

1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
4

5 In the Matter of

6 PACIFIC GAS AND ELECTRIC COMPANY

Docket Nos. 50-275 O.L.
50-323 O.L.

7 (Diablo Canyon Nuclear Power
8 Plant, Unit Nos. 1 and 2)

Low Power Test Proceeding

9 AFFIDAVIT OF RICHARD E. FELTY

10 Richard E. Felty, being duly sworn, states under oath the following:

11 1. My name is Richard E. Felty. I am the Regional Director,
12 Central Coast Region, of the California State Department of Parks and
13 Recreation. My office address is 2211 Garden Road, Monterey,
14 California 93940.

15 2. The Central Coast Region under my jurisdiction includes
16 San Luis Obispo County and Montana de Oro State Park, which is located
17 within San Luis Obispo County.

18 3. The State Department of Parks and Recreation is in the process
19 of preparing an emergency response plan as an element of the County Plan
20 for emergency actions in Montana de Oro State Park in the event of a
21 radiological emergency at the Diablo Canyon Nuclear Power Plant.
22 Montana de Oro State Park is a rugged and mountainous park which, at its
23 closest point, is less than two miles from the Diablo Canyon facility.
24 A portion of the park, that along the Pacific Ocean, is accessible by
25 public road. The majority of the park, however, including that closest to
26 Diablo Canyon, is mountainous terrain accessible only by foot or horseback.
27 In this mountainous terrain, there are many hiking and wild life trails



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1 which are utilized by numerous hikers.

2 4. In the course of preparation of an emergency response plan
3 for Montana de Oro State Park, it has come to my attention that during
4 the recent hearing on PG&E's request for a low power test license for
5 Diablo Canyon, statements were made by a Mr. John Sears of the NRC Staff
6 regarding preparedness to take emergency protective actions within
7 Montana de Oro State Park. Specifically, in that regard, I have reviewed
8 Mr. Sears' statements on pages 11,067-69, 11,251-61, and 11,323-24 of the
9 low power test license hearing transcript, which pages are attached hereto.

10 5. In the foregoing transcript pages, there are several statements
11 regarding notification of persons in the backcountry of Montana de Oro
12 State Park in the event of an emergency at Diablo Canyon. Those statements
13 by Mr. Sears, which concern use of a helicopter to notify persons in the
14 backcountry, are as follows:

15 The Sheriff's Office has an agreement with
16 Hunter-Liggett Air Force Base for use of a
17 helicopter. A helicopter could be down in
18 this area within about half an hour. Bull-
19 horns from the helicopters could warn anybody
20 in that area. Tr. 11,068 (Sears).

21 The Sheriff can call -- he has an agreement,
22 I believe, through some acronym called MAST
23 with the Military people at Hunter-Liggett
24 Air Base, and he can call them, and they can
25 dispatch a helicopter to warn the people in
26 the Montana de Oro State Park. Tr. 11,251
27 (Sears).

28 . . . they do have all-weather helicopters
29 It is also possible that there could
30 be some kind of weather conditions in which
31 it is not possible to get a helicopter off
32 the ground. Tr. 11,252 (Sears).



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1 6. I have also reviewed paragraph 43 of the Proposed Findings
2 of Fact and Conclusions of Law of the NRC Staff, dated June 22, 1981.
3 In paragraph 43, the NRC Staff has relied upon the foregoing statements
4 of Mr. Sears and has urged that the following factual finding be made
5 by the Licensing Board:

6 43. Mr. Sears testified that for notification
7 of persons in the state park the sheriff's
8 office has an agreement with Hunter Liggett
9 military reservation for the use of a helicopter.
10 The all-weather helicopter is equipped with bull
11 horns to notify anybody in the remote areas of
12 Montana de Oro State Park in the event of an
13 evacuation. (Tr. 11,068).

14 7. I conducted an inquiry to determine the accuracy of those
15 statements quoted above to determine whether such helicopter notification
16 is in existence and/or is feasible for Montana de Oro State Park.

17 8. Therefore, I have spoken with a Mr. Joseph West, a Chief Warrant
18 Officer at the United States military installation at Fort Ord, California.
19 I spoke with Mr. West because he is a military official employed by the
20 "MAST" program. MAST is the acronym for "Military Assistance to Safety
21 and Traffic".

22 9. Mr. West related to me the following facts:

23 (a) The MAST charter is a method by which military helicopters
24 might be provided for emergency missions to civilian
25 authorities.

26 (b) MAST has 6 helicopters available. Five of
27 these helicopters are normally located at
Fort Ord, near Monterey, and one is stationed
at Hunter-Liggett Air Force Base, north of
San Luis Obispo. MAST has no bull horns for use



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on any of these helicopters.

- (c) It is not feasible to use bull horns as an alerting device from flying helicopters. The noise that is generated by the helicopter motor would overcome the volume capacity of a bull horn, particularly when coupled with the height at which the helicopter must fly. MAST had conducted an experiment using a bull horn and the result was not acceptable.
- (d) It might be possible for skid-mounted loud speaker units to prove feasible as an alerting device. However, MAST does not have any such loud speaker units for use on its helicopters.
- (e) MAST has all-weather helicopters available, however, these units cannot fly in icing conditions and can only fly in foggy conditions on an official, pre-established route. Otherwise, they must be able to see the ground or be able to fly above the highest point in a certain area. In the Irish Hills of Montana de Oro State Park, MAST during a foggy condition could not fly safely close enough to the ground to alert people by a loud speaker system without taking a chance of crashing on hillsides or canyons. If MAST flew higher, i.e. above the highest point in the park area, a loud speaker system, even if available, would be ineffective.



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1 no, so we don't need to go through line by line every single
2 one of the items, because we have already said that we will
3 admit Joint Intervenor's Exhibit 111 as an accurate assessment
4 of those matters for which compliance remains to be affected.

5 MR. REYNOLDS: Fine. Let me just withdraw the
6 question. It was my last one in that series, anyway.

7 BY MR. REYNOLDS:

8 Q If I understand you correctly then, Mr. Sears, it
9 is your position that, for purposes of low-power testing,
10 an adequate public notification program is simply PG & E
11 preparing its plan and submitting it to the NRC; is that
12 correct?

13 A For a low-power testing program; yes, sir.

14 MR. OLMSTEAD: Mr. Chairman, I would ask you to
15 remind the audience that hissing is not permitted in this
16 hearing room.

17 JUDGE WOLF: It certainly is not. I didn't hear any.

18 BY MR. REYNOLDS:

19 Q How far away is Montana De Oro State Park from the
20 Plant?

21 A About four miles north, sir; three to four miles north.

22 Q Assuming an accident with exposure within the LPZ
23 resulting from an accident at the Plant, is it your position
24 that there is no obligation to notify persons who may be in
25 remote areas of the Montana De Oro State Park?



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1 A Absolutely not; sir.

2 Q Has PG & E demonstrated an ability to notify such
3 persons?

4 A They have to me; yes, sir.

5 Q And in what way?

6 A In what way? Because PG & E's Plan and the plan of
7 the San Luis Obispo Sheriff specify that a PG & E operator
8 will call the Sheriff's Office. The Sheriff's Office has an
9 agreement with Hunter Liggett Air Force Base for the use of
10 a helicopter.

11 A helicopter could be down in this area within about
12 half an hour. Bullhorns from the helicopter could warn anybody
13 in that area.

14 Q Has that capability ever been demonstrated?

15 A That sort of capability --

16 Q Has that been demonstrated, to your knowledge?

17 A That capability has been demonstrated very often
18 in all kinds of situations, sir; specifically here, for those
19 hills, by a specific helicopter from that Air Force Base, no,
20 sir.

21 Q Have you verified that capability?

22 A I have verified that capability by reading of it
23 in the Plans of both PG & E and the Sheriff.

24 / / / /

25 (Please continue reading to the next numbered page.)



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1 Q Have you independently contacted the Air Force
2 base?

3 A No, sir.

4 Q On page 6, line 119, you refer to a supplement to
5 the emergency preparedness evaluation report which will con-
6 tain FEMA's findings for full power.

7 A Yes, sir.

8 Q That will issue after the state and local emergency
9 plans have been revised and FEMA has reviewed them, is that
10 correct?

11 A Yes, sir.

12 Q On page 6, line 132, you refer to two documents
13 of the FEMA NRC steering committee. You stated earlier that
14 you were not a member of that committee. Is it also true
15 that you were not at the meetings at which those documents,
16 the FEMA NRC Steering Committee meetings at which those
17 documents were discussed?

18 A That is correct.

19 Q Then you don't personally know whether or not
20 FEMA actually reviewed the specific Diablo Canyon off-site
21 plan for adequacy prior to the issuance of those two documents,
22 is that right?

23 A Would you repeat that question, sir?

24 Q You don't personally know whether or not FEMA
25 actually reviewed specific Diablo Canyon off-site plans for



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1 satisfy other provisions of this Plan

2 A No, sir; there are not.

3 Q Now, can the Sheriff cause the evacuation of the
4 Montana De Oro State Park?

5 A The Sheriff can call.-- he has an agreement; I believe,
6 through some acronym called MAST with the Military people at
7 the Hunter-Liggett Air Base, and he can call them, and they
8 can dispatch a helicopter to warn the people in the Montana
9 De Oro State Park.

10 Q Now, he can call these people. Their capability
11 to respond, of course, is independent of his calling them--

12 A The capability in their response, sir, is up to
13 themselves.

14 Q That is right. It is possible that they couldn't
15 respond, isn't it?

16 A If they fell down and broke a leg, I would imagine
17 they would have trouble getting out of the Park; yes, sir.

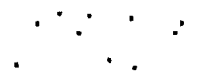
18 Q No, we are referring to the people who are going to
19 assist the Sheriff.

20 A You mean the people in the helicopter, sir?

21 Q Yes.

22 A It is possible that, if they were disabled, they
23 could not respond; yes; that is true.

24 Q I guess there could be weather conditions; heavy
25 fog, for example, of the kind we saw here several mornings,



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that might preclude the use of helicopters?

A This is possible, but they do have all-weather helicopters.

Q Which makes it possible for the pilots to see better in fog?

A There is IFR in helicopters; it is possible. All-weather helicopters fly in all kinds of weather, yes. It is also possible --

Q Do pilots fly them?

A Sir, would you permit me to finish my answer before you start the next one?

It is also possible that there could be some kind of weather conditions in which it is not possible to get a helicopter off the ground.

Q And have you done an evaluation of the frequency of those fog conditions in the area of the fields from which the helicopters leave in the Montana De Oro State Park?

A No, sir.

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1 MR. BROWN:

2 Q Mr. Sears, I would like to ask you a question now
3 about your own perspective and your purposes in evaluating
4 as you evaluate this plan. Is it the purpose of this plan
5 to protect the public health and safety?

6 A (Witness Sears) Yes, sir.

7 Q How do you -- what do you bring to the plan during
8 your evaluation with respect to the meaning of "public?"

9 A The public people here, sir. You, I, the Board,
10 all of us.

11 Q Could it mean a thousand people only?

12 A It could mean 200 million people in the U.S.; we
13 are all part of the public.

14 Q Could it mean a small number of people?

15 A It could mean one, two, ten, 200 million. I --
16 we are all part of the public, sir.

17 Q Now, let us say it meant one, two, or ten, for
18 purposes of my next question. Is it the purpose of this
19 plan to protect one, two, or ten people during the low power
20 operation of Diablo Canyon?

21 A The purpose is to protect one, two or ten or 20 or
22 50 or any number.

23 Q Now, yesterday, yesterday there was a question
24 asked by Mr. Reynolds with respect to the distance of the
25 Montana De Oro State Park. This is at transcript page 11067,



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1 and at line 9, the question was, "How far away is Montana
2 De Oro State Park from the plant?" Your answer, sir, was
3 "About four miles north, sir; three to four miles north."

4 I would like you to look at the page in the plan
5 that has the scale drawing of the location of the plant and
6 the park, and just scale it, because as we look at it, the
7 park of course has a range. It begins at one point, and it
8 ends at another, and covers several miles, I think, I would
9 like the record to be very clear on precisely the distance
10 of it. It is in Appendix VIII to the County plan, I was
11 just told.

12 MR. NORTON: May I have the page reference to the
13 transcript, please?

14 MR. BROWN: 11067. It is Appendix VIII to the
15 County Emergency Response Plan, Mr. Sears.

16 BY MR. BROWN:

17 Q Do you have it, Mr. Sears?

18 A (Witness Sears) I do indeed, thank you.

19 JUDGE WOLF: Mr. Brown, what section are we looking
20 for?

21 MR. BROWN: It is Appendix VIII.

22 JUDGE WOLF: Eight?

23 MR. BROWN: Yes, eight. The numeral VIII, to the
24 County evacuation plan, which is tab number 10, Appendix 10
25 to the plan.



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1 MR. BROWN:

2 Q Mr. Sears, if you would just -- you can scale it,
3 if you would like to -- if you have a ruler, we can scale it
4 off, or something else.

5 A (Witness Sears) Yes, sir.

6 Q Okay.

7 A And I -- what was your question sir, now?

8 Q I would like you to scale for us, using the scale
9 at the bottom of that page, the distance from the power plant
10 to the closest point of Montana De Oro State Park and then to
11 the farthest point, so we just have for the record the range
12 of distance of this park.

13 But if you -- Mr. Sears, if you could wait before
14 you answer, the Board is still searching for the page.

15 A May I respond yet, sir?

16 Q Yes, please.

17 A A very rough estimate on this blue piece of paper
18 says that the nearest point is about possibly a mile and
19 three-quarters, and the farthest is possibly five and a half
20 miles.

21 Q Thank you.

22 A So that when my response was between three and four,
23 this about where the middle of the park was.

24 Q Well, thank you very much for going through this
25 exercise. So just for the record, I assume you do not rule



1 out the possibility of people in the back country in the
2 Montana De Oro State Park being there when weather conditions
3 were adverse to the use of the helicopters pursuant to the
4 Sheriff's agreement so that these individuals could not be
5 contacted by the use of those helicopters?

6 A So what is your question? Is that a question, sir?
7 You said assume something?

8 Q Is that correct?

9 A I don't know. I didn't hear a question. What is
10 your question now, sir?

11 Q Is it correct that you do not rule out the
12 possibility of persons being in the back country at Montana
13 De Oro State Park under weather conditions which prevent the
14 use of the helicopters --

15 A It is a possibility that somebody could be there,
16 yes, sir.

17 Q Now, I am addressing a hypothetical with ten
18 people who are there. How are they going to be contacted
19 under those conditions, under the provisions of this plan?
20 Could you please point to the provisions of the plan that
21 deal with that situation?

22 MR. NORTON: Excuse me, Your Honor. If we are
23 going to have hypotheticals, may we have the conditions, all
24 the facts that are necessary, instead of saying under those
25 conditions, may we find out where those people are, et cetera,



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1 et cetera, all the facts, not just some imaginary facts, but
2 the hypothetical facts that Mr. Brown wants addressed?

3 MR. OLMSTEAD: Mr. Chairman, I am afraid I have a
4 more fundamental objection to this line of questioning. The
5 testimony has established, and we have all stipulated
6 pursuant to Joint Intervenor's Exhibit 111 that the current
7 notification requirements which exist in 5047 as a result of
8 the November changes are not yet fully implemented. Now,
9 that is the fact as it sits on this record.

10 The review that Mr. Sears has testified to is the
11 review of the State and local plans submitted prior to that
12 change in regulations, and Mr. Brown has not laid a basis
13 for a requirement that existed under that criteria for the
14 type of notification that he is trying to demonstrate does
15 not exist in that plan, so even if he were able to prove what
16 it is he is seeking to prove, he wouldn't have proved any-
17 thing that deals with the requirements at issue.

18 MR. BROWN: Judge Wolf, the only thing that it would
19 prove is that there could be people stranded in this park
20 who could not be evacuated.

21 MR. OLMSTEAD: And I presume that is why the
22 regulations were changed.

23 MR. BROWN: I want to know, under the review Mr.
24 Sears has done, whether he can show us in the documents he has
25 used for his review if there is any way that the individuals



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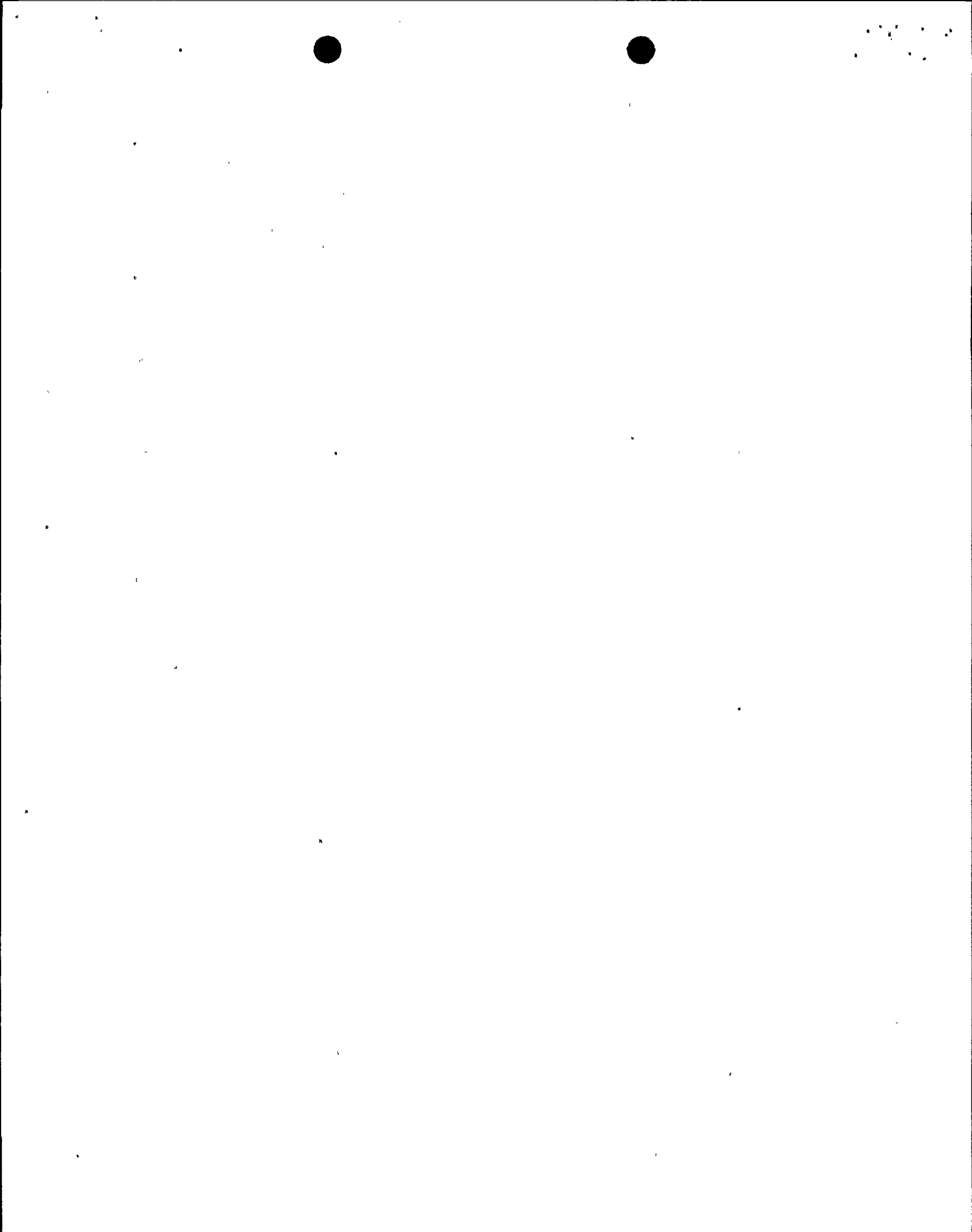
6 1 in the park under the adverse weather conditions we
2 addressed a moment ago could be evacuated.

3 MR. NORTON: Excuse me, Your Honor. Again, the
4 problem is, he talks about these conditions. What conditions?
5 What weather conditions? How long are those weather
6 conditions going to persist to have relevancy to this
7 proceeding. He can't just say these conditions without
8 anybody, the Board or the witness or anyone else, knowing
9 what he is talking about. Is he talking about a hurricane
10 sitting in one spot for a week? What is he talking about?
11 What conditions?

12 I don't mind the question being asked if he
13 identifies the conditions he is talking about so somebody
14 can give an intelligent answer to the question.

15 MR. BROWN: Judge Wolf, Mr. Norton just keeps
16 coaching the witness. Hard questions are here. The
17 conditions I am asking this gentleman to address are those
18 which were in his mind when he in the earlier question said
19 that it was possible that fog conditions could, under -- at
20 times prevent helicopters from being used to get the people
21 in the park.

22 Now, given those conditions, in his mind, I am just
23 using his words, isn't it possible -- I want him to tell me
24 if there is any other means through this plan that those
25 people would be evacuated?



1 JUDGE WOLF: You may answer, Mr. Sears, if you know,
2 or if you can.

3 WITNESS SEARS: There may be conditions due to
4 weather when a helicopter would not be able to fly over
5 Montana De Oro State Park. I have been informed by my
6 colleague that the time for fuel melting in low power testing
7 may be as long as 15 hours. I would expect that in 15 hours,
8 the weather would change. This is a seacoast area. The
9 weather would change, and with the changing area, one could
10 fly a helicopter in there to warn people in the back hills.

11 BY MR. BROWN:

12 Q I only have one more question for you then, we are
13 going to dispense with this matter. When you said you would
14 expect that the weather would change in 15 hours, what is the
15 professional basis that you use for your statement of
16 expecting the weather in this area to change within 15 hours.

17 A (Witness Sears) I am not a professional
18 meteorologist, sir.

19 Q Thank you. I would like to ask the question of
20 whether you have considered the possibility of recommending
21 that PG & E provide to individuals for work with the Park to
22 assure that individuals who do go into the back country and
23 might be exposed to situations where they could not be
24 evacuated, to have a portable radio with them, so that a
25 special alerting system might be devised to protect these



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1 individuals on the event of a release have you considered
2 that idea?

3 A No, sir. I have not considered that.

4 Q Just to clarify one further point, on page six of
5 the evacuation authority of the County Evacuation Plan,
6 Point B, is it -- do you have that, Mr. Sears?

7 A Yes, sir. I do.

8 Q Is it correct that this sentence says that the
9 State Parks and Beaches within San Luis Obispo County will
10 be evacuated on order of the Chief Ranger in charge or his
11 designated representative?

12 A Yes, sir. That is what it says.

13 Q Fine, well, let us move on now, but before we do
14 that, I would like just the record to show --

15 A My I amplify my answer?

16 Q You surely may, sure.

17 A It does seem to me that if indeed a helicopter
18 were flying over the back area, and the advice came from the
19 helicopter for people to leave the area, it really wouldn't
20 make any difference whether this was an Army helicopter pilot
21 who made this announcement to the people, or the Chief
22 Ranger.

23 Q Well, the question is who would order the
24 helicopter?

25 A Who would get the helicopter would be the Sheriff's



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1 Department, sir.

2 Q Now, this sentence, in A, I believe, you call very
3 important or very significant. Are there other parts of
4 this plan, particular provisions, which are in the same
5 category as very important as influencing your judgment to
6 support this County plan in this proceeding?

7 A That was the most important, sir.

8 Q Thank you. Now, before I go on, I want to make sure
9 that you have your answer complete. Are there any other
10 parts you would like to cite for the record that are
11 particularly significant or important as influencing your
12 judgment that we should have before the Board?

13 MR. OLMSTEAD: Objection. Asked and answered.

14 JUDGE WOLF: I think that question has been
15 answered, Mr. Brown.

16 MR. BROWN: All right, we will move on.

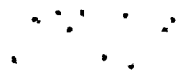
17 BY MR. BROWN:

18 Q What was the FEMA/NRC Steering Committee, or what
19 is that Committee?

20 A (Witness Sears) The FEMA/NRC --

21 Q Yes, go ahead.

22 A -- Steering Committee, sir, consisted of -- to the
23 best of my knowledge -- the following people: I think there
24 were four FEMA people on it. I believe there was Robert Ryan,
25 John McConnell, Doc Collins -- that is, Harold Collins.



1 JUDGE WOLF: I told Mr. Norton, if you had been
 2 listening, Mr. Brown, that he could inform this witness of
 3 what Mr. Jorgenson said. He is trying to do that now. Let
 4 him finish and please don't interrupt until he is finished.

5 BY MR. NORTON:

6 Q He says "The 1976 has a standard operating pro-
 7 cedure." The word "plan" doesn't follow "1976", but that's
 8 what was being discussed. "The 1976 (plan) has a standard
 9 operating procedure which calls for the sherriff to have
 10 responsibility in a low population zone. It also refers to
 11 a detailed and specific plan which the sherriff would have
 12 available which would talk about the actual specifics of
 13 carrying out a plan such as that. That detailed and specific
 14 plan that is referred to in the SOP is not in the 1976 plan
 15 and, in consultation with the emergency services coordinator,
 16 the emergency services coordinator nor I are familiar with
 17 any detailed and specific implementing plan for the LPZ. I
 18 heard the testimony yesterday. There may be, you know,
 19 telephone conversation agreements or letters. But as far as
 20 any official knowledge of a specific plan for evacuation, no,
 21 other than that referenced in the SOP."

22 Now that was Mr. Jorgenson's testimony. My question
 23 to you, Sherriff, is if you have a specific plan for the
 24 evacuation of the LPZ, would you describe it to this Board?

25 A We do have a plan and we would operate from that



1 plan. The plan is kept with the watch commander. He would
2 use that plan to at this particular time -- well, it would
3 update it first and use that plan to do an evacuation of that
4 particular area.

5 Q Could you describe that plan to the Board?

6 A The particular plan we have right now is the
7 sherriff would be responsible for the evacuation on an order
8 from the emergency planner. If in his absence, the sherriff
9 watch commander could invoke the plan. The plan now exists
10 that we have 57 residences, the name, address, telephone
11 number, the mileage from San Luis Bay Road, and which we
12 could make contact with the people in that area. We also
13 have -- it's in a six mile radius of the Montagne D'Oro,
14 which we would also evacuate if we could not reach the parks
15 and beaches. It would be our responsibility to take care of
16 that part of it. Basically it would mean that we would have
17 the responsibility for evacuating that particular area.

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