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Control of Radiation Accidents at the R.E. Ginna Nuclear Power Plant*

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THE ROCHESTER COMMITTEE FOR SCIENTIFIC INFORMATION  
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SUMMARY

In the unlikely event of many safeguards breaking down at once, a nuclear power plant may release hazardous radioactive materials into the environment. Arrangements to cope with such an accident at the R. E. Ginna Power Plant were set up by the Rochester Gas and Electric Corporation, by Wayne County, and by the State Office of Disaster Preparedness. The RCSI finds that the Company's emergency plans are excellent, and that Wayne County authorities are able and ready to get everyone out of harm's way if radioactive materials escape from the plant. By contrast, the State emergency plans are characterized as inadequate and possibly hazardous. Fortunately, local officials have the legal authority to control an emergency without waiting for orders from Albany. The Emergency Operations Center of the Wayne County Office of Disaster Preparedness is therefore the key to public safety. This Emergency Center is adequate in the judgment of the RCSI.

1. BACKGROUND

Radioactive isotopes are only one item in a long list of hazardous poisons and explosives that are handled in homes, workshops, factories and military installations and that should be subject to strict safety measures. Safety for the public from large-scale uses of hazardous materials depends on three lines of defense: (a) containment: the deadly materials must be secured in a way that will protect people from harm; (b) controlled release: the user must account for all released material, and the environment must be checked for leaks and other accidental releases; (c) accident readiness: if the control fails, a system must be ready to protect lives. This bulletin deals only with accident readiness at the R. E. Ginna Nuclear Power Plant in Wayne County, New York.

The Rochester Gas and Electric Corporation (RG & E) prepared an accident control plan as a part of its application for a license to operate the R. E. Ginna Plant (1). During the licensing proceedings, RG & E also was obligated to produce a pamphlet, explaining to the public in Wayne County how they were safeguarded. This pamphlet was to cover emergency plans, security measures, and radioactive shipment safeguards. It was to be reviewed by the RCSI before publication (2).

The company did submit a draft of such a pamphlet, but RCSI found it unsatisfactory. The fault was not with the utility's emergency plans, which were excellent, but with the rest of the pamphlet which summarized the New York State plan for emergencies extending beyond company property.

The RCSI discussed this problem with representatives of RG & E, the State agencies, and the Wayne County Office of Defense Preparedness. The applicable state laws were studied by our counsel, Warren Rosenbaum. RCSI inspected the Emergency Center and its equipment and discussed the Center's plans and procedures. We found that a sound organization for disaster control was in place in Wayne County, and that it could be relied on to protect the population from being hurt by atomic accidents at the Ginna Plant.

This Bulletin explains all three plans for emergency preparedness: the Company's, the County's and the State's. We ask State authorities to write a new and workable emergency plan. We suggest a series of improvements in Wayne County's plans. We ask RG & E to support our requests for improvement in government plans; and to publish an informational pamphlet for Wayne County and Monroe County residents after the plans have been settled.

## 2. THE RG & E PLAN

### A. Overview

RG & E published a set of contingency plans for the Ginna site (1), as a part of their application for an operating license for the Ginna Plant. These plans cover radiation emergencies, adverse weather, fires, floods (high water) and earthquakes. This bulletin is concerned with radiation emergency plans, summarized below. RCSI reviewers judged that the radiation emergency program was excellent for the following reasons. The control center for emergency measures was located close enough to the site of the accident but far enough away not to be uninhabitable in the event of accident. Some person was sure to take command promptly. There was a clear plan of positive action, with secure lines of communication. The local community would help materially by maintaining a volunteer force at a constant level of preparedness. The general public was protected against misinformation and panic. Finally, the record of all the safety

measures and of all the releases of hazardous materials was open to the public.

#### B. On-site control

Any employee who finds unusual levels of radiation, temperature or pressure, or a combination of increased radiation and increased pressure, is required to notify the plant control room. Automatic alarms are also set to alert the control room. There is always a licensed Reactor Operator on duty, and he has the authority to sound the evacuation alarm. This starts two lines of emergency action. The first is to contain the accident by shutting down endangered equipment, sealing off contaminated areas, and providing auxiliary power and emergency repairs. The foreman on duty takes charge of this. The second is to carry out the Emergency Plan. The Plant Manager is in charge of this, but if he is not immediately available a fail-safe procedure assures that someone will take command.

There is an Emergency Center in the basement of the Information Building, which is separate from, but close to, the plant. When the evacuation alarm is heard, everyone goes there who is not a member of the operating crew at the plant. (Training exercises are held every year to teach the staff where to go and what to do in an emergency.) The first qualified person to enter the Emergency Center takes a tag off a board. The tag makes him the Emergency Coordinator; a checklist connected to the tag tells him what to do. The Coordinator telephones the control room and takes over from the on-shift foreman, who was in charge of all emergency operations up to that moment. The next thirteen people to enter take the next thirteen tags, and become the Emergency Teams. Their checklists assign them duties in communications, emergency equipment checkout and radiation survey.

There is also a backup Emergency Center in another building.

#### C. Plan of positive action with secure lines of communication

The Emergency Organization consists of the Coordinator, the Emergency Teams, the plant operators and the guards on duty. The plant operators have the job of confining the damage. The tasks of the others are designed to accomplish the following as fast as possible:

- alert government authorities;
- seal off the site, and let no people or vehicles out until they have been checked for radioactive contamination;
- determine what kind of accident is taking place: for example, is the hazard confined to the site, or is radioactivity spreading past the fence?
- bring help on site as needed;
- prevent the spread of rumors, by restricting outside communication to designated spokesmen.

The lines of communication in this plan consist of written checklists, face-to-face conversations and telephone calls to people known by name. No link can be broken by the absence of some one person, and the system is designed to prevent confusion. Site evacuation is rehearsed once a year in a simulated emergency, and the results of the exercise are reviewed by a committee charged with checking out and improving the whole procedure.

#### D. Civic preparedness

If the accident is a minor one, the only people called in from outside may be additional plant operators, supervisory personnel and one of the plant's physicians (trained to handle radiation accidents). In a major accident, the Coordinator may call the Ontario Volunteer Fire Department and the Ontario Volunteer Emergency Squad. The members of these civic organizations are trained to handle radiation emergencies, and they visit the Ginna Station every year in order to be familiar with the layout and equipment. The Emergency Squad has an ambulance that can be fitted with a radiation shield, and members who maintain a New York State certification as Medical Emergency Technicians.

The Emergency Squad will take radiation accident victims to the Rochester General Hospital, where an emergency radiation treatment facility is maintained under contract with RG & E. The final industrial health resource directly available to the Coordinator is the Radiation Management Corporation of Philadelphia (RMC). RMC is on call on a 24 hour basis, with a radiation emergency medical team, air and ground ambulances, and facilities for treatment of accident victims at the Radiation Medical Center of the University of Pennsylvania.

There are other civic, medical and governmental resources off site as described in part 3, below, but they do not fall directly under the control of the Coordinator.

#### E. Protection from crowds and panic

The news that there was an accident at the atomic power plant will first reach people who have been trained for this emergency, and have been instructed not to pass information on to outsiders. The public will be informed through two channels: The public relations office of RG & E (in Rochester) and government officials (in Albany). The people in charge of the official news have the option to delay the release in order to gain the critical time that is required to keep the roads around the plant clear for the accident fighters coming in, and for any evacuated people moving out of the path of fallout. Prematurely released news could clog the roads with traffic both coming and going.

#### F. Open and complete record

Every malfunction of a nuclear power plant is reported to the Nuclear Regulatory Commission; so is every release of radioactive material. The semiannual reports are open to the public (they are available in the Rundel Memorial Library in Rochester, at the Public Library in Lyons, Wayne County, and at the Brookwood Public Information Center in Wayne County). Releases of radioactivity are independently checked by the Department of Environmental Conservation of New York State, which monitors the environment and publishes the results quarterly (3).

### 3. EMERGENCY MEASURES IN WAYNE COUNTY

#### A. Overview

If hazardous materials escape past the fence of the Ginna Plant, the responsibility for protecting people from harm falls

on the government of Wayne County (4). Wayne County is prepared to do this. The laws of the state give county officials full authority for emergency measures, and place adequate personnel and equipment at their disposal. The resources for the county's response to an emergency are centered in a well equipped and accident-proof Emergency Operations Center. A plan for the emergency is ready, and has been rehearsed by the officials who would have to carry it out. In the opinion of the RCSI, these officials would clear everyone out of harm's way, even in case of the worst believable malfunction of the Ginna Plant. The remaining problem is to maintain the present readiness and to correct some gaps in the plan.

#### B. The law

An industrial accident becomes a "special emergency" under New York State law when it endangers people outside the grounds of the plant. Two Wayne County officials - the sheriff and the Chairman of the Board of Supervisors, are in charge of protecting people if such an emergency happens at the Ginna site.

The law puts emergency powers over the civilian population in the hands of the Chairman of the County Board of Supervisors. As chief executive officer, he may proclaim a state of emergency if he decides that public safety is imperiled in any part of the county. He can then establish curfews, order people out of designated zones, restrict traffic, and control the possession of weapons. Once proclaimed, the emergency holds for five days. The chief executive officer may call it off earlier, but he may also keep extending it for five days at a time (8).

The sheriff has the authority to get instant help for his police force by declaring "a state of special emergency in any part or parts of his county where the public peace is threatened or where life or property may be endangered..." The only formal requirement is for the sheriff to advise the Governor of New York State, by telegram, that an emergency was declared (4). Then the sheriff may use local civil defense personnel and take charge of reinforcements sent from outside. The emergency may only be ended by the sheriff or by the Governor. After it is over, the cost of outside help will be repaid, in part, from county funds (5).

During an emergency, the law provides for an orderly increase of forces under the command of the sheriff.

1) The sheriff can order the county's civil defense director to hold a "civil defense drill" (7). In Wayne County, this would be the Director of the County Office of Disaster Preparedness, and the drill would carry out the County's disaster emergency plan, described below.

2) If the chief executive of the county decides to ask for outside help, the sheriff can request police units, equipment and supplies from police departments of other counties, from the nearest state police headquarters, and from park police. The forces that answer this call are to remain on the job until the sheriff lets them go (1, 8).

3) State government agencies are expected to assist the county in an emergency, but they are not supposed to take charge. The Governor is told to follow "the state plan for coordination of disaster assistance", and he may also request disaster assistance from the federal authorities (6).

In summary, the law gives full authority and full responsibility for the control of a public emergency to two local officials: the chief executive officer and the chief of police (8). In Wayne County, these are the Chairman of the County Board of Supervisors and the Sheriff.

### C. The resources

The Wayne County Emergency Operations Center (EOC) is located at the county seat in Lyons, approximately 20 miles from Brookwood, in a bombproof and fallout-proof shelter with its own emergency power and water supply. The EOC has six independent radio installations that reach throughout the county and beyond:

- 1) the local government net to schools, firehouses and hospitals (KEH 898);
- 2) the Highway Radio, to county and town highway vehicles (KAY 997);
- 3) the Fire Mutual Aid System, to fire stations and equipment (KEH 574);
- 4) the Sheriff's Police System, to police vehicles (KEC 876);
- 5, 6) two amateur radio sending-receiving units (CB and RACES).

These units are operated by a Communications Center in the EOC, which also has a telephone switchboard and a number of direct telephone lines:

- 1) to the New York State Disaster Control Center at Albany, and through it to the National Warning Service telephone network;
- 2) to the operations room at the Ginna Plant;
- 3) to the Sheriff's headquarters in the building next door (intercom);
- 4) to radio station WHAM;
- 5) to the National Emergency Broadcast System, which can be activated by the President of the United States.

This EOC is operated by the Wayne County Office of Disaster Preparedness (ODP). The communications lines are manned around the clock by personnel either from the ODP or from the Sheriff's office.

The Director of the ODP is trained and equipped to predict where and when radioactive pollution will spread in case of an accident at the Ginna Plant; to provide command and control during an emergency; and to direct civil defense teams that will monitor the distribution of radioactivity. This ODP is partly supported by matching funds from the Department of Defense, which considers it a part of its civil defense network.

#### D. The plan

The director of the ODP has prepared an up-to-date plan for a response to an emergency radiation incident in Wayne County (9). This plan, as outlined below, provides for positive and timely action; establishes reliable lines of communication to every person in danger outside the power plant grounds; safeguards against confusion and panic; and calls for rehearsals every two years.

Information about an accident at Ginna will reach the Center over telephone lines from the State Disaster Warning Point in Albany. The dispatcher at the switchboard will alert all the public officials concerned with the plan (if at night, he has a list of nighttime telephone numbers). They include the Director of the ODP, the chairman of the County Board of Supervisors, and the Sheriff. All these officials reside in Lyons, and each can take charge of emergency operations on arriving at the Center.

If the accident is serious enough, the person in charge will declare an emergency (Alert A). The County Plan delegates this authority to the Director of the ODP, but the other two officials may also do it. This will start a series of planned actions by the Sheriff, the Director of the ODP, the Fire Coordinator, the Ambulance Coordinator, the superintendent (or acting superintendent) of public schools, and the Civil Defense Administrator of the neighboring county of Ontario. Ambulances and fire equipment will be dispatched to the site of the accident. Outside the plant, the area of hazard will be mapped in the Center's map room; traffic will be controlled; people in danger will be warned and guided either by dispatched police officers, or by telephone; and shelters will be provided for evacuees and for school children kept from returning to danger areas.

The Center will not make general announcements through the news media. It will refer reporters to public information officers at RG & E headquarters in Rochester and at the Health Department in Albany.

#### E. Comments

This County Response Plan appears workable, but needs several improvements.

1) The most urgent need is to spell out who makes the decision to start evacuating the endangered neighborhoods. State laws give complete authority to the County Chairman. He may delegate it to the Sheriff and to the Director of the Office of Disaster Preparedness (that is, Civilian Defense). The county plan should say this. Instead, there is a confusing sentence about evacuating "if advised by the State Commissioner of Health" (county plan, pg. 4). This should be deleted, so it is quite clear that local authority is free to do what is necessary without waiting for decisions from Albany.

2) The accident alert is routed by the plan from the Ginna Plant to Albany, and from Albany back to the EOC in Lyons. The plan should also provide for the use of the independent, direct communications link between the Ginna Plant and the Center.



3) Provisions should be made for alerting the authorities of Monroe County. Specifically, traffic control should be requested from the sheriff of Monroe County, to provide a patrolled, high-speed right of way for emergency traffic between Brookwood and two Rochester locations: the RG & E headquarters and the Rochester General Hospital. Also, alert arrangements should be made in advance with the town government of Webster.

4) Advice on radiological hazards should be secured from experts close at hand. The plan lists only remote experts from the New York State Department of Health (in Albany and in Syracuse). It should list the name and telephone number of the director of radiological health and safety at the University of Rochester, and should arrange with that person to bring him to the EOC as promptly as possible after the alert.

5) The plan should say what to do in case of minor accidents. The accident covered in the County plan is the worst one ("Alert A"). The State Plan, described below, deals with a series of minor alerts (B, C, D, E). These should be included in County plans. For example, in case of an Alert C it may only be necessary to take milk cows off some pastures contaminated with iodine-131. Much of this information can be copied from the current State Plan (10).

#### 4. EMERGENCY MEASURES IN ALBANY

##### A. Overview

The executive branch of State government has also made a plan to deal with accidents at the Ginna Plant. In one part of this plan, experts from the State Bureau of Radiological Health would be mobilized in Albany to provide needed information and advice to Wayne County officials by telephone. Other parts of the State plan were criticized by the RCSI as likely to do more harm than good in an emergency. The whole plan should be revised.

##### B. The resources

A State Natural Disaster Warning Point and Emergency Operations Center (State EOC) is set up in Albany, at the Office of Disaster Preparedness, under the Chief of Staff to the Governor. This Warning Point has direct telephone lines to the Ginna Plant, to the Wayne County EOC, and to the Lake District Office of Disaster Preparedness (described below). Its telephone switchboard is manned round the clock. The telephone operators are, presumably, trained to carry out the New York State Emergency Plans.

In an emergency, the State EOC is to be used as headquarters by responsible state officials. They are the Director of the Bureau of Radiological Health (BRH), the Commissioner of Health, and the Chief of Staff to the Governor, or their substitutes. The BRH (a branch of the State Department of Health) normally operates a laboratory to measure radioactive contamination of milk, air and water, and inspects medical and commercial sources of ionizing radiation (such as X-ray machines). The Director of the BRH is consequently the State's expert on hazards of radioactive materials.

In Newark, some five miles from the Lyons EOC, the State of New York maintains another emergency center, the Lake District Office of Disaster Preparedness. This is an elaborately equipped fallout shelter, designed as civil defense headquarters for a region that includes Wayne County and Monroe County. Except for custodial care it stood empty when visited by the RCSI in 1974.

### C. The plan

A plan for emergencies at the Ginna site was prepared by the BRH (10). This is an adaptation to a local problem of the general State plan for disasters and major emergencies, such as a hurricane or an atomic war (11).

The responsibility for evaluating the emergency is in the hands of the Director of the BRH but the authority for all protective actions is restricted to his superior, the Commissioner of Health. Information about an accident will come from the Ginna Plant to the telephone operator at the Warning Point in Albany. He will pass it promptly to the Director of BRH (or his deputy); to the Wayne County EOC in Lyons and to the Lake District Office of Disaster Preparedness in Newark. The Director of BRH will take charge of the State EOC, talk by telephone to the Ginna Plant, and determine the extent of danger on a scale from A (greatest, or "design accident") to E (probably just a harmless puff of radiation). He will then report the situation to the Commissioner of Health.

The Commissioner of Health will decide whether to call an alert, and at what level (from A to E). Each level of alert has a separate plan of action: to see how these plans would work, we need only follow what will happen after the Commissioner declares Alert A.

The Director of the BRH is to get information about wind and weather, keep in touch with the engineers at the Ginna Plant, and send out radiation monitoring teams. It is his job to predict the path of radioactive fallout from the accident.

The task of protecting the public is left to the Commissioner. He is instructed to use police to control traffic on roads near the site of the accident; and to tell the residents around the plant how to stay out of danger. The plan says what should be done, but it does not say how the Commissioner is to get it done. The plan does not even tell the Commissioner to talk to the people in charge of Wayne County. Instead, it sets up a line of communication which relays the Commissioner's decisions to the Director of the BRH, from him to the staff of the Albany EOC, and finally from the Albany telephone operator to the Wayne County EOC.

Independently of these local measures, the general public is to be informed through the news media. This is the responsibility of the Public Information Officer of the Department of Health. The plan spells out in detail the reassuring messages to be broadcast, telling the public that the Commissioner has the situation under control; the plan also tells the Commissioner to use radio and television broadcasts for instructing people in Wayne County on local safety measures.

D. Comments

One part of this State plan is useful, in that it sets up a source of expert information and advice about the emergency. The Director of the BRH is given clear and workable instructions for predicting what will happen as a result of an accident and a reasonable way of measuring the resulting danger to people in terms of predicted exposures to iodine-131.

The rest of the plan, as written, seems likely to do more harm than good.

1) It asks local officials not to take action on their own, instead of making sure that someone will act in time. The plan lets no one make a move without the Commissioner's say-so. See comment 4, below.

2) Its lines of command and control are either vague or unwieldy. A man trained in medicine is put in charge of a remote police operation. The officials responsible for evacuation and traffic control at the site are not named; the lines of communication with them are not secured. Instead, the Commissioner is given a list of roadblocks to be set up on county roads around Brookwood, as though this was something he could handle from Albany.

3) The plan is conducive to panic and disorder. It would broadcast information about the emergency through public radio and television channels. The plan ignores the hazards of such a broadcast, even though the broadcast alone could bring damage to more people than the accident at the Ginna Plant. How many people would not wait to hear the end of such a broadcast, or even to consider how far they were from the accident? How many would jump into their cars and head away? How many would head to Brookwood for a look? This part of the plan would increase traffic throughout the state and jeopardize rescue operations at the site, without contributing to the safety of the population at risk.

4) The plan seems contrary to the intent and letter of State laws. State law does not give the Commissioner of Health authority to stop County officials from taking action in an emergency.

These four shortcomings of the State plan should be corrected as follows:

1) The Commissioner of Health should be made responsible for recommending emergency actions to Wayne County officials, and for ordering an alert in case of excessive delays by local officials. The plan should acknowledge, that the Commissioner does not have the authority to delay actions by local officials. The Commissioner should be made responsible for reviewing the local emergency plans every other year, though this task could be delegated by him to outside consultants.

2) The plan should make detailed provisions for bringing into the State EOC in Albany the best available experts on technical problems of radiation hazard, traffic control, mob control, medical aid, publicity, and law. Advice and support from this Albany team should be made available as directly as possible to the officials in charge of the emergency in Wayne County. On the other hand, the plan should not have any detailed instructions on what to do at the site of the accident, because this would only get in the way of local officials carrying out the local plans for the emergency.

3) The Public Information Officer in Albany should be assigned two tasks: to admit some reporters into the State EOC, so that there would be no secrets about the alert later on; but also to keep the news about the accident off the air until the emergency has been brought under control in Wayne County.

## 5. DISCUSSION

### A. Why prepare?

The R. E. Ginna Nuclear Power Plant is well built and safely operated (12). The odds on someone outside being hurt by an accident originating at the Plant were estimated as equivalent to the odds of being hit by a meteor. Is it worth while to prepare for such an emergency? The RCSI considers the time and effort of the Rochester Gas and Electric Corporation, and of Wayne County citizens to be well spent.

An atomic power plant in our neighborhood is much like a shotgun in our attic: it is safe to the extent that we respect its hazards, and to the extent that we can handle it with skill. Disaster emergency drills maintain the skills of plant operators, and a respect for atomic hazards among their neighbors in Wayne County. They protect the operating standards from going slack, even as they insure safety outside the fence in case of accidents. This insurance is available at no extra cost for more probable and more disastrous emergencies, ranging from hurricanes to wars.

### B. How do we rate?

In the opinion of the RCSI, residents of our region are fully safeguarded against damage from an accident in the atomic pile, but only because some of the safeguards are much better than the rest. We rated the emergency measures of RG & E as excellent; those of Wayne County as satisfactory, though in need of some improvement; and those of the State government as defective and of dubious legality, in their apparent limitation of the authority of local officials to take effective and decisive action in the event of an emergency.

On closer analysis, some of the emergency measures planned in Albany were, in themselves, a hazard to the public, and the whole State plan was a top-heavy attempt at remote control of a local problem. This Bulletin spells out the revisions that have to be made in the State plan. Until then, we will rely on New York State laws, which wisely gave to the Chairman of the Wayne County Board of Supervisors the authority to proclaim an emergency and the means to control it without interference from Albany.

### C. Will it last?

The Wayne County Emergency Operations Center is the key to public safety in case of a disaster. Up to now, it was equipped and maintained with the help of Department of Defense (D.O.D.) appropriations for civil defense. Unfortunately, this support is now threatened. The D.O.D. announced that it will cut civil defense funds (13). There may well be places for cutting expenditures on civil defense in New York State, but the Wayne County EOC is not one of them. The RCSI calls the attention of Governor Carey and of the local legislators to the importance of this Wayne County Center as an essential component of atomic industry in our region. We also suggest, that

the emergency measures worked out by RG & E and by Wayne County are good enough to be a model for protecting the public near any atomic power plant in a rural setting.

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- (3) "Environmental Radiation Bulletin", RAD-P1, New York State Department of Environmental Conservation, Albany, New York
- (4) New York State General Municipal Law, Section 209f
- (5) New York State General Municipal Law, Section 209g
- (6) New York State Executive Law, Section 10
- (7) New York State County Law, Section 656a
- (8) New York State General Municipal Law, Section 209m
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