

FROM:

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Charlevoix, MI. 49720

TO:

Brian K. Grimes
Program Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

John W. McConnell,
Assistant Associate Director for Population
Preparedness
Federal Emergency Management Agency
Washington, D. C. 20472

SUBJECT:

Pamphlet Guide to the Charlevoix and Emmet
County Michigan Emergency Operations Plans.
Request for review and correction of the
misconceptions contained therein.

REFERENCE:

(a) NUREG-0654 PEMA-REP 1 REV. 1 of NOV. 1980.

ENCLOSURES:

(1) Pamphlet Guide to the Charlevoix and
Emmet County, Michigan, Emergency Operations
Plans

(2) Detailed Critique of the Pamphlet
Guide to the Charlevoix and Emmet County,
Michigan, Emergency Operation Plan.

1. In reference (a) page 50 paragraph G. 2., a requirement is stated for written material on emergency planning that is likely to be available in a residence during an emergency. At a joint PEMA, NRC, state and local government meeting held in Petoskey, Michigan on 15 December 1980, enclosure (2) was unveiled as the apparent answer to this requirement. It is supposed to have been a joint effort of the Charlevoix and Emmet County Emergency Service and the Consumers Power Company personnel and planned for distribution before April, 1981. It certainly is a step in the right direction. Unfortunately, no public input in its preparation seems to have been openly solicited before it was printed. As an apparent result there are questions that should be raised as to its effective ability to properly inform and educate the public.

2. Reference (a) pg. 49 paragraph G. 1 calls out criteria that should be applied to the subject pamphlet. Among these criteria are:

- a. Education information on radiation
- c. Protective measures, e.g. sheltering, respiratory protection, radioprotective drugs, etc.

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It should be quite apparent to persons versed in NBC (Nuclear Biological and Chemical) Defense and Training that many illustrations contained in enclosure (1) contradict and violate the principles of protection from nuclear fallout but are not necessarily apparent to the general public. The misconception that could, and probably would, be drawn by the public from these illustrations could lead to probable contamination by not taking proper precautions in dress and carelessly exposing themselves in an exposed area or in transit during evacuation. This obviously violates the intent of the criteria stated above.

The explanation of Radiation is over-simplified and misleading and could likely cause persons to be improperly concerned as to the real danger.

Some important points that could be helpful for public protection which are easily implemented are omitted despite obvious intent in the above criteria.

Enclosure (2) goes into a more specific explanation and includes some practical points that might assist in improvement to content.

3. Therefore, I object to the distribution of the subject pamphlet for the general public in its present form without correction or additional clarification.

I request that the pamphlet be reviewed and particularly scrutinized in the areas pointed out and recommend that at minimum some type of an addendum be added to correct the possibility of serious misconceptions.

Furthermore, I request you consider the recommended inclusion of some additional helpful information for citizens to protect themselves from the dangers of fallout as listed in enclosure (2).

4. Last, as an attempt to prevent the categorization of the originator as another ANTI-NUKE KOOK, a label which seems easily bestowed nowadays, at least in the BIG KOOK area, I submit some of my pertinent background credentials:

- a. Graduate Mechanical Engineer with experience in power generation and propulsion systems.
- b. Certified Naval Ordnance Engineer with experience in the interface, operation and maintenance of nuclear weapons.

- c. Naval Officer for 24 years who as a LCDR and Command Duty Officer served a 28 month tour on board USS Long Beach CGN-9 and became directly acquainted with the potential, benefits, problems and dangers of nuclear power.

I therefore request that this correspondence be evaluated as serious, constructive and professional in nature and purpose.

Sincerely yours,

Joseph P. O'Sullivan

Information copies with enclosure to:

US Senator Carl Levin
US Senator Donald Riegle
US Congressman Bob Davis
Governor William G. Milliken
State Senator Mitch Irwin
State Representative Charles Varnum

Information copies without enclosure (1) to:

Charlevoix County Commission
Emmet County Commission
Charlevoix County Emergency Director
Emmet County Emergency Director
Mayor, City of Charlevoix
Concerned Citizens of Charlevoix

Emergency planning: We are prepared

YOUR GUIDE TO THE
CHARLEVOIX AND EMMET COUNTY
EMERGENCY OPERATIONS PLANS



ENCLOSURE (1)

INFORMATION FROM THE SHERIFFS DEPARTMENTS
AND EMERGENCY SERVICES DIRECTORS
1000 GRANT ST., CHARLEVOIX, MI 49720
450 BAY ST., PETOSKEY, MI 49770

DETAILED CRITIQUE
of the
Pamphlet Guide
to the
CHARLEVOIX and EMMET COUNTY MICHIGAN
EMERGENCY OPERATIONS PLANS

OVERALL THEME page 2 and 3

The pamphlet starts out by stating the public should have FAITH in the Emergency planning because of 24 June 1980 a successful "rehearsal" of evacuation was conducted. In fact the "rehearsal" was limited to a command and control drill between the Emergency Operation Centers using a canned scenario and the Emergency Plan, to practice evaluation and decision making, was not complete at that time. It did not exercise field forces or ever interface with the general public as part of the drill.

While this type of drill is essential and the first major step in exercising and proofing a plan and training certain personnel it still only represents attainment of a basic level of readiness (or ability) to handle a nuclear incident. Obviously the word FAITH was used rather than what the public really needs--CONFIDENCE.

Although the pamphlet alludes to the plans covering emergency procedures for severe winter, fires, tornadoes or other natural disasters, there is no significant information contained on this subject nor does the actual plan (at this time) itself contain specific procedures on these problems.

Progressively in today's society, industry and big government have access to public relations types and try to super sell or subtly persuade the public by slick brochuresmanship or appeals to (blind?) FAITH--Trust us, trust us. I do not think it necessary to enumerate the many examples set in recent years. When the public's trust is breached, it requires proof to re-establish confidence. In evacuation plans or Civil Defense issues Public Confidence and Co-operation will make or break the issue and can only be realistically won by demonstrated performance, public participation and sincere response to questions and problems.

RADIATION pages 4-6

The tone is set initially by what most people consider a pleasant and sought after experience illustration by a couple relaxing and enjoying a leisure time at the beach. (depth probing projection technique) Then draws on the experience common to most of us: the possibility of sunburn caused by Ultra Violet ionizing radiation which we all know how to easily control by proper clothing, limiting exposure, the use of suntan oils and skin lotions. One can also sense the possibility of sunburn because of being able to see the sun, knowledge of its intensity, reflections off the water, etc., and the thermal effect of the radiant heat on your skin. Therefore a relatively controllable and minor magnitude problem using reasonable forethought and precaution.

With the subject of radiation nicely introduced, the explanation by comparison transition for the far greater magnitude energy levels of Alpha, Beta and Gamma Radiation, which is deep penetrating beyond the skin into the organs, is omitted. Also omitted is the lethality of ingestion which can concentrate doses in certain organs (thyroid). Thus no need to mention thyroid blocking and radio protective drugs.

By incomplete explanation, the probable conclusion that this is a minor rather than a major problem can easily be subconsciously reached by the general public like the public was persuaded on early atomic weapons tests. Only now are we beginning to realize the tragic results of those early tests which could have easily been avoided.

PUBLIC PREVENTION AND PROTECTION MEASURES page 4, 7, 8, 9,
10 and 11

Protective Clothing

Probably the most blatant and reinforced brochuresmanship involved in the pamphlet starts out early on page 4 illustrating a relaxed family standing outside of their residence in short sleeved sports clothes calmly awaiting evacuation. Illustrations usually speak louder than words and the illustrations involved totally violate the most important principle of shelter and protective clothing to guard against fallout. If people are to be evacuated it is because of a direct threat of fallout, therefore they shouldn't be outside the shelter waiting. Second, they should have clothing that covers their skin, collars up, head covering and gloves. Third there are no protective dust or pollen masks or even a cloth or handkerchief to filter breathing. Admittedly this would not be a very pleasant picture and probably has thus been avoided by PR types. The illustration selected was about the most misleading that could have been substituted. This misconception is consistently reinforced by three other illustrations, two on page 9 where a similarly dressed family is embarking in a private vehicle and another on an evacuation bus. The most striking of all is the remaining illustration, page 8, which shows a macho Civil Defense worker and military/police type with sleeves rolled up evidently as perfect models to instill some sense of strength and security. They apparently will gladly jump into the fray to rescue us. Too bad they aren't prepared in proper uniform.

All of the above seems to contradict the direction given in the pamphlet to seek shelter and cut off ventilation in the home.

ESSENTIAL POINTS THAT SHOULD BE ADDED:

No specific helpful directions are given on clothing such as long-sleeved garments, donning a hat or a covering that can be removed if contaminated by radioactive material. The wearing of a raincoat as outerwear before going outside. The safeguard of having on hand inexpensive dust and pollen masks or even just a cloth over the face to prevent inhalation of radioactive fallout particles. Respiratory protection is one of the subjects required by regulations. At least the pamphlet does remind people to shut the windows, door, and turn off ventilating devices in the house. If this was included why not the personal bodily aspects? Why not a reminder if evacuating by private auto to keep the air conditioning off and minimizing vent induction of air and keeping the windows closed?

Since radio protective drugs are a requirement for discussion, why wasn't mention made of consulting your doctor in advance to see if you can take potassium iodide pills and then if OK having them on hand for such an emergency?

CONCLUSION

I am distressed at being so hard on this subject, but it is only because I have voiced concerns on this topic and met so much indifference. I have also witnessed some very sincere people put down and ignored when they brought up suggestions on Emergency plans and drills over the last seven months.

If I appear redundant in bringing up the subject of protective clothing in two sections of this CRITIQUE, it is because I fear the authors of the pamphlet would only correct the illustrations and think that sufficient rather than spell out the how and why to be properly clothed and prepared.

Lest one draw the impression that I think the present effort to planning is a failure, I would point out that a good start was achieved. That start is just a start and is being over-publicized as a solution and that if this mediocre effort on a pamphlet put out by supposed professionals is accepted it will encourage deterioration of effort just when the most difficult problems are being addressed.

I suppose I should be polite and compliment the local authorities on at least trying to put out information on the subject, but again that might encourage them to let their standards down.

The effort that is going to be required to meet the challenge of preparations and possible reality of a nuclear incident or attack is difficult to imagine and certainly uncomfortable to do so, but it cannot be met by heretofore accepted standards.

Nor do I have much sympathy for people who are paid and authorized to do a job, who use difficulties ~~as~~ excuses and take the easy and expedient approach to work around problems rather than face them. Several times when I was in the Military I had very forceful persuasion and pressure applied to me by Pentagon types to write favorable reports to help pass new Weapons Systems. Briefly the most frequent themes used were:

"If we don't OK it, we will lose the budgeted money"

"We have an important commitment! We need it now!
We'll fix it later."

"Be reasonable! Something is better than nothing."

The last is the most subtle and emotionally appealing. But if you pretend to have solved a problem and say it often enough, you will probably believe it, and others who are concerned can be diverted away from the problem and become deluded. I would not then nor would I now be moved by such appeals or pressure. The consequences of failure that could result from accepting shallow or expedient planning, training, or drills could come back to haunt all of us.

Very respectfully submitted,

Joseph F. O'Sullivan

Joseph F. O'Sullivan
31 JAN 1981