

Indian Point Plan for Clarkstown Central School District

ROCKLAND COUNTY SCHOOLS

RADIOLOGICAL EMERGENCY RESPONSE PLAN
FOR INCIDENTS AT THE
INDIAN POINT ENERGY CENTER

Clarkstown Central School District

62 Old Middletown Road
New City, NY 10956
(845) 639-6300

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I. INTRODUCTION

A. Authority

This plan is issued under the authority of and in accordance with the provisions of the Clarkstown Central School District.

B. Purpose

This plan is presented to establish responsibilities, define a concept of operations, offer workable procedures for the protection of students and provide for the direction and control of school facilities, staff and students in the event of an incident at the Indian Point Energy Center.

C. Objectives

1. Clarify lines of authority and establish responsibilities for the protection of students and staff.
2. Ensure that planned actions are in consonance with municipal, county and state RERPs.
3. Identify necessary resources and requires personnel to assure protective actions can be implemented for the school population.
4. Provide the basis for orientation of school staff, students and parents/guardians, regarding appropriate actions, in the event of an incident at the Indian Point Energy Center

D. Radiological Emergency Classification System

All incidents occurring at the Indian Point Energy Center will be classified according to four emergency classifications:

1. **UNUSUAL EVENT** – Unusual events are in process or have occurred which indicated a potential degradation of the level of safety of the plant. No releases or radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.
2. **ALERT** – Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant. Any releases expected to be limited to small fractions of the Environmental Protection Agency (EPA) Protective Action exposure levels.
3. **SITE AREA EMERGENCY** – Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Any releases are not expected to exceed EPA Protective Action Guide exposure levels except near site boundary.
4. **GENERAL EMERGENCY** – Events are in process or have occurred which involve actual or imminent substantial core degradation or meeting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guide exposure levels off-site for more that the immediate facility site area.

E. Fixed Nuclear Facility Incident Situation

1. A fixed nuclear facility incident could occur during school hours and result in the disruption of school services for an extended period of time.
2. In the event of an incident at the Indian Point Energy Center, county elected officials and school administration may initiate protective actions including all those actions

considered necessary for the safety of the general population, requiring students and staff to either initiate sheltering actions or evacuate to designated school reception centers.

F. Alert/Notification

1. Notification to Schools

- a. In the event of an incident at the Indian Point Energy Center, the Superintendent of Schools will be notified by Rockland BOCES.
- b. The Superintendent will notify appropriate school staff as outlined within the "Concepts of Operation".

2. Public Alert/Notification

- a. The public will be alerted through the activation of the public alert system by Rockland County. This is the outdoor siren system and consists of electromechanically sirens distributed throughout the Emergency Planning Zone (EPZ). The sounding of sirens indicates that the public should tune to the Emergency Alert System (EAS) for instructions. **THE SIREN SIGNAL IS NEVER A NOTICE TO EVACUATE.**
- b. To assure coverage, personnel and equipment from the County Sheriff's Office will be dispatched by the Rockland County Emergency Operation Center (EOC) to supplement this alerting procedure when the public alert system has failed to operate. Rockland County residents may also receive emergency information by calling the Rockland County Resident Information System for a pre-recorded, automated message.
- c. **The public alert system may be activated during ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY.**
- d. Following public alert system activation, detailed information or instructions for protective actions will be made through the Emergency Alert System (EAS) and the Rockland County Citizen Advisory Network, 1640-AM.

NOTE: The County EAS stations for Rockland County are:

- (1) WABC-AM, 770
- (2) WCBS-AM, 880
- (3) WFAS-AM, 1230
- (4) WHUD-FM, 100.7

3. Notification of Families

- a. Families will be notified of school closings/re-openings, utilizing the normal school/media procedures, unless pre-empted by public alert/notification procedures and/or announcements outlining school evacuation or sheltering.
- b. Informational materials regarding plans for the protection of school students in the event of an incident at the Indian Point Energy Center, descriptive of school closures, evacuation procedures and appropriate family responses have been developed for annual distribution to parents/guardians as a cooperative effort of the Rockland County Office of Fire Emergency Services (OFES), Clarkstown Central Central School District and State Environmental Management Office (SEMO).
- c. The informational material also includes an Indian Point Energy Center Emergency Information Brochure.

G. School Closing/Cancellation of Events/Early Dismissal

1. Should a protective action directive become imminent while school is not in session, a decision will be made to keep schools closed. The decision will be made based on a directive made by the County Executive and will be issued by the Rockland County OFES. Families and staff will be notified utilizing regular school procedures for school closing announcements.

Note: Consideration for the closing of schools may be made at ALERT, SITE AREA and GENERAL EMERGENCY.

2. Special activities, extracurricular events, sport contest, competitions, club meetings, class trips, etc. will be canceled or terminated during ALERT, SITE AREA EMERGENCY and GENERAL EMERGENCY and resumed only at the termination of incident classification or reduction to UNUSUAL EVENT.
3. Schools in session will not send children home early should a protective action such as sheltering or evacuation appear imminent or be in progress. Regular dismissal policy and transportation routes will be in effect unless pre-empted by the school requesting that students be picked up by parents, guardians, etc, and/or a protective action directive from Rockland County OFES.

H. Training and Exercises

1. The School District, in consultation with Rockland BOCES and County OFES, is responsible for providing radiological emergency response training to school staff and faculty.
2. Exercise and drill related to the Indian Point Energy Center will be coordinated through the Rockland County OFES.

II. CONCEPT OF OPERATIONS

A. Unusual Event

No actions required. Clarkstown Central School District is not notified of an UNUSUAL EVENT.

B. Alert, Site Area or General Emergency

Proceed to and complete the appropriate action item checklist(s) as follows:

EMERGENCY CLASSIFICATION LEVEL	SCHOOL IN SESSION	SCHOOL <u>NOT</u> IN SESSION
ALERT	CHECKLIST 1	CHECKLIST 4
SITE AREA EMERGENCY	CHECKLIST 2	CHECKLIST 5
GENERAL EMERGENCY	CHECKLIST 3	CHECKLIST 6

ATTACHMENT 1

ALERT – SCHOOL IN SESSION

Initial each step and indicate time completed

The Superintendent will, upon notification by the school district or Rockland County OFES:

- ___ 1. Assure immediate update of student attendance and class rosters.
- ___ 2. Notify appropriate staff, including:
 - ___ a. Building Principals (or other building level administrators)
 - ___ b. Other Administrators
 - ___ c. Facilities Department
- ___ 3. Update rosters periodically in preparation for having appropriate staff report attendance twice each day (0900, 1400).

NOTE: Report significant changes in attendance to the school district or Rockland County OFES.

- ___ 4. Cancel school sponsored activities, including:
 - ___ a. Special Activities
 - ___ b. Extra-curricular Events
 - ___ c. Meetings
 - ___ d. Trips
 - ___ e. After School Activities
- ___ 5. Assure preparation of the facility(ies) for sheltering, coordinating with the maintenance personnel or other staff as appropriate:
 - ___ a. Fuel and test support systems
 - ___ b. Secure entrances/exits/windows
 - ___ c. Review snack capabilities
 - ___ d. Instruct staff to prepare shelter activities/equipment
 - ___ e. Report unmet needs to the Rockland County OFES School Services
- ___ 6. Notify transportation, as appropriate, requesting they:
 - ___ a. Fuel and maintain vehicles
 - ___ b. Report unserviceable vehicles.

- ___ 7. Review any special student medical supplies/needs.
- ___ 8. Review situation and procedures with appropriate staff.
- ___ 9. Recall/dismiss appropriate staff, such as to maintain emergency staffing needs.
- ___ 10. Contact parents, brief them of the situation and review procedures for student pick up.

NOTE: Initiate student pick up for those parents who so desire, ensuring with the school district and county that protective action – evacuation or sheltering – is not imminent.

- ___ 11. Confirm with the school district that the school reception center has been notified of the situation and is available to receive students, if necessary.
- ___ 12. Monitor radio and TV for emergency information.

ATTACHMENT 2

SITE AREA EMERGENCY – SCHOOL IN SESSION

Initial each step and indicate time completed

The Superintendent will, upon notification by the Rockland County OFES:

- ___ 1. Complete all procedures outlined for ALERT.
- ___ 2. Report to the School Administrative Office.
- ___ 3. Confirm resources necessary for evacuation and sheltering, reporting unmet needs and attendance changes to the school district.
- ___ 4. Further notify staff to prepare vehicles for possible evacuation.
- ___ 5. Assure "Authorization for Student Pick-Up" forms are distributed.
- ___ 6. Confirm school reception center facility and evacuation routes are available, via the school district.
- ___ 7. Initiate emergency staffing and excuse or dismiss staff, as appropriate.
- ___ 8. Monitor local radio and TV stations (designated EAS stations) and County Citizen Advisory Network (1640 AM) and begin family notifications.
- ___ 9. Provide protective action directives to school staff as appropriate.

NOTE: If a protective action is recommended, implement appropriate procedures under
GENERAL EMERGENCY.

ATTACHMENT 3

GENERAL EMERGENCY – SCHOOL IN SESSION

Initial Each Step and Indicate Time Completed

The Superintendent will, upon receipt of notification from the Rockland County OFES:

- ___ 1. Complete all procedures outlined for ALERT and SITE AREA EMERGENCY.
- ___ 2. Direct staff to mobilize for completion of preplanned assignments; moving vehicles into position.
- ___ 3. Confirm mobilization and positioning of buses/evacuation vehicles, reporting unmet transportation needs and changes in attendance received from staff, to Rockland County OFES through the school district.
- ___ 4. Provide protective action directives to school staff, as appropriate.
- ___ 5. Immediately suspend any non-classroom special activities, practices, etc., not previously canceled and recall students to the School or to a designated location outside the EPZ.
- ___ 6. Monitor EAS announcements (WABC-AM 770, WCBS-AM 880, WFAS-AM 1230, WHUD-FM 100.7) and coordinate family notifications with Rockland County OFES, as appropriate.
- ___ 7. Maintain emergency school administrative headquarters at Clarkstown Central School District Administration Building, located at 62 Old Middletown Road, New City, NY 10956.
- ___ 8. Upon notice of a protective action affecting the location of the school facility, and the need for the public to take KI, administer KI to students and staff.
- ___ 9. UPON DIRECTION TO SHELTER:
 - ___ a. Notify School faculty and staff.
 - ___ b. Ensure that outside activities are terminated and personnel moved to pre-designated shelter areas.
 - ___ c. Assign staff to:
 - ___ (1) Shut down heating, ventilation and air conditioning systems, to the extent possible while still maintaining a safe indoor temperature.
 - ___ (2) Ensure closing/locking of all exterior doors/windows.
 - ___ (3) Move students to areas of the facility providing the most shelter from outside environment, as appropriate.
 - ___ d. Assign support staff to:
 - ___ (1) Secure area to extent possible.
 - ___ (2) Assemble drinks and snacks in shelter areas.
 - ___ e. Assign administrative personnel to:
 - ___ (1) Secure all personnel records and student files.
 - ___ (2) Take attendance records to shelter areas.
 - ___ (3) Take "Authorization for Student Pick-Up" and car pool forms to shelter areas.
 - ___ f. Assign staff to:
 - ___ (1) Close all windows in classroom.

- _____ (2) Maintain discipline/order.
- _____ (3) Verify classroom attendance and take attendance sheet to shelter area.
- _____ (4) Check non-classroom areas for students.
- _____ (5) Secure required materials for predetermined shelter area activities and take to shelter areas.
- _____ g. Secure student health records and assemble required health supplies in shelter area.
- _____ h. Determine status of unmet transportation needs and notify the school district for forwarding to Rockland County OFES.
- _____ i. Assure administrative staff and maintenance supervisors prepare schools as they would for a regular weekend; closing all windows, locking doors, locking files and closing outside ducts or air intakes.
- _____ j. Post the facility entrance with sheltering notice (attachment 9).
- _____ k. Do not dismiss students into the Emergency Planning Zone (EPZ).
- _____ l. Upon suspension of shelter directive, review the situation with the school district and/or Rockland County OFES and prepare students for dismissal in accordance with existing plans, or take other protective actions as directed by emergency authorities.

_____ 10. UPON DIRECTION TO EVACUATE OR IMPLEMENT PRE-CAUTIONARY RELOCATION:

- _____ a. Notify faculty and staff.
- _____ b. Discuss school reception center arrangements/status with school district.
- _____ c. Assure updated attendance.
- _____ d. If in sheltering, students are to be reunited with their assigned staff and attendance updated.
- _____ e. Direct non-canceled, special activities, be immediately terminated and student attendance taken and records completed.
- _____ f. Confirm positioning of buses/evacuation vehicles, reporting unmet transportation needs, to the school district or Rockland County OFES. NOTE: Assure telecommunications capability of at least one (1) transportation vehicle assigned.
- _____ g. Initiate orderly movement of students to transportation vehicles and monitor loading and seating of students/staff.
- _____ h. Provide drivers accompanying students to special events (within EPZ or outside EPZ) directions to school reception center, as appropriate.
- _____ i. Assign staff to accompany students in each transportation vehicle.
- _____ j. Assign staff to accompany buses in their private vehicles.
- _____ k. Post "Notice of Movement" sign at appropriate building entrances (reference Attachment 10).
- _____ l. Provide staff with appropriate attendance records and assure recording of students in each vehicle.
- _____ m. Supervise movement to school reception center, notifying Rockland County EOC via telecommunication of progress/problems.
- _____ n. Upon disembarking in an orderly fashion, verify student attendance and provide attendance records to appropriate staff.
- _____ o. Assign school staff to remain with students at school reception center/facility until students in staff's charge are picked up by parent/guardian, or until relieved by other staff or instructed to leave.
- _____ p. Provide staff "Authorization for Student Pick-up" forms and direct that completed lists/records be returned.
- _____ q. Report status of student pick-up to Rockland County EOC school representative every two (2) hours.

- _____ r. After 8:00 p.m., if students remain to be picked up by their parents or legal guardians, assure that staff remains with students and discuss feeding and housing arrangements with American Red Cross representatives.
- _____ s. Report completion of student pick-up to Rockland County OFES and arrange to provide Rockland County OFES pick-up/attendance records.
- _____ t. Excuse remaining staff and provide Rockland County EOC a means of future contact for receipt of re-entry orders or inquiries, etc., to emergency school administrative headquarters at Clarkstown Central School District Administration Building, located at 62 Old Middletown Road, New City, New York, or evacuation location.

Recovery/Reopening of Schools (School in Session)

1. Upon notification that re-entry is permitted, the Superintendent will direct that buildings be inspected for occupation by appropriate staff and deficiencies be reported to the Superintendent.
2. The Superintendent will report unmet needs to the Rockland County EOC School Services Officer, coordinate necessary repair/supply and keep accurate records of costs incurred.
3. The Superintendent will, based on information received from Rockland County EOC, decide to reopen the School and communicate this decision to the appropriate staff. Re-opening of schools will be the decision of the Superintendent of Schools.
4. Families, faculty and staff will be notified of the decision to re-open schools, using normal media/information procedures, supplementing appropriate EAS announcements.

NOTE: Announcements will be published in appropriate newspapers and coordinated with Rockland County.

ATTACHMENT 4

ALERT – SCHOOL NOT IN SESSION

The Superintendent will, upon receipt of notification by the School District or Rockland County OFES:

Initial Each Step and Indicate Time Completed

- ___ 1. Cancel/terminate school sponsored activities, including:
 - ___ a. Special activities
 - ___ b. Extracurricular events
 - ___ c. Meetings
 - ___ d. Trips

- ___ 2. Notify and review Rockland Emergency Response Plan (RERP) procedures with appropriate staff.

- ___ 3. Notify any groups or individuals occupying the school facilities, requesting that all non-school staff vacate the facility.

- ___ 4. Facilities shall remain closed until the emergency conditions at Indian Point Energy Center (IPEC) are resolved.

ATTACHMENT 5

SITE AREA EMERGENCY – SCHOOL NOT IN SESSION

Initial Each Step and Indicate Time Completed

The Superintendent and/or designee will, upon receipt of notification from the Rockland County OFES:

- ___ 1. Implement the decision to close or keep schools closed, notifying families and utilizing normal school procedures.
NOTE: A recommendation to keep schools closed will be made by Rockland County and communicated through school district channels.
- ___ 2. Notify appropriate staff and faculty of the decision to close schools or keep schools closed and brief them of the situation.
- ___ 3. Complete all procedures outlined for ALERT.
- ___ 4. Provide the school district with information on your personal location and means of contact, while assuring the building is secured and vacated; immediately canceling any activities.

ATTACHMENT 6

GENERAL EMERGENCY – SCHOOL NOT IN SESSION

NOTE: A decision to keep schools closed will be made by Rockland County and communicated through school channels.

Initial Each Step and Indicate Time Completed

The Superintendent will, upon receipt of notification:

- ___ 1. Complete all procedures outlined for ALERT and SITE AREA EMERGENCY that not have yet been completed.
- ___ 2. Maintain emergency school administrative headquarters at Clarkstown Central School District Administration Building, located at 62 Old Middletown Road, New City, New York 10956.
- ___ 3. Monitor EAS announcements (WABC- 770 AM, WCBS – 880 AM, WFAS – 1230 AM/103.9 FM, WHUD-100.7 FM).
- ___ 4. Notify staff and brief them of the situation.
- ___ 5. Keep facility closed until the county authorizes recovery and re-entry.

Recovery/Reopening of Schools (School Not In Session)

1. The Rockland County School Services Officer or school district representatives will notify the Superintendent of the decision to reoccupy the evacuated area.
2. The Superintendent will assure that buildings have been inspected for reoccupation by appropriate staff and deficiencies reported to the Superintendent.
3. The Superintendent will report unmet needs to the Rockland BOCES or Rockland County OFES School Services Officer, coordinate necessary repair/re-supply and keep accurate records of costs incurred.
4. The Superintendent will, based on information received from Rockland County OFES, decide to re-open the school and communicate this decision to appropriate staff, using the staff telephone chain. Re-opening of schools will be the decision of the Superintendent of Schools.
5. Parents, faculty and staff will be notified of the decision to re-open schools using normal media/information procedures, supplementing appropriate EAS announcements.

ATTACHMENT 7

Web Notification

For Schools in the IPEC 10-Mile Emergency Planning Zone

Dear Parent,

Emergency planning is a continuous process that needs careful review and revision on a regular basis. Specific plans and procedures for this school have been developed as part of the Rockland County Radiological Emergency Plan for the Indian Point Nuclear Power Plants. We believe it is important for you to know the steps that would be taken to protect the health and safety of your child if an incident were to occur at one of the Indian Point Nuclear Power Plants.

The Rockland County Executive, as the Emergency Coordinator, could order one or a combination of the following actions to be taken if an incident were to occur at one of the Indian Point Nuclear Power Plants. Please note that these actions might also be utilized for any one of a number of major emergencies that could affect our schools, but the procedures detailed here are specific for Indian Point.

Actions taken are based on an emergency classification system that identifies the severity of the incident and the potential for danger to the general public. Rockland County officials notify schools at the earliest stage that an incident has occurred at one of the Indian Point Nuclear Power Plants. One of the following actions would be ordered:

1. Schools may continue normal school session until the end of the school day, at which time students would return home in their usual manner.
-OR-
2. School would be canceled for all schools in Rockland County.
-OR-
3. School would be ordered closed and children would be returned home according to the school's "Emergency Go Home" policy and procedures.
-OR-
4. In the event the "Emergency Go Home" policy is not the safest course of action, based on information and instructions from the Rockland County Emergency Coordinator, students and staff may be ordered to take shelter within the school.
-OR-
5. Schools within the 10 mile Emergency Planning Zone for Indian Point may be evacuated to a school relocation site by Clarkstown Central School District Transportation including Dominican College, St. Thomas Aquinas College and South Orangetown Middle School (See attachment # 9 for specifics) and if required, to a School Reception Center located at Bergen Catholic High School, 1040 Oradell Avenue, Oradell, New Jersey, by county buses.

Please note that four district schools are located outside the 10 mile Planning Zone for Indian Point: Bardonia, Birchwood, West Nyack and Clarkstown High School South.

Information regarding actions taken by the Rockland County schools during an Indian Point Emergency would be broadcasted over WHUD 100.7 FM and on the Emergency Alert System Network.

ATTACHMENT 9

NOTICE OF MOVEMENT TO SCHOOL RECEPTION CENTER

Clarkstown Schools within FEMA Indian Point 10 mile Evacuation Zone

SCHOOL

STUDENTS AND STAFF
RELOCATED BY CCSD TRANSPORTATION TO

School	Relocation Site	Address
Clarkstown HS North	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
Child Care Center @ Clarkstown Learning Center	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
Lakewood Elementary School	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
Laurel Plains Elementary School	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
Link Elementary School	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
New City Elementary School	St. Thomas Aquinas College	Route 340, Sparkill, NY 10976
Strawtown Elementary School	Dominican College	470 Western Highway, Orangeburg, NY 10963
Little Tor Elementary School	Dominican College	470 Western Highway, Orangeburg, NY 10963
Woodglen Elementary School	Dominican College	470 Western Highway, Orangeburg, NY 10963
Felix Festa Middle School	South Orangetown Middle School	160 Van Wyck, Blauvelt, NY 10913

If required, students will be taken to a School Reception Center located at Bergen Catholic High School, 1040 Oradell Avenue, Oradell, New Jersey, by county buses.

Four district school are outside of the 10 mile evacuation zone: Clarkstown High School South, Birchwood, and Bardonia and West Nyack Elementary Schools.

FEMA Indian Point 10 mile Evacuation Zone



ATTACHMENT 10

SHELTER-IN-PLACE SIGN

WE ARE
SHELTERING IN PLACE



DO NOT ENTER

ATTACHMENT 11
NOTIFICATION LIST

SCHOOL/OFFICE/AGENCY	TELEPHONE #
CCSD Superintendent – Tom Morton	(845) 639-6418 Cell:
CCSD Asst. Supt. – John LaNave	(845) 639-6472 Cell:
CCSD Safety Officer- Maureen Sullivan	(845) 639-5631 Cell:
Rockland County Office of Fire and Emergency Services (OFES)	(845) 364-8900
Rockland County Emergency Operations Center – Schools Desk (EOC)	(845) 362-0610
CCSD Director of Transportation – Tom Balko	845) 639-6380 Cell:
CCSD Director of Facilities - Anthony Valenti	(845) 639-6434 Cell:
St. Thomas Aquinas College School Reception Center & Mass Care Center	(845) 398-4100
Dominican College School Reception Center & Mass Care Center	(845) 359-7800
South Orangetown Middle School School Reception Center & Mass Care Center	(845) 680-1101

District Emergency Response Plan

Annex for the Distribution of Potassium Iodide (KI)

Section I: General Considerations and Planning Guidelines

A. Introduction

Federal regulations have been established that require public officials to develop emergency plans for accidents at commercial nuclear power plants. The purpose of such plans is to provide reasonable assurance that adequate measures can and will be taken, in the event of a radiological emergency. Guidelines for choice actions during an emergency consistent with federal guidelines are developed and in place.

State and local officials may implement a range of protective actions that can be utilized for protecting the public from radioactive plume exposure. Traditionally, the range of public protective actions for severe accidents has been limited to evacuation and in-place sheltering. Recent federal guidance has prompted state and local governments to implement procedures to include the prophylactic use of potassium iodide (KI) as an additional public protective action. This outlines the district's strategy for implementing an effective plan to provide KI as a protective measure.

B. Purpose

This Annex applies to an accident at the Indian Point Nuclear Plant that would prompt public health officials to make the recommendation to administer KI. The purpose of this Annex is to ensure that appropriate designated personnel can adequately and effectively administer KI to students and staff in the event of such a radiological emergency. This Annex identifies the plan to effectively manage a KI program on a district-wide basis.

Each school building shall also develop a building-level plan for the distribution of KI to students and staff in the event of radiological emergency. Such plan shall be annexed to the Building-Level Emergency Response Plan.

C. Situation

A severe accident at a commercial nuclear power plant may result in the release of radioactive isotopes (radioactive material), including radio iodide. Communities within a 10-mile radius of a nuclear facility, known as the Emergency Planning Zone (EPZ), stand at considerable risk of exposure to isotopes that may be present during a release. Nine of our schools are located within the EPZ for the Indian Point Nuclear Power Plant: Clarkstown High School North, Felix Festa Middle School, Lakewood, Laurel Plains, Link, Little Tor, New City, Strawtown and Woodglen Elementary Schools. The Child Care Center at Clarkstown Learning Center is also located within the zone. The plan to distribute potassium iodide, however, will cover all district school buildings.

Iodide is readily absorbed by the thyroid gland. The inhalation or ingestion of radio iodide increases the risk of thyroid cancer in individuals or populations, at risk. The ingestion of stable potassium iodide (KI) to block the uptake of radio iodide by the thyroid has been identified as an effective protective action. Although KI may still have a substantial protective effect if taken within three-four hours after exposure, optimal protection is achieved if KI is administered prior to, or concurrent with, exposure. KI is only effective against one form of radiation and it is NOT an alternative to evacuation.

D. Assumptions

1. An accident at the Indian Point Nuclear Power Plant may or may not result in the release of radio iodide and thus, may or may not, warrant the administration of KI. This can only be determined by thorough assessment by public health officials during the emergency.
2. The evacuation of the school population to a reception center may not have begun, be in progress, or be complete at the time that the recommendation to administer KI is made by state and/or county Department of Health officials.
3. "Designated individuals" may need to administer KI while in the school, en route, or at the designated reception center.
4. Parents/guardians of school children may choose to decline participation in the KI administration program and thus, not authorize the District, by its "designated individuals", to administer KI to their children.
5. Current guidance from the World Health Organization (WHO) and the FDA suggests that allergic reactions to KI are rare, but may occur in those who have known allergies to iodide.
6. An emergency at the Indian Point Nuclear Power Plant can create confusion and may result in inaccurate or unreliable information. School district administrators need to be cognizant that rumors may exist and should only implement protective actions as directed by state and/or county officials.

E. Concept of Operations

1. An emergency at a nuclear power plant may begin with and escalate through a series of Emergency Classification levels (ECLs). An emergency may also begin without escalating at any level, including an Immediate General Emergency, the highest Emergency Classification Level.
2. Emergencies that progressively escalate may allow time for the school liaison to be represented at the county Emergency Operations Center (EOC). This liaison serves as the conduit of information between public officials and the school districts.
3. If the emergency escalates and radioactive materials are released, an analysis will be done by public health officials to determine if radio iodide has been, or will be, released. If plant conditions indicate that radio iodide has been, or may be released, public health officials will make a determination on the impact to the population.
4. If conditions warrant, public health officials will make the recommendation to administer KI. The recommendation to administer KI will be issued by the New York State Commissioner of Health and/or the County Health Commissioner.
5. In an escalating emergency, with the school liaison present at the county Emergency Operations Center, the notification of the recommendation to school officials to administer KI will be disseminated through the school liaison to the school districts and through the Emergency Alert System (EAS) to the population at risk.

6. If the emergency begins at the Immediate General Emergency level, public officials will activate the Emergency Alert System (EAS), and inform the population to “shelter-in-place and await further instructions”. If plant conditions indicate that radio iodide has been, or may be released, public health officials will make a determination of the impact on the population.
7. If conditions warrant, public health officials will make the recommendation to administer KI. The recommendation to do so will be made by the New York State Commissioner of Health and/or the County Health Commissioner, and a follow-up Emergency Alert System (EAS) message will be disseminated to the population to recommend the administration of KI.
8. Upon receipt of the recommendation to administer KI, “designated individuals” will begin administering KI to the school population.

Section II: Preparedness

A. Identification of KI Recipients and Emergency Personnel

1. Identification of Potential KI Recipients
 - a) Participation in the KI program is voluntary. Each building principal will ensure distribution of the attached cover letter and opt-out form to parents/legal guardians that will allow parents to “opt-out” of participation in the KI program. Such cover letter and opt-out form were distributed to parents/legal guardians upon registration of a student in the Clarkstown Central School District. Such cover letter and opt-out form shall, thereafter, be provided to the parents/legal guardians of each new student who enrolls in the district. The district will aggressively communicate with our parents/guardians about KI through the following methods:
 - Sending the “opt-out” letter to all parents/guardians.
 - Placing a notice and the “opt-out” form on our website.
 - Notifying parents of back-to-school night and parent/teacher conference days.
 - Soliciting the assistance of the PTA.
 - b) If an opt-out form is not promptly received for a student with a known allergy to iodide (shellfish), the school nurses will follow-up with the student’s parents/legal guardians to determine whether they wish to submit an opt-out form.
 - c) Each building principal will maintain current listings of the “opt-out” students. These listings will be distributed to all “designated individuals” and members of the building level Emergency Response Team.
 - D) “Opt-out” forms shall be maintained in each school nurse’s office. When an “opt-out” student transfers from one school to another school within the district, the school nurse shall ensure that the “opt-out” form follows the student to his/her new school, and the new school’s “opt-out” list is updated accordingly.
2. Identification of “Designated Individuals”
 - a) Each building principal will develop and maintain a list of “designated individuals” who can be called upon to administer KI to the school population, except for “opt-out” students.
 - b) “Designated individuals” may include members of the nursing staff, the building level Emergency Response Team and others, as deemed appropriate.

- c) Provisions must be made for each school building so that “designated individuals” will be available to administer KI during school hours, as well as during before and after school programs.
 - d) Provisions must be made for each school building to ensure that “designated individuals” have access to the KI storage location(s) and the current opt-out list at all times.
3. Identification of Building Level Emergency Response Team
- a) Each building principal shall ensure that a building level Emergency Response Team is designated and is fully familiar with the provisions of the district-wide and building-level procedures for the distribution of KI.

B. Identification of Storage and Dispensing Points

1. Identification of storage facilities/mobile facilities for KI
- a) Within each school building, a KI storage location shall be identified. This location needs to be secure, centrally located and environmentally controlled.
 - b) The storage location needs to be accessible to “designated individuals” and members of the building level Emergency Response Team.
 - c) Each school building shall utilize mobile storage of KI, such as “go-kits” or “fly-away kits” to allow quick access, in the event that the order to evacuate comes in advance of the recommendation to administer KI. A mobile storage system must include a copy of the current “opt-out” list. This would allow the KI to be brought with the school population on the buses of the reception center(s) in an efficient and timely manner.
2. Identification of dispensing point(s) to administer the KI
- a) Within each school building, one or more physical location(s) where KI is to be administered on-site shall be identified. This can be done systematically – classroom by classroom, or may be done at a central assembly area.
 - b) Each school building shall also incorporate into its building level Emergency Response Plan, procedures for the administration of KI en route to and at the designated evacuation center.

C. Training and Exercising

1. Training
- a) The District Wide School Safety Team will support training activities for “designated individuals” and building level Emergency Response Teams. Training will include the proper administration of KI and the correct procedures for carrying out the assigned tasks in each building level Emergency Response Plan.
2. Exercising
- a) The District Wide Safety Team and each building level Emergency Response Team will incorporate the district wide and building level plans for distribution of KI into their annual exercise.

Section III: Response

A. Notification and Activation before Evacuation

1. The Superintendent of Schools or his/her designee will receive the recommendation to administer KI from either the Emergency Alert System (EAS), the school liaison at the County Emergency Operations Center (EOC), or the state and/or the county Department of Health.
2. Upon receipt of the recommendation to administer KI, a decision will be made by the Superintendent of Schools or his/her designee to administer KI. This decision will be communicated to each building principal who shall, in turn, communicate the decision to members of the building level Emergency Response Team and "designated individuals".
3. If a predetermined central location for the distribution of KI to students has been identified, the building principal will instruct the staff to accompany their respective class to the assembly area.
4. The building level Emergency Response Team and "designated individuals" will retrieve the KI from the designated storage places or "go-kits" and proceed to the pre-determined location or classroom(s).

B. Notification and Activation During or After Evacuation

1. If the order to evacuate comes in advance of the recommendation to administer KI, the building level Emergency Response Team and "designated individuals" will retrieve the KI from the designated storage places or "go-kits".
2. "Designated individuals" will take the "go-kit" with the students on the buses to the designated reception center(s).
3. If the recommendation to administer KI is made during evacuation, such information shall be disseminated to the buses by means of communication from the superintendent or his/her designee to the emergency transportation carriers for transmission over two-way bus radios.
4. The bus driver or radio operator will relay the information to the "designated individuals" who will, in turn, administer KI to the students.
5. If the recommendation to administer KI is made after the buses arrive at the reception center, "designated individuals" will administer KI to the students at the reception center.
6. Evacuation will not be delayed to allow for the administration of KI.

C. Administration of KI

1. In the absence of parents/guardians, "designated individuals" are the only persons authorized to administer KI to the students.
2. By utilizing current "opt-out" listings, "designated individuals" will ensure that only those students who participate in the KI program will be administered KI.
3. The prescribed doses and administration of KI will be in concurrence with FDA recommended guidelines, (a 65 mg dose administered to children up to 12 years who weigh less than 150 pounds and a 130 mg dose administered to children 12-18 years who weigh at least 150 pounds) in accordance with the recommendation by Dr. Antonia Novello, Commissioner of Health, dated May 22, 2002.

4. "Designated individuals" will ensure that students are not administered more than one dose of KI. Each building level plan must include appropriate procedures to accomplish this.
5. District staff may choose to self-administer KI. According to the FDA, however, it is not necessary for persons over 40 years of age to take KI in the event of radiological emergency.
6. "Designated individuals" shall be aware of the signs and symptoms of an allergic reaction and shall report such findings to the appropriate nursing or medical personnel as soon as possible. Appropriate actions should be taken with any allergic reaction to relieve symptoms. If an anaphylactic reaction occurs, non-patient specific order epinephrine and/or other agent to treat anaphylaxis may be used, as appropriate. CPR should be initiated, if needed, and the individual transported to the nearest medical facility, if possible.

D. Documentation

1. Each building level plan shall identify a means for members of the Emergency Response Team and designated individuals to document their actions during the emergency. Information may include notification times, doses administered, control rosters and any observed adverse reactions.
2. Documentation should be assembled, per school policy and should be secured where sensitive material is normally kept.

Section IV: Recovery/Return

1. Once public health officials determine it is safe to return, each building principal should implement recovery (post-incident) procedures as specified in their building level Emergency Response Plan.
2. The district shall conduct a post-incident critique of its KI program and the effectiveness of that program. The critique may prove to be valuable in identifying ways to build upon the KI plan and improve its effectiveness.
3. Information supplied from the critique shall be incorporated into the district wide and building level KI plans and be utilized upon replenishment of KI from public health officials.

PARENT NOTIFICATION

Our school building is located in proximity to the Indian Point nuclear power plant. In January 2001, the federal Nuclear Regulatory Commission amended its policy on the availability and usage of the over-the-counter drug, potassium iodide (KI), during a radiological emergency. As a result, New York State also revised its policy regarding providing KI to the general population in the 10 mile emergency planning zones surrounding the Indian Point, Nine Mile and Ginna commercial nuclear power sites.

KI is an over the counter drug. We have been advised by the New York State Department of Health that KI protects the thyroid from exposure to radioactive iodide. KI is not an alternative to evacuation or sheltering (see attached KI information sheet).

Should the county and/or state Department of Health recommend the use of KI during an emergency, our schools will have appropriate doses of KI available on-site for your child(ren).

If you do not want the school to provide your child with KI in a radiological emergency, you must sign and return the enclosed Refusal/Opt-Out form to the school nurse. This form will remain in effect as long as your child attends a Clarkstown Central School District school. Please note that if you do not return the enclosed form and KI use is recommended by health officials, your child will receive KI.

If you have any concerns regarding the emergency use of KI or questions about your child's health and the use of KI, please discuss this with your child's healthcare provider.

If you have any further questions about the school's program, please contact our school nurse.

Sincerely,

School Principal

encl: Opt-Out Form
KI Information Sheet

Clarkstown Central School District
62 Old Middletown Road
New City, NY 10956

Potassium Iodide (KI) Refusal/Opt-Out Form

If you DO NOT want your child given potassium iodide (KI) in the event of a radiological emergency, complete this form and return it to your child's school within three days.

I understand that potassium iodide (KI) may be given to my child if recommended by the county and/or state Department of Health in a radiological emergency.

I have read and understand the Parent/Guardian letter, Potassium Iodide (KI) Parent Q & A's, and Department of Health KI information sheet.

I DO NOT want my child given potassium iodide (KI) in the event of a radiological emergency.

Child's Name: _____

Grade: _____ Teacher/Homeroom Teacher: _____

Parent/Guardian Signature: _____

Date: _____ Telephone Number: _____

**IF YOU DO NOT RETURN THIS FORM AND KI USE IS RECOMMENDED BY
HEALTH OFFICIALS, YOUR CHILD WILL RECEIVE KI.**