

STATEMENT OF PROFESSIONAL BACKGROUND AND QUALIFICATIONS

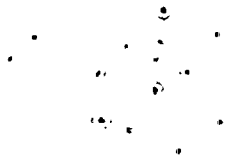
LEONARD G. PARDUE

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.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter of )  
 )  
 ) Docket Nos. 50-250-SP  
 ) 50-251-SP  
FLORIDA POWER & LIGHT COMPANY )  
 )  
 ) (Proposed Amendments to  
(Turkey Point Nuclear ) Facility Operating Licenses  
Generating Units Nos. 3 ) to Permit Steam Generator  
and 4) ) Repairs.)  
 )  
 )  
 )  
 )  
 )

AFFIDAVIT OF DOUGLAS KING

STATE OF FLORIDA )  
 ) ss.  
COUNTY OF DADE )

I, DOUGLAS KING, being first duly sworn do state and affirm that:

1. My name is Douglas King. My business address is Physics Department, Miami Dade Junior College, South Campus. A statement of my professional background and qualifications is attached to this affidavit and made a part thereof.

2. I participated in the Turkey Point site inspection on April 19, 1981 as a member of Intervenor, Mark Oncavage's party. The inspection was authorized by the Atomic Safety and Licensing Board.

3. I observed several locations of loosely stacked, sealed drums in roped off areas. These drums were identified as containing radioactive material. At no time during the inspection did I observe LSA boxes on site.

4. In the first six weeks of the steam generator repair, according to Bechtel Power Corp.'s "Steam Generator Replacement Summary Schedule," the containment building will be decontaminated. the nuclear core will be off loaded, and the channel heads on steam generators, A, B, and C,



will be decontaminated.

5. If, during off loading of the nuclear core, the primary coolant is drained, processed and released, the entire inventory of radioactive isotopes, extracted from the coolant, must be stored as solid radioactive waste. This radioactivity is estimated to be approximately 270 ci. per unit, according to NUREG CR/1595; PNL 3454, Page 40.

6. There is no estimate in the FES, NUREG 0743 for the amount of radioactivity that must be stored resulting from the decontamination of the containment building.

7. In the FES, pages 4-12, Florida Power & Light states that 1500 ci. of gamma radioactivity will be present in the six steam generators at the time of removal. NUREG CR/1595, PNL 3454, page 5, estimates that each steam generator will contain between 400 and 1000 ci. of radioactivity. The criterion for the large discrepancy between Florida Power & Light's estimate and Battelle's estimate of activity per steam generator has not been forthcoming and demands further investigation and clarification.

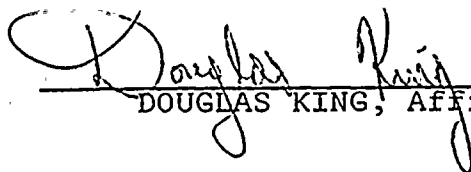
8. Florida Power & Light will attempt to remove the radioactivity from the channel head and divider plate areas of each steam generator by grit blast. Whether the 250 ci. or the 400 ci. or the 1000 ci. activity per steam generator is accurate, all radioactivity from the decontamination process must be stored as solid waste.

#### CONCLUSION

The initial six week period of the steam generator repair requires very large, potentially hazardous amounts of radioactivity to be stored as solid radioactive waste. The lack of adequate precautions in storing these wastes can lead to an irreversible contaminating accident if a hurricane or tornado should breach the waste containers and scatter

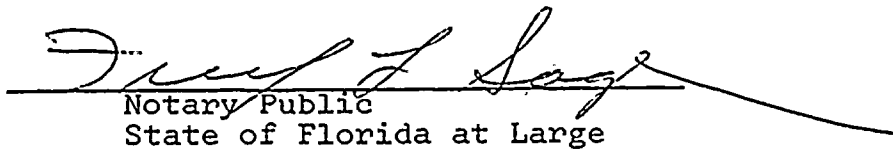


the contaminated material over the Turkey Point site and its surrounding waters.

  
DOUGLAS KING, Affiant

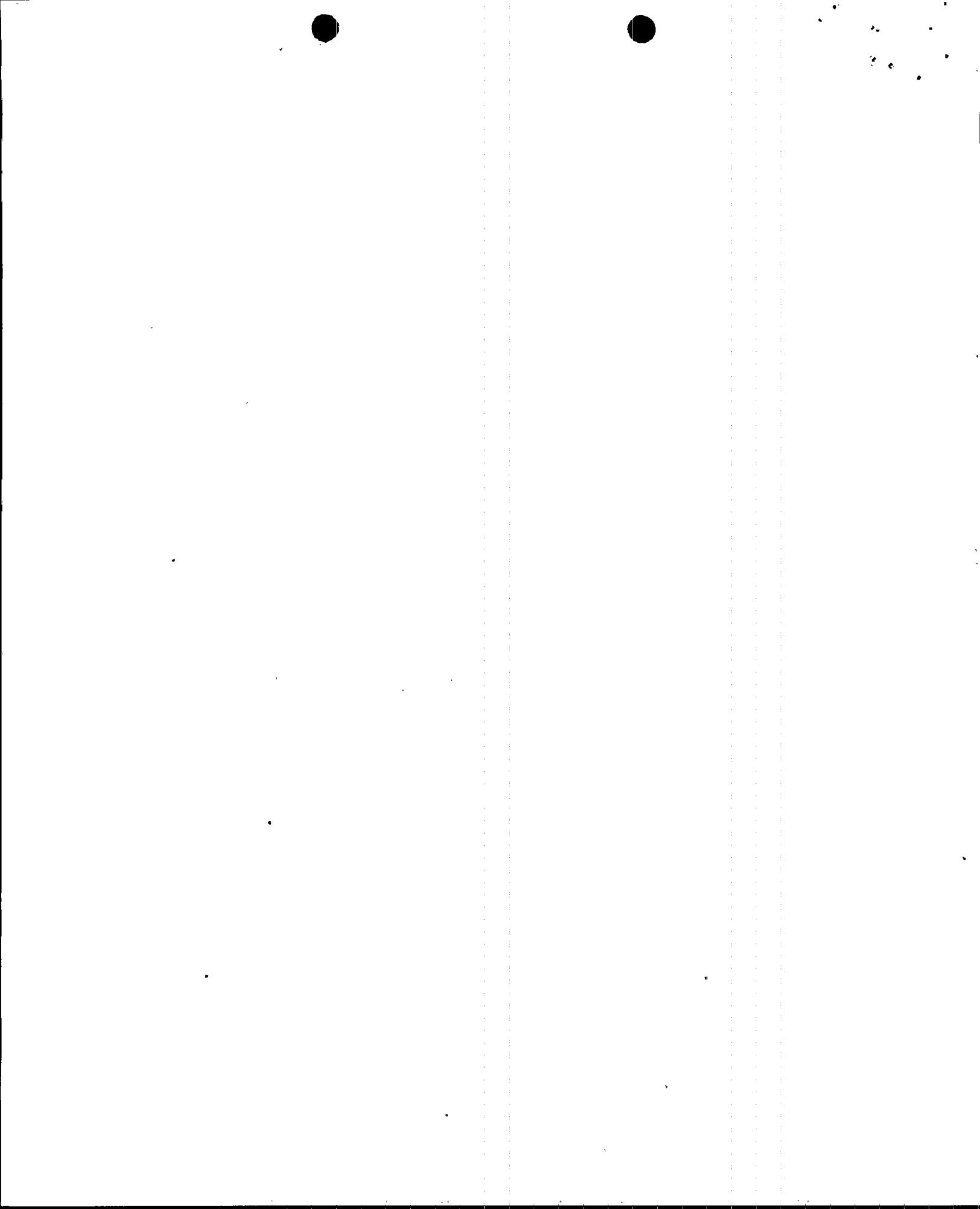
BEFORE ME, the undersigned authority, personally appeared DOUGLAS KING, who by me first being duly sworn, state that the foregoing facts are true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED before me on this 27 day of JUNE, 1981.

  
Notary Public  
State of Florida at Large

My Commission expires:

NOTARY PUBLIC STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES JAN. 11 1982  
BONDED THRU GENERAL INS. UNDERWRITERS





STATEMENT OF PROFESSIONAL BACKGROUND AND QUALIFICATIONS

DOUGLAS KING

EDUCATION:

Bachelor of Science, Physics, 1971  
The Cooper Union, New York City, New York

GRADUATE STUDIES:

Physics Department, Radiation Biophysics Department, 1971 - 1977  
University of Florida, Gainesville, Florida

RESEARCH AREAS:

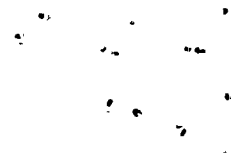
Nuclear Magnetic Resonance, Radiation Biophysics, Biological  
Action of Ionizing Radiation, Cell Membrane Physiology, and  
TLD Dosimetry

EMPLOYMENT:

1975 - 1977 Teaching Assistant, Physics Dept. Univ. of Florida  
10/77 - 1/78 Biomedical Engineer, Univ. of Miami, Medical School  
2/78 - 10/78 Radiation Health Physics Supervisor, Medi + Physics Inc.  
11/78 - 5/81 Physics and Advanced Mathematics Teacher, The  
Palmer School

MEMBERSHIPS AND HONORS:

Member of Sigma Pi Sigma, Physics National Honor Society  
President of Sigma Pi Sigma, Univ. of Florida Chapter, 1976 - 1977  
Member of United States Chess Federation, 1964 - 1980.



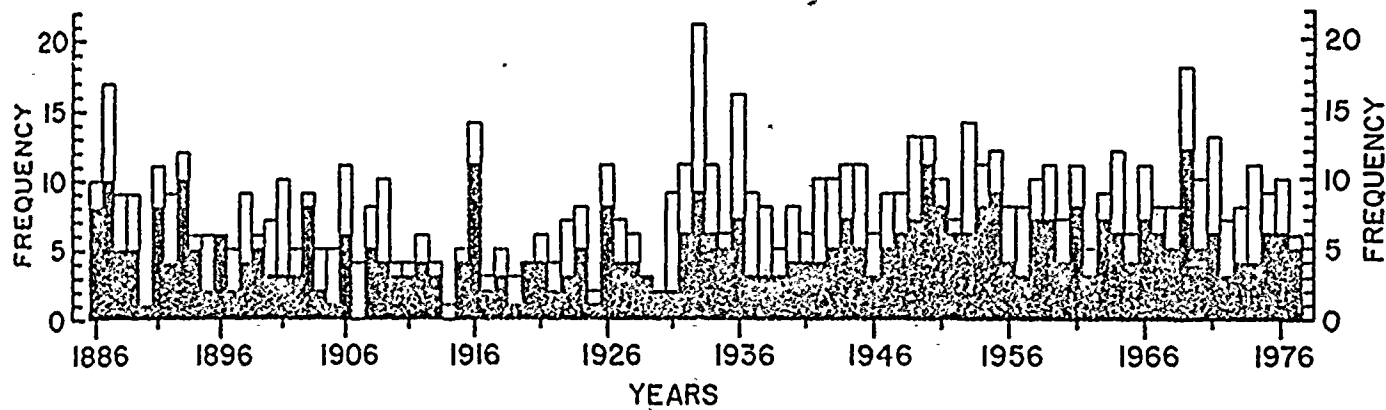


Figure 5.—Annual distribution of the 761 recorded Atlantic tropical cyclones reaching at least tropical storm strength (open bar) and the 448 reaching hurricane strength (solid bar), 1886 through 1977. The average number of such storms is 8.3 and 4.9, respectively (see Table 4).

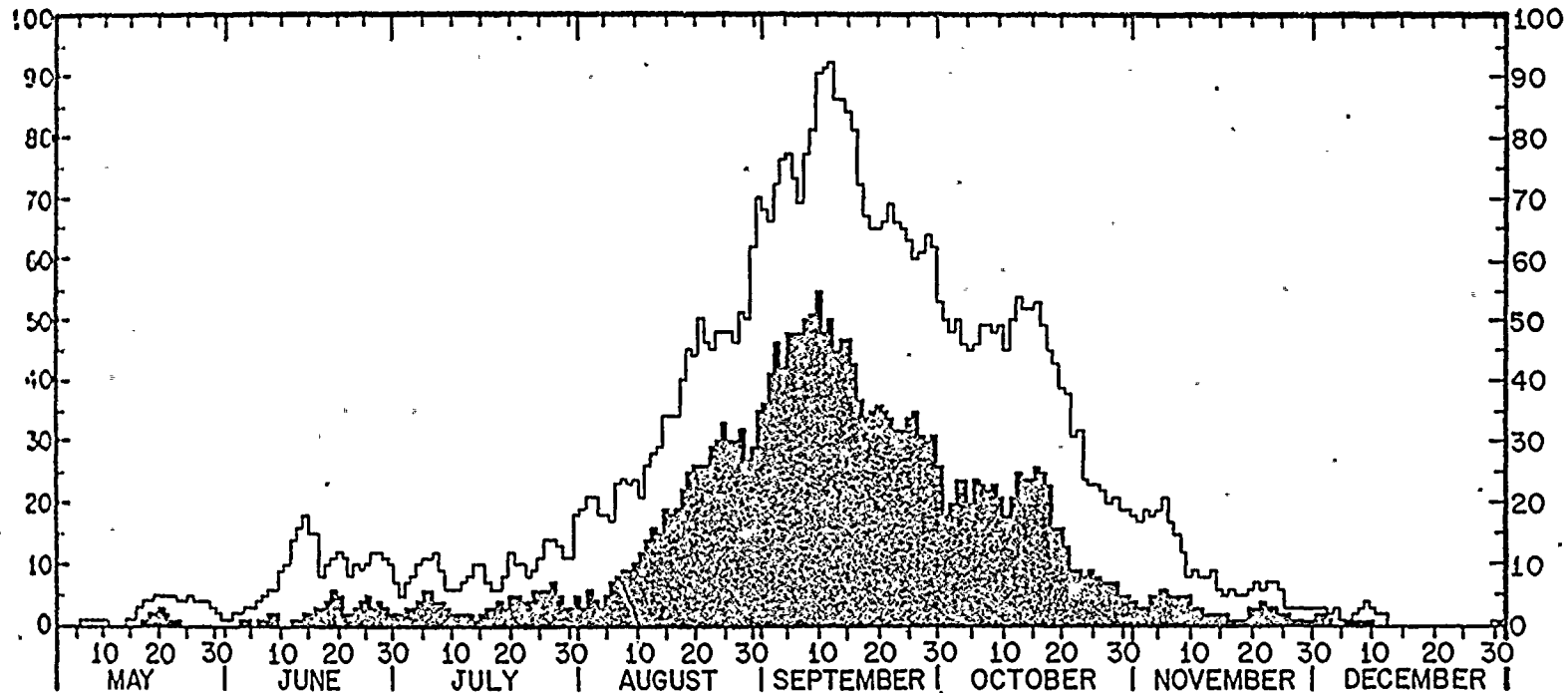


Figure 6.—Number of tropical storms and hurricanes (open bar) and hurricanes (solid bar) observed on each day, May 1–December 30, 1886 through 1977.

Exhibit IV

