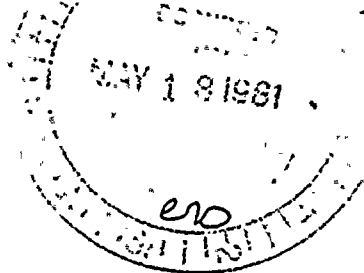


AFFIDAVIT OF LEONARD G. PARDUE

ON CONTENTION 4 B



1. My name is Leonard G. Pardue. My address is 641 Falcon Avenue, Miami Springs, Florida, 33166. A statement of my professional background and qualifications is attached to this affidavit and made a part thereof.

2. This affidavit addresses Contention 4 B which states:

There are likely to occur radioactive releases, (from the steam generator repair) to unrestricted areas which violate 10 CFR Part 20 or are not as low as reasonably achievable within the meaning of 10 CFR Part 50 as a result of a hurricane or tornado striking the site during the repairs.

3. The statistical probability of a major hurricane (categories 3, 4, or 5 on the Saffir/Simpson Hurricane Scale), striking the Turkey Point area is 5 % each year. This area is a 50 mile segment of the southeast Florida coast in which Turkey Point is located.

4. The Saffir/Simpson Hurricane Scale defines a category 3 hurricane as having a central pressure from 945 - 964 millibars, winds from 111 - 130 mph, and a surge from 9 - 12 feet;

a category 4 hurricane as having a central pressure from 920 - 944 millibars, winds from 131 - 155 mph, and a surge from 13 - 18 feet; and

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a category 5 hurricane as having a central pressure less than 920 millibars, winds greater than 155 mph, and a surge greater than 18 feet.

5. Winds generated during a category 5 hurricane can exceed 200 mph. The most recent category 5 hurricane to strike the United States was Hurricane Camille in 1969.

6. Tornadoes can strike the Turkey Point plant as independent storms or they can be spawned from hurricanes.

7. On April 10, 1956, a tornado struck Florida Power and Light's Cutler power plant, located approximately 14 miles north of the Turkey Point plant. The reported estimated windspeed was in excess of 100 mph.

8. Winds generated during a tornado can exceed 300 mph, but the possibility of a tornado of such severity, occurring in Southeast Florida, is remote.

9. A major hurricane can generate a storm surge 15 feet above mean sea level at the Turkey Point site.

10. Waves 6 - 8 feet high which are superimposed on the 15 foot storm surge can occur during a major hurricane at Turkey Point.



11. Hurricane force winds will usually last 4 - 6 hours at a location directly in the hurricane's path, but, if a hurricane were to stall over Turkey Point, the duration of hurricane force winds would be extended.

12. On September 5, 1950, Cedar Key, Florida experienced winds of 120 mph, intermittently, over a 12 hour period.

13. For a location directly in the path of a hurricane, hurricane force winds can be expected to reverse direction 180 degrees, as the storm passes.

14. Due to the flooding of the access roads and the isolated location of the plant site, the National Hurricane Center would most likely advise that Turkey Point be evacuated at the approach of a major hurricane.

15. During the strike of a major hurricane, objects, such as loosely stacked drums, can be scattered by the hurricane and can receive mechanical shocks from collisions with other objects.

CONCLUSION

During the passage of a major hurricane over the Turkey Point site, the integrity of loosely stacked drums of low level radioactive waste cannot be assured. The scattering of these loosely stacked drums can be expected.



FURTHER AFFIANT SAYETH NOT

Date: 5/11/81

Leonard G. Pardue

STATE OF FLORIDA)
) SS.
COUNTY OF DADE)

SWORN to and subscribed before me this
11 day of May, 1981.

Thomas P. Reck

Notary Public

Notary Public, State of Florida at Large
My Commission Expires March 16, 1984
Bonded thru Maynard Bonding Agency



STATEMENT OF PROFESSIONAL BACKGROUND AND QUALIFICATIONS

LEONARD G. PARDUE

I am a fully qualified meteorologist. Following many years with the National Weather Service, including 25 years in Miami, Florida at the National Hurricane Center, I left the Government to enter private practice as a consultant. I have assisted many law firms and assistant state's attorneys and public defenders, appearing often as an expert in Circuit Court and Federal District Court in Dade, Broward, Palm Beach, and Lee Counties and Washington, D. C.

I entered the Weather Bureau at Montgomery, Alabama, serving also at other points in Alabama, Louisiana, and Florida. Meanwhile I attended Spring Hill College at Mobile, Florida Southern College at Lakeland, Tulane University at New Orleans, and the University of Miami, followed by a year at the Graduate School of Meteorology at New York University, where I had been awarded a full scholarship. Upon completing my year at NYU I was assigned to Miami. I have taught weather courses at the University of Miami, Florida A & M University, Miami-Dade Community College, the Air Force Reserve, and adult evening high school. For two years I was president of the Museum of Science and Planetarium and now am president of the Friends of Physics of the University of Miami. I have been certified as a consultant by the American Meteorological Society.

During my private practice I have worked with attorneys in cases involving railroads, air lines, public utilities, aircraft manufacturers, municipalities, and the United States Government. I have been consulted by commodity traders, architects, engineers, and insurance companies.

