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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of
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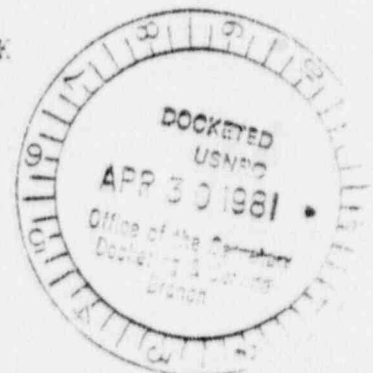
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Docket 50-289

TESTIMONY ON BEHALF OF THE ANTI-NUCLEAR GROUP REPRESENTING YORK
ON MUNICIPAL AND SCHOOL EMERGENCY PLANNING
IN YORK COUNTY, PA
AND YORK COUNTY EMERGENCY RESPONSE TO THREE MILE ISLAND

THE LEAGUE OF WOMEN VOTERS OF GREATER YORK (PENNSYLVANIA)

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Summary of Testimony

The League of Women Voters of Greater York reviewed evacuation plans at the municipal level to learn of their present status and to see they are made optimally adequate to ensure the protection of the public's health and safety.

We found of the 14 municipalities within the 10-mile EPZ, one had no coordinator. Six had completed their plans, four will soon. One had no plan, one has barely started and two are not close to completion. The plans that exist are models of a model plan developed by Kline and Knopf, a GPU-hired consultant firm. In some areas, this plan doesn't conform with NUREG 0654 and specifics are listed. The issue of what 'local' means is discussed. The areas where the county relies on the municipalities in its plan is presented and it is noted if it is called for in the Kline and Knopf plan, too.

For the most part (all but 2) the public has not received a notification with specific information relative to its respective municipality though 5 out of the 14 have distributed a copy of the county's evacuation brochure.

Equipment large and small is needed by most municipalities and they have little if any money to pay for it. A few have done informal time estimates, the rest have not. Other than some formal and/or correspondence course work with PEMA for some of the coordinators, and a small degree of radiation monitor training, local emergency personnel are not now receiving training in any specific aspects called for in NUREG 0654. The latest York County plan commendably now addresses this issue.

Siren systems were mostly felt to be inadequate but rumors have been heard of more to come. Some were concerned the predicted numbers would still not be sufficient due to loud industrial noise, traffic noise, etc.

Major problems were recognized in the radio and telephone communications systems -with voice-locking, phone jamming, etc. The municipalities include virtually nothing in their plans about sheltering. There is confusion as to the function of the local ambulances in some instances.

Some felt major problems will exist with the busses and bus-drivers. Some coordinators and superintendents expected parents will ignore directives and attempt to get their children from school, causing traffic problems and panic. Busdrivers may not stay and drive in a severe accident but may attend to their own families first. They may be difficult to reach if the accident occurred at an odd hour.

Though a few coordinators expressed no worries about being able to rely on their personnel, more felt in a sudden severe accident it is more likely the personnel will put their families first, will get them and themselves out and therefore not be generally available in the initial stages of an evacuation if at all. This was anticipated to occur down the line from the coordinators themselves to the firemen, policemen, alert teams, etc. The Newberry Township coordinator felt people are fooling themselves if they believe they will have adequate personnel available to handle a panicking, frightened public.

It was found that in the last few months, the coordinators have felt communication with the county has improved (where it was very poor previously), that Mr. Curry, the York County Emergency Management Coordinator, was doing a fine job but is overburdened having to do it unassisted, especially since he's been given additional non-emergency jobs such as Veteran's Services.

We found the coordinators entirely accessible to interview most often once we reached them but unfortunately found it took at times 4 or more calls, sometimes over days to get in touch with them and therefore wonder how much more difficult it will be for key people during an evacuation attempt.

Testimony of Dr. Mary E. Ryscavage

1. Q. What is the purpose of the League of Women Voters?

1. A. The League has three purposes- to foster education and citizenship, to promote forums and public discussions, and to support needed legislation. When the League takes up an issue, we do so because we think the problem is one that must be solved and we're convinced that the League can help to solve it. Once we've worked out our own response to the problem, we stick with it until the issue is resolved - sometimes against heavy odds. The League is a unique, non-partisan organization that promotes citizen participation at all levels of government and is a recognized force in the making of social policy. The League is not new to the citizen advocacy movement. We've been at it since 1920. The League is involved most intimately with the workings of the government at the grassroots level. We choose program because of the urgency of a solution and/or the lack of community awareness.

2. Q. Why did the League of Women Voters of Greater York do this study and describe the methodology.

2. A. From a previous study a year before we found the status of evacuation planning for York County was poor. We felt it important to review the plans and share our findings with the community with the hopes that resultant increased public input would improve the plan and thereby increase plan effectiveness.

Our study began formally in September, 1980. We studied the state, county, municipal (townships and boroughs), and school district plans, with greater emphasis on the latter two. We broke our committee of 12 members down to approximately three persons to a subcommittee, with a subcommittee for each aspect mentioned above. Phone or in-person interviews were conducted with representatives from FEMA and other state agencies, the NRC, FEMA, the Bureau of Radiation Protection of the Pa. Department of Environmental Resources, Kline and Knopf, the Maryland Department of Health as well as the emergency management coordinator or if she or he didn't exist, a local official from each of the 14 risk municipalities within the 10 mile radius, school superintendents within the 20 mile radius, Mr. Randy Curry, the York

County Emergency Management Coordinator, June Snyder of the State Department of Health, a prison warden and others.

We met regularly and reported on our subcommittees' progress. When our data were collated, we completed our summary and presented it to the League and interested public twice, on November 19, 1980 and on January 7, 1981. We took consensus on the findings on February 18, 1981. We decided to do an update during the month of April, concentrating mostly on follow-ups at the municipal and school district levels and a summary of our update accompanies this.

3.Q Q. Did every municipality have a coordinator?

3.A A. No. Conewago Township still has no coordinator at all. They simply cannot find anyone to volunteer. Of the coordinators present, some serve only in that role, others also as fire chief or town manager.

4.Q Q. How many municipalities have completed plans?

4.A A. Six have what they consider complete plans. Four say they will be completed soon. Conewago has no plan whatsoever. Manchester Borough's is in a very early stage of development. Two others are not close to completion.

5.Q Q. What guideline or guidelines were used by the municipalities to develop their plan?

5.A A. Most emergency management coordinators never heard of NUREG 0654. A GPU-hired company, Kline and Knopf, developed a Model Plan and distributed it to each of the 14 municipalities. When asked what its purpose was, Mr. Knopf said it was to be used as a guideline only, to be used to aid the municipality as it developed its own plan. However, in a memorandum by Kline and Knopf (9/15/80) to GPU they state, "Kline and Knopf feels that, armed with the Model Plan and the Work Sheet, and having been led through the Model Plan, step by step, the coordinator was extremely well prepared to complete the blank spaces; and have his draft retyped in final form for submission to his elected public officials." The plans that have been completed or nearly completed appeared to be the

the Model Plan with blanks filled in for the most part. The York County Coordinator Mr. Curry welcomed the assistance of this company as he took on his own overwhelming job around the same time as Kline and Knopf geared up to go out in the field (March, 1980); in fact, Mr. Curry incorporated the Model Plan into his penultimate County draft though it is entirely deleted in his most recent one. The Model Plan calls for no annual exercise, no training of key personnel, no demonstration of the ability to notify the public within approximately 15 minutes, nor anything concerning radiation monitoring, including how dosimeters will be distributed, who will read them, record keeping, etc. There is nothing concerning decontamination procedures nor care or transportation of the radiation victim. There is no space for time estimates or requirements for periodic testing of communication systems. It does call for a public information notice to be distributed by the local municipality which should include pick-up points, assembly areas and evacuation routes. It does not call for other things listed in Nureg 0654 including education regarding radiation, respiratory protection, contact for additional information and sheltering.

- 6.Q Q. What about the confusion as to what "local" means in NUREG 0654?
- 6.A A. Mr. Grimes of the NRC explained that it primarily refers to the county; however, wherever the county relies on the municipalities, evidence has to be present showing it meets NUREG 0654's standards.
- 7.Q Q. How does the York County Plan rely on the municipalities vis-a-vis NUREG 0654?
- 7.A A. The county plan relies on them:
- a. for distribution of a public information notice.
 - b. The municipal fire companies are responsible for provision of supplementary warning by use of alert teams (in K&K plan)
 - c. The fire and rescue personnel are to provide transportation for those without it (in K&K plan)
 - d. Communications systems have to be available to be able to

be in touch with the County (in K&K plan)

e. The police are to assist in traffic control. (in K&K plan)

f. The fire and police chiefs are to distribute potassium iodide to assigned personnel. (not in K&K plan)

g. The fire and police chiefs are to distribute dosimetry devices to assigned personnel. (not in K&K plan)

h. It relies on local assigned personnel to read dosimeters and keep records of readings. (not in K&K plan)

i. The county calls for the municipalities to participate in a state sponsored full scale exercise once approximately every 5 years and in a small scale exercise once a year. (not in K&K plan)

j. Concerning training, the county will identify key municipal personnel to receive training for potassium iodide distribution and use. (not in K&K plan)

k. Also, the county states the municipalities will require training of "identified officials in 1981" (unclear as to what this means exactly) and will target audiences in subsequent years including newly elected officials training. It expects refresher training courses to be taken by appropriate personnel. (not in K&K plan)

l. It is not clear if the county relies on risk municipality fire companies or others to aid in decontamination procedures. (if it does, not in K&K plan)

Q. What is the present status of public information notices concerning a general evacuation?

The county developed a brochure and distributed limited numbers to each municipality. Five of the 14 have chosen to duplicate this and distribute it to their constituents as the only form of information in this regard. Only 2 have drawn up their own information notice and one of the two is passing out the county's as well.

The problem with the county brochure is that it doesn't gear itself to the specifics of each township or borough. It refers to "the reception point designated by your local official", "If you do not have transportation, go to one of the pick-up points in your municipality", "If you are physically unable to leave your

home, contact your local emergency management coordinator". These are all dead-end references if no other more local information has been given out prior to an accident. The latest county plan requires that only the county brochure be distributed. In addition, as noted before with the discussion about Kline and Knopf's information notice, the county brochure does not entirely follow the standards set forth in NUREG 0654.

8.Q Q. What was the assessment of equipment needs?

8.A A. The Kline and Knopf plan did provide an annex where unmet needs as well present supplies were to be listed. Most coordinators felt they need some forms of equipment both large and small to effectuate their plan. A few were satisfied with what they have as it would pertain to a 10 mile evacuation. Virtually everyone asked felt neither the equipment or the money for it would be forthcoming from elsewhere and local funds are limited.

9.Q Q. Did anyone do time estimates?

9.A A. Newberry Township has done an "unscientific" time estimate by driving its trucks, etc. over areas needed to be notified and concluded an excess of 3 hours in average conditions was needed. Two others have or are doing informal estimates. The rest have not. (see summary)

10.Q Q. Have the key personnel received training?

10.A A. A few coordinators have taken correspondence courses, some others formal FEMA training courses but certainly not all. Except for Dover, there is no other training of emergency personnel going on. commendably, in the latest county plan draft, the issue of training needs is now addressed and appears more in line with NUREG 0654 which requires training programs for coordinators, accident assessment and radiation monitoring teams, police and firement, first aid, rescue and medical support personnel. It is obviously not only important to state such courses are available but to see to it the proper people are actually receiving it. The county plan states that the county and the municipalities will require training for identified individuals in 1981. In other instances, the county plans to make those involved aware of what's available and urge them to acquire the training.

Fire Co., and 9 York vehicles , b. Suburban York - 45.88mhz including 8 police departments and c. metropolitan York - 155.625 and 158.970mhz which will include 23 groups.

Phone jams are expected by many. They were experienced in March, 1979. A few feel getting additional lines in is a high priority need, especially to use to reach emergency personnel. One coordinator criticized the printing of the county phone number on the county brochure, predicting many would try to call that number for information at a time lines would be most needed to contact and line up key personnel.

14.Q Q. What about radiation monitors?

14.A A. Monitors are now present in varying, usually small numbers throughout the townships. A scarce number of people have taken the formal radiation monitoring course and one who did won't use his skill anymore.

15.Q Q. How have the municipalities worked with the schools?

15.A There has been a variable level of coordinated effort in those municipalities where schools exist. Some said the school districts are handling the task alone and they have only general ideas of relocations sites, etc. though this seemed not to be a concern to them. The cluster of coordinators from the municipalities included in the Northeastern School District all felt frustrated with the persistent lack of cooperation with the superintendent there.

16.Q Q. How do the municipalities deal with sheltering?

16.A As per the Kline and Knopf model plan, they don't deal with it at all other than state a directive may be given to take shelter. Most have done no work specifically dealing with sheltering and view their responsibility and efforts in planning to be directed to evacuation alone.

17.Q Q. What are the concerns about ambulance functions?

17.A A. The ambulance in Lewisberry is to be relied on as the source of radiocommunication with the county as it has the fire frequency. E. Manchester has no ambulances and plans to rely on Manchester, understanding they'll be second in line. York Haven is similarly strapped

and plans to rely on Newberry or Manchester. Other coordinators envisioned their ambulances to function as means of evacuating non-ambulatory persons. Others assume they will be attending mostly to accidents that may occur during the evacuation. The Newberry Township coordinator anticipates problems with choosing priorities - choosing between carrying a non-ambulatory invalid and an accident victim and further wonders where accident victims are to be taken. He was also concerned with both the length of time it would take for ambulances from elsewhere to come and if the drivers are volunteer

as they are often, would they risk radiation exposure and drive into the risk zones.

Q. Are there enough busses and busdrivers?

18.Q

18.A

A. Mrs. Miller's testimony regarding the school districts will go into greater detail on this issue. The points raised by the coordinators included extreme concern about parents ignoring any directive and attempting independently to get their children out of their school(s), resulting in panic and traffic problems. We got similar feedback from many parents during our presentations of the study. The superintendent of the Northeastern school district is convinced of this as well and describes efforts at planning to be futile. In addition, the Manchester Township coordinator pointed out the availability of the drivers can't be counted on because they are not paid to be by the phone and may be out shopping, farming, etc. He cited a recent example of a fire at Central High School. Though the administration wanted to bus the children home, they simply couldn't get hold of the busdrivers to get them out. Another coordinator doubted the drivers would stay if there were a severe rapidly progressive accident but would rather attend to getting themselves and their families out first.

19.Q

19.A

Q. What were the problems raised concerning commitment?

A. The Lewisberry and Hellam coordinators felt confident about getting the commitment to stay and perform assigned duties from their emergency

personnel (with Hellam specifically addressing the portion within the 10 mile radius). The coordinator from Mt. Wolf felt he had a respectable level of commitment from his people as did the coordinator from Fairview Township. On the other hand, to quote the coordinator from E. Manchester Township, "It ain't gonna work." He noted only 50% of his people showed up for a planning meeting and felt less would show up

for a real radiation emergency. Another questioned, "How do we mandate that a man stay here to work when in his mind his first responsibility may be his family?" A representative from Congewago Township expressed worries about getting commitments for a radiation accident specifically though not for a general accident. Both the Newberry and Goldsboro coordinators stated, depending on the type and severity of the accident, they would take their families out first as they were their first priority and they felt their police and firemen would leave as well. The Goldsboro coordinator felt half of the helicopter pilots would be available for emergency aid. The Newberry Township coordinator felt given a gradual situation, meaning days, many may stay and help but if there was more immediate danger, most would head south with the others. He felt this was the most severe problem by far in the evacuation planning. If an accident happened suddenly, "people would be in a pure panic just trying to get away," he observed and he cited examples of what actually occurred during the 1979 accident. He interviewed his fire company (of which he's president) and was given by the man the indication the majority would not necessarily stay, that their families were first in line. The Newberry coordinator predicted no one would sit and direct traffic, that it " would be like suicide." He felt people are fooling themselves is they feel volunteers will stay.

20.Q Q. How has the relationship been between the county and the municipalities?

20.A A. Initial feedback early on in the study indicated county involvement in the planning at the municipal levels was not nearly adequate and many felt frustrated by it and resented the lack of seeking input from them. During our updating this past month, we got positive feedback on Mr. Curry's efforts. Many felt he was doing a particularly fine job and that communication has picked up. They felt, too, he

is excessively burdened, especially with extra, non-emergency management jobs such as Veteran's services. He has apparently started sector meetings. They must be in their initial stages as not too many of the coordinators had attended them. He sends regular newsletters conveying timely information to the coordinators.

21.Q Q. Can you comment on the interviewing experiences with the personnel contacted?

21.A A. Almost all the coordinators were willing, cooperative and patient with the interview. Our biggest problem laid with the difficulties in trying to reach some of them. Some of them required 4 or more phone calls and some over a period of days. All this was at a time when no disaster was going on, so we wonder how much more difficult it will be for those concerned during an evacuation attempt.

Testimony of Arlene Miller and Judith Hilliard on School Plans

1. Q. How did you arrive at your questions used in your interviews?

A. We studied the school section of the York County Plan and devised our questions from that.

2. Q. Who were the interviewers?

A. Arlene Miller, Sandra Menchey, Judy Hilliard, Liz Ferguson, Pearl Wintrode

3. Q. How did you choose your interviewees?

A. The York County Plan states that it is the responsibility of the superintendent to develop each district's plan, estimate travel time, etc. It was logical to contact them. In some cases we were then directed to someone he had designated to work on the plan.

4. Q. Did you find any significant changes in planning from your original findings in the follow-up interviews?

A. No. In all cases the Superintendent had received copies of the York County Plan dated 9/3/80. They had also received copies of the Lower Dauphin Plan from the Dept. of Educ. but there had been no changes in their planning since our interview in November.

5. Q. How did you arrive at your questions concerning private schools?

A. We discovered an inconsistency in interpretation of the County plan where private school evacuation was concerned. There was no direct contact between the Superintendents and the private schools within and outside their districts. Communication and consistency is essential on this point.

6. Q. Why have you included figures for districts whose buildings lie outside the 10 mile radius since these are outside the evacuation area?

A. We included them since a portion of these districts lie within the 10 mile zone and therefore some of the students live within it. Two of the superintendents in this situation had detailed plans for evacuation and two did not. But those who did not have them were not saying that they were not required to evacuate. They told us that they had insufficient guidelines and help to develop an adequate plan. Again this points up a lack of communication and coordination among responsible parties.

7. Q. Where did you get your information on buses?

A. From the superintendents and the bus companies.

8. And on drivers?

A. From the same sources.

9. Q. Are the reception centers that parents without transportation may be taken to the same reception centers that their children will be taken to?

A. No. Not in all cases. There is also no provision noted in the York County plans for reuniting families or even for assisting families to find out where other members are who have been separated by the planning itself.

10. Q. Does the York County Brochure list designations of where school children will be evacuated to or does it list any way for parents to find this out?

A. No. Schools are responsible for informing parents, but this has not yet been done.

11. Q. If the area busses are used to evacuate ~~all~~ the children at school whose school buildings are within the EPZ, will there be enough busses to also evacuate the school children who live within the EPZ but whose school buildings are not within the EPZ?

A. No, not on the first run. This leads to several problems.

1. All of the schools within a school district which has children who live within the EPZ may evacuate, as they now expect to, in which case there are not enough busses.
2. The school buildings within the EPZ and persons without transportation may be evacuated first, which would leave children whose families have been evacuated from the EPZ at school for possibly a very long period of time until busses could be used to pick them up, and even then, they could not go home if they lived within the EPZ.
3. Parents may receive a confusing message-- some school children (in school buildings outside of the EPZ) must be picked up and some school children (in buildings inside of the EPZ) must not be picked up.
4. It may be very difficult to reunite families, and it may be unreasonable to expect that parents will understand where their children are, where their children are going, and what the parents are expected to do, and unreasonable to expect that parents will act as the York County Plan assumes they will.