

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

65 FEB 22 A11:46

OFFICE OF SECRETARY
NUCLEAR REGULATORY COMMISSION

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 LEON CAMPO ON BEHALF OF
SUFFOLK COUNTY REGARDING LILCO'S
PROFFERED EVIDENCE OF JANUARY 11

Q. Please state your name, occupation, and professional background.

A. My name is Leon Campo. I am the Executive Assistant for Finance (Assistant Superintendent of Schools), East Meadow Union Free School District, Nassau County, New York. I have been associated with the East Meadow Union Free School District for approximately 10 years. I hold the following educational degrees: Master of Business Administration, Finance, June 1975, Adelphi University; Master of Science Degree, Education, June 1972, Hofstra University; and a Bachelor of Arts Degree, Education, 1964, Adelphi University.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to express the position of the East Meadow Union Free School District and to respond to LILCO's proffered evidence of January 11, 1985.

Q. Are you familiar with the evidence proffered by LILCO?

A. Yes. I have reviewed LILCO's evidence, including the letter dated October 23, 1984 from Matthew C. Cordaro, Vice President, Long Island Lighting Company, to Frank M. Rasbury, Executive Director of the Nassau County Chapter of the American Red Cross. Among other things, the October 23 letter provides that Red Cross personnel will "direct evacuees [from the Nassau Coliseum] to congregate care centers operated by the Red Cross" It is my understanding that the East Meadow Union Free School District is among the "congregate care centers" relied upon by the American Red Cross and LILCO for use as shelters during an emergency at Shoreham.

Q. When did you first learn about the Red Cross and LILCO proposal to use East Meadow Union Free School District buildings to shelter Shoreham evacuees?

A. I first became aware of the proposal by the Red Cross and LILCO only recently, following LILCO's proposal to use the Nassau Coliseum as a monitoring and decontamination center for evacuees during an accident at Shoreham.

Q. What is the position of the East Meadow Union Free School District with respect to the evidence proffered by LILCO?

A. Notwithstanding the assertion of the American Red Cross and LILCO to the contrary, the East Meadow Union Free School District has not entered into any agreement with the Red Cross or LILCO to provide facilities for sheltering evacuees during an emergency at the Shoreham plant. Any such agreement would have

to have been approved by the East Meadow Union Free School District Board of Education, upon the recommendation of the District Superintendent. No such approval has been granted. On February 12, 1985, I wrote Frank M. Rasbury, Executive Director of the Nassau County Chapter of the American Red Cross, to inform him of this fact and to advise that there is therefore no basis for either the Red Cross or LILCO to assume that evacuees would be sheltered in our School District's buildings during an emergency at Shoreham. A copy of my February 12 letter is Attachment 1 to this testimony.

In addition, on February 15, Dr. Howard M. Koenig, the District Superintendent of East Meadow School District, formally advised the Nuclear Regulatory Commission that notwithstanding the representations of the Red Cross and LILCO, there is no agreement between the East Meadow School District and the Red Cross or LILCO which permits the use of school facilities to shelter evacuees in the event of a radiological emergency at Shoreham. Dr. Koenig's letter, which was expressly approved by the East Meadow Board of Education, is Attachment 2 to this testimony.

Q. Do you have any other concerns relating to LILCO's proffered evidence?

A. Yes. It appears that the Red Cross and LILCO have proposed using the facilities of the East Meadow Union Free School District to shelter Shoreham evacuees based upon a 1978 agreement. A copy of this agreement is Attachment 3 to this testimony.

However, that agreement was limited to the use of School District buildings as shelters during natural disasters, and did not grant the Red Cross or LILCO permission to use such buildings as shelters pursuant to LILCO's proposed plan to deal with a radiological emergency at Shoreham. In addition, the agreement has never been renewed or even discussed by the School Board, the District Superintendent or me since 1978, and, in my view, is not in effect at this time. To my knowledge, neither the Red Cross nor LILCO has ever contacted the School Board or any School District official concerning their proposed use of the School District's buildings. Therefore, I am unable to understand how LILCO and the Red Cross can presume that the buildings of the East Meadow Union Free School District would be available for their use during an emergency at Shoreham.

Given the complete lack of any attempt by LILCO or the Red Cross to contact the East Meadow School District concerning their proposal to use School District property, I question whether LILCO and the Red Cross have, in fact, available to them sufficient shelters for evacuees during a Shoreham emergency. All but a handful of the approximately 50 shelters or "congregate care centers" relied upon by LILCO and the Red Cross are school buildings.^{1/} I have contacted officials and administrators for a

^{1/} A list of the facilities for which the Red Cross claims to have agreements for sheltering evacuees during an emergency is Attachment 4 to this testimony. It is my understanding that this list was attached to a July 25, 1984 letter from the Red Cross to LILCO. Even though I am named as a "contact" person for the East Meadow School District, I first learned about this list only recently, following LILCO's

number of these schools and school districts and have learned that none has ever been contacted by LILCO or the Red Cross with respect to the use of school property to shelter evacuees during a Shoreham emergency. Moreover, without exception, the school officials I have contacted informed me that any agreements they have entered into with the Red Cross do not mention, nor did they ever contemplate, a radiological emergency or the use of school buildings by LILCO or the Red Cross during a radiological emergency.^{2/}

This is not surprising, since all the agreements relied upon by LILCO and the Red Cross pre-date the appearance of LILCO's -- or any -- proposed emergency plan for Shoreham, and clearly could

(Footnote Continued From Previous Page)

announcement that it intends to use the Nassau Coliseum to monitor and decontaminate evacuees. I have since learned that many other so-called "contact" people on the Red Cross' list are no longer even associated with their respective school districts. In at least one case, the contact person has been deceased for four years. In other cases, the contacts listed by the Red Cross have not been associated with their school districts for five years or more because, for example, of retirement.

^{2/} I have personally reviewed the agreements which exist between the Red Cross and the approximately 50 shelters or "congregate care centers" which LILCO and the Red Cross claim would be used to shelter Shoreham evacuees. Most of these agreements are limited to natural disasters and none mentions Shoreham or a radiological emergency.

not have contemplated the use of school facilities for a Shoreham emergency pursuant to the plan first proposed by LILCO in 1983. Thus, in the opinion of the school officials contacted by me, there are at this time no agreements between their schools and school districts and LILCO or the Red Cross to provide shelters for Shoreham evacuees. Attachment 5 to this testimony sets forth a list of school officials and administrators contacted by me.^{3/}

In addition, on February 14, 1985, I was advised by the District Superintendent of the East Meadow School District that, at a County-wide meeting of school district superintendents the previous day, he had raised the issue of the LILCO and Red Cross proposal for using Nassau County school buildings to shelter evacuees during an emergency at Shoreham, and had discovered that none of the superintendents present at the meeting had ever been contacted by LILCO or the Red Cross. The superintendents in attendance made clear that any agreements their schools had entered into with the Red Cross did not include the use of school property by LILCO or the Red Cross during a radiological emergency at Shoreham. Such a use of school property would require the approval of the respective Boards of Education of the school districts, with the involvement of the district superintendents.

^{3/} The number of school officials and administrators contacted by me was necessarily limited by the shortness of time between my learning of the LILCO and Red Cross proposal to use Nassau County school buildings to shelter evacuees during an emergency at Shoreham and the February 19 deadline for filing testimony concerning this proposal. I am continuing my efforts to contact officials and administrators at other school districts, but, at this time, I am aware of no school or district which has entered into any agreement with LILCO or the Red Cross permitting the use of school property to shelter Shoreham evacuees.

Q. What conclusions have you made from your conversations with other school officials?

A. LILCO and the Red Cross have no basis for their claim that there exist agreements that provide assurance that there would be sufficient sheltering capacity for evacuees during a radiological emergency at Shoreham. There is certainly no agreement between the East Meadow Union Free School District and LILCO or the Red Cross to provide such shelters, and based upon my conversations with other school officials and administrators, I believe that is the case at many or all the other schools and districts relied upon by LILCO and the Red Cross.

Q. Does that conclude your testimony?

A. Yes.

East Meadow Union Free School District

CARMAN AVENUE, EAST MEADOW, NEW YORK 11554

516-794-7000

OFFICE OF THE SUPERINTENDENT OF SCHOOLS



February 12, 1985

Mr. Frank M. Rasbury
Executive Director
Nassau County Chapter
of the American Red Cross
264 Old Country Road
Mineola, New York 11501

Dear Mr. Rasbury:

It has recently come to my attention that, in official testimony before the Nuclear Regulatory Commission, you outlined a relationship which requires East Meadow Union Free School District to offer our facilities to the Red Cross in the event of an accident of the Shoreham Nuclear Plant which necessitates evacuation of the population. As I understand it, the basis of your claim is an agreement signed by East Meadow in 1978 which indicates our willingness to cooperate with the Red Cross in the event of a natural disaster.

Please be advised that East Meadow School District is under no obligation, contractual or otherwise, for the use of our schools in the wake of a radiological accident at Shoreham. The original agreement with the Red Cross specifically omits "man-made" disasters including those of a radiological nature.

Prudence, if not respect for the agreement which you referenced before the NRC, should have compelled you to contact me before describing the relationship between the Red Cross and the East Meadow Union Free School District.

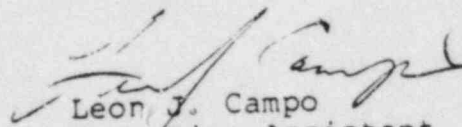
There are numerous reasons which make our school system inappropriate for use in the event of a radiological emergency; however, I will not elaborate as you have expressed no direct interest in these factors. For your information, in East Meadow a proposal to consider participation in an emergency response plan for Shoreham would be subject to a fact-finding, discussion and decision-making process which involves the Superintendent of Schools and the Board of Education.

It is troublesome that you list me and Claude Stringham, a custodian in one of our buildings, as "contact" persons regarding use of our schools in the event of an emergency. Mr. Stringham has no districtwide responsibility nor administrative authority regarding use of our schools. Mr. Stringham has indicated to me that he possesses no knowledge of you or this matter. Have you ever contacted me regarding emergency preparedness? Have you contacted me for any reason? My records reflect an absence of conversation or communication with you or the American Red Cross on these matters. In the event of a natural disaster, in the absence of contact between the Red Cross and our school district, I must question the readiness to respond to any emergency.

Upon telephoning a number of my colleagues in other school systems, it appears that you failed to specify that they have no contractual agreement to participate in a radiological emergency at Shoreham and that contact regarding this matter has never been initiated by the Red Cross.

You are requested to take immediate steps to modify your testimony before the NRC to reflect the reality of the relationship between the Red Cross and the East Meadow Union Free School District.

Sincerely,


Leon J. Campo
Executive Assistant
For Finance

LJC:ms

East Meadow Union Free School District

CARMAN AVENUE, EAST MEADOW, NEW YORK 11554
516-794-7000

OFFICE OF THE SUPERINTENDENT OF SCHOOLS



February 15, 1985

Mr. Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Margulies:

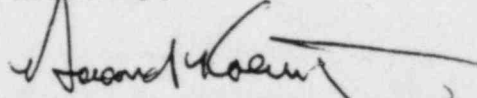
I have recently become aware of the fact that the American Red Cross and the Long Island Lighting Company have, in official testimony before the Nuclear Regulatory Commission, designated the facilities of East Meadow Union Free School District as a "congregate care center" in connection with the utility's evacuation plan for the Shoreham Nuclear Plant. Apparently, the basis of this claim is an agreement signed by East Meadow in 1978 which indicates our willingness to cooperate with the Red Cross in the event of a natural disaster.

Please be advised that the East Meadow School District is under no obligation, contractual or otherwise, for the use of our schools in the event of a radiological accident at Shoreham. Neither the Red Cross nor Lilco has contacted us regarding this matter and their presentation to the NRC is, therefore, a misrepresentation of the truth.

In addition, the Governor of the State of New York has determined that the State of New York will not participate in the implementation of the Lilco designed and Red Cross sponsored evacuation plan and has characterized Lilco's plan as illegal in that the Corporation assumes powers normally reserved to government.

On behalf of the East Meadow Board of Education, which commenced this letter through official vote, I am advising you that the facilities of East Meadow Schools will not be available to the American Red Cross or Lilco for implementing the Lilco evacuation plan and that we have not entered into any agreement for the use of our schools for purposes of monitoring, decontamination, or relocation in the event of an emergency at Shoreham.

Sincerely,

A handwritten signature in dark ink, appearing to read "Howard M. Koenig", with a long horizontal flourish extending to the right.

Howard M. Koenig
Superintendent of Schools

cc: Long Island Lighting Company
American Red Cross



STATEMENT OF AGREEMENT
CONCERNING THE USE OF FACILITIES AS MASS CARE SHELTERS
BY THE AMERICAN NATIONAL RED CROSS

This agreement is made and entered into between the governing board of the East Meadow UFSD and the Nassau County chapter of the American National Red Cross, here in after refer to as "Red Cross."

RECITALS

Pursuant to the terms of Federal statutes, the Red Cross provides emergency services on behalf of individuals and family victims of disaster.

East Meadow UFSD Board of Education is authorized to permit Red Cross to use buildings, grounds, and equipment for mass care shelters required in the conduct to Red Cross Disaster Relief activities and wishes to cooperate with the Red Cross for such purposes.

The parties here to mutually desire to reach an understanding that will result in making the aforesaid facilities of East Meadow UFSD available to the Red Cross for the aforesaid use.

Now therefore, it is mutually agreed between the parties as follows:

1. East Meadow UFSD Board of Education agree that, it will permit, to the extent of its ability, and upon request by Red Cross, the use of its physical facilities by Red Cross as mass shelters for the victims of natural disasters.
2. Red Cross agrees that it shall exercise reasonable care in the conduct of its activities in such facilities and further agrees to replace or reimburse East Meadow UFSD for supplies that may be used by Red Cross in the conduct of its relief activities in said mass shelters.

In witness thereof the governing board of the East Meadow UFSD has caused this agreement to be executed by the President of the Governing Board, and the Red Cross has caused this agreement to be executed by the Nassau County chapter said agreement to become effective and operative upon the fixing of the last signature hereto.

Signature to the agreement

East Meadow UFSD

American Red Cross Chapter

Frank M. Barbary
Chairman Executive Director

9/5/78
Date

gf 2/11

Dale A. Edwards
President of Board of Education
Dale A. Edwards

SHELTER INFORMATION 1982-1983

I. SAU COUNTY CHAPTER
AMERICAN RED CROSS
264 OLD COUNTRY ROAD
MINEOLA, NY 11501

AGREEMENT & CAPACITY

1975 500	Baldwin Public Schools High School Drive Baldwin, New York 11510	Contact: Sheldon Fuchs 223-8100 ext. 207/208
1978 1000	Bellmore-Herrick Central H.S. Dist. 1691 Meadowbrook Road Herrick, N.Y. 11566	Mr. Ellinger 623-8900
1978 900	Carle Place Union Free School Carle Place, N.Y. 11514	George Beyhl 334-1900 ext. 224
1978 500	East Meadow Union Free School Dist. Carman Ave. East Meadow, New York 11534	Claude Stringham Mr. Camp 794-7000 ext. 206
1978 1100	East Rockaway Public Schools East Rockaway H.S. Ocean Ave. East Rockaway, N.Y. 11518	Edward Lattare 599-7589 Robert Morse 599-7589 334-8020
1981 900	East Williston School District 110 E. Williston Ave. East Williston, N.Y. 11596	354-4917
1978 1400	Elmont Public Schools Elmont Road Elmont, N.Y. 11003	752-6512 249-7680
1975 1500	Farmingdale Public Schools Van Cott & Grant Ave. Farmingdale, N.Y. 11735	Mr. Russell 352-0768
1981 400	Floral-Park-Bellrose Union Free School Dist. 1 Poppy Place Floral Park, N.Y. 11001	George Reynolds 354-1045
1981 600	Franklin Square Union Free School Dist. Washington Street Franklin Square, N.Y. 11010	Robert Swanson 623-2100
1976 2000	Freeport Public Schools 235 North Ocean Ave. Freeport, N.Y. 11520	Mr. Heimisch 248-7700
1980 1500	Garden City Public Schools Garden City, N.Y. 11530	Anthony Frizzolo 671-3272
1978 1500	Glen Cove Public Schools Doris Lane Glen Cove, N.Y. 11542	

1975 1400	Henricks Public Schools Shelter Rock Road New Hyde Park, N.Y. 11040	Fred DePalma 374-5200 Gus Bruno
1981 1400	Hewlett High School 60 Everitt Ave. Hewlett, N.Y. 11557	Harry Richter 374-5200 ext. 213
1974 800	Hewlett-Woodmere Union Free School Dist. 1 Johnson Place Woodmere, N.Y. 11598	733-2100 Kathleen Hogan
1975 2400	Hicksville Public Schools Division Ave. Hicksville, N.Y. 11801	432-8933 431-8100
1980 400	Island Park Schools Island Park, N.Y. 11558	Mr. Fred Neist 731-4020 Stella Clark 731-7247
1975 1400	Island Trees Union Free School Dist. Owl Place & Concor Road Levittown, N.Y. 11756	Barton Thorp 295-2700 ext. 283/253
1975 300	Lawrence Jr. H.S. Lawrence, N.Y.	James D'Aloncel Richard Smith 676-8430
1975 1400	Locust Valley Central School Locust Valley, N.Y. 11560	William Soldan 889-2410 Larry Bourger 889-2167
1981 800	Long Beach H.S. Lido Blvd. & Allevard Street Long Beach, N.Y.	Louis Pearsall LY 34861
1974 1000	Lynbrook Union Free School Dist. Waverly Ave. East Rockaway, N.Y. 11518	Father John Jobson 798-1122
1978 100	Massapequa Grace Episcopal Church 4750 Merrick Road Massapequa, N.Y. 11758	William A. Eldard 541-6600
1975 1300	Massapequa High School 4925 Merrick Road Massapequa, N.Y. 11758	Lawrence Chapman 887-7733
1980 500	Malverne U.F.S.D. Woodfield Road Rockville Centre, N.Y. 11570	Dr. Owen Hill 627-4400 Dr. Donald Grote 627-4400
1975 300	Manhasset Public Schools Memorial Place Manhasset, N.Y. 11030	

1978
100

Mineola Town Hall
Jericho Turnpike
Mineola, N.Y. 11501

Contact: Mayor Smith
747-2232

747-6700

1978
1600

Mineola Union Free School Dist.
200 Emory Road
Mineola, N.Y. 11501

997-8700

1981
1000

Nassau County B.O.C.E.S.
Salisbury Center
Valentines Rd. & The Plain Rd.
Westbury, N.Y. 11590

221-2200

1975
1600

No. Bellmore U.F.S.D.
2616 Martin Ave.
No. Bellmore, N.Y. 11710

379-4070

1978
600

North Merrick U.F.S.D.
1775 Old Mill Road
No. Merrick, N.Y. 11566

671-5500

1980
500

North Shore Schools
Sea Cliff, N.Y.

678-1200

1982
500

Oceanside Merle Ave. School
Merle Ave.
Oceanside, N.Y. 11572

922-3170

1978
1200

Oyster Bay-East Morvich School Dist.
Oyster Bay, N.Y. 11771

Norman Black
715-8100 ext. 304

1981
1600

Flainedge Public Schools
Hickville Road
Bethpage, N.Y. 11714

938-5400

1978
800

Plainview-Old Bethpage Central School
Plainview, N.Y. 11803

1978
2400

Port Washington U.F.S.D.
27 Longview Road
Port Washington, N.Y. 11050

Harold Champol
886-2517
Francis Banta
883-4000

1978
400

Roosevelt Public Schools
288 Nassau Road
Roosevelt, N.Y.

378-7302

1981
1400

Roslyn Public Schools
Locust Lane
Roslyn, New York

621-4900

1981
300

St. Ignatious Rectory
129 Broadway
Hicksville, N.Y. 11801

Father Harter
931-0056

1978
1600
Seaford Union Free School Dist.
2147 Jackson Ave.
Seaford, N.Y. 11783

1978
500
Sewanhaka Central H.S. Dist.
555 Ridge Rd.
Elmont, N.Y. 11003

1975
500
Syosset Central School Dist.
Pell Lane
Syosset, N.Y. 11791

1978
2300
Uniondale Public Schools
Goodrich Street
Uniondale, N.Y. 11553

1978
150
United Methodist Church
40 Washington Street
Hempstead, N.Y. 11550

1978
100
United Methodist Church
192 Broadway
Bethpage, N.Y. 11714

1975
600
Valley Stream U.F.S.D.
Corona Ave.
Valley Stream, N.Y. 11580

1980
400
Valley Stream U.F.S.D. #30
Valley Stream, N.Y. 11580

1978
1600
Westbury U.F.S.D.
Jericho Tpke. & Hitchcock Lane
Westbury, N.Y. 11590

1975
1200
West Hempstead U.F.S.D.
450 Nassau Blvd.
W. Hempstead, N.Y. 11552

1981
500
WESTBURY CAMPUS
SUNNY
OLD WESTBURY N.Y.

Edward Voorhees
CA 1-0700

28-4878

Joseph Singleton
921-5500

485-9804

Rev. George Cear
485-6363

George Hilton
WE 1-4345
WE 1-2977
825-8545

Don Ciarro
483-3969

Elwood Webster
876-2016

Harry Hatow
489-8415

ANDREW R. TIRAFSAI
516 876 3146 Bus
516 433 5459 -CRX

NASSAU COUNTY SCHOOL OFFICIALS
AND ADMINISTRATORS CONTACTED

<u>School</u>	<u>Person Contacted</u>
Bellmore-Merrick Central High School District	George W. Littman, III Assistant Superintendent for Business
Carle Place Union Free School	Donald F. Connor Assistant Superintendent for Business
East Rockaway Public Schools	Ed Vorhees Business Administrator
Elmont Public Schools	Thomas Galante Business Manager
Garden City Public Schools	Robert J. Dema Assistant Superintendent for Business
Herricks Public Schools	Haskell E. Paige Assistant Superintendent for Business
Hicksville Public Schools	William H. Hall School Business Administrator
North Bellmore Union Free School District	Dominic Savino Business Manager
Oceanside Merle Avenue School	Herb Brown Business Administrator