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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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 BRUCE G. BRODSKY, EDWARD J.
DOHERTY, HOWARD M. KOENIG, NICK F. MUTO, RT W.
PETRILAK, ANTHONY R. ROSSI, J. THOMAS S. , AND
RICHARD N. SUPRINA

ON BEHALF OF SUFFOLK COUNTY

REGARDING

CONTENTION 25.C

April 13, 1988

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I. Introduction and Background

Q. Please state your names.

A. My name is Bruce G. Brodsky.

My name is Edward J. Doherty.

My name is Howard M. Koenig.

My name is Nick F. Muto.

My name is Robert W. Petrilak.

My name is Anthony R. Rossi.

My name is J. Thomas Smith.

My name is Richard N. Suprina.

Q. Please describe your involvement with schools on Long Island.

A. (Brodsky) I have been a member of the Middle Country Central School District Board of Education for the past ten and one-half years. I have served on the legislative, policy,

finance and public relations subcommittees of the Board. In addition, I am a member of the Nassau-Suffolk School Boards Association, the New York State School Boards Association, the Brookhaven School Board Association, and the National School Boards Association. A copy of my resume is Attachment 1 hereto.

(Rossi) I have been the Director of Transportation for the Middle Country Central School District since January, 1973. I am also a certified instructor for the New York State Basic and Advanced School Bus Driver Training Programs and serve as a qualified inspector for the New York State Motor Vehicle Department. As an inspector, I test school bus driver candidates to determine whether they may continue to be certified school bus drivers in compliance with Article 19-A of the New York Vehicle and Traffic Law. I am an active member of the New York Association for Pupil Transportation and I serve as President of the Suffolk County Chapter of the New York Association for Pupil Transportation, a position which requires me to remain abreast of school transportation related matters within New York State. A copy of my resume is Attachment 2 hereto.

(Suprina) I have been the Superintendent of Schools for the Riverhead Central School District for the past five years. Prior to becoming Superintendent, I held a variety of other school-related positions in other school districts, including assistant superintendent, principal, and teacher. I have

been involved in the education profession for over 30 years. I am an active member of the BOCES I Council of Superintendents, the New York State Council of School Superintendents, and the Suffolk County Council of School Superintendents. I also serve on the executive committee of the Suffolk County Organization for the Promotion of Education, an organization which devises educational in-services for teachers. A copy of my resume is Attachment 3 hereto.

(Doherty) I have been employed by the Riverhead Central School District since 1953. Between 1953 and 1963, I was at various times a school bus driver, school bus mechanic, and the District's Assistant Supervisor of Transportation. Since 1963, I have been the District's Supervisor of Transportation. I am a certified school bus driver instructor and examiner. Over the years, I have served as President, Vice President, Treasurer, and Secretary for the Suffolk County Chapter of the New York Association for Pupil Transportation. I am currently the Secretary of the New York State Association for Pupil Transportation. A copy of my resume is Attachment 4 hereto.

(Muto) I have been the Superintendent of Schools for the Longwood Central School District for the past six years. Prior to becoming Longwood's Superintendent, I served as Superintendent of Schools for Nauset Public Schools in South Wellfleet, Massachusetts. I have been involved in the education profession

since 1954. I am also familiar with school-related issues as a result of the experience and knowledge I have gained through my position with the Nassau-Suffolk School Boards Association. A copy of my resume is Attachment 5 hereto.

(Smith) I have been the Transportation Coordinator for Longwood Central School District for the past 18 years. I am also a certified school bus driver instructor for the New York State Education Department, a New York Department of Motor Vehicle certified school bus driver examiner, and a National Safety Council defensive driver training instructor. I am a member of the Brookhaven Township Transportation Advisory Board, the Suffolk County Chapter of the New York Association for Pupil Transportation (for which I previously served as President), the New York Association for Pupil Transportation, and the National School Transportation Association. A copy of my resume is Attachment 6 hereto.

(Koenig) I have been the Superintendent of Schools for the East Meadow Union Free School District for the past five years. Prior to becoming East Meadow's School Superintendent, I served as Assistant Superintendent of Administration for the Harborfields Central School District. I have been employed in the education field since 1968. I am a member of the New York State Council of School Superintendents and the Nassau County Council of School Superintendents. I received my Ph.D. in educa-

tional administration from New York University and teach courses which deal with the subject of role conflict at both New York University and Long Island University. I also am a member of the Nassau-Suffolk School Boards Association. This association meets regularly to discuss issues of common interest to school administrators on Long Island, including issues regarding pupil transportation. A copy of my resume is Attachment 7 hereto.

(Petrilak) I have been a member of the Mt. Sinai Board of Education since 1983 and have previously served as Vice President of the Board. As a Board member, I am involved in all aspects of education policy formulation for Mt. Sinai, including transportation policy. A copy of my resume is Attachment 8 hereto.

(All) These school-related activities have provided us the opportunity to participate in a wide variety of school matters, including those related to the safe transportation of our children. These activities have also given us a broad perspective regarding school transportation issues and how they are handled, both by our respective school districts and by other districts.

Q. Please describe your school districts and your school related responsibilities that pertain to your testimony in this proceeding.

Middle Country Central School District

A. (Brodsky) As a member of the Board of Education of the Middle Country Central School District, I work with the other Board members to establish policy for the District. We appoint the Superintendent and other officials who are responsible for implementing the Board's policies. Among other things, we establish and monitor the Middle Country District's policy regarding the transportation of schoolchildren, which policy is then implemented by the District's Superintendent and by the District's Director of Transportation, Mr. Rossi, and his staff. Our policy derives from State regulation requirements and District-level administrative directives. That policy is that only drivers approved by Mr. Rossi and the Superintendent are permitted to transport our children, and that Middle Country children are permitted to be transported to and from school only in buses which have passed the bi-annual State certification inspections and meet with the approval of Mr. Rossi and his staff. This policy is based upon our strongly held view that we can protect our children's safety in travel to and from school only if we maintain strict controls over who transports our children and how.

(Brodsky, Rossi) The Middle Country Central School District is located partly inside and mostly just outside and to the west of the 10-mile EPZ. Our total public school enrollment is approximately 12,000. We have 13 public schools for which we

provide daily transportation to and from school; for these 13 schools, we also provide transportation for extracurricular activities such as field trips, sporting events, and the like. Further, our District provides transportation to and from school for District children (approximately 900 children) who attend private and parochial schools. Some of these schools (St. John the Evangelist, Infant Jesus, North Shore Christian, and Yaphank Christian) are within or very close to the 10-mile EPZ; some are to the east of the 10-mile EPZ, necessitating travel within the EPZ in order to carry out daily bus runs; and others are located elsewhere on Long Island.

(Rossi) As Director of Transportation for Middle Country Central School District, I oversee the transportation of approximately 10,000 students to and from school daily; we transport approximately 9,000 students to the public schools and approximately 900 to the private and parochial schools. About 2,500 of our students (mostly attending public schools) regularly walk to and from school.

I am responsible for the hiring and training of school bus drivers, and the maintenance of school buses. I personally interview and approve each driver who transports District children, including those persons who drive buses for our contracting bus companies. This interview/approval process is necessarily somewhat subjective. In my experience, however, I

have come to recognize that driving a school bus requires persons with not only the requisite training in driving a large vehicle, but also the composure and capability to gain the confidence and respect of children and parents. I feel that personal interviews are an important part of the overall selection process of bus drivers.

Each school bus driver applicant must undergo a physical examination, submit three letters of reference, perform satisfactorily on a written and behind-the-wheel examination and undergo fingerprinting to verify that he or she does not have a criminal record. In addition, I obtain from the Department of Motor Vehicles a copy of each applicant's driving record for the past three years. Our bus driver training entails 40-50 hours of instruction. In addition to teaching our driver candidates how to operate a bus, we offer instruction on school bus safety practices, handling children and the importance of discipline, special laws and regulations that our drivers must comply with, repair procedures and what to do should their bus become involved in an accident. Our drivers are taught to conduct a pre-trip safety inspection each and every time the bus is placed in service, and to fill out and submit to me the pre-trip inspection forms. Our driver candidates must ride for three days with a regular driver to observe student discipline and proper handling of students, to learn the locations of streets and schools, and

to get any questions they might have answered by a trained driver.

I ensure that each bus which carries Middle Country children is operated in compliance with the rules, regulations, and laws of the State. For example, I, or persons working under my direction, inspect all District-owned and contract buses. The District-owned buses undergo complete maintenance at our garage every 3,000 miles, in addition to regularly scheduled quarterly maintenance. All school buses undergo a rigorous inspection by the State Department of Transportation every five to six months. Should a bus fail the inspection, that bus would not be used to transport children until the problem was corrected and the bus passed inspection. I also conduct all required and supplemental safety seminars.

(Rossi, Brodsky) Middle Country relies upon a combination of District-employed (40) and contract (33 from United Bus Company and 29 from Medibus) drivers to transport its 10,000 students. The large majority of our drivers are women, often of child-bearing age and with children attending our schools. Most of the drivers reside in the District or close to it. Some reside within the 10-mile EPZ.

For the most part, the 40 District-employed drivers are not full-time employees. Rather, they work only the hours that they

drive and can be reached during times when they are not driving only if they happen to be at home or if they are in buses which are equipped with radios. The same is true for the District's contract drivers. The contract drivers typically keep their buses with them during the day; the Medibus drivers keep their buses overnight. Many District-employed drivers also keep their buses during the day; as a result, very few buses are at the Middle Country bus yard during the day.

We use 101 buses each day. Most of these buses engage in both public and private and parochial school runs each day. At any given time during the school day, 24 buses are being used solely for the transportation of the private and parochial school students. We also use three mini-buses to transport those children with special needs.

The buses in our fleet are not of the same size. Of the District-owned buses we have 32, 20-seat school buses; five, 10-seat buses; and two, 15 passenger vans and one, 16 passenger van. Of the contract buses, 33 are 20-seat buses, and 29 are 16 passenger mini-vans. For trips under 10 miles, the buses can carry three elementary students per seat, meaning the capacities are 30, or 60 elementary students, depending on bus size. For trips over 10 miles, I would not load a bus three per seat even with elementary students. I would load high school students only

two per seat, meaning the bus would be carrying 20 or 40 students, depending upon the size of the bus.

Middle Country does not have sufficient buses or drivers to transport all its children -- or even those who regularly require transport -- at a single time. Rather, as described in greater detail below, each driver must perform multiple runs both in the morning and afternoon in order to transport our children. We have staggered school openings and closings as a result. To accommodate our transportation needs, we have buses arriving and leaving our schools at 24 separate scheduled times. We also have unscheduled runs each day. At least half of our drivers are on the road with their buses at any given time during the day. Those drivers responsible for the kindergarten runs are on the road virtually all day.

Riverhead Central School District

A. (Suprina) As Superintendent of the Riverhead Central School District, I am in charge of implementing all School District policies which are established by the Board of Education. One area of my responsibility is to supervise School District operations -- such as Mr. Doherty's transportation activities. The Riverhead School District Board of Education has instituted a transportation policy under which our children will be transported only by drivers who have received District approval and

only in District-owned buses, which are maintained and inspected by District personnel. This policy is based on safety concerns: our parents demand assurance that their children are well cared for and adequately protected. To satisfy this demand and provide such assurance, the Riverhead School District has determined that it must maintain complete control over who transports the District's schoolchildren and how.

(Suprina, Doherty) The Riverhead Central School District is located to the east and south of the Shoreham plant. The District begins within approximately two miles of the Shoreham plant and then continues to the south and east of the 10-mile EPZ. The District has approximately 3,700 public school students enrolled in seven public schools. Four of our public schools (Riley Avenue and Pulaski Street Elementary Schools, Riverhead Junior High, and Riverhead High) are located within 10 miles of Shoreham and have approximately 2,705 students. Our remaining three public schools are all located close to the 10-mile EPZ boundary line. We feel it is unrealistic to assume that those schools falling just outside the 10-mile line are somehow "safe." Thus, we consider all the Riverhead schools to fall within the zone of potential danger.

In addition, we also provide transportation to 369 parochial and private schoolchildren who reside in our District. These children attend schools both inside and outside the 10-mile EPZ.

We transport students to the following private and parochial schools located inside or very close to the EPZ: St. Isidore, St. David, St. John the Evangelist, Living Water and Mercy High School.

(Doherty) As Transportation Supervisor for the Riverhead Central School District, I administer the operation of the bus fleet owned by the District for the purpose of safely transporting schoolchildren to and from school on a daily basis. I also am responsible for all transportation necessary for extra-curricular activities.

The District owns 54 buses of which 39 are full passenger capacity buses (21 have 20 seats and 18 have 22 seats) and 15 are 5 to 28 passenger buses used for handicapped children and other uses. The District employs 47 regular drivers, and six substitute drivers. Thirteen of our 54 buses are used solely for the transportation of the private and parochial school students; 32 of our buses are used for public school transportation. We use 15 buses to transport 36 handicapped students to eight schools. Eight of our 54 buses are spare buses and we contract for the use of two buses. Our capacity policy is the same as that described above by Mr. Rossi: the only circumstance where three children per seat are permitted is on elementary school trips under 10 miles. In all other situations, two children per seat is the maximum permitted.

Most of our drivers are women who often are young with school age children. For the most part, our drivers reside within the District; many reside very close to or within the 10-mile Shoreham EPZ. Our drivers are not full-time District employees. Rather, they work only during peak driving times -- morning and afternoon, plus those needed for midday kindergarten transportation and extracurricular activities. At other times of the day, our drivers can be reached only if they happen to be at home or in buses which are equipped with radios.

Each driver receives a rigorous training program which I directly supervise. The program includes 40-60 hours of on-the-job training, involving actually driving school buses with a supervisor (usually me) present. In addition, I personally interview each driver applicant (including substitutes) to ensure to my satisfaction -- based on my years of experience -- that the applicant possesses the necessary personal qualities to make him/her a satisfactory driver. The Riverhead School District adheres to these requirements, because we have determined that anything less would not ensure the safe transportation of our children. No person is permitted to drive who has not received my personal approval. Dr. Suprina ultimately gives his approval of each driver as well, based upon my recommendation. These requirements have never been subject to waiver. Thus, we have forbidden the use of substitute drivers who have not received our full training and approval. As a result, during times when we

have been short of drivers, the transportation of some children has been delayed.

(Suprina, Doherty) We do not have sufficient resources to transport all our students at the same time. Indeed, as discussed below, we do not have sufficient resources even to transport the pupils attending the four EPZ schools at one time.

Longwood Central School District

A. (Muto) As Superintendent of Schools for Longwood Central School District, I am responsible for all areas of the administration of the school district. The Longwood District is located within the 10-mile Shoreham EPZ. Our six public schools are roughly southwest of the plant, ranging in distance from about four to nine miles from Shoreham. My responsibilities include the implementation of the transportation policies of my District. These include the policy that our schoolchildren may be transported only by persons who have received the personal approval of the District, and only in buses which have received the approval of Mr. Smith. The reason for this policy is the same as that testified to above by other witnesses: we have determined that we can provide for the safe transportation of our children only by the maintenance of strict controls over how and by whom our children are transported.

(Smith) As Longwood Transportation Coordinator, I am responsible for the transportation of schoolchildren enrolled in the six public and 36 private and parochial schools within the Longwood District. Longwood obtains buses and bus drivers from the Suburbia Middle Island Bus Company and Noyl Equipment. Our contracts call for 89 regular 20-seat buses to be available from Suburbia. Of those 89 buses, 19 are used solely for the transportation of private and parochial school students, while 70 are used to transport public school students. Noyl Equipment supplies 57 buses, which we use for transporting handicapped and other special needs children. Of these 57 buses, three have the capacity to hold five students confined to a wheel chair and five ambulatory students, two hold 10 students confined to a wheel-chair and eight ambulatory students, six are 20-seat buses and 46 are eight-seat buses. We use all the Noyl Equipment buses for the transportation of our children with special needs.

The majority of the bus drivers utilized for our children are women, many of child-bearing age. The majority of our drivers are also local, meaning that they reside within or near our School District. Many have children who attend our schools.

We are very careful never to overload our buses. For instance, we would never load 60 students, even elementary students, on a bus. At most, for trips under 10 miles, we would load 55 elementary students on a bus. For trips over 10 miles,

such as to Nassau County, we would load the buses two students per seat, leaving room for two adult supervisors in accordance with District practice.

Notwithstanding the use of contract drivers and buses, I maintain close control over the training of all drivers who transport our children. Thus, I personally oversee all employment and training of these school bus drivers in order to ensure the safe and competent transportation of our schoolchildren. The training includes 48 hours of instruction, divided between myself and driver training instructors employed by the bus company. A significant portion of the training -- 20 hours -- is route simulation prior to actual assignment involving the transportation of children. That portion of the training carried out by the bus company instructors is subject to my overall approval. Further, I personally interview and approve every school bus driver who drives District children.

Suburbia Middle Island Bus Company has the primary responsibility to ensure that the bus equipment contracted to the District meets all requirements. I review Suburbia's standards and periodically inspect all buses and inspection records to ensure that proper maintenance is being carried out. Should I receive a complaint about the condition of one of our contract buses, I personally inspect that bus from top to bottom. Moreover, all the school buses used to transport our schoolchildren must under-

go rigorous inspection by the State Department of Transportation every five or six months. Only State-certified buses are allowed to transport our school- children.

(Muto, Smith) The total student enrollment in our District is over 10,000 students. Our District transports approximately 9,465 schoolchildren daily. Our student enrollment breaks down as follows: we transport daily 8,574 public schoolchildren (4,018 elementary students, 1,354 middle school students, 1,287 junior high school students and 1,796 high school students) and 891 private and parochial school students. Many of our private and parochial school students are transported to schools located within or very close to the Shoreham EPZ, including North Shore Christian, Infant Jesus, St. Isidore, Mercy High School, St. David, St. John the Evangelist and Yaphank Christian. To transport all our children requires three bus runs by each driver, both in the morning and the afternoon, in addition to the midday kindergarten and split session bus routes which must be driven. Our drivers cover 638 different bus routes, over which more than 11,740 stops are made. We do not have enough drivers or buses to transport all our children at the same time.

East Meadow Union Free School District

A. (Koenig) As Superintendent of East Meadow Union Free School District, I am responsible for the overall operation of the school system. I implement the educational and administrative policies for the District, which are established by the East Meadow School Board. The East Meadow District has approximately 7,000 students enrolled in its eight schools. The District is located in Nassau County, New York, several miles from the Nassau Coliseum and Nassau Community College, which LILCO has designated as school reception centers.

I am charged with implementing the District's policies with respect to the transportation of schoolchildren. Our policy is consistent with the policies described above: our children are permitted to be transported only by drivers who have been personally approved by me. I base my approval on the recommendations of our Transportation Director.

Mt. Sinai School District

A. (Petrilak) As a member of the Mt. Sinai Board of Education, I participate in the development of policies to be implemented by schools within the District. Part of my job as a School Board member necessarily concerns devising and implementing policies that ensure the safe transportation of school-

children to and from the two schools located within the Mt. Sinai District, as well as the transportation of our high school students to and from the school they attend in Port Jefferson. We also transport pupils to 21 private and parochial schools both inside and outside the 10-mile Shoreham EPZ.

Our transportation policy requires that all drivers be approved by the District's Superintendent before they are permitted to drive our children. Further, our bus contractor is not authorized to allow unapproved personnel to operate buses under contract to our District.

All Mt. Sinai schoolchildren are transported by bus to and from school each day; in other words, none of our children walk to school. Mt. Sinai relies on contract buses in order to transport its children. A total of 2,350 students are transported, including 976 elementary students, 684 junior high students, 572 senior high students and 118 private and parochial school students. We have a total of 27 full capacity buses (19 have 22 seat and eight have 20 seats) and 27 drivers, plus five substitute drivers, under contract with the Harborview Coram Bus Company. Most of our drivers are women who live within or relatively close to Mt. Sinai. Twenty-six buses are used to transport the public schoolchildren and 11 eight seat mini-vans are used in the transportation of the private and parochial school

students. The District uses one mini-van to transport children with special needs.

For our 27 full capacity buses, we use the same capacity numbers mentioned by Mr. Rossi, Mr. Doherty and Mr. Smith: never more than two students per seat except for elementary students on trips under 10 miles. We do not have enough buses and drivers to transport all our children at the same time. Each driver must make two bus runs, in addition to the kindergarten runs, every morning and again in the afternoon in order to accomplish the transportation of our pupils to 24 different schools.

The primary responsibility for training the bus drivers who transport our children and for maintaining our buses rests with our bus contractor. The Mt. Sinai Transportation Director, Ms. Gail Litsch, however, personally interviews every driver, conducts safety seminars, and ensures that the buses are properly maintained and that all drivers undergo extensive training prior to ever transporting children. She also ensures that all drivers attend regular bi-annual refresher training courses.

Q. You have discussed bus driver training. What is the most important aspect of such a training program?

A. (Rossi, Doherty, Smith, Petrilak) Without question, the most essential component of effective bus driver training is

on-the-job training during which the drivers actually transport children. Classroom training and instruction regarding bus driving, without children present, are important, but clearly insufficient. It is only when you have been trained and are experienced in transporting 40 or more children day after day that you learn the practical aspects of safe school bus operation.

Accordingly, we include extensive supervised on-the-job training for all our drivers. We permit no drivers to transport children on their own until they have been trained and observed in real world, on-the-job driving on multiple occasions, including observation of defensive driving practices. It is our understanding that LILCO's drivers will have had no such training.

It should also be emphasized that, in addition to the basic training, testing, interviews, criminal record checks, and physical examinations described in this testimony (which must be carried out for a person to qualify initially to become a bus driver), each of our Districts -- and we believe all other school districts as well -- carry out regular training of bus drivers throughout the year.

(Smith) For example, the Longwood Central School District provides refresher courses twice a year for both its

regular and substitute drivers. Refresher I must be completed by all drivers before the opening of school in September. This in-service program provides a review of bus driver responsibilities, and pertinent rules, regulations, laws, and local policies and practices. Topics for discussion include, but are not limited to, safety measures, accident prevention, pre-trip inspection and current developments in pupil transportation. Refresher II also must be completed by all drivers on an annual basis, and in no event later than January 31 of each year. Refresher II includes review of safe winter driving practices, as well as changes in laws, rules and regulations, and local policies and practices.

In addition to the bi-annual refresher courses, I typically hold additional meetings during the course of the school year to emphasize safety. This year, for instance, I have already held two such meetings to discuss driver training and student discipline. Our drivers also sit down each year with the contractor to review their driving record from the previous year.

(Rossi) All our drivers, contract and District, are also required to complete a refresher course twice each year; Refresher I is provided before the schools open and Refresher II is provided before February 1 of each year. The same topics covered by Longwood are also covered in Middle Country. In addition, we provide instruction on railroad crossings and field trip procedures, student discipline, accidents and accident

liability. I also hold a third meeting each year to discuss various safety related topics and policy concerns and to conduct the testing necessary for our drivers to remain certified to drive our buses. I frequently show films to emphasize particularly important topics. At the beginning of each school year, I sit down with each driver to discuss their driving record from the previous year and any job related concerns those drivers may wish to discuss with me. I do all this to ensure the safe transportation of our schoolchildren.

(Doherty) My drivers also must attend two refresher courses, one before schools open and the other in the winter. I emphasize all the same topics covered in the Longwood and Middle Country refresher courses. In addition, I hold periodic mini-meetings throughout the year and typically review safety related procedures and policy concerns. We have a safe driving awards program to enhance our drivers' safety awareness and to recognize safe driving.

(Petrilak) Mt. Sinai drivers also must undergo compulsory refresher courses twice each year. Similarly, the Mt. Sinai Transportation Coordinator sits down with our contract drivers at the beginning of each school year to review their driving record from the preceding year.

(Rossi, Smith, Doherty, Petrilak) To ensure the safe transportation of our schoolchildren, we must make certain that our drivers maintain the high standards expected by our Districts and the parents of our children. Thus, in addition to the refresher courses we hold twice a year, we require our drivers to do other things as well. Our drivers must undergo a physical examination and perform satisfactorily on a behind-the-wheel, oral and/or written examination every year. In addition, a motor vehicle license inspector must observe annually the defensive driving performance of each and every one of our drivers.

Q. You have each discussed your involvement in the transportation policies of your School District. How important is transportation policy?

A. (All). Very important. School bus-related accidents often lead to injuries and deaths of schoolchildren in this country each year. We are aware that accidents may result from the following avoidable causes: lack of attention to training of drivers, over-crowded buses, lack of student control when getting on or off buses, crowded bus parking areas, defective equipment, and similar problems. In an effort to avoid these problems, our School Districts have made the safe transportation of our children high priority matters. We have adopted stringent standards because transporting children is not easy and cannot be performed by just anyone. Because we have stringent require-

ments, which in some respects may even exceed the particular requirements specified by New York State law for the transportation of schoolchildren, we have fine safety records. We have, over the years, rejected many persons who have sought to become drivers. For many reasons, including driving ability and temperament, we have concluded that some prospective drivers are not acceptable. We insist upon the proper training of drivers and proper maintenance of school buses.

The parents of our schoolchildren have insisted that we maintain these high standards. When there is a transportation problem, such as a bus driver unable to find a home or a driver who cannot maintain order on the bus, we hear about it from our parents. They become concerned for the safety of their children.

Q. Have your Districts taken a position regarding the Shoreham plant and/or LILCO's plans for protective actions for schoolchildren?

A. (Brodsky, Rossi) Yes. The Middle Country Central School District first established its position in 1983. At that time, Middle Country, after Board of Education public meetings and meetings with the Middle Country Parents Teachers Association, determined that the District could not adequately evacuate or otherwise protect its children in the event of a serious

Shoreham emergency. LILCO assumed that schools could utilize existing resources and snow emergency early dismissal plans in order to get children home or to relocation centers during a Shoreham emergency. We concluded, however, that the limited road network on Long Island, combined with our limited resources, the likelihood that school personnel, including bus drivers, would experience role conflict, the lack of parental or adult supervision of children in the event of an early dismissal or any supervision in the event of evacuation, the lack of adequate school buildings to provide safe sheltering for our children, as well as parents' desires to reunite with their children at the schools, made effective planning impossible. For these reasons, the District decided in 1983 that LILCO's planning for schools was unworkable and failed to adequately protect the safety of the District's schoolchildren. Middle Country set forth these reasons for its opposition to LILCO's Plan in a Middle Country School District Board of Education Resolution dated November 7, 1983, which is Attachment 9 to this testimony, and was included in testimony previously submitted in this Shoreham proceeding. See Jeffers and Rossi, ff. Tr. 3087, Att. 1 (January 25, 1984). That resolution continues to represent our District's policy.

(Nuto, Smith) We are also familiar with the position taken by our School District in opposition to the LILCO Plan as it relates to schools, as evidenced by a resolution passed by the Middle Island Central School Board (now the Longwood Central

School District) on September 29, 1983. See Attachment 10 hereto and the testimony previously submitted in this Shoreham proceeding (Muto and Smith, ff. Tr. 3087, Att. 1 (January 25, 1984)). After a review of the schools-related provisions of LILCO's Plan, the District concluded at that time that it could not safely or successfully implement early dismissal, evacuation, or sheltering for a variety of reasons, including the role conflict which would be experienced by school personnel. That September 29, 1983 resolution continues to represent our District's position regarding LILCO's Plan.

(Petrilak) The Mt. Sinai School District has also been concerned with matters related to emergency planning for Shoreham since 1983. In 1983, after public meetings and hearings, the Mt. Sinai Board of Education determined that it could not safely evacuate or otherwise protect its children during a Shoreham emergency. A copy of our resolution, dated October 18, 1983, and a copy of an undated resolution are Attachment 11 hereto. These resolutions were also included in testimony previously submitted in this proceeding. See PetrilaK, ff. Tr. 3087, Att. 1 (January 25, 1984. The Mt. Sinai Parents Teachers Organization and the Mt. Sinai Teachers Association concurred with the conclusion reached by the Board of Education, and those resolutions are included in Attachment 11.

More recently, the Mt. Sinai Board of Education reviewed LILCO's single-wave school evacuation plan, as set forth in Revision 9 of LILCO's Plan. The Board also found this new LILCO plan to be inadequate, and determined that Mt. Sinai would not allow LILCO employees to transport its schoolchildren in the event of a Shoreham emergency. The Board also determined that it would not authorize Mt. Sinai's bus contractor to allow LILCO employees to use the buses under contract to the District in the event of a Shoreham emergency. A copy of this resolution, and another resolution authorizing me to represent the Board of Education in this proceeding, both dated March 15, 1988, are included in Attachment 11 to this testimony.

(Suprina) The Riverhead Central School District has passed no formal resolution taking a position on Shoreham. The District's Board of Education, however, has been advised by me of my testimony herein, and has approved my participation.

(Koenig) The East Meadow District has taken no formal position on Shoreham, except to advise the Red Cross and LILCO that our schools cannot be used as congregate care centers in a Shoreham emergency.

II. Purpose of Testimony and Summary of Conclusions

Q. What is the purpose of your testimony?

A. (All) We are providing testimony regarding whether EPZ school districts have sufficient school bus drivers and buses to carry out protective actions for schoolchildren in the event of a Shoreham accident. Specifically, our testimony addresses the single-wave evacuation of EPZ schools proposed by LILCO in Revision 9 of its emergency plan, as well as the early dismissal of schools proposed by LILCO. The issue concerning the availability of school bus drivers arises in the context of potential "role conflict" among such drivers.

Q. What contention is addressed in this testimony?

A. (All) Contention 25.C which states:

Intervenors contend that the LILCO Plan fails to comply with 10 CFR §§ 50.47(a)(1), 50.47(b)(1), and 50.47(b)(3), because the Plan fails to address the problem of emergency worker role conflict. Intervenors contend that a substantial number of the emergency workers relied upon under the LILCO Plan will resolve such conflicts by attending to their other obligations prior to, or in lieu of performing the emergency functions assigned to them by LILCO. In the absence of such workers, the LILCO Plan cannot and will not be implemented, and there can be no finding of compliance with 10 CFR §§ 50.47(a)(1), 50.47(b), and NUREG-0654 § II. The emergency workers likely to experience role conflict, the type of conflict, and the effect of such conflict upon the implementability of the

LILCO Plan are set forth in Sections A-F below.

* * *

Contention 25.C. The LILCO Plan fails to take into account the role conflict that will be experienced by school bus drivers. In fact, a substantial number of school bus drivers are likely to attend to the safety of their own families before they report (if they report at all) to perform the bus driving duties which LILCO assumes will be performed. Role conflict of school bus drivers will mean that neither school buses nor school bus drivers will be available to implement the LILCO Plan. Without an adequate number of buses or bus drivers, LILCO will be incapable of implementing the following protective actions:

1. early dismissal of schools (necessary under the LILCO Plan to permit schoolchildren to be sheltered or to evacuate with their parents);
2. evacuation of schools.

Q. What do you mean by "role conflict" in the context of this contention?

A. (All) Role conflict describes the situation whereby an individual is confronted with contradictory demands on his or her sense of loyalty as a result of membership in different groups. In the context of this proceeding, an emergency at Shoreham would present the following conflict: whether a bus driver, on being alerted to the fact of a Shoreham emergency, would first drive his or her bus in order to evacuate or early dismiss schoolchildren; or whether the driver would attend first to the safety of his or her own family members or his or her own safety.

III. LILCO's Plan for School Evacuation

Q. What do you understand is proposed by Revision 9 of LILCO's Plan, with respect to school evacuation and the potential role conflict problem among school bus drivers under contract to and employed by the school districts?

A. (All) In a serious emergency at Shoreham, LILCO proposes to carry out a single-wave evacuation of all EPZ schools. By single-wave evacuation, we mean that LILCO proposes to evacuate all the schools within the 10-mile EPZ at about the same time (assuming an evacuation of the entire EPZ were recommended), by utilizing enough buses and drivers so that each bus and driver would be used only once.

Q. How many buses and drivers would be required for such a single-wave evacuation?

A. (All) It is our understanding that one of LILCO's school witnesses, Mr. Crocker, stated during his deposition that 477 drivers and buses would be required. See Deposition of Douglas Crocker (February 2, 1988) (hereafter, "Crocker deposition") at 85. According to Mr. Crocker, LILCO assumes 60 students per bus for elementary and junior high students and 40 students per bus for high school students. Id. at 160-62. Apparently, Mr. Crocker was referring to the number of buses that

would be needed to evacuate all public schools, nursery schools, and private and parochial schools within the EPZ. Id. at 85. At least, LILCO's Plan also indicates that the number of buses that would be required for evacuation would be 477, broken down as follows: 448 for public schools; 15 for nursery schools; and 14 for private and parochial schools. Thus, according to the LILCO Plan, a total of 477 buses would be needed to evacuate all schools within the EPZ in a single wave. See LILCO Plan, OPIP 3.6.5, Attachment 3a. For purposes of this testimony, we will use the 477, 60- and 40-passenger bus figure set forth in LILCO's Plan as a basis for our evaluation of LILCO's proposed single-wave evacuation.

Q. Do the schools in the EPZ have sufficient regular school bus drivers to carry out the single-wave evacuation proposed by LILCO?

A. (All) No, but the exact extent of the shortfall is unclear. According to Mr. Crocker, LILCO believes that the EPZ school districts have available to them 356 regular school bus drivers and buses, i.e., those drivers regularly employed by or under contract to the school districts. Crocker deposition at 86. According to LILCO's Plan, however, the EPZ schools only have 324 buses available to them. See LILCO Plan, OPIP 3.6.5, Attachment 3a. Thus, depending upon whether LILCO's witness or

its Plan is relied upon, the shortfall of buses and drivers is between 121 and 153.

Q. How does LILCO intend to compensate for this shortfall of drivers and buses?

A. (All) LILCO proposes to use its employees to make up for the shortfall. Under LILCO's Plan, it is assumed that the schools' 324 or 356 regular drivers would use their regular buses to pick up schoolchildren at the schools and transport them to either the Nassau Community College or the Nassau Coliseum, or to some other location if the schools should so direct. At the same time, LILCO proposes to provide a sufficient number of its own employees (either 121 or 153 LILCO drivers) to pick up additional buses at bus yards, proceed to schools, pick up the schoolchildren, and proceed to the Nassau Community College or the Coliseum. In this way, LILCO assumes that all schoolchildren could be evacuated in one wave.

Q. What does LILCO propose to do if some or all of the schools' regular drivers are not available to drive?

A. (All) Should some or all of the regular school bus drivers fail to drive their buses, LILCO proposes to provide additional LILCO personnel to drive the buses normally driven by the regular drivers. The LILCO drivers would pick up each school

district's regular buses at the district's regular bus yard(s) -- such as at the Riverhead bus yard in Riverhead or, for Longwood, at the contractors' bus yards in Middle Island and Yaphank. The LILCO drivers, driving either the school districts' "regular" buses (or one of LILCO's "supplementary" buses), would consult a "packet of instructions" provided by LILCO to determine the directions to the designated schools, and then would drive to the schools ordinarily serviced by the non-available regular drivers to pick up the schoolchildren and drive them to the Coliseum or the Nassau Community College. In this way, with a combination of regular and LILCO drivers -- or solely with LILCO drivers, if no regular school bus drivers reported to the bus yards -- LILCO suggests that a single-wave evacuation of all EPZ schools could be carried out.

Q. Do you agree with LILCO that there are insufficient regular buses and drivers for the schools themselves to carry out a single-wave evacuation?

A. (All) Yes, we agree that there are insufficient regular buses and drivers for the schools themselves to carry out a single-wave evacuation of their schoolchildren. This point has previously been addressed in Section I above. Several additional points need to be emphasized, however.

First, we do not have enough regular buses and drivers to transport all schoolchildren who regularly ride buses at a single time. That is why multiple school bus runs are used in both the morning and the afternoon in transporting schoolchildren to and from our public, parochial and private schools. Even then, it must be recognized that some students in most districts walk to school. In a Shoreham evacuation, the normal bus resources (assuming they are available) would presumably be used to transport all students, not just the regular riders. Thus, it is clear that we do not have an adequate number of buses or bus drivers to implement a single-wave evacuation of our schools. Indeed, based upon our knowledge of the schools on Long Island, it is our opinion that no school district has sufficient resources to transport all its students at the same time.

Second, we disagree with the figures set forth in LILCO's Plan regarding the number of children who attend the EPZ schools and would need to be transported. For example, for the Ridge Elementary School in the Longwood Central School District, LILCO's Plan indicates that 1,275 students are enrolled, and that, of these, 1,211 would require evacuation transportation. See LILCO Plan, OPWP 3.6.5, Attachment 3a. By using the lower figure of 1,212 students, LILCO assumes that 21 buses, carrying an average of 58 children, would be sufficient to evacuate the Ridge Elementary School. It would have been more appropriate, however, for LILCO to have used the larger 1,275 enrollment

figure as the basis for determining transportation needs, since this is the total school enrollment figure. Using the total enrollment figure, each bus would have to carry 61 elementary children on the long trip to Nassau County (which would not be acceptable, as discussed elsewhere in this testimony). There are several reasons. Enrollment at our schools constantly increases. Further, it is simply not possible to predict on any particular day how many children will be absent from school. To be prudent, therefore, the higher enrollment figure should have been used by LILCO in calculating the number of buses potentially needed to evacuate the Ridge Elementary or any other school.

Moreover, LILCO's use of enrollment figures that are lower than that of total enrollment is all the more in error because LILCO has generally understated the actual school enrollment figures for the EPZ schools.

(Muto, Smith) LILCO states in OPIP 3.6.5, Attachment 3a, that 8,673 students attend our six public schools. In actuality, 9,465 students attend these schools.^{1/}

(Suprina, Doherty) LILCO states (also in OPIP 3.6.5, Attachment 3a) that 2,669 students attend our four schools located within the EPZ. We have 2,705 students attending those schools.

^{1/} This figure does not include those students that walk to and from school and would be higher were these students included.

(Petrilak) LILCO's Attachment 3a to OPIP 3.6.5 neglects to include our high school students attending school in Port Jefferson. The total Mt. Sinai student enrollment including these students is 2,332, not 1,830 as stated by LILCO.

(All) In fact, LILCO has used estimated enrollment numbers with respect to every EPZ school listed in LILCO Plan, OPIP 3.6.5, Attachment 3a. If actual enrollment numbers were used for the EPZ schools, many schools would not meet the 40/high school and 60/other school capacity figures used by LILCO to calculate the number of buses and drivers needed to implement LILCO's proposed single-wave evacuation. Indeed, even if the estimated enrollment figures set forth in LILCO's Plan are used, it is clear that LILCO has underestimated the number of buses needed to evacuate the EPZ schools. As a result, LILCO's bus numbers would require more children per bus than LILCO claims would be the case. Using LILCO's estimated enrollment figures, the over-capacities are as follows:

<u>High Schools Exceeding 40/bus</u>		<u>Additional # of Buses Needed to Get Back to 40/Bus</u>
Shoreham-Wading River	52.53/bus	5 more buses
Rocky Point Jr./Sr. High	52.17/bus	7 more buses
Longwood	52.19/bus	11 more buses
Miller Place	50.44/bus	4 more buses
Vandermeulen High	52.27/bus	7 more buses

Comsewogue High	52.11/bus	7 more buses
Riverhead	50.95/bus	5 more buses

<u>Elementary and Jr. Highs</u> <u>Exceeding 60/bus</u>		<u>Additional # of</u> <u>Buses Needed to</u> <u>Get Back to 60/Bus</u>
Shoreham-Wading River Middle	62.25/bus	1 more bus
Joseph A. Edgar	61.11/bus	1 more bus
Ridge Elementary	60.71/bus	1 more bus
West Middle Island Elementary	62.00/bus	1 more bus
Coram Elementary	61.93/bus	1 more bus
Longwood Middle/Jr. High	60.90/bus	1 more bus
Charles E. Walters Elementary	61.29/bus	1 more bus
North Country Road	60.71/bus	1 more bus
Andrew Muller Primary	60.46/bus	1 more bus
Mt. Sinai Jr.	61.71/bus	1 more bus
Mt. Sinai Elementary	60.37/bus	1 more bus
Port Jefferson Elementary	62.55/bus	1 more bus
Clinton Avenue Elementary	61.50/bus	1 more bus
Eagle Elementary	62.61/bus	1 more bus
South Street	62.50/bus	1 more bus
Dayton Avenue	60.71/bus	1 more bus
Pulaski Street Elementary	60.44/bus	1 more bus
Riverhead Jr. High	62.91/bus	1 more bus

The foregoing figures indicate that LILCO has significantly underestimated the number of buses needed to effect a single-wave evacuation of our schools. In fact, LILCO has underestimated by at least 64 buses. This means that the single-wave evacuation proposed by LILCO is unimplementable on its face.

Third, the degree of underestimation is, in fact, greater than 64 buses. LILCO's assumption of 40 high school students per bus on a trip to Nassau County appears appropriate for 20-seat buses. The estimate of 60 junior high and elementary students per bus is not appropriate. For elementary students, 60 students per 20-seat bus (i.e., three per seat) would be very crowded and, inappropriate for a long trip. For junior high students, 60 students per 20-seat bus (i.e., three per seat) would be too many even for a short trip. Sixty students per 20-seat bus means that each student has only 13 inches of rump space. Junior high students are not small and would not be able to fit three per seat. Moreover, during the winter months students would be wearing bulky coats, which always take up considerable space.

(Petrilak, Doherty, Smith) In our experience, one must be careful about crowding buses even under the best of circumstances. A crowded bus leads to extra noise and confusion, which is very distracting to the driver and poses a potential safety hazard. We are very careful to monitor crowding and would permit it, if at all, only on short trips involving the trans-

portation of elementary students (10 miles or 20 minutes or less) and only when there are several adults, besides the driver, to monitor the situation. For any trip over 10 miles, we would never load the bus three per seat, but would always place only two students per seat, regardless of the age or size of the students. We would never allow a crowded bus on a long trip, such as to the Nassau Coliseum, no matter how many adults were along. For such a long trip -- especially in the possibly congested conditions of a Shoreham evacuation -- we would not permit more than two children per seat of any age or a maximum of 40 children per bus. LILCO's plan to have 60 children per 20-seat bus is not acceptable and is not safe.

(All) Finally, LILCO's bus figures are inaccurate in that they overstate the number of regular 20-seat buses available to the schools. According to the LILCO Plan, Mt. Sinai School District currently has contracts for the use of 30 buses, Riverhead School District owns 47, and Longwood Central School District contracts for the use of 100 buses. LILCO Plan, OPIP 3.6.5, Attachment 3a. Leaving aside our strong disagreement with LILCO regarding the number of students that can be put safely on any of these buses, these figures are still not accurate.

(Petrilak) Mt. Sinai has contracts with Harborview Bus Company for only 27 buses, not 30 buses. All 27 buses have either

20 or 22 seats. Of these 27 buses, 26 are available for the transportation of public schoolchildren.

(Doherty) Riverhead owns 56 buses of which only 39 are 20 or 22 seat, full-size buses, not 47 as LILCO states in its Plan. Of these 39 regular school buses, only 28 are readily available for the transportation of public schoolchildren. The remaining 13 full passenger capacity buses are devoted to the transportation of private and parochial schoolchildren.

(Smith) Longwood has contracts with Suburbia Bus Company for 89 20-seat buses, not 100 buses. Of those 89 buses, only 70 are available for the transportation of public schoolchildren.

(All) In sum, therefore, not only do the schools not have enough buses to transport students in a single wave themselves, but LILCO has underestimated the number of buses that would be required and has overestimated the number of buses and drivers that would be available. As a result, we find LILCO's Plan seriously deficient.

IV. Availability of Regular Bus Drivers

Q. LILCO's Plan begins with the premise that the EPZ school districts' regular bus drivers -- 324 to 356 in number -- or at

least many of them, would be available and willing to drive in the event of a Shoreham emergency requiring evacuation. Do you agree with that premise?

A. (All) No. For a variety of reasons, it is unlikely that we would be able to get many of our regular drivers to the schools promptly were an emergency at Shoreham to occur. First, unlike an early dismissal due to inclement weather, when drivers are aware that the weather is bad and that an early dismissal may be considered, our drivers might have no forewarning of a Shoreham emergency that necessitates evacuation. In that circumstance, it is unlikely that we would be able to contact many of our drivers. School bus drivers are not at schools or at their bus companies on a full-time basis. Once they finish their morning runs, the drivers normally are free until their afternoon runs, unless they have noon kindergarten runs or special activities runs. We might be able to reach them if they were in a bus equipped with a radio. We also might be able to reach them if they were at home and if the telephone circuitry were not overloaded, as might well be the case in the event of a Shoreham emergency. Otherwise, however, they could not be reached. You have to expect under these circumstances that many of our regular bus drivers would not be at home and could not be reached if needed.

Second, assuming that we would be able to contact our bus drivers either at home, at bus yards, or while they were in their

buses, it is our strong belief that many drivers would refuse to drive their buses -- at least until they assured themselves that their families were not in danger. Virtually all of the EPZ drivers reside in or near the area of risk surrounding the Shoreham plant. We think it likely that during an emergency, the first and foremost concern of most people living in this area, including our school bus drivers, would be to ensure that family members and friends are transported safely out of the danger zone. Thus, rather than report first to drive buses, the drivers would most likely go first to attend to the needs of others.

Our school bus drivers are part-time employees of the school districts or bus companies, not full-time, professionally trained emergency workers. As such, they are not, nor could we expect them to be, committed to tending to the needs of their part-time employer rather than to the safety of their family members or loved ones during a Shoreham emergency. It is simply not rational in our opinion to suggest that part-time school bus drivers would determine that, in an emergency, his or her commitment to the school district would outweigh the commitment and responsibility owed to his or her family.

To our knowledge, there exist various data which support our views regarding the potential for role conflict among our bus drivers. For example, we are aware that in 1986, 255 school bus drivers from school districts in or near the 10-mile Shoreham EPZ

signed statements attesting to the fact that they would not drive their buses in the event of a Shoreham emergency. See Attachment 12 to this testimony, which includes a representative copy of the statements that were signed, and a breakdown of the number of bus drivers from each school district that signed statements.

We also are aware of a survey conducted of trained emergency workers during 1982 (volunteer firefighters), that indicated that many of these trained emergency workers would attend to the safety of their families in the event of a Shoreham emergency before reporting to perform their firefighting roles. We also understand that Suffolk County recently had a similar survey conducted, which revealed that a clear majority of firefighters would continue to resolve the role conflict dilemma in favor of caring for their families. See Testimony of Stephen Cole, Ralph H. Turner and Alan H. Barton on the Remand of Contention 25.C--Role Conflict of School Bus Drivers (April 13, 1988). It would be unrealistic to expect more of part-time school bus drivers than could be expected of trained emergency workers, such as firefighters.

We are also aware of another survey which was conducted in 1982. This survey questioned school bus drivers employed by school districts located within the 10-mile EPZ, and found that 69 percent of the drivers queried would first ensure that their families were safely out of the EPZ before reporting to drive a school bus. Based upon the previously referenced bus driver

statements of 1986, where 255 bus drivers indicated that they would not drive a bus during a Shoreham emergency, we believe the number who would not report to drive is actually higher than indicated by the 1982 survey.

Finally, it should be noted that a vast majority of our school bus drivers are women, many of whom are of child-bearing age. It is our understanding that LILCO advises its women LERO workers who might be pregnant to consider carefully whether to enter the EPZ. Indeed, LILCO gives them the option to be assigned to jobs outside the EPZ. LILCO Plan, OPIP 3.6.4, Attachment 2; Crocker deposition at 115-18.^{2/} Our women bus drivers would have to be given the same choice. If given that choice, we believe their overwhelming decision would be to leave the EPZ and not to drive our buses.

(Brodsky, Rossi) In 1983, Middle Country performed a survey of bus drivers under contract to and employed by the District, to ascertain whether they would drive buses during a Shoreham emergency. The results of this survey indicated that a majority of our drivers would suffer severe role conflict, if they had to choose between their duty to the District's schoolchildren and their duty to the safety of their own families. Sixty-two responses were received. Among the 62 respondents, only three

^{2/} Curiously, all prior versions of LILCO's Plan stated that all LERO women of childbearing age should not accept assignment within the EPZ.

drivers indicated that they would report to work before ensuring the safety of their own families. Fifty-nine respondents stated that they would first attend to the needs of their own families in the event of a Shoreham emergency.

(Petrilak) An informal survey of Mt. Sinai employees conducted by the Mt. Sinai Teachers Union in 1983 also indicated that role conflict would be a serious problem during a Shoreham emergency.

(All) In sum, it is our strongly held view that a large number of regular school bus drivers would not be available to drive in the event of a Shoreham emergency, either because they cannot be reached or because of role conflict. Thus, for a single-wave evacuation to be possible, it would have to be effected through the use of LERO drivers. Our school districts, however, would not permit LERO drivers to transport our schoolchildren.

V. There Will Be No Implementation of LILCO's
Proposal for LERO to Drive School Buses

Q. Based on your earlier answers, it is clear that your Districts could not implement a single-wave evacuation of schoolchildren using your regular buses and drivers. If LERO drivers arrived at your bus yards and offered to drive the buses owned by your District or buses under contract to your School District, or

if LERO drivers arrived at your schools with school buses, would that make a single-wave evacuation possible?

A. (All) No.

Q. Why not?

A. (All) There are at least three reasons. First, the school districts would not permit LERO personnel to drive their buses or to transport their schoolchildren. Second, there is no basis, and in fact LILCO is wrong in assuming, that the buses regularly used by the school districts would necessarily be at the bus yards, even if it is assumed for purposes of this testimony that the schools would permit LILCO to use their buses if they were available. Third, LILCO's school evacuation plan is seriously unrealistic from a logistical point of view; it simply cannot work. We discuss each of these matters below.

Schools Would Not Permit LERO Personnel
to Drive Their Children

(All) It would be contrary to our settled transportation policies to permit unapproved LERO personnel to transport our children. We would not allow that to happen, even in the event of a serious Shoreham emergency.

(Brodsky, Doherty, Muto, Petrilak, Rossi, Smith, Suprina) First, we do not believe that LILCO employees would be able to safely and efficiently transport schoolchildren from the schools to reception centers in an emergency. As discussed previously, the safe transportation of schoolchildren requires extensive training, plus extensive actual experience. School districts typically provide at least 40-50 hours of training to drivers just during their first year on the job. Drivers are instructed in how to operate a bus and how to handle children. Training includes behind-the-wheel instruction in the operation of a bus, instruction regarding defensive driving techniques and driving under inclement weather conditions, classroom training, instruction in child psychology, first aid, and how to safely transport schoolchildren during inclement weather conditions. In addition, training and special instruction are provided to those who will be transporting handicapped children. Drivers also must become familiar with bus routes during their training. Before our drivers are allowed to transport children, they must be certified in accordance with State law provisions to be morally and physically qualified, as well as competent to transport schoolchildren. Accordingly, the transportation directors of our Districts personally interview and screen each and every driver candidate for our Districts. The District Superintendents must approve the moral fitness of each and every driver for their respective District. We also require our drivers to submit character references and undergo fingerprinting so that we may

ascertain whether any applicant has a criminal record. The parents in our Districts expect and demand that the kinds of precautions we have described are taken, so that it can be reasonably assumed that the drivers to whom we entrust their children are qualified to safely and proficiently discharge their duties as school bus drivers. LERO personnel will not have met these requirements. Thus, we could not permit them to transport our schoolchildren.

(All) Further, we must emphasize that a critical part of training is the actual experience that can be gained from driving children. The transportation of schoolchildren is not an easy or routine task in the best of circumstances. The drivers must learn, for example, to deal with children in a crowded and sometimes chaotic situation. With experience, it is possible to learn how to cope with and handle such situations. Moreover, it is our opinion that, as a general proposition, the successful drivers are the ones that the children come to know and trust. This probably explains why we often have difficulties with substitute drivers, even though our substitutes all have had extensive training. They simply do not have the day-to-day, first-hand experience that is necessary and the children do not know them as well as the regular drivers. LILCO's "substitutes" present a far greater problem.

It is our opinion that the training that will allegedly be provided by LILCO to the LERO personnel designated to drive school buses is inadequate. According to LILCO, LERO personnel will attain a license to drive a bus and will attend four hours of classroom training concerning emergency planning and the Shoreham plant. In our opinion, LILCO's employees, if trained by LILCO in this manner, would be incapable of safely transporting our school-children. The recent Licensing Board decision (LBP-88-2), which questioned the adequacy of LILCO's training program in general, reinforces our belief that LILCO's training program is deficient. We could not give assurance to our parents that LILCO's drivers are either qualified or competent to safely transport school-children. In these circumstances, we would refuse to permit LILCO's drivers to transport our children.

We are aware that LILCO proposes to have school teachers or other school personnel travel on LERO-driven buses along with the LERO drivers and evacuated schoolchildren. This is no solution. There still would be an unapproved LILCO employee driving the bus. Further, teachers and other personnel would likely be as subject to role conflict as other personnel. In our opinion, it is not reasonable to believe that as many as 477 (actually more would be needed when LILCO's underestimation is corrected) school personnel would agree to accompany LILCO's drivers during a Shoreham emergency (assuming the necessary buses are made available to LILCO). Thus, in accordance with LILCO's provisions, and even assuming

buses were available, some of our children would be riding unsupervised and under adverse conditions on overcrowded buses driven by a LILCO employee for 30 or 40 miles. This is unacceptable.

There is a further reason why we could never agree to permit LERO personnel to transport our schoolchildren. LILCO's Plan calls for the buses to carry our students to the Nassau Coliseum or the Nassau Community College. But LILCO's Plan is based on the assumption that the Nassau County Executive would give permission to LILCO to use these facilities as relocation centers for the approximately 28,000 children who attend public schools within the Shoreham 10-mile EPZ. LILCO Plan, Appendix A, at II-20, II-20a. In fact, however, the Nassau County Executive, Mr. Gulotta, has made clear that these facilities are not available for LILCO's use. See Attachment 13 hereto, which contains a copy of Mr. Gulotta's letter to W. Catocosinos, LILCO's Chairman, dated March 15, 1988, a copy of his letter to the NRC dated July 1, 1987 and a copy of the Nassau County Board of Supervisors Resolution dated June 16, 1986. We would never allow our children to be transported to facilities whose availability is so uncertain.

Further, the LILCO Plan offers no adequate assurance that even if "permission" were obtained to use the Nassau Community College or Coliseum, that those facilities would be appropriate relocation centers for schoolchildren. LILCO proposes to send up

to 28,000 children to those facilities. LILCO's bus drivers would be given responsibility for supervising the children both on the buses and at the facilities, once reached. Even if teachers, who would also be subject to role conflict, rode on the buses, they would be in no better position than LILCO's personnel to supervise such a large number of children under the circumstances that would likely exist in the event of a radiological emergency.

Moreover, the LILCO Plan contains no provision for the decontamination or monitoring of schoolchildren prior to their arrival at the Coliseum or the Community College. As a result, even if our students would somehow manage to escape uncontaminated from the EPZ, they would again face the risk of contamination from contact with contaminated persons relocated to, but not decontaminated or monitored at the Coliseum or Community College. As children are reported to be particularly susceptible to the harmful effects of radiation, this lack of planning for decontamination and monitoring is serious.

The LILCO Plan also lacks adequate provision for reuniting parents with schoolchildren at the relocation centers. Should children actually be transported pursuant to the LILCO Plan, parents would not readily know to which, if any, relocation center their child had been taken. It is easy to imagine the chaos and confusion that would result from parents converging upon the LILCO-designated relocation centers, in an effort to locate their

children among 28,000 other children. In some instances, brothers and sisters will likely be relocated to different facilities.

(Petrilak) In Mt. Sinai, for example, LILCO proposes that all elementary and junior high students are to be relocated to the Community College; an older brother or sister attending high school, however, would be relocated to the Coliseum, thereby further complicating any attempt by parents to reunite with children.

(All) LILCO's Plan also overlooks the fact that most of our Suffolk County school buses would be prohibited from entering Nassau County. A 1987 Nassau County law makes it illegal for an unlicensed Suffolk County bus to enter Nassau County. To obtain a license, an applicant must pay a license application fee, comply with a variety of requirements including supplying information regarding the bus owner(s) and all bus drivers, in addition to submitting all buses for which a license is sought to a Nassau County official for extensive inspection and testing. Only a handful of our buses have been licensed to enter Nassau County.

(Doherty) Eighteen of our buses are licensed to enter Nassau County.

(Petrilak, Rossi, Smith) None of our buses is licensed to enter Nassau County.

(All) There is an additional reason as well why we would not and could not permit LERO drivers to transport our schoolchildren. It appears to us that LILCO has been somewhat less than entirely straightforward in its approach to the school evacuation issue. Our school districts have recently received letters from LILCO concerning LILCO's Revision 9, particularly as it pertains to schoolchildren. The letters purport to set forth what would happen in the event of a Shoreham emergency, including a portrayal of the actions of Suffolk County. Our review of the letters raises a serious question in our minds, as to their accuracy. Suffolk County has previously made clear that it does not intend to follow the LILCO Plan in the event of an emergency. Further, we have received a letter from Suffolk County Executive Patrick Halpin, which responds in part to LILCO's characterizations of likely County action in the event of a Shoreham emergency. Copies of the six different LILCO form letters sent to schools and Mr. Halpin's letter in response to the LILCO letters are attached to this testimony as Attachment 14.

What we derive from this exchange of letters is that there is no agreement between LILCO and Suffolk County regarding the actions that would be taken in the event of a Shoreham emergency. School districts in New York State, although independent political subdivisions of their own, traditionally work closely with and show deference to local governments in matters such as emergency planning and preparedness. Our Districts have had the opportunity

over the years to work closely with Suffolk County and as a result, have become familiar with the County's determinations regarding the feasibility of effective emergency planning and preparedness on Long Island. LILCO's letter to us appears to ignore those County determinations. We, on the other hand, as members of the Long Island community, cannot ignore those County determinations. The County has determined that in the event of an emergency, it would be best not to follow or rely upon the LILCO Plan or school-related provisions in any way. We agree with that determination.

In short, LILCO's plan for school evacuation is, in our opinion, fundamentally flawed, and we could not and would not jeopardize the welfare and safety of our schoolchildren by allowing them to be transported as proposed by LILCO.

Many of the Regular School Buses Will Not Be Available

(All) LILCO assumes that even if regular school bus drivers are not available in the event of a Shoreham emergency, LERO's drivers would have ready access to the buses either owned by or under contract to the school districts. See LILCO Plan, Appendix A, at II-20a. We reiterate that we would not release our buses to LILCO or its employees. Setting that fact aside for the moment, however, the fact is that in many instances, the regular school buses would not be at the bus yards, and thus LERO drivers,

even if they showed up at bus yards and were allowed to drive the buses owned by or under contract to the school districts, would have no buses to drive.

(Rossi, Doherty, Smith) Should an emergency occur during the day, some buses might be at the bus yards. Many buses, however, would be with the regular school bus drivers, either on the roads or at their homes, or some other location. During the day, it is normal to find less than five percent of our buses at the bus yards at any one time. As previously noted, many drivers are on the road most of the day, many keep their buses all day and some keep their buses overnight.

(All) If the bus drivers are in possession of their buses at the time of a Shoreham emergency, and decide to resolve role conflict in favor of their families (as we think would be the case), these buses may never get back to the yards to be available for LERO's drivers. Thus, LILCO would not have access to our buses (or the buses owned by or under contract to other school districts), and would not have enough buses to implement a single-wave evacuation.

LILCO's Plan Is a Logistical Nightmare

(Rossi, Doherty, Smith) LILCO's "plan" for evacuation of schoolchildren is seriously defective, in part because it re-

flects a lack of understanding with respect to the extreme logistical difficulties which it presents. To put this matter in perspective, it is necessary to compare the logistical factors involved in school transportation on a normal day with those which would most likely be present in a Shoreham emergency.

On a normal school day, school transportation is complex and complicated, to say the least. Our bus drivers who do not keep their buses overnight must first report to bus yards to obtain their buses. All drivers must conduct a pre-trip inspection of their buses, any problems must be corrected, and all gas tanks must be filled. If, as is usual, some drivers are unavailable, approved substitutes must be contacted. It is often not possible to know, however, whether all drivers will be available (or whether all buses will be functional) until the last moment. As a result, there are always a host of last-minute decisions to be made regarding who will handle what bus routes, which routes will be delayed, who must be contacted to warn of delays, etc. The bus yards are crowded during these times and the bus yards' dispatchers, maintenance and management personnel are very busy.

On a normal school day, virtually every driver makes multiple bus trips. Drivers do not just go to one school but, rather, typically go to several schools. Our schools generally have staggered opening and closing times to permit multiple use of bus and driver resources. However, the scheduling of buses is not

limited only to the morning, afternoon runs and mid-day kindergarten runs. To the contrary, on any given day a large number of buses are used for field trips, sporting events, and similar activities. Thus, during the day almost none of our buses would be at the bus yards. In addition, the buses that are at the yards between runs during the day are often garaged for maintenance work, and thus are not immediately available for use. Typically, a district will have three or four buses out of service and undergoing maintenance on any given day. Finally, most of our buses that are not in service at any particular time during the day will be in the custody of drivers between runs. As previously noted, most drivers keep their buses with them during the day and many even keep their buses overnight.

The scheduling of buses is an intricate process at the schools as well. Each bus has an assigned location at the school(s) serviced. Schools generally have very limited parking space, and thus buses are scheduled to arrive and depart over time in order to reduce congestion. Even in the best of circumstances, however, the scene at schools during opening and closing periods is a very busy one, with buses arriving and departing and children getting to their proper locations for boarding or leaving their buses. School officials, and school traffic guards, play a critical role at the schools in ensuring safe drop off and pick up of the schoolchildren. Moreover, extensive training regarding the pick up and drop off phases of bus transportation is provided to

our drivers, since this is a circumstance which presents many opportunities for accidents.

(Smith) The middle school and junior high school in the Longwood Central School District operate on a split session schedule within the same building. The middle school meets from 7:05 a.m. to 12 noon; the junior high meets from 12:10 p.m. to 5:20 p.m. Thus, we not only must implement multiple bus runs to transport the kindergarten, elementary and school children to and from school, but we also must implement additional mid-day bus runs to accommodate the split session schedule. Under these circumstances, even an early dismissal due to inclement weather (but with ample forewarning) is difficult to implement.

We presently require three "waves" of bus runs every morning and afternoon just to transport our schoolchildren to and from school. We also transport nearly 900 private and parochial school students up to 28 miles outside the District's boundaries. In short, we have buses going in and out of the District all day long.

(Rossi) We presently require five bus runs during the course of the day to transport our schoolchildren to and from school. The drivers responsible for our kindergarten runs are on the road with their buses most of the day. We also transport approximately 900 students to 39 private and parochial schools,

which requires our drivers to travel up to 29 miles from the Middle Country School District, through the EPZ and back.

(Doherty) We presently perform three bus runs every morning and every afternoon just to transport our schoolchildren to and from school. We also require 13 runs to transport our 369 private and parochial school students.

(Petrilak) We require two bus runs in both the morning and the afternoon, in addition to nine kindergarten runs, to transport all our schoolchildren to and from school daily. We also transport 113 schoolchildren to and from 21 private and parochial schools on a daily basis.

(All) The reality thus is as follows: on a "normal" day, there is constant bus activity throughout the day; at any particular time, only a portion of our buses are at the yards and available for use; the bus dispatch system is complex and, by nature, involves many last-minute switches and scheduling changes, and is dependent upon trained and experienced dispatchers knowing where to send particular buses; and conditions at schools are crowded, even with staggered arrival and departure times for our buses.

Given the foregoing, it is our opinion that LILCO's single-wave evacuation "plan" would result in chaos both at the bus yards

and at our schools. First, LILCO proposes to send LERO personnel to the bus yards, to pick up and drive buses in the event regular school bus drivers do not report for duty. But, as noted above, many of the buses would not be at the yards. Thus, LERO personnel would have no buses -- or an insufficient number of buses -- to drive, even if it is assumed that the schools would entrust LILCO with the buses owned by or under contract to them.

Second, LILCO does not understand the dispatch difficulties which would be presented. Our regular bus drivers routinely go to several schools. The few regular drivers who could realistically be expected to show up to drive during a Shoreham emergency would not know which one of these several schools to go to. Certainly, LILCO's drivers would not know which schools to go to, or even how to find them.

Third, the influx of LERO personnel at our bus yards would only add to the confusion. The bus yards are busy under normal operating conditions. Extra people (LERO drivers and perhaps LERO dispatch personnel) would add to the confusion. Moreover, it is quite likely that the regular dispatchers, management and maintenance personnel at the yards would experience role conflict. Should that occur, there would be no trained personnel to dispatch and service the buses.

Fourth, LILCO has failed to plan for the evacuation of handicapped schoolchildren or schoolchildren with special problems. Specially-designed buses and specially-trained drivers and other supervisory personnel would be needed. For example, we provide extra training and instruction to the drivers who transport these children. To our knowledge, however, LILCO does not provide for such training. Handicapped children cannot be safely transported on regular school buses ill-equipped to meet their needs; nor can they be transported by drivers who have not undergone specialized training. By failing to plan for the special needs of these children, LILCO has overlooked an important segment of our school populations.

Fifth, in the event of a Shoreham emergency the situation at the schools (assuming buses were even dispatched) would be no better. Under LILCO's proposal, enough buses to evacuate each school would arrive at that school at about the same time. This would result in chaos, gridlock, and a severe safety risk to our schoolchildren and others. Our schools do not have sufficient space for so many buses. Further, it would have to be expected that many parents, fearful of the accident at Shoreham, would converge on the schools in an attempt to reunite with their children, adding further to traffic congestion. Even assuming any buses actually arrived at the schools and children boarded those buses, it is unlikely that those buses would leave the parking lots promptly as parents would likely board the buses in search of

their children. This would add substantially to the chaos and confusion. Moreover, there would be no crossing guards present to guide and direct buses or children. Under this scenario, the likelihood of serious accidents and injuries occurring, in addition to potential exposure to harmful radiation, is substantial.

In short, LILCO's plan is a logistical nightmare. It would not work. We are the persons charged with protecting the children who attend our schools, and we would never even try to implement LILCO's plan. It is an invitation to endanger the health and safety of our children.

Q. The LILCO Plan indicates that Middle Country's public schools are located outside the 10-mile EPZ. Would Middle Country's buses and drivers be available to help schools inside the EPZ evacuate or conduct early dismissal in a Shoreham emergency?

A. (Brodsky, Rossi) No. First, based upon the survey previously mentioned that we conducted of school bus drivers in 1983, in addition to our daily contacts with our drivers, we believe many would experience role conflict in the event of a Shoreham accident, and thus would not be available to drive buses. This would be particularly true for those drivers who reside within the 10-mile EPZ.

Second, we could not release our buses or drivers, notwithstanding the many concerns previously stated, because we would need them for our children. The parents of schoolchildren attending our schools would expect us to get their children home or to attempt to evacuate them if a serious accident occurs. Some of our schools are very close to, if not within, the 10-mile EPZ boundary line. In any event, no one believes that schools beyond the 10-mile zone are free of risk.

Third, the LILCO Plan indicates that all our public schools are outside the 10-mile EPZ. We have difficulty with that, however. The Bicycle Path School, located at 27 North Bicycle Path in Selden, and the New Lane Elementary School, located at 10 New Lane in Coram, appear to be within 10 miles of Shoreham. If not, they are certainly virtually on the edge of the EPZ. Thus, in our opinion we have children attending public schools within the 10-mile EPZ. In any event, we have children who live in the EPZ, even though they may attend public schools which lie outside the EPZ. Moreover, our buses enter the immediate area of the Shoreham plant daily to transport our private and parochial school students to Mercy High, St. Johns Elementary, Yaphank Christian and the Step by Step Schools.

Q. LILCO's Plan appears to assume that, in a Shoreham emergency, the Riverhead Central School District could focus its attention solely on the evacuation of the four public schools

located in the EPZ. Thus, LILCO asserts (LILCO Plan, OPIF 3.6.5) that 47 buses owned by the Riverhead School District would be sufficient for the evacuation of the Riverhead schools. Do you agree?

A. (Suprina, Doherty) No. First, as already discussed, Riverhead owns 54 buses of which 39 are full capacity passenger buses (of which only 33 are available to the public schools) and 15 are mini-vans. Assuming we were able to use all 54 vehicles to evacuate the four EPZ schools, there would still be too few buses to evacuate these schools in a single wave. There are 2,705 students attending those four schools. Using only the 39 full capacity buses, we would have to load 69.35 students per bus which is implausible. We would safely only load the buses two students per seat. Using all 54 buses, loaded with two students per seat and not allowing any seating space for adult supervisors, 773 students would remain to be evacuated. We would need 20 more full capacity (20-seat) buses to evacuate these 773 students. In short, using all our bus resources, plus 20 more full capacity buses, we would need a total of 74 buses just to evacuate the students attending the four EPZ schools in a single wave, not 47 buses as proposed by LILCO in its Plan.

Second, the District's 54 buses could not be devoted solely to the evacuation of the four EPZ schools. Some of our buses would not be available at all, for reasons already discussed.

Further, we could not ignore our non-EPZ schools. As previously noted, these schools are very close to the EPZ boundary line and we consider these schools also to be within the zone of danger. Parents would not believe that their children in those schools are free from risk. Thus, a portion of our bus resources would have to remain devoted to non-EPZ schools.

Q. Does LILCO's school evacuation plan make sense for Mt. Sinai?

A. (Petrilak) No. For the reasons already discussed, LILCO's plan makes no sense. Further, LILCO overlooks a critical fact. LILCO assumes that all our 27 contract buses (not 30 as the LILCO Plan states) could be assigned to the evacuation of our elementary and junior high school. That is not true. We also are responsible for the transportation of the 572 Mt. Sinai students who go to school in Port Jefferson and the 118 students attending private and parochial schools. Thus, we have far fewer buses than would be necessary for the single-wave evacuation proposed by LILCO. Even if we were to use all 27 regular buses, plus the 11 mini-vans, to evacuate only the elementary and junior high schools, as LILCO presumes, we would still have too few buses to effectuate a one-wave evacuation of those schools. We have 1,660 students enrolled in those two schools. Using the 27 buses, and the 11 mini-vans, loaded two students per seat and not allowing any space for adult supervisors, we would need an additional nine

20-seat buses to evacuate our elementary and junior high schools. We would need 15 more 20-seat buses to evacuate our 572 high school students in a single wave.

Moreover, given the daily heavy traffic congestion on the two roads leading to our elementary and junior high school (Route 25A and North Country Road) and given the fact that traffic will be infinitely more congested were an emergency at Shoreham to occur, it is highly unlikely that if any buses managed to reach these schools, they would be able to negotiate the left turn onto either Route 25A or North Country Road. Quite simply, were any buses to reach the schools, those buses would have a very difficult time trying to leave the parking lot.

Q. Does LILCO's school evacuation plan make sense for Longwood?

(Muto, Smith) No. First, as previously noted, we have contracts with Suburbia for only 89 buses, not 100 as contended by LILCO in its Plan. LILCO Plan, OPIP 3.6.5, Att. 3a. Of those 89 buses, only 70 are available for transportation of public school-children. Second, LILCO does not state the passenger capacity of its 28 "supplemental" buses. Assuming we would have access to all 89 Suburbia buses, and assuming further that the 28 LILCO buses are full capacity 20-seat buses, there would still be too few buses to implement a single-wave evacuation of our students.

As noted, our middle and junior high schools operate on a split schedule. Thus, were an emergency to occur around midday when these students would be in transit to and from school, all 8,574 public school students would have to be evacuated.^{3/} Loading the buses two students per seat and not allowing any room for adult supervision, we would require 215 buses, or 98 buses in addition to our 89 and LILCO's 28.

If the accident occurred in the morning when the middle school was in session, but not the junior high, 183 buses would be needed to evacuate the 7,287 public school students and LILCO would be short 66 buses. If the accident occurred in the afternoon when the junior high students were in session, but not the middle school students, 181 buses would be needed for a one-wave evacuation of the 7,220 students and LILCO would be short 64 buses.

Q. Gentlemen, you have made clear that you would not permit LERO drivers to transport your schoolchildren, and that you do not have enough buses to carry out an evacuation on your own, especially given likely role conflict problems. What action would you undertake to protect the safety of your schoolchildren in the event of an emergency at Shoreham requiring evacuation?

^{3/} The figure of 8,574 public schoolchildren excludes those students who walk to school. In the event of a Shoreham emergency, these students might need to be evacuated as well. Were these students included in the calculations, LILCO's underestimation of the number of buses needed to be evacuated in a single wave would be even greater.

A. (All) The LILCO Plan is not workable and fails to protect the safety of schoolchildren. Each school district has the responsibility for protecting the health and safety of its students while they are at school or being bussed to or from school. We could not and would not turn this responsibility over to LILCO.

In the interest of safety, the only option that might be available to us would be to utilize and rely upon however many of our own bus drivers and buses that would be available. If only a few bus drivers reported to the schools, we might have to utilize those drivers for an evacuation to some location determined at that time, using as many multiple runs as would be necessary. In the interim, we might have to attempt to retain the schoolchildren at the schools.

This is not to suggest that sheltering presents an option preferable to evacuation. Our buildings generally do not have basements and thus might make poor and inadequate sheltering facilities. The safety risk involved, however, in allowing our schoolchildren to board buses driven by LILCO employees is one which we are not willing to bear, and we would be forced to make do with whatever options remained.

VI. Early Dismissal

Q. The LILCO Plan, as it relates to schools, also provides for the alternative protective action of early dismissal. It is alleged in Contention 25.C that role conflict would preclude early dismissal. Could early dismissal be implemented by your school districts in the event of an emergency at Shoreham?

A. (All) No.

Q. What is the basis for your response?

A. (All) First, unlike evacuation, LILCO's proposal for early dismissal does not presume that LILCO drivers would drive buses. Crocker deposition at 28. In this respect, LILCO's proposal is more realistic than is its single-wave evacuation proposal, since, as noted above, LILCO drivers would not be permitted to drive our children under any circumstances. Stated somewhat differently, LILCO assumes that an early dismissal of schools would be carried out solely by regular school personnel. Early dismissal, however, would require multiple bus runs to be conducted, even if it is assumed that all regular drivers were available. If some drivers were unavailable (as it must be assumed would be the case), then it would take even longer to transport schoolchildren from schools to their homes. Consequently, there

would be a real likelihood that children could be caught in a radiological plume.

Second, the problems previously discussed would make it impossible to obtain a full complement of regular bus drivers or the other school personnel necessary to implement an early dismissal. For example, the implementation of an early dismissal requires central office administration personnel, transportation contractor personnel, teachers and other school district employees to perform decisionmaking and notification functions, and supervisory and logistical duties, in addition to the transportation of schoolchildren. All these personnel would likely be subject to role conflict. Moreover, difficulties in notifying off-duty bus drivers, and the role conflict that and would prevail with respect to those drivers who could be contacted, would make it virtually impossible to obtain many drivers.

(Doherty) During an early dismissal due to snow, I often find it very difficult to contact drivers even though the drivers have forewarning of the inclement weather conditions. Many drivers are not at home and thus cannot be reached on their home phone. Moreover, the phone system here cannot handle the heavy volume of phone calls being made during times of inclement weather conditions. I typically cannot get a dial tone due to overloading of the phone circuitry systems and am unable to even try to reach my drivers at their homes. At the first sign of any

emergency at the Shoreham plant, it is likely that many people would try to locate friends and family members to handle the volume of calls. Consequently, even if some of my drivers were at home, I would be unable to reach them.

(Rossi) I am able to implement early dismissal due to snow only because at the slightest hint of winter weather, I pay my drivers to remain at the bus yard. I also call my contractors and suggest that they do the same with their drivers. If I did not do this, I would never have enough drivers to implement early dismissal.

Third, even if one assumes that LILCO might attempt to send its drivers to "assist" the schools with early dismissal, it must again be emphasized that we would never allow our children to board buses driven by LILCO employees. Under LILCO's evacuation proposal, LILCO's drivers would have to follow the printed directions provided by LILCO at the time of the emergency to find the particular school he or she would be assigned to evacuate. For early dismissal, however, these drivers would have to not only locate a particular school, but would also have to follow routes to the children's homes. This is a difficult task for even our trained regular school bus drivers. Short of asking each child where he or she lives, LILCO's employees would simply be unable to find the homes of our schoolchildren.

(Smith) In Longwood, for example, early dismissal involves the driving of at least 317 individual routes. Our trained substitutes often have difficulties. We could never let LILCO's employees take our children and try to find their homes.

(Doherty) In Riverhead, early dismissal involves the driving of 140 individual routes.

(Rossi) In Middle Country, early dismissal involves the driving of 550 individual routes over which more than 5,600 stops must be made.

(Petrilak) In Mt. Sinai, early dismissal involves the driving of 113 individual routes.

(All) Fourth, early dismissal does not present a realistic option, because we would not discharge our children to homes without parental or adult supervision; nor would we choose to relocate our children to locations within the EPZ which may be or might become contaminated. We all have a large percentage of latch key children attending our schools. Indeed, some school districts do not engage in early dismissals at all for that reason.

(Koenig) East Meadow does not have an early dismissal or go-home plan, because we are unwilling to return children to homes without adult or parental supervision.

(Petrilak) Although Mt. Sinai has an early dismissal plan, it is used only if absolutely necessary. We have yet to implement an early dismissal this year and implemented early dismissal only once last year, when inclement weather made early dismissal absolutely necessary. Our reluctance to dismiss early stems from our concerns with respect to returning children to homes without adult or parental supervision. In fact, even under normal conditions, our drivers will not allow a child to return to an empty house. If no parents or other adults are at home, our drivers will return the child to the school to await the arrival of an adult. Our parents are grateful for our drivers' concerns for the safety of their children.

(All) In short, therefore, early dismissal does not present a viable protective action for responding to a Shoreham emergency. There is no means of predicting how long an early dismissal would take to implement, given our limited resources and the role conflict problem. Further, many children would be returning to homes without adult supervision, which is unacceptable. Moreover, for many children living near the plant, early dismissal would mean that by taking these children to their homes, their risk of exposure to harmful radiation might be increased. In

short, because early dismissal poses a severe safety risk, we would not attempt to implement an early dismissal in a Shoreham emergency under any circumstances.

VII. Sheltering

Q. The LILCO Plan, as it relates to schools, also provides for the alternative protective action of sheltering. Is sheltering a viable option that your Districts would be able to implement in the event of a Shoreham emergency?

A. (All) No. Our school buildings generally are not appropriate for sheltering. None of our schools has basements or airtight, windowless areas, such as would be needed to safely shelter our students from harmful radiation. Moreover, even if it is assumed that our buildings would make appropriate sheltering facilities, sheltering would still be unworkable since, given role conflict, it is unlikely that we would have an adequate number of school personnel available to us to supervise the children during a Shoreham accident.

VIII. Conclusion

Q. Do you believe that other EPZ school districts would concur in the views you have presented in this testimony regarding LILCO's school evacuation and early dismissal plan?

A. (All) Yes. We believe the views expressed above are generally representative of the actions other schools would take. We deal with school personnel throughout Long Island and understand how most schools operate. In particular, given our knowledge of schools, we believe it is highly unlikely that schools would entrust their children to LILCO drivers, or attempt an early dismissal in the event of a Shoreham emergency. Revision 9 of LILCO's Plan, at least as it relates to schools, cannot be implemented.

We find support for our views in the rather broad belief expressed by schools over the years that LILCO's plan for school evacuation and other alternative actions is not adequate. For instance, many schools within the EPZ, other than ours, have passed resolutions attesting to their belief that LILCO's school evacuation plan is inadequate. See, e.g., Miller Place Union Free School District (September 1, 1983 and February 10, 1988); Comsewogue Union Free School District (January 16, 1986); Rocky Point Union Free Public Schools (May 19, 1986). See also Port Jefferson Station Teachers Association letter to NRC dated

September 22, 1986. These resolutions and the Port Jefferson letter are attached to this testimony as Attachment 15.

Further, as previously mentioned, bus drivers in Port Jefferson, Patchogue, Shoreham-Wading River, Rocky Point, Comsewogue, South Manor and Miller Place, all school districts located within the EPZ, all signed statements indicating that in the event of a Shoreham emergency, they would not drive a school bus.

Moreover, it must be recognized that role conflict is not a problem confined only to our school bus drivers and teachers; it will also be experienced by school bus drivers and teachers in other school districts near or in the Shoreham 10-mile EPZ. Thus, these school districts would also not have sufficient personnel to implement either early dismissal or an evacuation pursuant to LILCO's Plan. The problems that we have outlined that our schools would likely experience with respect to implementation of LILCO's Plan are not unique to us, and would be experienced by other school districts as well. Thus, it is our conclusion that the other school districts within the EPZ would be unable and unwilling to carry out LILCO's plan for schools.

Q. Does that conclude your testimony?

A. (All) Yes.

ATTACHMENT 1

BRUCE G. BRODSKY

28 HAWKINS PATH
CORAM, NEW YORK 11727
(516) 732-0821

Family: Married
Four children

Business Address: 356 Middle Country Road
Coram, New York 11727 (516) 732-0822

Employment: Self employed, private practice

Education: Massachusetts College of Optometry
Boston, Massachusetts
Bachelor of Science 1961
Doctor of Optometry 1963

School District Activities:

- Trustee, Middle Country Board of Education 1977-present
 - A) Member legislative subcommittee 1987
 - Chairperson 1987
 - B) Member policy subcommittee 1982-present
 - Chairperson 1984, 1985
 - C) Member finance subcommittee 1985-1987
 - Chairperson 1986-1987
 - D) Member public relations subcommittee 1986-present
 - Chairperson 1986
- Member, Nassau-Suffolk School Boards Association 1977 - present
 - A) Executive board member 1977-present
 - B) Member legislative committee 1977-present
 - Chairperson 1987-present
 - C) Member various sub-committees, developing position papers on various legislative bills and Regents regulations
 - D) Treasurer 1987-present
 - E) Spokesperson at Regents hearing regarding Regents Action Plan, High School Dropouts, Teacher certifications
- New York State School Boards Association 1977 - present
 - A) Legislative Network Representative 1981-present
 - B) Faculty Member 1982, 1987
 - C) Resolutions Committee member 1984-1987
 - Chairperson 1987
 - D) Convention voting delegate 1981-present

- E) Moderator at Fiscal Responsibilities Workshop-1987
- F) Panel member on Policy Utilization 1986

National School Boards Association 1977-present

Advisory Committee for Scope/Septic 1982-1983

Brookhaven School Board Association member 1977-present

Spokesperson for school districts to Suffolk legislature

Other Civic Activities:

Executive Board Member of Nassau-Suffolk Health Systems Agency 1976-1978

Strathmore East Civic Association 1968-present

Vice President 1969-1970

Area representative 1969-1972

Executive Committee 1973-1975

1969-1972

1979, 1985

Masons 1961-present

Central Brookhaven Lions Club 1976-present

Central Brookhaven Chamber of Commerce 1981-present

Seldon Civic Association 1958-1972

1980-present

1968-present

North Shore Jewish Center

YMCA Outreach of Brookhaven, Board of Directors 1976-1980

Vice chairperson 1977-1979

Chairperson 1979-1980

Community Mediation Center of Coram, Board of Directors 1981-1985

Community Volunteer, running property tax assessment grievance workshops in: Bellport, Medford, Coram, Middle Island and Gordon Heights

Middle Country School District: Various PTA's School Community Relations Committee

Political Activities:

Middle Country Democratic Club 1975-1979

New Democratic Coalition 1976-1980

Tanglewood Democratic Club 1975-present

Brookhaven Town Democratic Club 1975-present

Brookhaven Town Zone Leader 1980-1982

Vice Chairperson Brookhaven Democratic Committee 1982-1985

Judicial Convention Delegate 1980, 1982, 1986

Committeeperson: ED 130 1978-1982

ED 209 1982-present

Primary candidate for Legislature 1981

Candidate for Legislature 1981

Primary Candidate for State Assembly 1985

Worker and/or contributor in the following campaigns:

Hochbrueckner for Assembly	1976, 78, 80, 82
Randolph for Supervisor	1977
Randolph for Congress	1978
Linton for Legislature	1976
Reynolds for Council	1977
Betheil for Council	1977
Capria for Council	1977
McCoy for State Senate	1975
Twomey for Congress	1970
Eldon for Congress	1982
Holtzman for US Senate	1980
Hoffman for Assembly	1982
Seltzer for Council	1978
Rosenblum for Council	1977, 1981
Phil Nolan for Legislature	1983, 1985
Englebright for Legislature	1983, 1985
Foley for Legislature	1981, 1983, 1985
Town Democratic Slates	1979-1987
Cuomo for Governor	1982, 1986
Gaughan for Town Council	1983
Gaughan for Legislature	1987
Sawicki for Assembly	1984, 1986
Hochbrueckner for Congress	1984, 1986

Town Government:

Manager, Brookhaven Airport	1976-1979
Brookhaven Industrial Commission	1977-1979
Spokesperson for Brookhaven Town at:	
Civic Associations	
State Senate Hearings on Air Service	
Advisory group for development of	
Suffolk County Airport	
Testified at Suffolk County Hearings pertaining to	
Development of Long Island MacArthur Airport	

Professional
Organizations:

N.Y. State Optometric Council	1968-1973
American Optometric Association	1973-present
NYS Optometric Association	1973-present
Suffolk Optometric Society	1973-present
Recording Secretary	1977-1978

Personal Interests:

Reading, music, golf, flying (have pilot license),
boating, water skiing

Military:

Three (3) years active duty U.S. Air Force
Seven (7) years inactive reserve
Honorable discharge 1965
Retired 1971

ATTACHMENT 2

RESUME

ANTHONY R. ROSSI
45 Chestnut Avenue
Patchogue, New York 11772

(516) 289-1386

OBJECTIVE:

Major interest is in the field of Management.

PERSONAL DATA:

Date of Birth: June 7, 1942
Height: 5' 10"
Weight: 180 lbs
Marital Status: Married - four children
Health: Excellent
Military Status: Honorable Discharge
from U. S. Army Reserve
Program, 1969

EDUCATION:

St. Francis College
B. B. A. June 1968
Major: Business Management

Qualified instructor for:

- a. New York State Basic and Advanced School
Bus Driver Training Programs
- b. Greater New York Safety Council Defensive
Driving Program

Qualified inspector for New York State Motor
Vehicle Department for the testing of drivers
under Article 19A.

EXPERIENCE:

Trained mediator for the area Conflict Resolution
and Mediation Program

January 1973
to present

Middle Country Central School District
10 43rd Street
Centereach, New York 11720

Director of Transportation for this school
district responsible for the daily transpor-
tation of approximately 11,000 students to 14
in district schools and 39 private/parochial
schools, utilizing 42 district owned buses and
55 contracted.

Responsibilities include routing using automated scheduling, preparation and control of a \$2,500,000 budget, negotiations, preparation of State Aid Forms, coordination of all areas related to the operation of a transportation division. Operations include a garage for repair of 51 school buses and 45+ other vehicles.

January 1970
to January 1973

Patchogue Medford Public Schools
241 South Ocean Avenue
Patchogue, New York 11772

Assistant Business Administrator for the Patchogue Medford Schools. Primary duties included daily transportation of 5,500 students to eleven district schools and eight private/parochial schools, utilizing 34 buses, eleven of which were owned by the district. I was instrumental in the initial utilization of automated scheduling for transportation. I also prepared and reviewed all bids. I did some of the purchasing for the district and handled questions and complaints regarding purchase orders and payments.

1960 to
January 1970

Equitable Life Assurance Society of the
U. S. 1285 Avenue of the Americas, New York,
New York

Supervisor of the Cancellation Division of the Policy Service Department, which consisted of 32 people. Duties involved decisions on exceptions for cancellation of policies from issue, dividend over-payments and authorization for use of dividends. Basic familiarity of various IBM equipment.

Cadet Management Training Program. Training covered all phases of managerial responsibility, including preparation of budget, supervisory duties, policy formulation.

REFERENCES:

Will be furnished upon request.

ATTACHMENT 3

Biographical Data of the Superintendent of Schools
for the Riverhead Central School District
Riverhead, N.Y. 11901

Name: Dr. Richard N. Suprina
Superintendent of Schools
Riverhead Central School District
700 Osborne Avenue
Riverhead, N.Y. 11901

Current Position: Superintendent of Schools in the 3700 Pupil Riverhead Central School District on Eastern Long Island since January 1983.

Previous Administrative and Teaching Experience:

- °Assistant Superintendent for Administration and Curriculum of the Deer Park Union Free School District
- °Principal-- Hauppauge High School
- °District Coordinator and Assistant Principal-- Harborfields Central School District #6
- °Guidance Counselor--Jericho Junior/Senior High School
- °Chairman of Health, Physical Education and Athletics-- Elwood Union Free School District
- °Teacher--Valley Stream North Junior/Senior High School

Education:

- °Ed.D. from Fairleigh Dickinson University
- °M.S. from Hofstra University
- °B.S. from SUNY at Cortland

Publication Background: Has authored numerous educationally related articles which appeared in professional journals and newspapers

Sampling of Honors Earned:

- °Selected as a Kettering Foundation /I/D/E/A Fellow
- °Named the School Administrator of the Year by the N.Y. State Association of Foreign Language Teachers
- °Presented the N.Y. State PTA Jenkins Memorial Award
- °Selected to participate in the White House Conference on Youth Employment
- °Selected as a chairperson for Middle States Association Commission on Secondary Schools evaluation committees
- °Selected to address national conventions and conferences of various educational organizations
- °Elected as an officer in various local and State Professional Organizations

Family Status: Married for over thirty years to Barbara Grande Suprina
Three children--Darren, age 29, computer consultant
Todd, age 26, Speech Pathologist
Jill, age 23, college student

ATTACHMENT 4

EDWARD J. DOHERTY

RFD #2 Box 96
Riverhead, New York 11901
(516) 727-1745

EDUCATION Port Jefferson H.S., Port Jefferson, NY
Graduated 1948

EMPLOYMENT Managed & Operated family-owned service
station, Ridge, New York 1948-1950

Dugan Bros., Riverhead, New York -Bakery
Product Salesman - 1950-1952

F.K. Blum Contracting Co., Ridge, New York
Driver-mechanic - 1952-1953

Riverhead Central School District (formerly
known as Union Free School District #5) -Bus
Driver -1953-1957

Riverhead Central School District, Riverhead
New York -Assistant to Transportation Supervisor-
Bus Driver-mechanic 1957-1963

Supervisor of Transportation, Riverhead Central
School District 1963-Present

SPECIFIC
QUALIFICATIONS

Appointed Transportation Coordinator July, 1962,
Riverhead Central Schools

Appointed Supervisor of Transportation July, 1963 -
Duties include: Establish routes, select and train
driver applicants, supervise district repair garage,
possess considerable mechanical experience in all
phases of repair and maintenance procedures,
specifications and purchasing.

Maintain and prepare all records for State Aid
Routing Data, District Transportation Financial
Reports, Commissioners Regulation 156.3, Depart-
ment of Motor Vehicles Article 19A, conduct
driver training courses -both Basic and Advanced
as prescribed by NYS Education Department -

SPE CIFIC
QUALIFICATIONS
CONTINUED

N.S.C. Instructor # 10222, Certified Examiner D.M.V. Suffolk #1022, SED Instructor's Certificate #66, Certified Master Instructor #27, BOCES I Suffolk Adult Education Certificate #056223060 -resolve complaints and discipline problems and promote good public relations.

Coordinate school schedules and programs with transportation.

At present, I am responsible for the overall supervision and administration of a fleet of 50 district-owned buses and drivers, 5 mechanics, 8 substitute drivers and the maintenance and repair of an additional 30 vehicles for the building and grounds department. Additional responsibilities include purchasing supplies and parts, preparation and administration of transportation budget.

Regular attendance at Transportation Workshops conducted by the New York State Education Department.

Former President, Vice President, Treasurer, Secretary for the New York Association for Pupil Transportation, Suffolk Chapter, currently serving as Secretary for the New York State Association for Pupil Transportation.

REFERENCES

Mr. Kenneth Ross, Former District Principal, Riverhead Central School (residence- Pine Street, Aquebogue, NY)

Mr. Alan Hernandez, Superintendent of Schools, Uniondale Central Schools, Uniondale, NY 11553

Mr. Richard Suprina, Superintendent of Schools, Riverhead Central Schools, Riverhead, NY 11901

Mr. Ronald Revelle, Superintendent of Schools, Highland Central School District, Highland, New York

Mr. Lee Comeau, Associate, New York State Education Department, Albany, New York

ATTACHMENT 5

VITA

Nick F. Muto
52 Shore Road West
Mt. Sinai, N.Y. 11766
516-473-1953

Married, two children

EDUCATION

B.S.	Pennsylvania State, Edinboro, PA	Art-English 1951
M.S.	Auburn University, Alabama	Guidance 1954
Ed.D	Syracuse University, Syracuse, New York	Administration 1967

POSITIONS

Two year service - U.S. Army	1951-1953
Guidance Counselor	
Havorford Township, PA, School District	1954-1958
Part-time Instructor, Asst. Day Camp Director	
Main Line Y.M.C.A., Ardmore, PA	1954-1958
Teacher - Guidance Director - Administrator	1958-1964
Augsburg, Germany (2 years)	
Karlsruhe, Germany (1 year)	
Heidelberg, Germany (2 years)	
Paris, France (H.S. Principal) (1 year)	
Teaching at Syracuse University	1964-1966
Director, Syracuse University Center	Summers of '66 & '67
Elementary Principal (while completing dissertation)	
Manlius, NY	1966-1967
Project Director, Semi-professional Training Project	
Title III Center, Syracuse, NY	1967-1969
Associate Supt. for Curriculum and Instruction	
Wellesley, MA	1969-1975
Visiting Professor, West Virginia University	Summers of '70 & '71
Associate Professor, Lowell University, Lowell, MA	Sept. 1970- 1976
Visiting Professor, University of Maine	Summer of 1973
Visiting Professor, Lesley College, Cambridge, MA	1970
Adjunct Professor, University of Mass., Amherst	1972
Superintendent of Schools, Nauset Public Schools	
South Wellfleet, MA	1975-1982
Superintendent of Schools, Longwood Central Sch. Dist.	
Middle Island, N.Y.	1982 - Present

ATTACHMENT 6

RESUME

J. Thomas Smith
Longwood Central School District
Middle Island - Yaphank Road
Middle Island, New York 11953
(516) 345-2775

Education: State University of New York
at Farmingdale 1955-1957
Pratt Institute of Technology (BA) 1958-1961
McAllister School of Science 1961-1962

Professional
Experience: Longwood Central School District,
Transportation Coordinator 1970-Present
New York State Education Department
Cert. School, Bus Driver Instructor
- Region III #461 1972-Present
New York Department of Motor Vehicle
Certified School Bus Driver Examiner
Suf. #1125 1977
National Safety Council Defensive
Driver Training Instructor
Cert. #11339440 1976

Associations: Brookhaven Township Transportation
Advisory Board 1978-Present
New York Association for Pupil
Transportation - Suffolk Chapter
President-elect 1978-1979
National School Transportation
Association 1975
New York Association for Pupil
Transportation - Suffolk Chapter 1971

Participant: New York State Pupil Transportation
Workshops:
University of Albany 1982-86; Cortland
1979; Niagra 1978; Plattsburg 1974-75;
Oswego 1971.

ATTACHMENT 7

HOWARD M. KOENIG, Ph.D.

31 Greenhill Lane
Huntington, New York 11743

Telephone No.
(516) 368-5294

SUPERINTENDENT OF SCHOOLS

EDUCATION:

Ph.D.	-	New York University - 1980 Educational Administration
M.A.	-	New York University - 1970 Educational Administration
B.A.	-	Queens College (CUNY) - 1966 Political Science/Psychology

EXPERIENCE:

September 1983 - Present

Superintendent of Schools
East Meadow Union Free School District, East Meadow,
New York.

July 1974 to September 1983

Assistant Superintendent for Administration
Harborfields Central School District, Greenlawn, New York.
Responsibilities Included: Personnel (all units and class-
ifications.), Compensatory Education (Chapter 1/PSEN.),
Negotiations (all units.), Out-of-District Funding, Public
Relations, and other duties which overlapped the areas of
curriculum and instruction and business.

October 1971 to September 1973

District Manager for Administration and Business Affairs
Community School District 24 - Flushing, New York
Community School District 26 - Fresh Meadows, New York
Responsibilities Included: Preparation and administration
of a budget of more than \$20,000,000 for as many as thirty
(30) schools. District purchasing, accounting, major and
minor plant improvements and community liaison.

February 1968 to October 1971

Teacher of Mathematics and Social Studies - Grades 6-8
Teacher - Grade 6 and Assistant Dean of Students
Intermediate School 61, Corona, New York

In addition to the above, during the time that I was preparing
for a career in education, I was employed as a social worker with
the New York City Department of Social Services and as an Official
Court Reporter for the N.Y.C. Civil Court and the N.Y.S. Department
of Labor.

HONORS:

Fellow - Education Professions Development Act (EPDA)
Fellowship - New York University - 1973/1974

President - Phi Delta Kappa - NYU Chapter - 1977/1978

Quadrant Leader - Southeast Quadrant of the Nassau County
Council of School Superintendents - 1986/1987

National Vice-President- Region I, National Association of
Federally Impacted Schools - 1985 / present.

ACTIVE
PROFESSIONAL
AFFILIATIONS

American Association of School Administrators

Association for Supervision & Curriculum Development

American Educational Research Association

New York State Council of School Superintendents

Nassau County Council of School Superintendents

New York University Administrators Roundtable

Phi Delta Kappa

UNIVERSITY
AFFILIATIONS

Adjunct Professor of Educational Administration

New York University 1980 - present

Long Island University 1982 - present

Chairperson - Dean's Professional Education Advisory
Committee - C.W. Post Campus of L.I.U.

PERSONAL
DATA

Born: July 9, 1940

Married, two children

Height 6' Weight 210lbs.

Excellent Health with no physical disabilities

Placement credentials are available upon request from the New York University
Office of Educational Placement.

ATTACHMENT 8

Robert W. Petrilak
12 Gardenia Road
Mt. Sinai, N.Y. 11766

Date Of Birth: November 27, 1942

Married, 3 Children

Education

Attended SUNY Fredonia N.Y

Adelphi University L.I. N.Y

Employment

US Air Force 1962-1966
Staff Sergeant, Aircraft Instrumentation

Grumman Aerospace 1966-1967
Instrumentation Research Technician

Riker Video 1967-1969
Engineering Research Technician

Applied Digital Data Systems 1969-1986
Research Technician
Manager Field Engineering
Director Field Engineering
Director Materials/Purchasing

ACM Data Systems Inc. / Channel One Entertainment
Owner

Other

Mt. Sinai Board of Education 1983-Present

President- Mt. Sinai Taxpayers Association 1980-Present

President- Westcliff Homeowners Association 1978-1980

February 1988

ATTACHMENT 9

11/7/83

Mrs. Yolanda Puterio, President of the Middle Country Secretarial Association to offer a statement re: negotiations.

A representative of the Andrea Doria Lodge requested consideration of band participation in the Columbus Day Parade next year.

Arlene Popaleski, Hawkins Path PTA to comment upon the success of the Halloween Party at Hawkins Path; to advise the Board of the Theatre Club activity; and requested that there be input when the report of the RESS Committee is discussed.

Jennie Camastra, Hawkins Path to comment upon the underbrush along Boyle Road and the need for sidewalks there.

Roberta Dangel re: substitute teacher placement

Roy Probeyahn re: aged out handicapped students, offered his services in this regard.

Superintendent's Report-

SUPERINTENDENT'S REPORT

Mrs. Adler led discussion concerning the resolution adopted last year and re-affirmed on August 15, 1983 to wit:

WHEREAS, the Middle Country Central School District's Board of Education has as its prime concern the welfare of the children of the School District and

SHOREHAM POWER PLANT

WHEREAS, the Long Island Lighting Company has not been able to insure that its proposed Shoreham Power Plant can meet acceptable safety standards, and

WHEREAS, no acceptable evacuation plan has been devised by the Long Island Lighting Company and Suffolk County

BE IT RESOLVED that the Board of Education in the interest of protecting the welfare of the children of Middle Country does hereby go on record as opposed to the opening of the Shoreham Power Plant until both an acceptable safety standard can be met and an acceptable evacuation plan can be developed.

Mrs. Adler asked the Board to consider that the above stated resolution might be sufficient and there would be no need to go further.

The following resolution was offered by Gallo, who moved its adoption, seconded by Durkin to wit:

11/7/83

WHEREAS, federal regulations for full power operation of the Shoreham Nuclear Power Plant require an emergency plan for communities surrounding the plant which will assure those communities adequate protection in event of a nuclear emergency; and

WHEREAS, the County of Suffolk has determined, after substantive study and lengthy hearings, that no emergency plan can be developed to provide citizens sufficient protection in a Shoreham emergency; and

WHEREAS, the County of Suffolk has therefore concluded that it cannot, in good faith, prepare or implement an emergency plan, or support full power operation of the Shoreham Nuclear Power Plant; and

WHEREAS, the Long Island Lighting Company, in an effort to meet federal regulations, has prepared an emergency plan which only LILCO, lacking coordination with local or state governments, will attempt to implement; and

WHEREAS, the Nuclear Regulatory Commission's Shoreham licensing board is now conducting hearings to review the adequacy of the LILCO emergency plan; and

WHEREAS, the LILCO emergency plan includes protective actions to be taken by schools; and

WHEREAS, this board of education, having reviewed LILCO's emergency plan for schools, and having discussed those plans with concerned parents, wishes to advise the NRC's Shoreham licensing board of the plan's workability for its district; and

WHEREAS, this board has identified the following weaknesses in the LILCO emergency plan:

1. Early Dismissal
Normal early dismissal procedures, which LILCO's plan incorporates, cannot bring children to uncontaminated areas quickly enough to protect their health and safety.
2. Transportation
We cannot guarantee that the requisite number of buses and drivers required for successful

7/83

early dismissal will be available to the schools. Drivers may need to first attend to the safety of their own families and may decline to drive school buses. This will prolong childrens' stay at schools in contaminated areas.

3. Needs of School Personnel

We cannot guarantee that teaching and non-teaching personnel will stay in schools to supervise early dismissal. These teachers and staff may need to attend to the safety of their own families and therefore may not be available to perform emergency-related tasks.

4. Lack of Parental Supervision

The success of an early dismissal plan depends not only on prompt dismissal from schools, but on prompt evacuation of children from their homes. In cases in which parents will not be at home during the day, children will be sent to unsupervised homes from which they will not be able to evacuate promptly.

5. Parental Intercession

We cannot be confident that parents will wait at home for their children to arrive. Many parents may attempt to retrieve their children at schools, perhaps causing increased confusion and chaos.

6. Panic

An announcement of a nuclear emergency at Shoreham may cause disorientation and panic in children, teachers, non-teaching staff, and parents. This will further prohibit effective, safe dismissal from schools.

7. Relocation

If a Shoreham emergency develops quickly and requires an evacuation of children from schools directly to relocation centers, this district will not have sufficient buses or drivers to transport all children to relocation centers in a timely, efficient manner.

8. Supervision at Relocation Centers

We cannot guarantee that teaching and/or non-teaching school personnel will travel to and remain at relocation centers to supervise children

until parents arrive to retrieve them.

11/7/83

9. Sheltering

The LILCO plan suggests that sheltering (remaining indoors) may be the preferred protective action in specific Shoreham emergencies. However, many of this district's schools do not have basements or other structures necessary to provide adequate protection.

10. Trust in Public Information

In the LILCO plan, the only public information upon which to base decisions for protective actions will come from the utility. LILCO, through its Public Schools Coordinator and WALK-AM Radio, will both describe the extent of the emergency and recommend actions. Because LILCO would be both operator of the plant and initiator of emergency actions, potential for conflict of interest exists. School Administrators, receiving information only from LILCO and not from any governmental agency, will be forced to decide upon actions with potentially serious consequences without the benefit of information from an objective source.

11. Indemnification

LILCO does not provide indemnification for school districts should damages, injuries, or deaths result from school administrators' decisions during an emergency, decisions which can be based only upon information and recommendations offered by LILCO

Now, be it therefore

RESOLVED, that this school district finds that LILCO's emergency plans for schools do not offer children school personnel, or parents of this district adequate protection in event of an accident at the Shoreham Nuclear Power Plant; and be it further

RESOLVED, that this school board cannot direct its schools to initiate or participate in emergency actions which not only fail to protect childrens' safety, but place it in further jeopardy; and, be it further

RESOLVED, that this school board believes that full power licensing of the Shoreham Nuclear Power Plant should be forbidden unless or until complete and reasonable resolution of these outstanding, critical emergency planning problems can be achieved.

1/7/83

The question of the adoption of the above stated resolution was duly put to vote on Roll Call which resulted as follows:

Amaruso	voting	no	does not want plant opened
Gallo	voting	yes	
Durkin	voting	yes	
Brodsky	voting	yes	
Boder	voting	yes	
Reynolds	voting	no	duplicate resolution
Purick	voting	yes	
Adler	voting	no	duplicate resolution

The resolution was thereupon declared duly adopted.

**ARTICIPATION
SC HEARINGS**

Motion by Gallo seconded by Brodsky to authorize the Superintendent of Schools and the Director of Transportation to participate in meetings prior to the NRC Hearings relative to the Shoreham Nuclear Power Plant; to appear at the NRC Hearings to state the concerns of the district; that the statements of the Superintendent of Schools and the Director of Transportation be reviewed by Counsel prior to appearance and, at the time of the hearings that Counsel be present to advise them.

The question of the adoption of the above stated motion was duly put to vote on Roll Call which resulted as follows:

Amaruso	voting	yes	
Gallo	voting	yes	
Durkin	voting	yes	
Brodsky	voting	yes	
Boder	voting	yes	
Reynolds	voting	yes	
Purick	voting	yes	
Adler	voting	no	would not like the Superintendent to take the time from the district in this matter.

The motion was carried.

ATTACHMENT 10

SCHOOL BOARD RESOLUTION

WHEREAS, federal regulations for full power operation of the Shoreham Nuclear Plant require an emergency plan for communities surrounding the plant which will assure those communities adequate protection in event of a nuclear emergency;

WHEREAS, the Long Island Lighting Company, in an effort to meet federal regulations, has prepared an emergency plan which LILCO, lacking coordination with local or state governments, will attempt to implement; and

WHEREAS, the Nuclear Regulatory Commission's Shoreham licensing board is now conducting hearings to review the adequacy of the LILCO emergency plan; and

WHEREAS, the LILCO emergency plan includes protective actions to be taken by schools; and

WHEREAS, this board has identified the following weaknesses in the LILCO emergency plan:

1. Early Dismissal
Our emergency early dismissal procedure, which LILCO's plan incorporates, wouldn't bring school children to an uncontaminated area quickly enough to protect their health and safety.
2. Transportation
The requisite number of buses and drivers required for successful early dismissal are not available to the schools. This will prolong childrens' stay at schools in contaminated areas.
3. Needs of School Personnel
We cannot guarantee that teaching and non-teaching personnel will stay in schools to supervise early dismissal. Those teachers and staff may need to attend to the safety of their own families and, therefore, may not be available to perform emergency-related tasks.
4. Lack of Parental Supervision
The success of an early dismissal plan depends not only on prompt dismissal from schools, but on prompt evacuation of children from their homes. In those cases in which parents will not be at home during the day, children will be sent to unsupervised homes from which they will not be able to evacuate promptly.
5. Parental Intercession
We cannot be confident that parents will wait at home for their children to arrive. Many parents may attempt

to retrieve their children at schools, perhaps causing increased confusion and chaos.

6. Relocation

If a Shoreham emergency develops quickly and requires an evacuation of children from schools directly to relocation centers, this district does not have sufficient buses or drivers to transport all children to relocation centers in a timely, effective manner.

7. Supervision at Relocation Centers

We cannot guarantee that teaching and/or non-teaching school personnel will travel to and remain at relocation centers to supervise school children until parents arrive to retrieve them.

8. Sheltering

The LILCO plan suggests that sheltering (remaining indoors) may be the preferred protective action in specific Shoreham emergencies. However, none of this district's schools have basements or other structures necessary to provide adequate protection.

9. Trust in Public Information

In the LILCO plan, the only public information upon which to base decisions for protective actions will come from the utility. LILCO, through its Public Schools Coordinator and WALK-AM Radio, will both describe the extent of the emergency and recommend actions. Because LILCO would be both operator of the plant and initiator of emergency actions, potential for conflict of interest exists. School administrators, receiving information only from LILCO and not from any governmental agency, will be forced to decide upon actions with potentially serious consequences without the benefit of a directive from a responsible governmental source.

10. Indemnification

LILCO does not provide indemnification for school districts should damages, injuries, or deaths result from school administrators' decisions during an emergency, decisions which can be made based only upon information and recommendations offered by LILCO.

Now, be it therefore

RESOLVED, that the Middle Island Central School District finds that LILCO's emergency plans for schools do not offer children or school personnel of this district adequate protection in event of an accident at the Shoreham Nuclear Plant; and, be it further

RESOLVED, that this school board believes that licensing of the Shoreham Nuclear Plant should not be permitted unless or until complete and reasonable resolution of these outstanding, critical emergency planning problems can be achieved.

* * * * *

The above Resolution was passed by the Middle Island Central School District Board of Education at the Board Meeting on September 29, 1983.

Lori D'Amico

Lori D'Amico
District Clerk

ATTACHMENT 11

MT. SINAI UNION FREE SCHOOL DISTRICT

Board Resolution of October 18, 1983

Be it resolved that an early dismissal or "go home plan" is not an appropriate response to an order to evacuate in the event of a malfunction at the Shoreham Nuclear Power Station until the following issues are resolved.

1. The State and County governments approve an implementable evacuation plan.
2. The District can be assured that Bus Drivers, Emergency and Supervisory personnel of adequate force will be available to the District to implement the plan.
3. That such plan receives the review of the residents of the District.

THEREFORE

Until such time, it is the position of the Board of Education that no plan shall be submitted to any agency as such submittal could be viewed as an agreement by the District that such a plan is feasible.

SHOREHAM RESOLUTION

Whereas the Mount Sinai School District lies within the emergency Planning Zone of the Shoreham Nuclear Power Station

and

Whereas the Board of Education is responsible for the health and safety of the students and staff of the district while on district property

and

Whereas an operating license can not be granted by the Nuclear Regulatory Commission for said plant without an approved implementable evacuation plan

and

Whereas the government of Suffolk County adopted a resolution on February 17, 1983 stating that due to our unique island geography and limited road capacity it would be impossible to devise and implement an evacuation plan that would protect the public health and safety of the public

and

Whereas on that day the Governor of the State of New York announced his support of county government and stated then and subsequently that he would not impose an evacuation plan on the county

therefore

be it resolved that the Board of Education of the Mount Sinai Union Free School District supports the decisions and position of the government of Suffolk County and the State of New York

and be it further

resolved that the Board believes that no operating license, either low or full power, should be granted to LILCO for the Shoreham Power Station until an implementable evacuation plan that protects the public health and safety is developed and approved by County and State Government.

1. SINAI PARENT TEACHER ORGANIZATION--DRAFT RESOLUTION

WHEREAS, the Mt. Sinai Parent Teacher Organization, having discussed LILCO's emergency evacuation plan for schools in the event of a nuclear accident at the Shoreham plant, wishes to advise the Nuclear regulatory Commission's Shoreham licensing board of the plan's workability for its community; and

WHEREAS, LILCO's emergency evacuation plan is dependent on our schools' early dismissal procedures; and

WHEREAS, this PTO has considered the following weaknesses in the LILCO evacuation plan:

1. Transportation

We are certain that the required number of buses and drivers for successful early dismissal will not be available to the schools. Drivers may need to attend to the safety of their own families first and may refuse to drive school buses. Furthermore, because of the shortage of buses in our school district, transporting children from school to home normally necessitates three bus shifts. Consequently, there is no possibility of a quick evacuation.

2. Needs of School Personnel

We are certain that not all teaching and non-teaching personnel will stay in schools to supervise early dismissal. Many of the teaching and non-teaching staff will leave school to attend to the needs of their own families. Consequently, not enough school personnel will be available to attend to emergency-related jobs. A teacher survey conducted in the Mt. Sinai school district indicated that a majority of the teachers would not remain in school to supervise emergency procedures.

3. Lack of Parental Supervision

Should there be a nuclear accident at the Shoreham plant, the success of an early dismissal plan depends not only on prompt dismissal from the schools, but on prompt evacuation of children from their homes as well. It is probable, however, that many panic-stricken children will be locked out of their homes; or that even if these children can enter their homes their parents will not be present to carry out the necessary second part of an evacuation.

4. Parental Intercession

We cannot be assured that all parents will wait at home for their children to arrive. Many parents will attempt to retrieve their children at schools, thereby increasing confusion and chaos.

1--RESOLUTION

5. Panic

The announcement of a nuclear emergency at Shoreham will cause disorientation and panic in children, teachers, non-teaching staff, and parents. This will further hinder effective and safe dismissal from our schools.

6. Relocation

If an emergency at Shoreham requires evacuating our children from schools directly to a relocation center, our school district would be unable to handle this situation effectively. (See #1, Transportation)

7. Supervision at Relocation Centers

Once again we are certain that teaching and/or non-teaching school personnel will not all travel to and remain at relocation centers to supervise children for a possibly indefinite period of time. The Mt. Sinai teacher survey showed that over 70% of the teachers would have left for their own homes after the first hour, and that a majority of the teachers would refuse to accompany children to relocation centers.

8. Sheltering

The LILCO plan suggests that sheltering, rather than evacuating, may be the preferred protective action in schools in specific Shoreham emergencies. The Mt. Sinai school district has one basement in its elementary school. The size and function (for furnace and boiler facilities and the storage of extra furniture) of this basement preclude the sheltering of all but a small number of our school population.

9. Trust in Public Information

In the LILCO plan, the only source of public information during an emergency is LILCO itself. As a result of LILCO's past statements and actions with regard to Shoreham, many of us in our community are already skeptical of LILCO's words and intentions. The fact that LILCO might also be involved in a conflict of interest--being both operator of the plant and initiator of emergency actions--would tend to intensify doubts about the validity of LILCO's information during an emergency.

Now, be it therefore

RESOLVED, that the Mt. Sinai Parent Teacher Organization finds that LILCO's emergency plans for our schools do not offer us adequate protection or quick and effective evacuation for our children in the event of an accident at the Shoreham Nuclear Power Plant; and

~~3~~-RESOLUTION

OLVED, that we agree with our Suffolk County legislators
that in fact no safe evacuation of our community is
possible; and

OLVED, that we believe that a full-power license should not
be granted to the Shoreham Nuclear Power Plant.

SERVED DEC 23 1983

DOCKETED
USNRC

'83 DEC 22 P4:16

11 +
TEACHERS' ASSOCIATION
V. L. Sinai

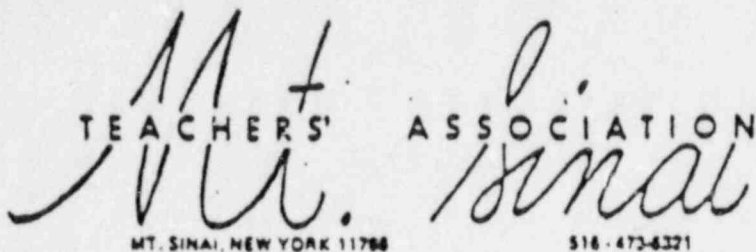
50-322-01-3 MT. SINAI, NEW YORK 11784

516-473-4321

RESOLUTION

OFFICE OF SECURITY
DOCKETING & SERVICE
BRANCH

- HEREAS, federal regulations for full power operation of the Shoreham Nuclear Plant require an emergency plan for communities surrounding the plant which will assure those communities adequate protection in event of a nuclear emergency; and
- HEREAS, the Long Island Lighting Company, in an effort to meet federal regulations, has prepared an emergency plan which LILCO, lacking coordination with local or state governments, will attempt to implement; and
- HEREAS, the LILCO emergency plan includes protective actions to be taken by schools; and
- HEREAS, this association has identified the following weaknesses in the LILCO emergency plan:
1. Early Dismissal
Our emergency early dismissal procedure, which LILCO's plan incorporates; wouldn't bring school children to an uncontaminated area quickly enough to protect their health and safety.
 2. Transportation
The requisite number of buses and drivers required for successful early dismissal are not available to the schools. This will prolong childrens' stay at schools in contaminated areas.
 3. Needs of Teachers
We cannot guarantee that the teachers will stay in schools to supervise early dismissal. Many of us may need to attend to the safety of our own families and, therefore, may not be available to perform emergency-related tasks.
 4. Lack of Parental Supervision
The success of an early dismissal plan depends not only on prompt dismissal from schools, but on prompt evacuation of children from their homes. In those cases in which parents will not be at home during the day, children will be sent to unsupervised homes from which they will not be able to evacuate promptly.
 5. Parental Intercession
We cannot be confident that parents will wait at home for their children to arrive. Many parents may attempt to retrieve their children at schools, perhaps causing increased confusion and chaos.
 6. Relocation
If a Shoreham emergency develops quickly and requires an evacuation of children from schools directly to relocation centers, this district does not have sufficient buses or drivers to transport all children to relocation centers in a timely, effective manner.



Mt. Sinai Teachers' Assn.
RESOLUTION - page 2

7. Supervision at Relocation Centers

We cannot guarantee that teachers will travel to and remain at relocation centers to supervise school children until parents arrive to retrieve them.

8. Trust in Public Information

In the LILCO plan, the only public information upon which to base decisions for protective actions will come from the utility. LILCO, through its Public Schools Coordinator and WALK-AM Radio, will both describe the extent of the emergency and recommend actions. Because LILCO would be both operator of the plant and initiator of emergency actions, potential for conflict of interest exists. School administrators, receiving information only from LILCO and not from any governmental agency, will be forced to decide upon actions with potentially serious consequences without the benefit of a directive from a responsible governmental source.

Now, be it therefore

- D, that the Mount Sinai Teachers Association finds that LILCO's emergency plans for schools do not offer children or school personnel of this district adequate protection in event of an accident at the Shoreham Nuclear Plant; and, be it further
- D, that this association believes that licensing of the Shoreham Nuclear Plant should not be permitted unless or until complete and reasonable resolution of these outstanding, critical emergency planning problems can be achieved.

11 +
TEACHERS' ASSOCIATION
MT. SINAI, NEW YORK 11768
816-473-4321

I have read the Mount Sinai Teachers' Association Resolution on the Shoreham Nuclear Plant. I support the Association's Resolution.

me	name
Carol W. Brush	Carmela Varelle
Bonnie Samuels	Sandra M. Muth
Charles Eisman	Jacqueline M. Portol
Gregory A. Storey	Susan Sturm
Gregory L. Stiller	Allen Schroeder
Tricia McMullen	Ann Finigan
Lisan Donnelly	Julie Stet
Patricia Liana	Bertha Fath
Kerry Mox	Patricia Uigubert
Mary Greenman	Naomi Balken
Barbara Palma	Ann Suda
Carol Wallace	Anne Fleiner
Edna L. Faulkner	Marion Burgess
Clyde Zuckerman	Barbara Rockoff
James H. Heston	Karen Connick
William (W.) J. B.	Betty Weiner
Gene Ditz	Blanche A. Leon
Barbara Stone	Linda Sill
Thomas Walker	

1
riet Ruth Kalich
? Spenberg
? Jesse McHenry
V

MOUNT SINAI UNION FREE SCHOOL DISTRICT
Mt. Sinai, New York 11766

ADOPTED - March 15, 1988

WHEREAS, this Board on July 19, 1983 and October 18, 1983 adopted resolutions expressing concern about the impact of licensing the Shoreham Nuclear Power Station upon the health and safety of the School District's students and personnel: and

WHEREAS, none of these concerns have been addressed, and because this Board has learned of a new Long Island Lighting Company proposal which also does not address these concerns: and

WHEREAS, LILCO represents in its revised plan that in the event of a Shoreham emergency requiring evacuation of the Schools, LILCO employees would perform functions normally performed by duly authorized school or contract personnel, i.e., transporting school children, by using LILCO/LERO employees to drive school buses, to evacuate in "one wave", our students to a relocation center outside the 10 mile EPZ: and

WHEREAS, it is the position of this Board that it will not allow anyone who is not authorized by this District to drive buses to transport our students, and we will not authorize our bus contractor to turn over to any unauthorized persons buses that are under contract to this School District:

NOW THEREFORE BE IT RESOLVED, that based upon this Board's determination that adequate protective actions, including early dismissal and evacuation as proposed by LILCO, could not be implemented so as to insure the health and safety of school children in the event of an emergency at the Shoreham Nuclear Power Station, the Mount Sinai Union Free School District cannot, and will not, accede to LILCO's new school evacuation proposal: and be it further

RESOLVED, that for these reasons and those set forth in prior resolutions, this Board believes that licensing of the Shoreham Nuclear Power Station should not be permitted unless and until complete and reasonable resolution of the outstanding critical emergency planning problems are achieved to the satisfaction of this Board, the County of Suffolk and the State of New York. And be it further

RESOLVED, that in order to make the views expressed herein known, the Clerk of the Board is directed to send a certified copy of this resolution to the Nuclear Regulatory Commission, and the Atomic Safety and Licensing Board of the Commission having jurisdiction over the Shoreham Proceedings. The Clerk is also directed to send copies to the Governor of the State of New York and the Suffolk County Executive.

MOUNT SINAI UNION FREE SCHOOL DISTRICT
Mt. Sinai, New York

ADOPTED - March 15, 1988

WHEREAS, the Board of Education on this day, March 15, 1988 passed a resolution regarding the LILCO Emergency Plan for the Shoreham Nuclear Power Station: and

WHEREAS, this Board desires to make its position known and represented before any body consider LILCO's Emergency Plan,

THEREFORE BE IT RESOLVED, that this Board authorizes Board Member, Robert W. Petrilak, to be its representative and speak on behalf of the Mount Sinai Board of Education in all matters pertaining to the LILCO Emergency Plan for the Shoreham Nuclear Power Station.

ATTACHMENT 12

I am a bus driver employed by Subura
bus company and I drive a school bus for the _____
Lebanon School District. I have
been told that according to an emergency plan proposed
by LILCO, I may be expected to drive a school bus in
the event of a radiological accident at the Shoreham
plant, as part of either an early dismissal or an
evacuation of schools.

This is to state that:

1. I will not participate in implementing
any LILCO emergency plan for Shoreham,
and
2. I cannot and will not agree to drive a
school bus in the event of an accident
at Shoreham.

Date 5-15-51

Signature _____

School Bus Driver Statements

The following is a breakdown by school district of the 255 school bus driver statements signed in 1986.

<u>School District</u>	<u>No. of Statements</u>
Port Jefferson	10
Boces/Central Islip	17
Patchogue	27
Sachem	5
Shoreham/Wading River	12
Smithtown	1
Three Village	13
Mount Sinai	19
Rocky Point	24
Comsewogue	19
Riverhead	16
South Manor	10
Miller Place	16
Middle Island/Longwood	64
Unspecified District	2

ATTACHMENT 13

THOMAS S. GULOTTA
COUNTY EXECUTIVE



OFFICE OF THE EXECUTIVE
NASSAU COUNTY EXECUTIVE BUILDING
ONE WEST STREET
MINEOLA, N.Y. 11501

March 15, 1988

Mr. William Catacosinos
Chairman and Chief Executive Officer
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

Dear Bill,

It has come to my attention that in its revised radiological emergency plan LILCO has included the use of the Nassau County Veterans Memorial Coliseum, the Nassau Community College and the Nassau County Medical Center as "relocation centers" to which school evacuees would go in the event of a nuclear accident at Shoreham.

I remind you of Resolution No. 782-1986, enacted on June 16, 1986 by the Nassau County Board of Supervisors. It resolved "that no Nassau County facilities, including the Nassau Veterans Memorial Coliseum, are or will be available for use by the Long Island Lighting Company or by Facility Management Corporation of New York Inc. as part of the Long Island Lighting Company emergency plan, unless prior approval by resolution is first obtained from the Nassau County Board of Supervisors." No such prior approval has been obtained by LILCO. Therefore, LILCO's plan contradicts Resolution 782-1986.

The NRC's new rule for emergency planning does not and could not supersede Resolution No. 782-1986 because the NRC has no authority over facilities owned by Nassau County. Moreover, Nassau County Resolution No. 782-1986 is the binding law of this County. The Resolution makes absolutely clear that Nassau County facilities are not available for use in LILCO's emergency plan unless prior approval is granted by the Board of Supervisors. The Board has not granted this approval.

I bring to your attention a copy of a letter signed by all the County Supervisors last July in reference to this same issue.

Therefore, again I ask that LILCO stop misrepresenting that the Nassau Veterans Memorial Coliseum, Nassau Community College, Nassau

THOMAS S. GULOTTA
COUNTY EXECUTIVE



OFFICE OF THE EXECUTIVE
NASSAU COUNTY EXECUTIVE BUILDING
ONE WEST STREET
MINEOLA, N.Y. 11501

July 1, 1987

Administrative Law Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulation Commission
Washington, D.C. 20555

Dear Administrative Law Judges;

As the Federal Atomic Safety and Licensing Board is now conducting hearings on the Long Island Lighting Company's emergency evacuation plan, I must point out that the latest revised plan still contains assumptions relative to Nassau County facilities that must be corrected.

In its resolution of June 16, 1986, the Nassau County Board of Supervisors resolved that no county facilities are to be available for the use by LILCO as part of its emergency plan, "unless prior approval by resolution is first obtained from the Nassau County Board of Supervisors."

LILCO has not received permission from the Nassau Board of Supervisors to include any county facilities in its emergency plan and, to my knowledge, has not even requested any specific approval.

I respectfully request, therefore, that the Nassau County Police Department and the Nassau County Medical Center be removed from the plan.

Sincerely,

Thomas S. Gulotta
THOMAS S. GULOTTA
County Executive

Joseph N. Mondello
JOSEPH N. MONDELLO
Presiding Supervisor
Town of Hempstead

John Kiernan
JOHN KIERNAN
Supervisor
Town of North Hempstead

Vincent Suozzi
VINCENT SUOZZI
Supervisor, City Glen Cove

Gregory Peterson
GREGORY PETERSON
Supervisor, Town of Hempstead

Joseph Cole
JOSEPH COLE
Supervisor
Town of Oyster Bay

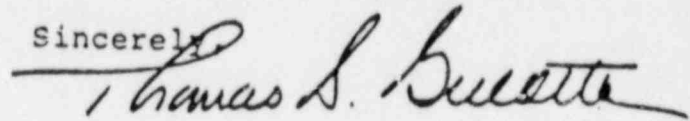
Bruce Nyman
BRUCE NYMAN
Supervisors, City of Long Beach

Stagwich
c: Mr. William Catacosinos
Chairman and Chief Executive Officer
Long Island Lighting Company
175 East Old County Road
Hicksville, New York 11801

County Medical Center, Nassau County Police or any other Nassau County facility is part of LILCO's emergency plan or is otherwise available for use in the event of a nuclear emergency at Shoreham.

Thank you for your attention to this matter.

Sincerely,



THOMAS S. GULOTTA
County Executive

TS:GW:je

Enclosure

CC: Honorable Lando Zech, Chairman
Nuclear Regulatory Commission
Washington, D. C. 20555

Honorable Julius Becton, Director
Federal Emergency Management Agency
Washington, D.C. 20472

RESOLUTION NO. 782B-1986

A RESOLUTION AMENDING A RESOLUTION ENTITLED: " A
RESOLUTION RELATIVE TO THE USE OF THE NASSAU VETERANS MEMORIAL
COLISEUM IN A LONG ISLAND LIGHTING COMPANY'S EVACUATION PLAN."

(Passed by Board of Supervisors on JUN 18 1986
Votes for 108 ; votes against, NONE . Became a
resolution on JUN 18 1986 with the approval
of the Acting County Executive.)

WHEREAS, the Long Island Lighting Company has entered
into an agreement with the Hyatt Management Corporation of New
York, Inc., which purports to designate the Nassau Veterans
Memorial Coliseum as a Nuclear Disaster Evacuation Center, and

WHEREAS, the County Attorney of Nassau County has advise
the Board of Supervisors that the terms of the lease between Nassa
County and the Facility Management Corporation of New York, Inc.,
do not allow for such use of the Nassau Veterans Memorial Coliseum
and now, therefore be it

RESOLVED, that the purported designation of the Nassau
Veterans Memorial Coliseum by the Long Island Lighting Company as
a Nuclear Disaster Evacuation Center be and the same is hereby
declared a nullity; contrary to law and void; and be it further

RESOLVED, that no Nassau County facilities, including
the Nassau Veterans Memorial Coliseum, are or will be available
for the use by the Long Island Lighting Company, or by the Facil
Management Corporation of New York, Inc., as part of the Long
Island Lighting Company emergency plan, unless prior approval by
resolution is first obtained from the Nassau County Board of
Supervisors; and be it further

RESOLVED, that a copy of this resolution shall be forth with served upon the Long Island Lighting Company and Facility Management of New York, Inc., formerly known as Hyatt Management Corporation of New York, Inc., and filed with notice of such service with the office of Nuclear Regulatory Commission at Washington D.C.; and be it further

RESOLVED, that a copy of this resolution shall be forth with published in the official newspaper of the County of Nassau.

APPROVED JUNE 14 1966
Frederick D. Jones
County Clerk

ATTACHMENT 14



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number:

January 23, 1983

Mr. Richard R. Doremus
Shoreham Wading River Central SD
Administrative Office
Route 25A
Shoreham, NY 11786

Dear Mr. Richard R. Doremus:

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the LILCO facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facility under the Shoreham plan.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of State and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new rule assumes (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assumes that governments will respond using their "best efforts" and that they will follow the utility plan, unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, according to the new rule, to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, LILCO's plan provides that public school students will be evacuated in a "single wave" by buses to two relocation centers located outside the 10-mile area around Shoreham. Your regular contract bus company drivers and buses will be used to evacuate your schools. LILCO's Local Emergency Response Organization (LERO) will provide additional qualified and licensed bus drivers and buses to ensure that there are enough drivers and buses for a single-wave evacuation. LERO drivers will also serve as back-up drivers if any contract company bus driver chooses not to participate in the evacuation.

January 22, 1993
Page 2

All public schools within the 10-mile radius of Shoreham will be evacuated to the Nassau County Veterans Memorial Coliseum, except for Longwood School District schools and Mount Sinai Union Free School District schools, which will be evacuated to the Nassau Community College. Students will be reunited with their parents or guardians at these relocation centers. Of course, if you would like to use a different relocation center, such as another school facility located outside the 10-mile radius of Shoreham, we would be pleased to help you pursue a signed agreement with that facility.

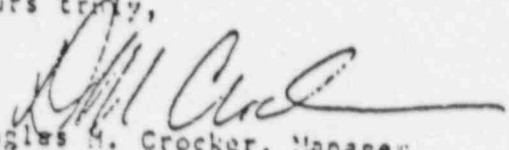
Obviously, an important element of emergency preparedness is training. LERD offers to schedule and conduct the necessary training sessions for your regular school bus drivers. (Since bus driver training should be coordinated through schools, we request that you contact your contract bus companies to advise them of the training and to provide us with a list of bus drivers.) In addition, we offer to provide similar training to members of your teaching and administrative staff who may be asked to accompany children on the buses to your school's designated relocation center. Training will include instructions on evacuation procedures, the role of emergency workers, planning with families for emergency worker responsibilities, and the proper use of radiation monitoring equipment. LILCO will reimburse bus drivers and school personnel for their time spent participating in emergency preparedness training. This training will be conducted to complement your school district's existing emergency preparedness training.

We are eager to work with you to ensure the effectiveness of the LILCO plan and would welcome the opportunity to meet with you to discuss the procedures affecting your schools. We can help you to modify your existing emergency plan or to prepare a new one that would include specific plans for a Shoreham emergency. We also encourage you, your staff, and the school bus drivers under contract to your school district to participate in upcoming emergency preparedness training, drills and exercises.

Please contact LILCO Emergency Planner Joann Wiggins at (516) 436-4214 at your earliest convenience to discuss this emergency planning effort and to schedule training for your personnel. Of course, please do not hesitate to contact Ms. Wiggins if you have questions or suggestions concerning our emergency planning efforts.

Thank you for your cooperation and assistance.

Yours truly,


Douglas M. Crocker, Manager
Nuclear Emergency Preparedness

DMC/ph



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

January 22, 1968

Dr. Richard Suprina
Riverhead Central School District
Administrative Office
700 Osborne Avenue
Riverhead, NY 11201

Dear Dr. Richard Suprina,

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the Shoreham facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facilities under the Shoreham plan.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of State and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new rule assumes (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assumes that governments will respond using their "best efforts" and that they will follow the utility plan, unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, according to the new rule to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, LILCO's plan provides that students in public schools located within the 10 mile radius of Shoreham will be evacuated in a "single wave" by buses to two relocation centers located outside the 10 mile area around Shoreham. For schools in your school district which are located within the 10 mile radius of Shoreham, your regular contract bus company drivers and buses will be used to evacuate those schools. LILCO's Local Emergency Response Organization (LERO) will provide additional qualified and licensed bus drivers and buses to ensure that there are enough drivers and buses for a single-wave evacuation. LERO drivers will also serve as back-up drivers if any contract company bus drivers choose not to participate in the evacuation.

All public schools in the 10 mile radius of Shoreham will be evacuated to the Nassau County Veterans Memorial Coliseum, except schools in the Longwood and Mount Sinai Union Free School Districts, which will be evacuated to the Nassau Community College. Students will be reunited with their parents or guardians at these relocation centers. Of course, if you would like to use a relocation center other than the one assigned to you in the Shoreham plan, such as another school located outside the 10 mile radius of Shoreham, we would be pleased to help you pursue an agreement with the facility.


For those schools in your school district which are outside the EPZ but which have students residing within the EPZ, school officials will be asked to hold those students at their schools until the parents or guardians arrive for the students' release.

Obviously, an important element of emergency preparedness is training. LERO offers to schedule and conduct the necessary training sessions for your regular school bus drivers and school personnel. Since bus driver training should be coordinated through your office, we request that you contact your contract bus companies to advise them of the need for training and to provide us with a list of bus drivers for schools in your system located within the 10 mile radius of Shoreham. Training will include instructions on evacuation procedures, the role of emergency workers, planning with families for emergency worker responsibilities, and the proper use of radiation monitoring equipment. LILCO will reimburse bus drivers and school personnel for their time spent participating in emergency preparedness training.

We are eager to work with you to ensure the effectiveness of emergency preparedness for your schools. We would welcome the opportunity to meet with you to discuss these procedures and to answer any questions. We can also help you to modify your existing emergency plan or to develop a new one that would include specific provisions for a Shoreham emergency.

We encourage you, your staff and the school bus drivers under contract to your school district to participate in upcoming emergency preparedness training, drills and exercises. Please contact Litch Emergency Planner Joan Higgins at (516) 436-4014 at your earliest convenience to arrange your participation in these emergency planning activities. Thank you for your cooperation and assistance.

Yours truly,



Douglas M. Crocker, Manager
Nuclear Emergency Preparedness



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

January 22, 1968

Mr. Charles P. Tufano, Superintendent
East Moriches UFSD
9 Adelaide Avenue
East Moriches, NY 11940

Dear Mr. Tufano,

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the Shoreham facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facilities under the Shoreham plan.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of state and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new rule assures (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assures that governments will respond using their "best efforts" and that they will follow the utility plan, unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, according to the new rule, to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, those schools which are located outside of the 10 mile emergency planning zone (EPZ) for Shoreham and which have students living within the EPZ will be requested to hold the students at their schools until parents/guardians arrive for the students.

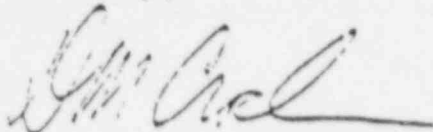
LILCO's Local Emergency Response Organization (LERO) offers to conduct the necessary training sessions for your administrative and teaching staff in the implementation of your procedures and plans for those schools.

We are eager to work with you to ensure the effectiveness of the Shoreham plan and would welcome the opportunity to meet with you to discuss the procedures affecting your schools. We would also encourage you and your staff to participate in upcoming emergency preparedness training, drills, and exercises.

Please contact LILCO Emergency Planner Joan Wiggins at (516) 436-4214 at your earliest convenience to discuss this emergency planning effort, and to schedule training for your personnel. Of course, please do not hesitate to contact Ms. Wiggins if you have questions or suggestions concerning our emergency planning efforts.

Thank you for your cooperation and assistance.

Yours truly,



Douglas M. Crocker, Manager
Nuclear Emergency Preparedness



LONG ISLAND LIGHTING COMPANY

131 Hoffman Lane, Central Islip, NY 11722

January 22, 1988

Sister Patricia Grant
Infant Jesus School
Myrtle Avenue
Port Jefferson, NY 11777

Dear Sister Patricia:

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the Shoreham facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facility under the Shoreham plan.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of State and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new rule assumes (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assumes that governments will respond using their "best efforts" and that they will follow the utility plan, unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, according to the new rule, to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, LILCO's plan provides that parochial school students will be evacuated in school buses provided by LILCO's Local Emergency Response Organization (LERO) to the Nassau Community College in Uniondale, unless you have a separate agreement with another facility outside the 10-mile area around Shoreham. Of course, if you would

Sister Patricia Grant
January 22, 1988
Page 2

like to use a relocation center other than the one assigned to you in the Shoreham plan, we would be pleased to help you pursue a signed agreement with that facility. The specific arrangements developed for your facility are shown below:

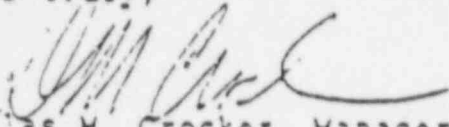
<u>Monitoring Station</u>	<u>Relocation Center</u>	<u>Transportation Assistance</u>
LILCO-Bellmore Hicksville Roslyn	Nassau Community College	6 Buses

We are eager to work with you to ensure the effectiveness of the Shoreham plan and would welcome the opportunity to meet with you to discuss the procedures affecting your schools. We can help you to modify your existing emergency plan or to prepare a new one that would include specific plans for a Shoreham emergency. We also encourage you and your staff to participate in upcoming emergency preparedness training, drills and exercises.

Please contact LILCO Emergency Planner Joan Wiggins at (516) 436-4214 at your earliest convenience to discuss this emergency planning effort and to schedule training for your personnel. Of course, please do not hesitate to contact Ms. Wiggins if you have questions or suggestions concerning our emergency planning efforts.

Thank you for your cooperation and assistance.

Yours truly,


Douglas M. Crocker, Manager
Nuclear Emergency Preparedness



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

January 22, 1983

Mrs. Weber
St. David School
563 Roanoke Avenue
Riverhead, NY 11901

Dear Mrs. Weber:

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the Shoreham facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facilities under the Shoreham plan.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of state and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new rule assumes (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assures that governments will respond using their "best efforts" and that they will follow the utility plan, unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, according to the new rule, to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, those schools which are located outside of the 10 mile emergency planning zone (EPZ) for Shoreham and which have students living within the EPZ will be requested to hold the students at their schools until parents/guardians arrive for the students.


LILCO's Local Emergency Response Organization (LERO) offers to conduct the necessary training sessions for your administrative and teaching staff in the implementation of your procedures and plans for those schools.

We are eager to work with you to ensure the effectiveness of the Shoreham plan and would welcome the opportunity to meet with you to discuss the procedures affecting your schools. We would also encourage you and your staff to participate in upcoming emergency preparedness training, drills, and exercises.

Please contact LILCO Emergency Planner Joan Wiggins at (516) 435-4214 at your earliest convenience to discuss this emergency planning effort, and to schedule training for your personnel. Of course, please do not hesitate to contact Ms. Wiggins if you have questions or suggestions concerning our emergency planning efforts.

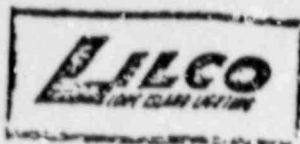
Thank you for your cooperation and assistance.

Yours truly,



Douglas M. Crocker, Manager
Nuclear Emergency Preparedness

/df



LONG ISLAND LIGHTING COMPANY

131 Hoffman Lane, Central Islip, NY 11722

January 22, 1988

Ms. Katherine Donnelly
St. Anselm's Nursery School
North Country Road
Shoreham, NY 11786

Dear Ms. Donnelly:

We have contacted you in the past about the Local Offsite Emergency Response Plan for the Shoreham Nuclear Power Station. This plan is developed and maintained by LILCO according to the requirements of the Nuclear Regulatory Commission (NRC) to provide for public safety in the unlikely event of an emergency at the Shoreham facility.

The purpose of this letter is to bring you up to date on a recent change in the NRC rules regarding emergency preparedness and to explain emergency planning procedures for your facility.

As you know, Suffolk County and the State of New York have refused to participate in emergency planning for the Shoreham facility. The NRC recently amended its rules to make clear that the refusal of State and local governments to participate in emergency planning will not prevent the NRC from reviewing and approving an otherwise adequate plan developed solely by a utility. The new rule does not modify any of the substantive standards for protecting all populations in the vicinity of a nuclear power plant. However, the new NRC rule assumes (consistent with New York State law) that State and local governments will respond in an emergency. The new rule further assumes that the governments will respond using their "best efforts" and that they will follow the utility's plan unless a more effective plan is available at the time of the emergency. LILCO has revised its plan, consistent with the new rule, to facilitate its use by governments which have not participated in emergency planning for Shoreham.

In the unlikely event of an emergency at Shoreham, LILCO's Local Emergency Response Organization (LERO) will provide transportation for evacuees from your facility to a temporary relocation center. If there is a possibility that they may have been contaminated by radioactive particulates, they will be taken first to a monitoring station where they will be checked for any possible signs of contamination, and then to the temporary relocation center. The specific arrangements developed for your facility are shown below:

Ms. Katherine Donnelly
January 22, 1988
Page 2

Monitoring Station

LILCO-Bellmore
Hicksville
Roslyn

Relocation Center

Nassau Community
College

Transportation
Assistance

1 Bus

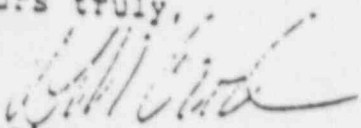
Of course, if you want to use a different relocation center, we can help you pursue a signed agreement with that facility.

We would like to meet with you to discuss LILCO's plan and those procedures that pertain specifically to your facility. We can assist you in modifying your own existing emergency plan or in preparing a new one. We would also like to include you in our training drills and exercises so that you can evaluate these procedures and provide your suggestions for improvements.

If you would, please call LILCO Emergency Planner Joan Wiggins at (516) 436-4214 at your earliest convenience. We look forward to meeting with you to discuss our cooperative emergency planning efforts.

Thank you for your cooperation and assistance.

Yours truly,


Douglas M. Crocker, Manager
Nuclear Emergency Preparedness

COUNTY OF SUFFOLK



OFFICE OF THE COUNTY EXECUTIVE

PATRICK G. HALPIN
SUFFOLK COUNTY EXECUTIVE

February 19, 1988

Dr. Richard Suprina
Riverhead Central School District
Administrative Office
700 Osborne Avenue
Riverhead, New York 11901

Dear Doctor Suprina:

This is in reference to the letter dated January 22, 1988, that you received from the Long Island Lighting Company requesting the involvement of your school district in LILCO's emergency planning for the Shoreham Nuclear Power Station. I am writing to correct false impressions that LILCO's letter creates about the actions and intentions of the government of Suffolk County and to make certain that the County's position is clear.

1. Suffolk County is opposed to the operation of the Shoreham plant. In February 1983, following nearly a year of extensive analyses, studies and hearings, Suffolk County determined that it would not be possible to evacuate or otherwise protect the public if there were a serious nuclear accident at Shoreham. Given this, the County resolved not to adopt or implement an emergency plan for Shoreham. To have instead adopted such a plan, the County would have misled the public into believing that they were being protected when in fact they were not. The County could not take such irresponsible action and jeopardize the safety of its citizens.

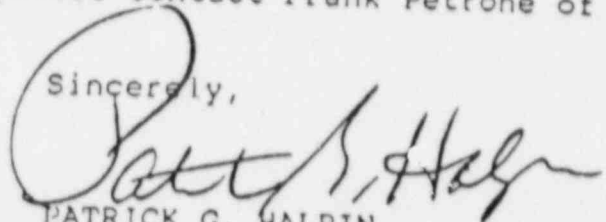
2. Suffolk County does not in any way support the emergency plan which LILCO is requesting your school district to support and help LILCO to implement. The County opposes LILCO's plan because it believes that the plan does not and cannot protect the safety of the citizens of Suffolk County. This is the conclusion of experts of both Suffolk County and New York State who have evaluated LILCO's plan. For your information, on February 2, 1988, the NRC's Atomic Safety and Licensing Board ruled that the emergency plan which LILCO is asking you to support is "fundamentally flawed". The Board also found LILCO's emergency workers to be inadequately trained to perform many of the emergency response functions assigned to them. In the Board's word, LILCO's emergency workers are "amateurs".

Dr. Richard Suprina
February 19, 1988
Page 2

3. LILCO's statements about the Nuclear Regulatory Commission's new emergency planning rule create the false impression that Suffolk County would follow LILCO's emergency plan and use the County's best efforts to implement the plan if Shoreham were to operate and a nuclear accident occurred. First, Suffolk County believes that Shoreham cannot lawfully be licensed to operate. Second, the NRC's new rule does not require, and cannot require, Suffolk County to use LILCO's plan. Third, the fact is that under no circumstance would Suffolk County in any way follow LILCO's plan or authorize LILCO to use it. The County believes that LILCO's plan is a threat to the safety of Suffolk County's citizens, and that LILCO's emergency response organization and emergency workers are incapable. Suffolk County would not endanger the safety of its citizens by relying upon such inadequate resources.

If you have any questions, please contact Frank Petrone of my staff at 360-4020.

Sincerely,



PATRICK G. HALPIN
Suffolk County Executive

PGH:ew

ATTACHMENT 15

SCHOOL BOARD RESOLUTION

Adopted September 1, 1983

WHEREAS, federal regulations for full power operation of the Shoreham Nuclear Plant require an emergency plan for communities surrounding the plant which will assure those communities adequate protection in event of a nuclear emergency; and

WHEREAS, the Long Island Lighting Company, in an effort to meet federal regulations, has prepared an emergency plan which LILCO, lacking coordination with local or state governments, will attempt to implement; and

WHEREAS, the Nuclear Regulatory Commission's Shoreham licensing board is now conducting hearings to review the adequacy of the LILCO emergency plan; and

WHEREAS, the LILCO emergency plan includes protective actions to be taken by schools; and

WHEREAS, this board has identified the following weaknesses in the LILCO emergency plan:

1. Early Dismissal
Our emergency early dismissal procedure, which LILCO's plan incorporates, wouldn't bring school children to an uncontaminated area quickly enough to protect their health and safety.
2. Transportation
The requisite number of buses and drivers required for successful early dismissal are not available to the schools. This will prolong childrens' stay at schools in contaminated areas.
3. Needs of School Personnel
We cannot guarantee that teaching and non-teaching personnel will stay in schools to supervise early dismissal. These teachers and staff may need to attend to the safety of their own families and, therefore, may not be available to perform emergency-related tasks.
4. Lack of Parental Supervision
The success of an early dismissal plan depends not only on prompt dismissal from schools, but on prompt evacuation of children from their homes. In those cases in which parents will not be at home during the day, children will be sent to unsupervised homes from which they will not be able to evacuate promptly.
5. Parental Intercession
We cannot be confident that parents will wait at home for their children to arrive. Many parents may attempt

to retrieve their children at schools, perhaps causing increased confusion and chaos.

6. Relocation

If a Shoreham emergency develops quickly and requires an evacuation of children from schools directly to relocation centers, this district does not have sufficient buses or drivers to transport all children to relocation centers in a timely, effective manner.

7. Supervision at Relocation Centers

We cannot guarantee that teaching and/or non-teaching school personnel will travel to and remain at relocation centers to supervise school children until parents arrive to retrieve them.

8. Sheltering

The LILCO plan suggests that sheltering (remaining indoors) may be the preferred protective action in specific Shoreham emergencies. However, none of this district's schools have basements or other structures necessary to provide adequate protection.

9. Trust in Public Information

In the LILCO plan, the only public information upon which to base decisions for protective actions will come from the utility. LILCO, through its Public Schools Coordinator and WALK-AM Radio, will both describe the extent of the emergency and recommend actions. Because LILCO would be both operator of the plant and initiator of emergency actions, potential for conflict of interest exists. School administrators, receiving information only from LILCO and not from any governmental agency, will be forced to decide upon actions with potentially serious consequences without the benefit of a directive from a responsible governmental source.

10. Indemnification

LILCO does not provide indemnification for school districts should damages, injuries, or deaths result from school administrators' decisions during an emergency, decisions which can be made based only upon information and recommendations offered by LILCO.

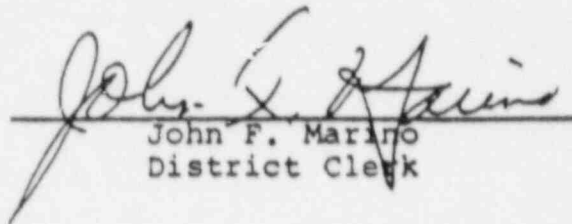
Now, be it therefore

RESOLVED, that the Miller Place Union Free School District finds that LILCO's emergency plans for schools do not offer children or school personnel of this district adequate protection in event of an accident at the Shoreham Nuclear Plant; and, be it further

RESOLVED, that this school board believes that licensing of the Shoreham Nuclear Plant should not be permitted unless or until complete and reasonable resolution of these outstanding, critical emergency planning problems can be achieved.

* * * *

The above Resolution was passed by the Miller Place Union Free School District Board of Education at the Board Meeting on September 1, 1983.


John F. Marino
District Clerk

RESOLUTION ON LILCO'S NEW
EVACUATION PLAN

WHEREAS, on September 1, 1983, and on July 1, 1986, this Board adopted resolutions expressing its concerns about the impact of full power operation of the Shoreham Nuclear Power Plant upon the safety and health of the School District's students and personnel; and

WHEREAS, because the Board's concerns have not been adequately addressed, and because the Board has learned of a recent Long Island Lighting Company (LILCO) proposal, the essence of which is set forth below, which still does not dispel those concerns, the Board now adopts this supplementary resolution; and

WHEREAS, on information and belief, LILCO has recently represented to the Nuclear Regulatory Commission's Licensing Board with jurisdiction over the Shoreham proceedings that it is revising its emergency plan to provide that in a Shoreham emergency, LILCO employees would perform functions normally performed by duly authorized school or contract personnel, i.e., transporting school children, by using LILCO employees to drive buses provided by LILCO, from schools to certain other locations during a Shoreham radiological emergency, in order to evacuate all public school children from the 10-mile Shoreham EPZ, in a "single wave," without the necessity of multiple bus runs; and

WHEREAS, after due consideration of the logistical and practical realities involved in implementing early dismissal,

evacuation, or other protective actions for school children in the Miller Place School District during a Shoreham emergency, this Board of Education has determined that it is highly unlikely that LILCO could, in the event of a Shoreham emergency, implement its plan in a way that reasonably might be expected to provide adequately for the health and safety of the children from the School District, and

WHEREAS, on information and belief, neither LILCO's original emergency plan nor LILCO's new school evacuation proposal includes appropriate provisions for dealing with the potential liability of the Miller Place School District or employees thereof, which could arise out of a Shoreham accident, or from protective actions attempted to be taken during such an accident;

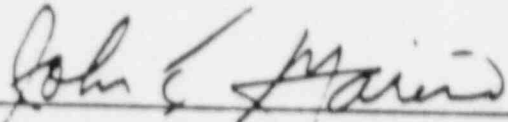
NOW THEREFORE BE IT RESOLVED, that, based upon this Board's determination that adequate protective actions, including early dismissal and evacuation as proposed by LILCO, could not be implemented so as to assure the safety of the school children in the event of a Shoreham emergency, the Miller Place Union Free School District cannot, and will not, accede to LILCO's new school evacuation proposal; and be it further

RESOLVED, that, for the reasons set forth in the Board's resolutions of September 1, 1983, and July 1, 1986, and for the reasons set forth herein, this Board believes that licensing of the Shoreham Nuclear Plant should not be permitted unless and

until complete and reasonable resolution of the outstanding critical emergency planning problems are achieved, and be it further

RESOLVED, that in order to make known the views expressed herein, the Clerk of this Board is directed to send a certified copy of this Resolution to the Nuclear Regulatory Commission, and the Atomic Safety and Licensing Board of the Commission having jurisdiction over the Shoreham proceedings.

This is a true copy of a resolution unanimously adopted by the Board of Education of the Miller Place Union Free School District at a public meeting held on February 9, 1988.



District Clerk
Miller Place Union Free School District
Miller Place, New York 11764
February 10, 1988

COMSEWOGUE SCHOOL DISTRICT
Port Jefferson Station, New York

SCHOOL BOARD RESOLUTION

WHEREAS, the Comsewogue School District is located within the 10 mile radiological emergency planning zone of the Shoreham plant; and

WHEREAS, the Comsewogue Board of Education is cognizant of its responsibilities relative to the health and safety of students and school personnel; and

WHEREAS, the governments of Suffolk County and New York State, after extensive analysis, decided not to adopt or implement any radiological emergency evacuation plan for response to a Shoreham emergency; and

WHEREAS, New York State Supreme Court decisions have upheld Suffolk County's decision not to adopt or implement any plan for Shoreham; and since the LILCO emergency plan for Shoreham has been found to be beyond LILCO's authority to implement, it would be inappropriate for the Comsewogue School District to cooperate with LILCO regarding Shoreham planning; and

WHEREAS, the Comsewogue Board of Education believes that the governments of Suffolk County and New York have acted responsibly and in furtherance of the interests of Comsewogue School District residents in deciding not to adopt or implement any radiological emergency evacuation plan for Shoreham; and

WHEREAS, the Shoreham emergency plan developed by Long Island Lighting Company makes unwarranted assumptions about the willingness and capability of Comsewogue School District personnel to undertake emergency actions in the event of a Shoreham radiological emergency; and

WHEREAS, the Comsewogue Board of Education after having surveyed its employees cannot assure adequate participation and supervision from school personnel and bus drivers, and on the basis of the limited transportation and other resources available to Comsewogue, it is clear that Comsewogue school personnel could not and would not implement early dismissal, evacuation, sheltering or other protective actions in the event of a Shoreham radiological emergency evacuation; and

WHEREAS, the Comsewogue School District is informed that the Nuclear Regulatory Commission's Licensing Board concluded that Comsewogue school preparedness is adequate for a Shoreham radiological emergency evacuation; and

WHEREAS, the Comsewogue School District is informed that the Federal Emergency Management Agency appears to have ignored the fact Comsewogue School District has adopted no plan and performed no training for a Shoreham radiological emergency; and

WHEREAS, that the mere acceptance and use of tone alert radios does not in any way indicate Comsewogue Board's acceptance of, or cooperation with LILCO's proposed evacuation plan.

NOW THEREFORE BE IT,

RESOLVED, that the Comsewogue Board of Education recognizes its responsibilities to students and school personnel in the Comsewogue School District; and be it further

RESOLVED, that the Comsewogue Board of Education recognizes that the LILCO Plan provides no way of dealing with the potential liability of the Comsewogue School District or to the school employees which could arise out of lawsuits resulting from a Shoreham radiological evacuation, or from protective actions taken during a radiological emergency evacuation; and be it further

RESOLVED, that the Comsewogue Board of Education fully supports the Suffolk County Legislature and the State of New York in their position of refusing to participate in Shoreham radiological emergency evacuation planning and in their opposition to the licensing of the Shoreham Nuclear Power Plant; and be it further

RESOLVED, therefore, that the Comsewogue Board of Education cannot and will not adopt or implement any plan for, or perform any training for, or participate in any exercise of school protective actions for response to a Shoreham radiological emergency, and that to do so would be irresponsible; and be it further

RESOLVED, that the Comsewogue Board of Education concludes that no operating license be granted to LILCO for the Shoreham Nuclear Power Plant.

I hereby certify and swear that this is a true excerpt from the January 16, 1986, minutes of the Regular Meeting of the Board of Education of the Comsewogue School District.

Kathleen Gaglias
Kathleen Gaglias,
District Clerk

PASSED RESOLUTION -- SHOREHAM EVACUATION PLAN
BOARD OF EDUCATION, ROCKY POINT PUBLIC SCHOOLS

[The Rocky Point School Board hereby replaces and supersedes its 1983 Shoreham Resolution with the following May 19, 1986 Resolution]:

WHEREAS, The Rocky Point School District is located within the 10-mile radiological emergency planning zone of the Shoreham plant; and

WHEREAS, the Rocky Point Board of Education is cognizant of its responsibilities relative to the health and safety of students and school personnel; and

WHEREAS, the governments of Suffolk County and New York State, after extensive analysis, decided not to adopt or implement any radiological emergency evacuation plan for response to a Shoreham emergency; and

WHEREAS, New York State Supreme Court decisions have upheld Suffolk County's decision not to adopt or implement any plan for Shoreham; and since the LILCO emergency plan for Shoreham has been found to be beyond LILCO's authority to implement, it would be inappropriate for the Rocky Point School District to cooperate with LILCO regarding Shoreham planning; and

WHEREAS, the Rocky Point Board of Education believes that the governments of Suffolk County and New York have acted responsibly and in furtherance of the interests of Rocky Point School District residents in deciding not to adopt or implement any radiological emergency evacuation plan for Shoreham; and

WHEREAS, the Shoreham emergency plan developed by Long Island Lighting Company makes unwarranted assumptions about the willingness and capability of Rocky Point school personnel to undertake emergency actions in the event of a Shoreham radiological emergency; and

WHEREAS, the Rocky Point Board of Education after having surveyed its employees cannot assure adequate participation and supervision from school personnel and bus drivers, and on the basis of the limited transportation and other resources available to Rocky Point, it is clear that Rocky Point school personnel could not and would not implement early dismissal, evacuation, sheltering or other protective actions in the event of a Shoreham radiological emergency evacuation; and

WHEREAS, the Rocky Point School District is informed that the Nuclear Regulatory Commission's Licensing Board concluded that Rocky Point school preparedness is adequate for a Shoreham radiological emergency evacuation; and

WHEREAS, the Rocky Point School District is informed that the Federal Emergency Management Agency appears to have ignored the fact Rocky Point School District has adopted no plan and performed no training for a Shoreham radiological emergency; and

WHEREAS, that the mere acceptance and use of tone alert radios does not in any way indicate Rocky Point School Board's acceptance of, or cooperation with LILCO's proposed evacuation plan.

May 19, 1986

Page -2- of 2 pages

PASSED RESOLUTION -- SHOREHAM EVACUATION PLAN
BOARD OF EDUCATION, ROCKY POINT PUBLIC SCHOOLS

NOW THEREFORE BE IT,

RESOLVED, that the Rocky Point Board of Education recognizes its responsibilities to students and school personnel in the Rocky Point School District; and be it further

RESOLVED, that the Rocky Point Board of Education recognizes that the LILCO plan provides no way of dealing with the potential liability of the Rocky Point School District or of the school employees which could arise out of lawsuits resulting from a Shoreham radiological evacuation, or from protective actions taken during a radiological emergency evacuation; and be it further

RESOLVED, that the Rocky Point Board of Education fully supports the Suffolk County Legislature and the State of New York in their position of refusing to participate in Shoreham radiological emergency evacuation planning and in their opposition to the licensing of the Shoreham Nuclear Power Plant; and be it further

RESOLVED, therefore, that the Rocky Point Board of Education cannot and will not adopt or implement any plan for, or perform any training for, or participate in any exercise of school protective actions for response to a Shoreham radiological emergency, and that to do so would be irresponsible; and be it further

RESOLVED, that the Rocky Point Board of Education concludes that no operating license be granted to LILCO for the Shoreham Nuclear Power Plant.



PORT JEFFERSON STATION TEACHERS ASSOCIATION

565 BICYCLE PATH
PORT JEFFERSON STATION, N. Y. 11776



September 22, 1986

Morton B. Margulies, Chairman
Dr. Jerry R. Klien
Mr. Frederick J. Shon
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
East-West Tower, Room 402-A
4350 East-West Highway
Bethesda, Maryland 20814

Re: Shoreham Nuclear Power Station

Gentlemen:

The Port Jefferson Station Teachers Association is the representative of the teachers of the Comsewogue School District. As such, the P.J.S.T.A. has the exclusive right to negotiate working conditions and job related duties for the teachers in the Comsewogue School District.

It is obvious that the Long Island Lighting Company has no authority to speak for the P.J.S.T.A. or its members. Any assumptions which the Long Island Lighting Company may have made concerning the duties of teachers in the Comsewogue School District during a radiological emergency at the Shoreham Nuclear Power Station are without the knowledge or consent of the P.J.S.T.A.

Furthermore, the Long Island Lighting Company has never consulted with this organization in any manner concerning a radiological emergency evacuation plan.

We resent any attempt to present our Association as a participant in a plan without our prior consultation and agreement.

Sincerely,

Robert Carr
President, P.J.S.T.A.

until complete and reasonable resolution of the outstanding critical emergency planning problems are achieved, and be it further

RESOLVED, that in order to make known the views expressed herein, the Clerk of this Board is directed to send a certified copy of this Resolution to the Nuclear Regulatory Commission, and the Atomic Safety and Licensing Board of the Commission having jurisdiction over the Shoreham proceedings.

This is a true copy of a resolution unanimously adopted by the Board of Education of the Miller Place Union Free School District at a public meeting held on February 9, 1988.



District Clerk
Miller Place Union Free School District
Miller Place, New York 11764
February 10, 1988