schools inside the EPZ, according to the LILCO Plan, if sheltering is recommended for any portion of the population in the EPZ, the Middle Country Central School District is expected to retain those students who live in the EPZ at school beyond the end of the school day. We have approximately 1100 school children who live inside the 10-mile EPZ.^{2/} Our district likely would not

^{2/} In addition, although none of the schools in our district are within the EPZ, some are very close to the EPZ boundary. When one looks at the irregular path followed by the EPZ boundary through the Middle Country Central School District, it looks as if the boundary were drawn intentionally to keep some of our school buildings outside the EPZ. Accordingly, it is not clear to us that a sheltering order for persons "in the EPZ" should not also apply to the children in our schools that are very close to the EPZ boundary.

be able to implement the LILCO proposals for keeping children in schools during a Shoreham emergency.

First, LILCO's apparent assumption that school officials have performed "preplanning" of actions that would protect children in the event of a Shoreham emergency is incorrect with respect to our district, and in our opinion, with respect to most, if not all, other districts in the vicinity of the EPZ. Our district has expressly determined that planning for the actions contemplated in the LILCO proposals would be futile and misleading to parents, because such a "plan" could not be implemented in a manner that would assure adequate protection to our students.

Second, LILCO appears to ignore the fact that children simply could not be kept in schools and given adequate supervision and care, unless the schools had sufficient personnel, food and other necessary supplies. Schools do not have the supplies, facilities or personnel to care for children for hours beyond the end of the school day, to secure buildings to maintain accountability, or to keep order under such frightening circumstances. Schools do not feed their school children three meals per day; they are not designed to accommodate people overnight; and school personnel do not work around the clock.

In addition, assuming we were to begin an early dismissal of our children prior to LILCO's recommendation of sheltering or evacuation for persons in the EPZ as the Plan appears to contemplate, we would be sending at least 1100 children into the EPZ. If the severity of the emergency increased and a recommendation to shelter were made, we could do nothing for those children we had already sent into contaminated areas. As we will discuss below in connection with Contention 69, those children, whether in buses or on foot, would take a long time to reach home, and while en route would have no access to effective shelter. Under these circumstances, it is unlikely that school children would receive adequate protection.

CONTENTION 69 - EARLY DISMISSAL OF SCHOOL CHILDREN

Q. Are you familiar with Contention 69?

A. Yes, we are. It asserts that an early dismissal would not protect school children as LILCO seems to assume.

Q. Do you agree with Contention 69?

A. Yes. First, LILCO's apparent assumption that schools either have developed early dismissal plans for a Shoreham emergency or have determined that their "normal" early dismissal plans developed for use in snow and other situations are

appropriate for use in a Shoreham emergency, is unwarranted. The Middle Country Central School District has no early dismissal plan designed for use in the event of a Shoreham emergency, and our standard early dismissal plan would not work, as discussed below.

Q. Why would early dismissal not result in the timely arrival of children at their homes so they could be protected by their parents, as asserted in Contention 9.C?

A. Simply put, early dismissals take much longer to complete than LILCO's planners seem to have realized. In a normal early dismissal, the last student would not leave his or her school until approximately 2 1/2 hours after the start of the dismissal. And a dismissal could occur that quickly only if everything went smoothly and no problems arose. It is not unusual in early dismissals in our district for the last children to leave school 4 to 5 hours after the start of the dismissal, and of course, they arrive home even later. In light of the serious difficulties likely to occur in the event of an accident at Shoreham (which we discuss below), we believe it is very likely that early dismissals would take even longer than 4 to 5 hours.

The take home process would likely be slowed still more by both the heavy evacuation traffic expected by other witnesses for the County and New York State, and the staffing shortages which would probably result from role conflict among school personnel. (See Direct Testimony and Supplemental Direct Testimony of Dr. George Jeffers and Anthony R. Rossi on Behalf of Middle Country Central School District and Suffolk County Regarding Contentions 25.C and 25.D, Ex. Tr. 3087).

Moreover, in more usual but nonetheless serious circumstances, such as severe storms, the degree of confusion in and around schools during an early dismissal is always high. Many parents arrive to pick up their children. Children do not find their buses or their parents. Traffic congestion around the schools impedes the arrival and departure of buses. Telephone calls from concerned parents, and locating and singling out children, tie up large numbers of school personnel. All these factors slow an early dismissal under "normal" conditions. In the event of an accident at Shoreham, these problems are likely to be substantially greater and more significant.

Furthermore, our district provides bus transportation for approximately 125 private school children who either reside or

attend private schools in the EPZ. In the event of an early dismissal of those schools, Middle Country Central School District bus drivers would have to travel into, and in some cases, through almost the entire EPZ, to reach the private schools, cope with the confusion likely to exist at those schools, and then return to our district through the traffic congestion before they could even begin the take home process.

When you add up all these factors, an early dismissal in the event of a Shoreham emergency would take a very long time.

Q. Do you have any other concerns relating to LILCO's proposal for an early dismissal in the event of a Shoreham emergency?

A. Yes. One of our more serious problems in early dismissals is looking out for those children who have no one to return to during the day, for example those children with working parents. Many working parents make arrangements for friends or relatives to care for their children in case of early dismissals or other emergencies. At the start of the school year, these parents inform the schools of the telephone numbers of the persons who will care for the children if they cannot be reached. However, all we can do is attempt to contact these friends or relatives. Under State law, we cannot deliver the children to any homes other than their own. Therefore, if we

cannot reach the person designated to watch after a child, or that person is unable to get to the child's home, the child could be left unattended at his or her home. These children would be without adults to care for them, and in the event of an emergency at Shoreham there would be no assurance that they would be protected.

Moreover, we believe that in the event of a Shoreham emergency, most parents would go to schools to pick up their children. We base this belief on our own experience as school administrators, and on our contacts with the parents organization in our district. As a result, we would probably be unable to contact very many parents or other responsible adults.

Q. Do you agree with Contention 69.E?

A. Yes, we do. That contention asserts that because the LILCO Plan does not provide a means of dealing with an escalation of an emergency, it is likely that many children would be stranded in schools or caught en route to their homes without available means of shelter or evacuation, even if sheltering or evacuation were being recommended for persons in the EPZ.

Once an early dismissal has begun, some children would be in buses or on foot, and would have no access to shelter or to a means of evacuating from the area until they arrived home. As we have discussed above, the trip home could take a very long time. This is a serious problem for our district, because if we started an early dismissal, and then LILCO recommended protective actions for the EPZ, many of those children in our schools who live in the EPZ would be on their way out of a presumably safe area and into potential danger, and we could do nothing at that point to help them. Our school buses are not equipped with radios and we have no means of contacting the vast majority of our drivers once they leave the school or garage.

CONTENTIONS 70 AND 71 - EVACUATION OF SCHOOL CHILDREN

Q. Are you familiar with Contentions 70 and 71?

A. Yes. They assert that LILCO's proposal to protect school children by evacuating them would not work. We agree with Contentions 70 and 71. Even though the LILCO Plan does not contemplate that our District would evacuate its students, because of the location of some of our schools and our evaluation of the dangers involved in a Shoreham accident, we have considered the problems that would be involved if an evacuation were

attempted in our district or other districts. Moreover, even under the LILCO Plan, we would have to evacuate those of our students who attend private schools in the EPZ.

First, as stated, in Contention 70, as far as we know LILCO has not arranged for relocation centers, or developed procedures necessary for an evacuation of schools to succeed. To our knowledge there are no facilities which have agreed to accept the children who would have to be evacuated. We could not and would not transport school children without knowing where to take them. And, we could not agree to transport the school children we would have to evacuate to any relocation center, unless we were sure beforehand that the center was adequately staffed and equipped to care for the children, and that workable arrangements had been made to allow children to be quickly reunited with their parents. To our knowledge, the assertions of Contention 70 are correct in that neither of those conditions has been met in the LILCO Plan. Moreover, even if these conditions had been met, it would be unlikely that our district could relocate students until parental approval had been obtained, and until responsibility for supervising the children at relocation centers had been assigned. The LILCO Plan makes neither of these arrangements.

Moreover, relocation centers for children would need extensive telephone equipment and staff to handle calls from parents asking about their children. We believe that the LILCO proposal would result in confusion. Parents would not know their children's whereabouts. They would call schools, LILCO, and anybody else who might know. Then, if they did learn their children's locations, they would have to fight heavy traffic to travel to the relocation centers. In the meantime, the children might easily become extremely anxious. They likely would be frightened to start with, and the lengthy delay could only worsen their emotional states.

Q. Is LILCO's apparent assumption that school districts have performed "preplanning" for a Shoreham evacuation correct?

A. That LILCO assumption, in our opinion, is unfounded. Our district has conducted no Shoreham-related "preplanning," either for evacuation or the safe reuniting of school children with their parents, and based upon our conversations with other administrators, we do not believe that many other districts have either.

Furthermore, we believe that such an evacuation would be very difficult, if not impossible. First, as stated in Contention 71.A, the LILCO Plan contains no provisions for

supervising school children during an evacuation. The children would have to be cared for during an evacuation. They would have to be supervised at schools and on buses, and then at relocation centers until their parents arrived and found them. And, staff would have to be available to provide information to parents. There are no provisions in the LILCO Plan relating to such necessary staffing, such staffing is beyond our district's present resources, and we do not believe such staffing could be obtained on an ad hoc basis during an emergency. Most districts do not normally send teachers or other staff with children on buses, nor are teachers or other school staff normally expected, or required, to remain with children (or accompany them to a new location) for extended periods beyond the end of the school day, which would be necessary if evacuation were to take place.

Q. Do you agree with Contention 71.B that evacuating school children by bus could not be accomplished in a timely manner?

A. Yes. Other witnesses have testified about the likelihood of heavy traffic in the event of an evacuation. It is our experience that regular early dismissals take the longest when traffic conditions are bad, and there is no reason to believe that congestion would have any less an effect on an evacuation.

Indeed, in our opinion, an evacuation would almost certainly take much longer than an early dismissal. Most school districts would not have enough buses to accomplish a timely evacuation. Normally, school districts do not transport all their school children. Many walk, or are driven to school by parents in carpools. If the schools were required to conduct an evacuation, they presumably would have to provide transportation even for those children who normally do not ride school buses. Therefore, an evacuation would require even more bus runs than would an early dismissal, which would mean even more delay.

Q. Does that conclude your testimony?

A. Yes.