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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD  
Before Administrative Judges:  
James P. Gleason, Chairman  
Frederick J. Shon  
Dr. Oscar H. Paris

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| -----X                                   |                     |
| In the Matter of                         | )                   |
|  | ) Docket Nos.       |
| CONSOLIDATED EDISON COMPANY OF NEW YORK, | ) 50-247 SP         |
| INC. (Indian Point, Unit No. 2)          | ) 50-286 SP         |
|  | )                   |
| POWER AUTHORITY OF THE STATE OF NEW YORK | ) February 22, 1983 |
| (Indian Point, Unit No. 3)               | )                   |
|  | )                   |
| -----X                                   |                     |

LICENSEES' SUPPLEMENTAL TESTIMONY OF  
PARSONS BRINCKERHOFF QUADE & DOUGLAS, INC.

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Supplemental Testimony of

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Purpose of Supplemental Testimony

The purpose of this supplemental testimony is to address issues which have arisen since the date of filing of the original testimony, either by reason of intervening events or by reason of concern expressed explicitly or implicitly by the Board, witnesses in their proceeding, or in various documents issued by the Federal Emergency Management Agency.

Relationship of Plan to Existing  
Procedures and Facilities

Throughout the planning process that led to the development of the Radiological Emergency Response Plans ("RERPs") for the Indian Point plume exposure pathway emergency planning zone ("EPZ"), extensive consideration was given to tailoring the plans to the Indian Point area. As such, the RERP's are built upon the organizational and functional agency responsibilities found in each of the four counties and New York State. The responsibilities identified in the RERPs call upon emergency response organizations to apply their fundamental, traditionally-

used skills, albeit in a somewhat different context. For example, while the number of traffic control officers required at one time in a mass evacuation exceeds required personnel in everyday situations, the role of each individual emergency worker is essentially the same. Policemen are already trained to direct traffic; Red Cross volunteers routinely run shelters; and firemen are trained in search and rescue and first-aid procedures.

Similarly, the evacuation component of the plan is predicated upon the roadway network as it exists in the EPZ. The RERP does not depend upon nor require any changes to the local roadway network. Rather, it utilizes the existing roads used every day by residents of the area. The plan recognizes and allows for the fact that some facilities are of higher quality than others, and that factors such as snow and accidents can occur. Further, identification of buses in the RERPs is the result of a study of available transit vehicles. Evacuation travel time estimates therefore reflect buses that would actually be available.

While the RERPs are comprehensive in nature, outlining major governmental roles and responsibilities, there is nonetheless an implicit public role inherent in

the plans. Residents of the EPZ can assure their protection to the fullest possible extent by responding appropriately to official directives and recommendations.

#### Communications With Local Officials

During the development of evacuation plans for the four counties surrounding Indian Point, Parsons Brinckerhoff Quade & Douglas, Inc.'s ("Parsons Brinckerhoff") made every effort to maintain communications with the various participating agencies in the four counties. In addition to initiating many meetings, Parsons Brinckerhoff also responded to all meeting invitations originated by the counties. On several occasions, comments were requested from the counties by letter. All comments received were duly considered during plan development. Further, it was made clear to all involved that Parsons Brinckerhoff would consider, evaluate and respond to all constructive suggestions received.

#### Updating The RERPs

In April, 1982, the New York State Radiological Emergency Planning Group ("REPG") became officially responsible for the oversight and maintenance of both the State and county plans. To aid in the transition, Parsons

Brinckerhoff provided the REPG with a document entitled, "Guidelines for Updating the Evacuation Portions of the Indian Point Radiological Emergency Response Plan and Procedures" (April 1982). We subsequently have been consulted from time to time on certain technical points in the RERPs, but have not participated in any of the Federal, State or county planning activities since April 1982.

Since the filing of initial testimony, concerns have been expressed about the adequacy of the county RERPs and, in particular, the evacuation components of these plans. The supplemental testimony of Westchester County Deputy Commissioner of Transportation, Raymond P. Jurkowski, included a proposal submitted by A.T.E. Management and Service Co. to Westchester County in response to the County's request. The proposal addressed means to rectify the county's concerns regarding the transportation component of the evacuation plan. Parsons Brinckerhoff's review of this proposal indicates that many of the recommended work elements are duplicative of work previously performed, and/or are redundant in that the tasks are already the assigned responsibilities of groups or agencies other than the Westchester County Department of Transportation. For example, as noted above, the State REPG has undertaken responsibility for updating the county



plans. Similarly, the REPG is also responsible for conducting any training program necessary to implement the plan. These tasks are proposed for completion by A.T.E. As another example, A.T.E. proposes to conduct a complete re-inventory of the physical characteristics of the roadway system, a task which is not required unless significant changes have occurred in the roadway network.

#### The Roadway System and Evacuation Routes

An issue raised during the hearings and addressed in Board Contention 3.9 concerns the adequacy of the existing roadway system for a timely evacuation. To consider this issue, it is important to begin with an understanding of how evacuation routes were selected and incorporated into the time estimate analysis. Evacuation routes were chosen to move traffic radially away from Indian Point. As stipulated in NUREG-0654 (pages 4-5), "evacuation shall be based on general radial dispersion."

Radial evacuation provides for expeditious movement away from Indian Point. The routes chosen to move traffic radially away from Indian Point included roadways oriented in north-south (for example, Route 9W and the Taconic State Parkway) and east-west (for example, Route 6

and Route 202) directions. All planning was based on the principle that traffic would flow in a normal two-way pattern. It was not assumed that all lanes would be converted to outbound flow.

However, the plan does provide for backup routes in the event that some segment or portion of a primary evacuation route becomes impassable. In the event that evacuation routes do need to be changed at the time of an evacuation, the chief law enforcement official in each county has the authority to activate backup routes, as indicated, for example, on page LE1-4 of the Law Enforcement procedure for Westchester County.

Every primary and back-up evacuation route was traveled by employees of Parsons Brinkerhoff to assess its adequacy for evacuation purposes. While it is true that some evacuation routes are narrower and more winding than others, these physical characteristics do not preclude the designation of such roads as evacuation routes. The more constricted roadways have lower vehicular capacities, thereby resulting in longer evacuation travel times for vehicles traversing them. The physical characteristics of the evacuation routes were thus explicitly accounted for in the development of the evacuation plan and travel time estimates.

The effects of adverse weather were also thoroughly considered in the development of evacuation travel time estimates. Weather conditions typical of those frequently found in the EPZ have been factored into the time estimate analysis. These conditions include slippery road surfaces due to snow or ice as well as reduced visibility due to fog or heavy rains. Travel time estimates incorporating these conditions have been presented for each of the six time-based scenarios included in the plan.

The county RERPs also include specific provisions to facilitate the flow of traffic during an evacuation. Revision 1 of the county RERPs provides procedures for clearing routes of impediments to traffic flow. As stated on page PW1-1 of the Public Works procedure for Westchester County, the Commissioner will assist in keeping State and local evacuation routes and routes from the EPZ to reception centers free of impediments (e.g., downed trees, snow, disabled vehicles). As stated on page LE1-2 of the Westchester County Law Enforcement procedure, "the Commissioner/Sheriff will advise local police authorities to request County, Town, City, and Village Public Works and Highway Departments to man and deploy tow trucks to predesignated locations. Additional tow trucks may be



requested, if necessary, from the New York State Department of Transportation Region 8 Director and from private operators."

In addition, the New York State Radiological Emergency Preparedness Plan (NYS REPP) has been revised (as of January 14, 1983) to further define both county and state roles and responsibilities on the clearing of evacuation routes of impediments. (See p. IP-57 and Attachment 14 IP of the NYS REPP.)

During an evacuation, traffic would flow primarily in an outbound direction. Except for emergency vehicles, little inbound traffic would be expected or permitted. Therefore, if a traffic accident did occur on a designated evacuation route, traffic would be diverted around that point in the underutilized, opposing travel lanes.

A traffic control system is also provided in the law enforcement procedure section of the RERPs. The traffic control system has two basic objectives; namely, to expedite the flow of traffic from the evacuating area, and to dissuade entry of unauthorized individuals into the evacuating area. Standard traffic control procedures, used every day by traffic control personnel, are provided in the

plan to assist the public in the evacuation of the affected area.

Trained traffic control officers would be stationed in a priority manner at key locations throughout the roadway network. These individuals would be responsible for expediting flow, metering traffic at merge points along the evacuation routes, reporting incidents to traffic control dispatchers located in police stations, and directing traffic in the preferred direction of evacuation flow. Because the appropriate authorities would be notified of potential trouble at Indian Point at its earliest stages, traffic control measures could be instituted at the "alert" stage, before the declaration of a general emergency. Traffic control would also be instituted in host areas to facilitate vehicular flow, family reuniting at reception centers and school reception centers, and travel to congregate care centers. Checkpoints would be established along the perimeter of the evacuating area to dissuade unauthorized individuals from entering the area.

Traffic control points have been assigned priorities in the RERPs to facilitate the manning of the most important locations. The evacuation travel time

estimates included in the RERPs address situations ranging from one in which traffic control personnel have been fully mobilized, to a situation in which the emergency work force has been mobilized to a minimal degree.

#### Spontaneous Evacuation

Questions have been raised with regard to the impact of spontaneous evacuation on evacuating traffic flow. If spontaneous evacuation were to occur either within or outside the EPZ (i.e., absent any specific order to evacuate), these movements are not expected to adversely affect any subsequent egress that occurs in response to an official evacuation directive.

In the first case, spontaneous evacuation from within the EPZ could have a positive impact on later movements by reducing the total number of people and cars evacuating, thereby shortening travel times. Should any traffic problems occur during the spontaneous evacuation, it is anticipated that local law enforcement agencies would respond to the problems as part of their usual responsibilities and day-to-day duties.

Spontaneous evacuation outside the EPZ is not expected to adversely affect evacuation from within the EPZ. There are provisions in the RERPs for expediting traffic flow beyond the plume EPZ. In the procedures discussing traffic control responsibilities (such as the Law Enforcement, Fire Department, and Public Works Procedures), routes from the EPZ boundary to the reception centers are designated as requiring traffic control activities. Certain limited access roadways would have access denied at particular locations to expedite EPZ resident evacuation. Law enforcement and other support agencies would provide traffic control in the vicinity of reception and school reception centers. Ingress control would be provided at the evacuation area boundary to dissuade unauthorized entry to the area.

#### Transit-dependent Population and Bus Requirements.

In Mr. Jurkowski's original and supplemental testimony, he raises questions about the adequacy of arrangements to evacuate those residents of the EPZ who would be transit-dependent in the event of a radiological emergency. Transit-dependent people are those who lack access to an automobile for purposes of leaving their portion of the EPZ during an ordered evacuation. Such

persons were categorized for purposes of the RERP into three types: 1.) the general public, 2.) residents of special facilities, and 3.) (when school is in session) schoolchildren. The numbers of special facility residents and schoolchildren were obtained directly from the administrations of special facilities and schools and were, therefore, accurate at the time of collection. The size of the transit-dependent general public was derived from U.S. Census data regarding car ownership. (See Section II B of the November 1981 Methodology to Calculate Evacuation Travel Time Estimates.) This number was conservatively over-estimated because plan estimates did not incorporate a factor that would significantly reduce demand for bus services. This factor is carpooling and ridesharing, whereby many persons with automobiles are likely to offer rides to friends, co-workers, or neighbors who might otherwise be transit-dependent.

A survey conducted by Yankelovich, Skelly, and White, Inc. ("A Report on Temporary Housing Needs Related to Evacuation of the Indian Point Power Plant Area," June 1980) reported that 74 percent of prospective evacuees with cars would be willing to pick up those without automobiles. Further the public information pamphlet ("Indian Point, Emergency Planning and You") distributed to



residents of the EPZ encourages ridesharing among EPZ residents (for example, at pages 6 and 8). As an example, if half the people who indicated they would offer a ride were actually to evacuate with a single transit-dependent person, the need for buses for the general public could be eliminated. Since ridesharing was not modeled in estimating the number of transit-dependent persons in the general public, this category of evacuee has been overestimated.

The Yankelovich, et al. survey reported that six percent of EPZ residents would require public transportation. However, the RERPs estimates are based on a significantly higher estimate of transit-dependency. For example, in Westchester County, evacuation time estimates were prepared assuming that over 10 percent of the evacuees would require public transportation. Thus, the estimated transit-dependent population (and, therefore, the required number of buses) may be overstated by 66% for Westchester, exclusive of ridesharing consideration.

Mr. Jurkowski also questions the rationale for the two-wave evacuation which is required to evacuate the entire EPZ when school is in session. Such a procedure is thought to be necessary because an inadequate number of

buses exists in the near vicinity of Indian Point simultaneously to evacuate both all schoolchildren from schools and the transit-dependent persons in the general population. In establishing priorities for evacuation, schoolchildren are to be evacuated prior to adults. Thus, the RERP calls for available vehicles to first transport children from the affected area to school reception centers beyond the EPZ, and then return to the EPZ for the remaining transit-dependent general public. It should be noted that school is in session for less than 20% of the hours in a given year, hence the two-wave procedure would not be required at least 80% of the time in any event.

In the event of an actual incident, decision makers in the counties and State could further increase the likelihood that parents and children could evacuate together. For example, the RERP contains provisions to implement school closing procedures (See Schools Procedure, page Sc-8). If an Alert were declared prior to 6:30 AM (approximately when many school buses are starting their daily pickups), children could be directed to stay at home (similar to a "snowday".) In addition, if an incident commenced late in the schoolday (for example, at 2 PM), decision makers could decide to send children home at their regularly scheduled time and delay an official evacuation

order until parents returned home from work. Thus the "two-wave" evacuation procedure would primarily be necessary only for rapidly-developing accident scenarios which start after the school day has begun.

Mobility Impaired Individuals.

Several of the Rockland County witnesses (e.g., James McCuire, Ruth Northrup, Ruth Wein) expressed concern about the feasibility and adequacy of planning for the transportation of non-institutionalized, mobility-impaired people. These people have been considered as part of the planning process. The public information brochure ("Indian Point, Emergency Planning and You") includes a mail-back postcard which provides a means for people requiring special assistance to make their needs known to the appropriate agencies. As these people are identified, vehicles can be assigned by the county to evacuate them.

Similar concerns were also expressed regarding the evacuation of special facilities such as hospitals and nursing homes. Planning for these facilities was based on discussions with facility administrators and the New York State Department of Health. All health-care facilities included in the RERPs were surveyed by telephone to assess their population numbers and evacuation needs.

In addition, meetings were held with administrators of all major hospitals to discuss the evacuation plan for special facilities in general and their facilities in particular. Vehicles and host facilities were assigned based on their identified needs. Host facilities for nursing homes and health-related facilities are identified by their operators in cooperation with and subject to review by the New York State Department of Health. Vehicles for nursing homes were assigned based on their needs as identified by the facility operators.

#### Host Facilities

During the cross-examination of the Westchester County Commissioner of Social Services, Charles W. Bates, there was some discussion regarding the functions of the various host facilities provided for in the RERPs. As described in the county RERP's (Appendix A, Attachment 4) and the public information brochure ("Indian Point, Emergency Planning and You"), all evacuees are not directed to report to reception centers. Evacuees are directed to reception centers if they need to take advantage of the services offered there (e.g., directions to a congregate care center, a location for reuniting with family members, first aid, general information, etc.). In the event of a



radiological release, however, evacuees from potentially affected ERPAs will be encouraged to report to their predesignated reception centers for monitoring, and, if necessary, decontamination.

In addition to the reception centers described above, the RERPs also make provision for both congregate care centers. Congregate care centers will provide temporary housing, food and other necessities and will be run by the American Red Cross. School reception centers are only needed for the school-in-session scenario as they provide a host location for children evacuated directly from school. These centers will be operated by the staffs of both the host and evacuating schools. (For additional details, see the county RERPs, Appendix A, Attachment 4.)

In the supplemental testimony filed by the Director of the Westchester County office of Disaster and Emergency Services, Anthony R. Marasco, the question was raised as to why children attending schools within a given district could potentially end up at school reception centers in two different counties. In the evacuation plan, host schools outside the EPZ are designated as school reception centers for schools evacuating from within the EPZ. To facilitate the reuniting process, locations for



reception centers and school reception centers were selected so that the reception center serving a particular traffic zone is in reasonable proximity to the school reception center that would host schools evacuating from that zone. In some cases, however, the geography of an ERPA and the distribution of the schools within that ERPA prevented this from occurring. For example, in the City of Peekskill (ERPA 2) there are several public elementary schools located throughout the City, but only one public middle school and one public high school. Because of the population density and the layout of the roadway system in the City, the ERPA was divided into six traffic zones to facilitate movement during an evacuation. Thus, Peekskill residents are directed north, east and south, depending upon their traffic zone location in the City. Similarly, the special facilities (including schools) evacuate in various directions also depending upon their location. Therefore, given the distribution of the various types of schools in the City, a family could reside in a traffic zone which is directed to evacuate to the south but have children attending the middle school and the high school which evacuate south and north, respectively. In the event that family members are separated in this way, they could either reunite by car or, if the family was transported to the reception center by bus, they could use the peripheral

bus system which provides linkages between the various reception centers and school reception centers.

During the cross-examination of Mr. Jurkowski, reference was made to the potential commandeering of buses by reception center personnel. In fact, the evacuation plan contains no provisions for the commandeering of buses by reception center personnel. A peripheral bus system, operated under the coordination of the county transportation departments, will link reception centers so that travel among them is possible for those needing it. The peripheral bus system is discussed in Attachment 4 of Appendix A of each county RERP.

Coordination With Indian Point Probabilistic Safety Study ("IPPSS")

Parsons Brinckerhoff and Pickard, Lowe & Garrick, Inc. ("PLG") worked together to prepare the evacuation-related input used in the IPPSS. PLG incorporated the data prepared by Parsons Brinckerhoff into the consequence analysis. However, some of the terminology used by PLG differs from that used by Parsons Brinckerhoff in the development of the evacuation travel time estimates. For example, the term "delay time" is defined differently in the context of the two different studies.

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NEW YORK, INC. (Indian Point, : 50-286-SP  
Unit No. 2) :

POWER AUTHORITY OF THE STATE OF : February 22, 1983  
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CERTIFICATE OF SERVICE

I certify that I have served copies of Licensees' Supplemental Testimony of Parsons Brinckerhoff Quade and Douglas,\* Inc. on the following parties indicated by asterisk by hand and on all others by deposit in the United States mail this 22nd day of February, 1983.

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