

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

| | | |
|----------------------------------|---|------------------------|
| In the Matter of |) | |
| |) | |
| LONG ISLAND LIGHTING COMPANY |) | Docket No. 50-322-OL-3 |
| |) | |
| (Shoreham Nuclear Power Station, |) | (Emergency Planning) |
| Unit 1) |) | |
| |) | |

DIRECT TESTIMONY OF
CHARLES V. FAILLA ON BEHALF
OF NEW YORK STATE REGARDING
CONTENTION 24.F.2.

Q. Please state your name and position.

A. My name is Charles V. Failla. I am Supervising Motor Vehicle Inspector with the New York State Department of Transportation, Region 10 (Nassau-Suffolk). My resume is attached hereto and is identified as Attachment A.

Q. Please provide a brief background of your work experience as it pertains to your testimony.

A. For the past year, I have been Supervising Motor Vehicle Inspector. Prior to that, I was a Motor Vehicle Inspector for 25 years.

I participate in and supervise accident investigation and eleven Motor Vehicle Inspectors whose duties are the inspection and/or investigation of omnibuses and/or corporations under the jurisdiction of the New York State Department of Transportation.

Q. Have you read Contention 24.F.2?

A. Yes. I have read the Contention. I understand that the Contention concerns LILCO's assertion that the agreements it has obtained from 12 bus companies ensure LILCO access to approximately 1236 buses in the event of a

radiological accident at Shoreham. However, it is my understanding that LILCO's bus company agreements provide that each bus company's obligation to provide buses to LILCO is subject to its obligations to provide buses to the schools and school districts with which it has contracts.

The State has been able to obtain information with respect to the buses committed to schools and school districts by 7 of the 12 bus companies with which LILCO has agreements. In the following table, the number of buses committed by each of those companies to schools and school districts is compared with the total number of buses that company has in service.¹

| <u>Company</u> | <u>Committed to Schools</u> | <u>Committed to LILCO</u> | <u>Total In Service*</u> | <u>Available for LILCO's Use</u> |
|--------------------------------------|---------------------------------|-------------------------------|------------------------------|--------------------------------------|
| Educational Bus Transportation, Inc. | 98 | 100 | 86 | 0 |
| Hermon E. Swezey Co., Inc. | 1 | 29 | 31 | 30 |
| Huntington Coach, Inc. | 107 | 100 | 69 | 0 |
| Seaman Bus Co., Inc. | 31 | 35 | 35 | 4 |
| Starlite Bus Co., Inc. | 44 | 60 | 63 | 19 |
| Suburbia Bus Corp. | 169 | 190 | 180 | 11 |
| United Bus Corp. | <u>200</u> | <u>200</u> | <u>205</u> | <u>5</u> |
| TOTALS | 650 | 714 | 669 | 69 |

*40-adult passenger school buses as of 3/19/84

¹-----
The source of information concerning the number of buses committed to schools and school districts by each of the seven bus companies included in the table is LILCO's response to Suffolk County Interrogatory No. 3 of August 19, 1983. LILCO's response only provides such information for the seven bus companies mentioned above. The total number of buses each of those companies has in service is derived from the bus inspection records of the New York State Department of Transportation, as of early March 1984. Educational Bus Transportation and Huntington Coach are able to satisfy their service demand by staggering the number of buses used at one time during peak service. As a result of this, the total buses in service less the total buses committed to schools by the 7 bus companies will not equal the total buses available for LILCO's use (i.e. 669-650=69).

LILCO claims that the seven aforementioned companies together have committed 714 buses to LILCO's use in the event of an accident at Shoreham. (See Testimony of Cordaro et al. on Behalf of Long Island Lighting Company on Phase II Emergency Planning Contention 24.F, G , I, K, L, O, P, R, S and T, at 6, 7.) However, as seen in the above table, if an accident were to occur during school sessions, the seven aforementioned companies could in fact provide LILCO with a total of only 69 buses, or about 10% of the number of buses nominally committed to LILCO.

ATTACHMENT A

RESUME

Charles V. Failla
Box 958 Holiday Boulevard
Center Moriches, NY 11934

Positions Held:

| | |
|----------------|--|
| 1983 - Present | Supervising Motor Vehicle Inspector, Dept. of Transportation, State of New York. |
| 1958 - 1983 | Motor Vehicle Inspector, Dept. of Transportation, State of New York. |
| 1956 - 1957 | Auto Mechanic, City of New York. Heavy duty repairs to trucks and related units. |
| 1950 - 1956 | Bus Maintainer "B" Transit Authority New York State - Repair and maintain city diesel and gasoline powered buses, trucks, autos. Repairs to engines, transmissions, front ends, rear end units, electrical and ignition systems, repair and or rebuild hydraulic and air controls. Troubleshoot and make repairs or adjustments on the field so that vehicles can be returned to shop for permanent repairs. Perform related work. |
| 1948 - 1950 | Auto Engineman - N.Y.C. Board of Transportation - Drive and maintained emergency crew truck with subway system. |
| 1941 - 1946 | U.S. Army Air Corp. - See attached "Separation Qualification Record." |

Educational Background

See Attached Sheets

RECORDED

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COUNTY CLERK'S OFFICE

MAY 29 10 42 AM 1946

BRONX COUNTY, N. Y.



Honorable Discharge

This is to certify that

STAFF SERGEANT CHARLES V. FAILLA 12036816 ARMY AIR FORCE

HEADQUARTERS AAF 146 (ATCHD)
714 BOMB SQ. 448 HEAVY BOMB GROUP

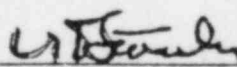
Army of the United States

*is hereby Honorably Discharged from the military
service of the United States of America.*

*This certificate is awarded as a testimonial of Honest
and Faithful Service to this country.*

Given at Halloran General Hospital, Staten Island, New York

Date 27 May 1946.


O.H. STANLEY
Colonel MC
Commanding

ENLISTED RECORD AND REPORT OF SEPARATION

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HONORABLE DISCHARGE


| | | | | | | | | | |
|---|--|---|--|---|--|--|--|-------------------------------|--|
| 1. LAST NAME - FIRST NAME - MIDDLE INITIAL FAILLA CHARLES V. | | 2. ARMY SERIAL NO. 12 036 816 | | 3. GRADE S/SGT | | 4. ACR OF SERVICE AAF | | 5. COMPONENT AUS | |
| 6. ORGANIZATION 711 Bomb Sq. 148 Heavy Bomb Hq AAF 146 APO # 558 (ATCHD) Gp. APO # 558 | | | | 7. DATE OF SEPARATION 27 May 1946 | | 8. PLACE OF SEPARATION Halloran GH SI NY | | | |
| 9. PERMANENT ADDRESS FOR MAILING PURPOSES 1239 East 222nd Street, Bronx, NY | | | | 10. DATE OF BIRTH 10 Feb 1922 | | 11. PLACE OF BIRTH Brooklyn, NY | | | |
| 12. ADDRESS FROM WHICH EMPLOYMENT WILL BE SOUGHT Same as # 9 | | | | 13. COLOR EYES Brown | | 14. COLOR HAIR Brown | | 15. HEIGHT 5'4 1/2" | |
| 16. RACE X | | 17. MARITAL STATUS X | | 18. U.S. CITIZEN X | | 19. CIVILIAN OCCUPATION AND NO. Turret-Lathe Operator (4-78.021) | | | |

MILITARY HISTORY

| | | | | | | | |
|--|----------|--|----------|--|-----------|---|----------|
| 22. DATE OF INDUCTION 14 Dec 41 | | 23. DATE OF ENLISTMENT 14 Dec 41 | | 24. DATE OF ENTRY INTO ACTIVE SERVICE 14 Dec 41 | | 25. PLACE OF ENTRY INTO SERVICE 39 Whitehall Street, NYC | |
| 26. REGISTERED X | | 27. LOCAL S.S. BOARD NO. | | 28. COUNTY AND STATE | | 29. HOME ADDRESS AT TIME OF ENTRY INTO SERVICE 532 Jackson Avenue, New York, NY | |
| 30. MILITARY OCCUPATION, SPECIALTY AND NO. Aircraft Chief (750) | | | | 31. MILITARY QUALIFICATION AND NO. (i.e., Infantry, Aviation and Transportation, etc.) Aerial Engineer | | | |
| 32. BATTLES AND CAMPAIGNS Participated in the Air Offensive - Europe. | | | | | | | |
| 33. DECORATIONS AND CITATIONS European African Middle Eastern Campaign Ribbon with 1 Bronze Star, Good Conduct Medal, Purple Heart, Air Medal and Oak Leaf Cluster, World War II Victory Ribbon, American Theatre Campaign Ribbon. | | | | | | | |
| 34. WOUNDS RECEIVED IN ACTION 8 April 1944 - Germany. | | | | | | | |
| 35. LATEST IMMUNIZATION DATES | | | | 36. SERVICE OUTSIDE CONTINENTAL U.S. AND RETURN | | | |
| SHALLPOX 27 Apr 43 | | TYPHOID 4 Jun 43 | | TETANUS 10 Jul 43 | | OTHER (specify) None | |
| DATE OF DEPARTURE 30 May 43 | | DESTINATION ETO | | DATE OF ARRIVAL 19 Jun 43 | | | |
| 37. TOTAL LENGTH OF SERVICE | | | | 38. HIGHEST GRADE HELD | | | |
| CONTINENTAL SERVICE | | FOREIGN SERVICE | | USA | | 24 Jun 43 | |
| YEARS | MONTHS | DAYS | YEARS | MONTHS | DAYS | | |
| 3 | 4 | 20 | 1 | 0 | 24 | S/Sgt | |
| 39. PRIOR SERVICE None | | | | | | | |
| 40. REASON AND AUTHORITY FOR SEPARATION Certificate of Disability Discharge Sec I AR 615-361 Apvd Hq Halloran GH SI NY dated * | | | | | | | |
| 41. SERVICE SCHOOLS ATTENDED P-40 Specialty School-Buffalo, New York - 5 wks. ACTS, Chanute Fld, Ill. 18 - weeks. AAFGS Tyndall Fld, Fla. 5 - weeks. | | | | | | | |
| 42. EDUCATION (years) | | 43. GRADE | | 44. DISCIPLINE | | 45. OTHER | |
| 8 | 2 | 0 | 0 | 0 | 0 | 0 | 0 |

INSURANCE NOTICE

| | | | | | | | |
|---|--|--|--|--|--|---|--|
| IMPORTANT: IF PREMIUM IS NOT PAID WHEN DUE OR WITHIN THIRTY DAYS THEREAFTER, INSURANCE WILL LAPSE. NAME SHOULD BE RIGHT UNDER PAYABLE TO THE TREASURER OF THE U. S. AND FORWARD TO COLLECTIONS SUBDIVISION, VETERANS ADMINISTRATION, WASHINGTON 25, D. C. | | | | | | | |
| 46. NAME OF INSURANCE U.S. Govt. | | 47. NOW PAID X | | 48. Effective Date of Assignment Discontinuance Waiver of Prem | | 49. Date of Next Premium Due (One month after 50) 31 May 46 | |
| 50. PREMIUM DUE EACH MONTH 6.50 | | 51. INTENTION OF VETERAN TO Continue | | 52. Continue Only | | 53. Discontinue | |

| | | | |
|--|--|--|--|
| 54. RIGHT THUMB PRINT  | | 55. REMARKS (This space for completion of above items or entry of other items specified in W. D. Directives) No time lost under AW # 107. Lapel Button and Emblem Issued. * 25 May 1946. | |
| 56. SIGNATURE OF PERSON BEING SEPARATED Charles V. Failla | | 57. PERSONNEL OFFICER (Type name, grade and organization - signature) FOLEY D. WOODS 1ST LT MAC | |

Army of the United States



SEPARATION QUALIFICATION RECORD

SAVE THIS FORM. IT WILL NOT BE REPLACED IF LOST

This record of job assignments and special training received in the Army is furnished to the soldier when he leaves the service. In its preparation, information is taken from available Army records and supplemented by personal interview. The information about civilian education and work experience is based on the individual's own statements. The veteran may present this document to former employers, prospective employers, representatives of schools or colleges, or use it in any other way that may prove beneficial to him.

| | | | | | |
|--|-----------------------|------------------------|-----------------------------------|-----------|-------------------------------------|
| 1. LAST NAME—FIRST NAME—MIDDLE INITIAL | | | MILITARY OCCUPATIONAL ASSIGNMENTS | | |
| FAILLA, CHARLES V. | | | 10. MONTHS | 11. GRADE | 12. MILITARY OCCUPATIONAL SPECIALTY |
| 2. ARMY SERIAL NO. | 3. GRADE | 4. SOCIAL SECURITY NO. | 1 | FVT | Basic Training (521) |
| 12 036 816 | S/SGT | - | 19 | S/SGT | Airplane and Engine Mechanic (747) |
| 5. PERMANENT MAILING ADDRESS (Street, City, County, State) | | | 28 | S/SGT | Airplane Mechanic Gunner (748) |
| 1239 East 222nd Street Bronx, 67, New York | | | 8 | S/SGT | Airplane Line Chief (750) |
| 6. DATE OF ENTRY INTO ACTIVE SERVICE | 7. DATE OF SEPARATION | 8. DATE OF BIRTH | | | |
| 14 Dec 1941 | 27 May 1946 | 10 Feb 1922 | | | |
| 9. PLACE OF SEPARATION | | | | | |
| HALLORAN GH, SI, N.Y. | | | | | |

SUMMARY OF MILITARY OCCUPATIONS

13. TITLE—DESCRIPTION—RELATED CIVILIAN OCCUPATION

AIRPLANE LINE CHIEF—Served with 23rd Base Hq., and Air Base Squadron in Puerto, Rico. Was in complete charge of repair, maintenance and inspection of all transit aircraft. Supervised three crews of mechanics, about 50 men. Inspected runways for defects, Also runway lights, plane parking areas. Kept records on all planes serviced or staying over night. Made out efficiency reports and recommendations for promotions.

AIRPLANE MECHANIC GUNNER—Served with 714th Bomb Squadron, 448th Bomb Group, 8th Air Force in England. Flew combat missions, B-24's over Germany, France and Belgium. Received the Purple Heart for wounds sustained from enemy flak while on mission over Brunswick, Germany. Duties were to maintain proper functioning of plane controls and engines. Also operated .50 cal. machine gun.

MILITARY EDUCATION

14. NAME OR TYPE OF SCHOOL—COURSE OR CURRICULUM—DURATION—DESCRIPTION

Air Corps Technical School, Chaunte Field, Ill. Airplane Mechanics course, 18 weeks. 50 hrs. per wk. Course included Theory and Practical work on all types of Aircraft and Aircraft Engines. Used all types of Hand Tools, Lathes, Drill Press, etc.

Curtis-Wright Service School, Buffalo, New York P-40 Specialist course, 6 weeks, 50 hrs. per wk. Course covered Repair and Maintenance of P-40 Plane and Engine.

CIVILIAN EDUCATION

15. HIGHEST GRADE COMPLETED

16. GRADE WHEN LEAVE SCHOOL

OTHER TRAINING OR SCHOOLING

20. COURSE—NAME AND ADDRESS OF SCHOOL—DATE

21. DURATION

18. NAME AND ADDRESS OF LAST SCHOOL ATTENDED

Hearen High School
New York, New York

19. MAJOR COURSES OF STUDY

Airplane Mechanics

CIVILIAN OCCUPATIONS

22. TITLE—NAME AND ADDRESS OF EMPLOYER—INCLUSIVE DATES—DESCRIPTION

TURRET LATHE OPERATOR —Employed by Horni Signal Mfg. Co., 515 Greenwich Street, New York. Did general machine shop work making traffic stop lights, fire control boxes, etc. Also operated drill press, punch, press, grinder. Did all types of mechanical assembling.

ADDITIONAL INFORMATION

23. REMARKS

Was awarded the European Theatre of Operations ribbon with one battle star, the Purple Heart, Air Medal, one Oak Leaf Cluster, Good Conduct Medal, American Theatre Ribbon and the Victory Medal.

24. SIGNATURE OF PERSON BEING SEPARATED

25. SIGNATURE OF SEPARATION CLASSIFICATION OFFICER

26. NAME OF OFFICER (Typed or Stamped)

Charles V. Lailla

Kenneth D. Jordan

Kenneth D. Jordan
2nd LT

United States Army



Air Corps Technical School

Be it known that

Private Charles V. Jalla, 12036816,
Attached ARTTC Unassigned,

has satisfactorily completed the course for

Airplane Mechanics

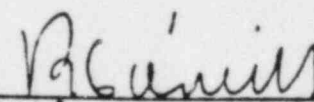
as prescribed by the Air Corps Technical School and Given at

Chanute Field, Illinois.

*In testimony whereof and by virtue of vested authority I
do confer upon him this*

—=====DIPLOMA=====

Given on this ninth day of May,
in the year of our Lord one thousand nine hundred and forty-two


Colonel, Army Air Forces

United States Army



Army Air Forces

Be it known that

CHARLES V. FAILLA

has satisfactorily completed the course of instruction

prescribed for

Aerial Gunners (Flexible)

at the Army Air Forces Gunnery School.

In testimony whereof and by virtue of vested authority

I do confer upon him this

DIPLOMA

Given at Tyndall Field, Fla. this *twelfth* *day*
of *January* *in the year of our Lord one thousand*
nine hundred and *forty-three.*

Attest

C. R. Shearn

1st Lt., Air Corps,
Secretary.

James R. Luper

Lt. Col., Air Corps,
Director of Training.

Curtiss-Wright Corporation

Airplane Division

This diploma is awarded to:

CHARLES V. FAILLA

To certify ~~that~~ he has attended the Curtiss-Wright
Service School and has successfully completed a course on the
Curtiss-Wright Airplane, P40-E and P40-F.

Samuel S. Spaulding
Director of Service Training

Frank Mc Gill
Service School Co-ordinator

The Drake High School



Charles Fattia

having satisfactorily completed the prescribed course of study for
graduation is awarded this

DIPLOMA

In witness whereof we hereby set our hand and seal

A. G. Breslin
President

Frank D. Wood
Vice President and Director

A. G. Breslin
Principal

August 25, 1948
Date

