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OFFICE OF SECRETARY
DOCKETING & SERVICE
WASHINGTON, D.C.

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 CONTENTION 15.C

Q. Please state your names and positions.

A. My name is Dr. George Jeffers. I am the Superintendent of Middle Central School District.

My name is Anthony R. Rossi. I am Director of Transportation for the Middle County Central School District.

Q. Are you familiar with Contention 15.C?

A. Yes. Contention 15 states that the public, including school administrators, do not consider LILCO to be a credible source of information, and that as a result people are unlikely

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to trust LILCO's advice or implement its recommendations. In particular, Contention 15.C asserts that because school personnel on whom LILCO would rely to implement its protective action recommendations for school children do not trust LILCO, LILCO's recommendations would not be followed. We agree with Contention 15.C.

In our opinion, school administrators are unlikely to trust LILCO or to follow LILCO's recommendations. This certainly is correct with respect to the Middle County Central School District. The Nuclear Regulatory Commission staff has expressed the concern that LILCO lacks experienced personnel to operate Shoreham; various studies have concluded that LILCO grossly mismanaged the construction of Shoreham; and LILCO is arguing for approval of an emergency plan that, insofar as it would affect school districts, is completely unworkable. Under these circumstances and in light of our responsibility for the children in our schools, we likely would not believe or trust protective action recommendations or any other information or advice that came from LILCO officers, employees or consultants. Accordingly, we would not base our determinations as to what should be done to protect the children in our charge solely upon information, recommendations or advice from LILCO; at the very least, we almost certainly would seek verification of the

accuracy and propriety of LILCO information or recommendations from more objective sources before we would act upon LILCO's suggestions.

Furthermore, based upon our contacts with other school administrators in and near the EPZ and our familiarity with the resolutions passed by other Boards of Education, we believe that distrust of LILCO and a lack of confidence in LILCO's proposals for school children are widespread among the school authorities upon whom LILCO relies for implementation of its Plan.

Q. Does that conclude your testimony?

A. Yes.