

EVALUATION
OF ADDITIONAL ISSUES RAISED
BY
NUCLEAR REGULATORY COMMISSION
RELATED TO NYPIRG'S PETITION
TO SUSPEND OPERATION OF
INDIAN POINT UNITS 2 AND 3

Prepared by
Federal Emergency Management Agency
REGION II
New York, New York

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I. NYPIRG's Concerns:

1. p.4. To date, the scenarios (sheltering, evacuation, early dismissal) have not been made explicit to all school districts which will be called upon to respond.
7. p.12-13 Information in the emergency information booklet related to evacuation of school children appears to be in contradiction to current New York State official thinking (Att. G.)

FEMA's Response:

According to the State of New York, the State commenced a detailed information program for schools as early as October 1981. Between December, 1981 and February 16, 1982 every school superintendent who had a role in radiological emergency preparedness, schools within the 10 mile EPZ and host schools beyond the EPZ, received letters, procedures, maps and details regarding their role in case of an emergency. Meetings were also scheduled for all these superintendents and, in most cases, they attended.

Since 1982, most schools have chosen to become more involved in the planning effort and in 1983 began to refine their early dismissal plans and emergency disaster plans, which, at that time, were required by the State Education Department, as outlined in the booklet entitled: Minimum Requirements for Schools in New York State, 1980.

Specifically, Section II of this booklet entitled "Disaster Planning and Civil Preparedness in Schools" (New York State Office of Disaster Preparedness) outlines the following requirements and definitions:

- ° Each school district, annually, must review and update the district's emergency disaster plans and standard operating procedures to assure that such plans and procedures are current.
- ° Natural disasters include extreme weather conditions such as snowstorms, thunderstorms, hurricanes, tornadoes, heat and cold waves, floods, earthquakes, tidal waves, and forest fires.
- ° Man-made disasters may take the form of technological failures, accidents involving nuclear or chemical production facilities or the transportation of such materials, fires and explosions, and environmental pollution related or unrelated to the above.
- ° Enemy attack could cause severe damage from blast effect, fire and fallout, and could deliver chemical or biological agents.
- ° Every county and several cities have an office which has the primary responsibility for disaster preparedness and civil defense. This office, by whatever name known locally, is charged with the coordination of survival, recovery, and governmental functions in accordance with the mandated "State of New York Emergency Operations Plan" prepared by the New York State Office of Disaster Preparedness. This local office should be contacted regarding assistance to the school district in the development and/or refinement of school district planning and to insure that school district plans are consistent and in concert with local community efforts.

- ° Plans must take into account the variable effects of each type of disaster providing for protection and/or orderly dispersal of students. Plans include a "Go Home" plan and a "Stay Where You Are" plan with variations with regard to licensed fallout shelters, the "safest area(s)" of a school building, and "duck and cover."
- ° In addition to disaster preparedness planning, every school system should provide instruction which will effectively prepare students to respond to any disaster situation in an intelligent, practical way and, hopefully, to save their lives in the process. Instruction should be at the elementary school, junior high school, and senior high school levels; should be an element of regular instructional activity; and should provide basic information and an understanding which can be translated into an appropriate response if and when a disaster strikes. Instruction may be based on any appropriate course area including Strand V of the Health Education curriculum and "Your Chance to Live," a publication of the Defense Civil Preparedness Agency of the Federal government. This publication is on hand in many districts and available, in limited quantity, from the local disaster preparedness office.

In addition to the information provided by the State, on May 3, 1984, NYPIRG submitted numerous documents to FEMA which they obtained from the State of New York under the Freedom of Information Act. A review of these documents revealed that school districts and school administrators/principals have indeed been contacted, and their roles and responsibilities in radiological emergency planning discussed.

Also, as we stated in our initial response to NYPIRG's petition dated June 8, 1984, issue number IX, the study conducted by Argonne National Laboratory revealed that a majority of the school organizations had been contacted regarding their role in the Indian Point Radiological Emergency Response Plan for the county. Some school organizations had received training in evacuation procedures.

With regard to NYPIRG's claim that the emergency information booklet related to evacuation of school children contradicts the current New York State official thinking, the State responded as follows:

"Many discussions take place between concerned parties during plan development stages and in ensuing years (ref. answer to NRC question 5). The purpose of ongoing cooperation and the REP program is to keep plans current and implementable.

Neither the Disaster Preparedness Commission nor the county officials have developed new implementation procedures that contradict the booklet, 'Indian Point, emergency planning, and you'."

In summary, FEMA concluded that:

- ° New York State Education Department requires that each school district is responsible for the review and update of the district's emergency plans and procedures.

- ° Three response options for school children (sheltering, evacuation, early dismissal) are presently contained in the county plans and are covered in the Public Education Brochure for each of the four (4) counties within the Indian Point plume exposure pathway EPZ.
- ° School superintendents/administrators have been provided with details regarding protective response options and their role in case of an emergency.
- ° Actual selection and implementation of protective response options for school children will be tested during the forthcoming exercise.
- ° New York State concluded that there is no contradiction between the Public Education Brochure and the current New York State official thinking.

II. NYPIRG's Concerns:

2. p.8. The representations given by certain State and county officials regarding planning and preparedness for schools were inaccurate and assurances were empty promises.
3. p.8. Inconsistency exists between NY State Department of Education (B. Walsh) and NY Director of Rad Emergency Preparedness Group regarding the education law of NY requiring school districts to formulate plans for early dismissal/go-home.

FEMA's Response:

NYPIRG contends that certain representations given by New York State and county officials regarding planning and preparedness for schools were inaccurate and assurances were empty promises. To prove this, they cite an apparent inconsistency between testimony of Mr. Davidoff, Director of the Radiological Emergency Preparedness Group, and a statement made by Dr. Walsh, Administrator for Educational Facilities and Management Services, New York State Department of Education.

In addressing this NYPIRG concern, the State indicated that:

"The alledged (sic) inconsistency of Mr. Davidoff's testimony and Dr. Walsh's letter was explained to Ms. Joan Holt of NYPIRG in a telephone conversation between Ms. Holt and Dr. Walsh, February 29, 1984. Dr. Walsh explained that although there were no specific education laws and regulations requiring schools to develop such detailed go home plans, such laws have not been necessary as this planning has been a routine standard operating procedure based on custom and context of Article 2-B of the State Executive Law which is the 'masterplan' of local municipality and political subdivision emergency planning, underwhich (sic) schools are included."

FEMA has also reviewed several letters by Dr. Brian Walsh whereby he strongly encourages all school officials to become involved in attending meetings and urged school administrators/principals to contact him for any assistance they may require in producing adequate emergency plans. On one occasion Dr. Walsh wrote to all school officials in Rockland County on the New York State Radiological Emergency Plan (dated August 15, 1983). Here he defined specifically the three response options for schools. Dr. Walsh also stated:

"Because the characteristics of each school population vary considerably, the guidelines which appear in this memorandum are of necessity broad. It is the responsibility of school officials to develop specific plans to meet the needs of students for whom they are responsible."

FEMA agrees with the State that there was no inconsistency of substance between Mr. Davidoff's and Dr. Walsh's statements regarding planning requirements for schools. Note also that as indicated in FEMA's response number I above, since 1980 certain disaster planning and preparedness requirements have been enunciated for New York schools although they were not strictly speaking a matter of law.

III. NYPIRG's Concerns:

4. p.10. FEMA has consistently identified deficiencies in the area of an inadequate public information, education and notification program.
6. p.12. FEMA has repeatedly pointed out that, despite distribution of the emergency information booklet to households in the EPZ, many residents do not know such basic data as the meaning of the warning sirens.

FEMA's Response:

As agreed in the June 26, 1984, telephone conversation between the Nuclear Regulatory Commission (NRC) and FEMA staff, FEMA's response will treat only public information, education and notification deficiencies mentioned in the two most recent post-exercise assessments cited by NYPIRG in its footnote on p.10 of the petition, i.e., the September 26, 1983 assessment report and the April 14, 1983 assessment report.

Notification. FEMA recognizes that in the past (1982 exercise), there have been problems with the offsite siren system for the Indian Point sites. However, since then, the utility has upgraded the siren system by moving existing sirens and providing additional sirens within the EPZ. The original 88 sirens were increased to about 150. In fact, there were no deficiencies in the March 9, 1983, exercise that linked to the siren system. In the August 24 and 25, 1983, exercise (September 26, 1983 report), there appeared to be somewhat of a problem in hearing sirens in Rockland County. It should be noted, however, that until recently, only spot-checks could be used to discover problems with siren systems.

In the past, some aspects of the total alert and notification (A&N) systems (e.g., call-down capability, 15-minute notification within 5 miles of the site, Emergency Broadcast System (EBS) activation and broadcasting) have been observed during exercises and evaluated by FEMA. However, FEMA has not yet been able to conduct design reviews of entire systems in accordance with NUREG-0654/FEMA-REP-1, Appendix 3, criteria. This process entails a technical engineering review of the alert and notification system itself as well as the conduct of a statistical telephone survey of the population of the EPZ.

Historically, FEMA has not had the requisite technical expertise and guidance to perform such reviews. The subsequent development of the testing criteria through contractor support was time-consuming. However, FEMA will publish its "Standard Review Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants," FEMA-43 in final form by August 31, 1984. As an interim document, this guidance has been tested, both in two pilot demonstrations and 5 formal demonstrations. These tests have shown that the telephone survey methodology and acoustical review procedures are successful.

FEMA plans to use these methods to test alert and notification systems at 11 plants in FY 84 and 28 plants in FY 85. The utilities operating the Indian Point units currently plan to submit to FEMA the acoustical design of their A&N system in mid-August 1984. Due to the time necessary to perform the engineering review and the quality assurance tests done through computer modeling, the telephone survey will probably take place in February 1985.

Public Education and Information. The April 14, 1983 post-exercise assessment reported that spot checks in Westchester, Rockland, and Orange Counties revealed that many people interviewed neither understood the meaning of the sirens nor knew that they were supposed to listen to EBS messages over the radio. However, it is important to note that since the Rockland County plan had not been completed, no public education brochures had been distributed in Rockland County within the year prior to the exercise. In Westchester County, information brochures were not distributed until June 1, 1983. In Orange County, brochures had been distributed only a week before the exercise. The primary cause of the lack of awareness in Westchester County and Rockland County was, we believe, due to the distribution problem rather than the format and content of the brochures, which had not yet been received by the public. The September 26, 1983 post-exercise assessment also lists problems in public awareness of emergency procedures in Rockland County. However, it also mentions that many improvements have been made, i.e., that an interim brochure had been distributed, radio-spots had been broadcast, etc. When the final brochure is distributed in Rockland, we anticipate that the situation will be improved. However, public awareness will be checked again at the time of the Fall 1984 exercise at Indian Point.

FEMA strives for clarity and effectiveness in the public education materials distributed in the vicinity of the nuclear power plants. In fact, in addition to individual review of brochures currently performed through the FEMA Regional offices, FEMA is now in the process of performing, through a contractor, a uniform review and critique of some seventy (70) existing brochures for reactor sites across the Nation, including Indian Point. Using established educational criteria, the contractor is to determine the reading and comprehension level of each brochure and set guidelines for future publications.

In the case of Indian Point, we intend to verify each year that the information contained in the brochures agrees with the information in the plans. However, we also recognize that the style, reading level and manner of expression of the documents are important in determining how much information is retained by the public. It is anticipated that the review of the Indian Point brochure and the general guidelines will further improve the current Indian Point public information materials.

IV. NYPiRG's Concern:

5. p.10. The description of the Red Cross role at reception centers does not coincide with the function that the Red Cross actually agreed to perform (Att. F).

FEMA's Response:

On July 13, 1984, New York State responded to NYPiRG's concern as follows:

"The September 29, 1983 American Red Cross letter, written by Mr. Michael Reilly, Director of Disaster Services to Ms. JR Dillenback, REPG has been taken out of context. The September 19 letter referred to by Mr. Reilly was a request by Ms. Dillenback to review the reception/congregate care system presently in place and to, once again, look at the possibility of combining their function and the context of their letters of agreement. Previous phone conversations and meetings between the state and the American Red Cross indicated such a possibility for future consideration."

Red Cross has the primary responsibility at the Congregate Care Center facility. Here they will provide food, clothing, shelter, first aid and other basic elements for comfort and survival. It is important to note that the Statement of Understanding between the State of New York and the American National Red Cross clearly describes the responsibilities of the Red Cross at sheltered facilities:

- ° In carrying out its responsibilities to provide for mass care in peacetime disasters, including precautionary evacuations and peacetime radiological emergencies/nuclear accidents, the American Red Cross will operate appropriate facilities (congregate care centers) and arrange for mass feeding and other appropriate support.
- ° The American Red Cross disaster responsibilities are nationwide. Therefore, when the local chapters in the affected areas are unable to meet the needs of disaster victims, the resources of the total organization are made available.

Furthermore, the Statement of Understanding states:

- ° In the case of peacetime radiological emergencies/nuclear accidents, which have company or owner liability implications, the American Red Cross will conduct shelter and feeding operations in centers and facilities designated in advance by the Office of Disaster Preparedness, under arrangements worked out among the Office of Disaster Preparedness, the American Red Cross and official or owners of the buildings.

In New York State, the Department of Social Services has the primary responsibility at the Reception Center. Social Services will provide initial assistance to the evacuees such as registration, decontamination (if necessary); first aid; and the release of evacuees to housing of their choice; including Congregate Care Centers. In addition, the Department of Social Services will coordinate activities of the Red Cross, Salvation Army, and other recognized volunteer organizations.

In summary, FEMA finds that the Red Cross role at sheltered facilities (congregate care centers) as described in the Statement of Understanding between the State of New York and the National Red Cross coincides with the role described in the New York State Radiological Emergency Response Plan for Indian Point.

V. NYPIRG's Concern:

9. p.15. The survey conducted by ANL (under contract with FEMA) during January 22 to February 19, 1983, revealed lack of training in emergency procedures and lack of guidance provided to schools. During the ensuing year, there is no evidence of improvement in training and guidance.

FEMA's Response:

Based on information provided by the State of New York, it was determined that many meetings have been held and information shared between planners and county and State officials and school administrators over the last year especially due to; the development of the Transportation Safety Planning Group's (TSPG) plan in Westchester and Rockland, the Compensating Measures Plan in Rockland, and the development of slide shows for each county that are presented to clubs, schools, PTA's, etc., as requested (Rockland has not completed their show to date).

In addition to the information provided by the State, on May 3, 1984, NYPIRG submitted numerous documents to FEMA which they obtained from the State of New York under the Freedom of Information Act. A review of these documents revealed that school districts and school administrators/principals have indeed been contacted, and their roles and responsibilities in radiological emergency planning discussed. (see also FEMA's Response #II)

Also, as we stated in our initial response to NYPIRG's petition dated June 8, 1984, issue number IX, the study conducted by Argonne National Laboratory revealed that a majority of the school organizations had been contacted regarding their role in the Indian Point Radiological Emergency Response Plan for the county. Some school organizations had received training in evacuation procedures.

VI. NYPIRG's Concerns:

8. p.14. The routine early dismissal plan does not incorporate special needs (i.e., during an emergency children should not be sent home on foot or dropped off at unattended road intersections).
10. p.15. The "go home" plan is not feasible because of changing social conditions, (i.e., it is no longer true that the majority of families have someone home during the day).
12. Appendix K - issues raised by Village of Croton-On-Hudson officials on inadequacies related to evacuation of 130 ambulance evacuees, communication capability of police and dosimetry for emergency workers.

FEMA's Response:

As agreed in the June 26, 1984 telephone conversation between NRC and FEMA Staff, FEMA's response will not treat matters raised in Issue 12, as they are presented on NRC's list. Issue 12 refers to Appendix K of the NYPIRG petition, which was a May 19, 1983 letter from the Village of Croton-on-Hudson, New York to FEMA. The NYPIRG petition refers to it in a footnote only in connection with Section F of the letter, which raises a school evacuation issue. The same matter was also raised in issues 8 and 10 on the NRC list so a combined response has been prepared for issues 8, 10, and 12.

With regard to the statement on page 14 of NYPIRG's petition, the provisions for early dismissal of schools are contained in the plans and covered in the Public Education Brochure for each of the four (4) counties within the Indian Point plume exposure pathway EPZ (this issue was previously addressed by FEMA in its evaluation of NYPIRG's petition dated June 8, 1984 issue number X).

In addition to question number 8 on the previous page, NYPIRG gives the example on page 14 of their petition:

"The teenage babysitter or grandmotherly neighbor who can care for a child sent home with a sore throat, during a snow storm, or after school while the parents work, may not have a car or may not be an appropriate person to handle an evacuation should the need arise."

It is important to note that neither the State of New York or FEMA are aware of any information regarding the views of parents and teachers as well as some school administrators on the subject of comparison between radiological emergencies and snow days.

The REP training programs and literature do, however, stress that early dismissal is based on ensuring that the children are wherever their parents want them to be prior to any possibility of a health hazard due to a radiological emergency. A review of the documents obtained by NYPIRG from New York State under the Freedom of Information Act noted examples of school districts having detailed procedures in place for notifying parents in the event of an emergency early dismissal and for securing alternative contacts when parents cannot be reached by phone.

One example cites the following procedures developed by school district officials and principals dated March 13, 1984:

- ° Verification forms for names and phone numbers of alternative contacts will go home with students in the 3rd quarter report card envelopes. Teachers will follow-up to insure that a return is received from each child.
- ° Class lists will be updated at the local building to include the child's home phone and the alternate names and phone numbers of the person to be contacted.
- ° Updated class list information will be distributed to class mothers.
- ° A master list will be maintained in the principal's office. Changes requested by parents will be recorded and the appropriate people will be notified of such change.
- ° In the event of emergency early dismissal, principals will notify the chairperson of the class mothers committee or the alternate(s) to initiate telephone contact to parents.
- ° Parents have to be reminded to give specific instructions to their children for emergency early dismissal in the event that the parents or the alternate person can't be reached by phone.

With respect to NYPIRG's concern regarding the Blue Mountain Middle School Drill, New York State responded on July 13, 1984 with the following:

"For the record, we respectfully submit the following facts:

The drill was a surprise to the faction of personnel to be tested. The only people who knew of the date were the School Superintendent and the School Principal. Teachers, drivers, dispatchers, etc..... were tested.

The phone survey conducted in White Plains was not part of the drill. The intent of that survey was to test some state-of-the-art equipment for speed calling. Second calls were not made as the contact was not part of the drill.

As to the conclusion based on the "Blue Mountain School telephone drill", that was not a drill. State and local planners and officials reinforce their statements that due to changing social conditions it is imperative that each parent identify a place for their child to be taken in the event of any emergency. Go home plans are not new for the creation of REP planning. Churches, neighborhood safe havens, etc..can be identified and have been designated during this plan awareness period."