



Town of Dummerston

1523 Middle Road East Dummerston, Vermont 05346

October 20, 2011

Sarah Hofmann
Deputy Commissioner
Vermont Dept. of Public service
112 State Street
Montpelier, VT 05620-2601

Dear Commissioner Hofmann,

I regret that the Dummerston Selectboard was not represented at the VSNAP meeting last night in Vernon regarding emergency planning for a radiological event at Vermont Yankee and we are grateful for this opportunity to provide you with our written comments here.

Dummerston has faithfully participated in the Emergency Response Plan (ERP) and the attendant VEM and FEMA graded drills since the inception of this planning. Our town recognizes the importance of this planning and also the inherent flaws with any plan attempting to predict an unpredictable event. With that in mind, we will limit our comments to those planning issues we feel are predictable, regardless of the way a radiological emergency might unfold. We have expressed these concerns to officials of VT Emergency Management and the American Red Cross over the course of many rounds of ERP drills and written drafts, but have yet to be satisfied. As you may know, Dummerston has never signed off on the ERP as the language requires us to take responsibility for a plan we still find to be unnervingly flawed.

At every drill I have participated in there comes a point in our Emergency Operations Center as the event escalates when local Dummerston officials look at each other and say, "This is where it all comes apart." Then we begin spit-balling what actions we might actually take in the event of a real emergency. Dummerston has gained the reputation in emergency management circles of being difficult. This is not our intent. As the body charged with the safety of Dummerston residents the selectboard has not been able to provide a signed endorsement of a plan it feels in all likelihood it will not adhere to. What follows is a brief outline of our most stubborn concerns.

Evacuation Routes

Dummerston is divided by the West River, which is crossed by two one-lane bridges. The current ERP evacuation plan has our West Dummerston residents evacuating across Route 30 and the river and making their way to Route 5 north to the receiving center in Bellows Falls. It seems obvious that our west side residents should evacuate directly up Route 30 to leave the area. Bellows Falls can be reached indirectly once they've cleared

the immediate area. Many of our residents along the east side of the West River would undoubtedly wish to cross to Route 30 and get the heck out of Dodge. This creates a very predictable head to head jam-up at the narrow bridges.

Traffic Control

It has never been definitively explained who will be charged with traffic control in the event of an evacuation. In a scenario where the winds are blowing north and west there will be lines of traffic from Brattleboro and points south filling all three area exits; I91, and Rts 5 and 30. Dummerston residents attempting to enter these lines without traffic controls will be in a precarious position. It was suggested at one point that local officials serve this function, but without real authority or a means of enforcement, this could prove to be dangerous and ineffective. It was also suggested that the Windham County Sherriff would serve this function, but questions about how and where the personnel would be dispatched and if there are enough deputies to man the posts have not been answered.

School Evacuations

As our most vulnerable residents, the ERP understandably calls for school children to be evacuated early in any radiological event scenario. It calls for buses to be brought in from outside of the area so that the children can be loaded and moved. Children are not to be released to parents or other parties, but are to remain with their group. This scenario - while well intentioned -- is highly unrealistic. This plan assumes that in a real radiological emergency lay bus drivers with children and families of their own will drive into a toxic event as ordered. Many will, certainly. But our questions about what happens if many or all won't have not been answered. It was once offered by a VEM official that National Guard trucks and helicopters could be deployed in the event that buses could not reach the area. When we asked where these resources would be coming from and in what numbers we were told that information was classified. It has also not been answered to our satisfaction who is going to explain to the Mama Grizzlies as they come for their school children that they can't have them.

Transfer and Receiving Centers

The current planning calls for Dummerston students to be first removed to the Putney Central School, which is only about 5 miles north of the Dummerston School. In a real emergency, even though Putney is not technically within the 10 mile EPZ radius, released radiation is not expected to stop at the circles on our maps and Putney is far too close to be a safe refuge. The original plan of removing them to the Bellows Falls Receiving Center is preferred.

After the Evacuation

The responsibilities of the Selectboard after an evacuation are unclear. If our EOC has been relocated to Bellows Falls, as our most recent drill in May of this year proscribed, one would expect we would have communications equipment and other facilities

available to us. One of our members proceeded to the Bellows Falls EOC as ordered by the plan and was met with wide eyes and wonder. There was nothing in their plan to accommodate our plan. This is one example of several where the step *after* an evacuation is left unclear. Granted, the goal is to remove people to safety and worry about the rest later, but in the event we still have people in transition and in harm's way, the Selectboard needs to be in communication with its people in the field.

Re-entry

Provisions for entry into the evacuated area by residents either to gather belongings or care for sheltered animals are not clear. One assumes that in a real emergency there would be state or federal security posted around the evacuation zone within hours or days of an event. It is all the more important that definitive and verifiable lists of farmers and other residents with legitimate business inside the evacuation zone be established in advance of an event. The current list of farmers with livestock in the ERP is quite outdated. These are things we can do for ourselves within our community, but without an area-wide effort of the same kind it would be for naught. It is doubtful our municipal boundaries and local passes are going to mean much to the National Guard soldier manning the roadblock on Route 5. Again, this is a predictable problem that can be mitigated by an area-wide effort from state officials.

Notifications

Another big area of ongoing concern is the emergency notification systems in place. There are sirens in addition to the EBS radios many residents have in their homes. There was a route-alerting plan in place at one point, which required our firefighters to canvas the town with bullhorns and instructions. That provision was dropped from the plan when the RENTS, or 'reverse 911' system was announced. We are very much in favor of this change; however, we have yet to witness a successful test of the system. It is also clear that a large percentage of residents now use cell phones exclusively and these new numbers need to be registered with the emergency network in advance of an emergency. Again, this is something that can be done locally, but would be much more effective with an area-wide effort with support from state officials.

The plan also calls for local emergency officials, including the Selectboard Chair, to be notified of any Unusual Event at Vermont Yankee. There have been several of these events over the past many years -- harmless as they turned out to be, which we only learned about in the next day's newspaper. This is a real world, real time example of how the ERP breaks down from the very advent of an emergency. This does not inspire confidence in what would follow.

Those are the chief concerns we have with the current planning. There are many other niggling points we've been trying to clean up over the years, but they do not present the threats to life and property we see in the issues listed above.

We do not mean these disagreements to diminish the hard work that state, local, and VY officials have put into the current planning. We accept that the ERP cannot be perfect. It can only be the best we can manage with what we know to be true. Our comments here are based on that understanding. Thank you for this opportunity to comment. We hope it will prove useful to you in your evaluation of the current ERP.

Sincerely,

Tom Bodett, Chair
Dummerston Selectboard

cc DSB
Rick Davis, EMD