UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of:

PENNSYLVANIA POWER & LIGHT CO.					
and	1				
ALLEGHENY ELECTRIC COOPERATIVE,		Docket	Nos.	50-387	
INC. (Susquehanna Steam Electric	:			50-388	
Station, Units 1 and 2)	:				

AFFIDAVIT OF ADOLPH L. BELSER AND RALPH J. HIPPERT

I, Adolph L. Belser, being duly sworn, depose and state that:

I am an employee of the Pennsylvania Emergency Management Agency. My present position is Director, Plans and Preparedness. A copy of my professional qualifications appears in the transcript of this proceeding following page 2586.

I, Ralph J. Hippert, being duly sworn, depose and state that:

I am an employee of the Pennsylvania Emergency Management Agency. My present position is Deputy Director, Plans and Preparedness. A copy of my professional qualifications appears in the transcript of this proceeding following page 2586.

We, Adolph L. Belser and Ralph J. Hippert, being duly sworn, depose and state that:

 The purpose of this affidavit is to respond to the questions in the Appeal Board Order dated August 20, 1982, and to support the Stipulation of Withdrawal of Exceptions filed herewith.

 The information submitted herein is based upon the best information currently available regarding numbers of emergency workers, and costs and delivery times associated with purchases of dosimetry. The numbers are based on actual counts or estimates of emergency workers by county emergency management personnel, and PEMA's estimate of State personnel that would be involved in responding to an incident at the Susquehanna Steam Electric Station (SSES). These numbers could be subject to some flucuation.

3. In the event of an incident at SSES, the Commonwealth of Pennsylvania would utilize emergency workers from the State, county and municipal levels. Since Pennsylvania has more than one nuclear plant, the response plans may call for use of the same emergency workers at more than one plant. This occurs most frequently in the case of State personnel and workers in support counties. If SSES were to stand alone, there would be 2,397 county and municipal emergency workers. Considering that dual use with other plants would be involved, this number can be reduced to 2,305. To the 2,305 must be added a prorata share of total State emergency workers that could be available and deployed, though not all necessarily for an SSES incident. This total figure, including National Guard and State Police, is 4,383. The prorata share for SSES was determined to be 887, which brings the total number of emergency workers for that site to 3,192.

CD V-742 Dosimeters

4. The Commonwealth plans to provide all off-site emergency workers who would be involved at Susquehanna with CD V-742 (0-200R) dosimeters. The Commonwealth has issued 1,934 CD V-742 dosimeters for county and municipal emergency workers and will issue 371 more (2,305-1,934) from stocks on hand. In addition, 1,500 of the 4,383 needed

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for State emergency workers throughout the Commonwealth have been issued, and the balance of 2,883 is available from civil defense stocks. This distribution is required by the Commonwealth of Pennsylvania's Disaster Operations Plan, Annex E, Fixed Nuclear Incidents, Appendix 16 (Radiological Exposure Control), Section V.B (page E-16-5).

CD V-730 Dosimeters

5. The Commonwealth believes that in addition to the CD V-742 dosimeter each emergency worker should have a CD V-730 (0-20R) dosimeter, or equivalent (a dosimeter with a range of 0- 50R maximum). (The basis for this statement is included in the affidavit of Margaret A. Reilly.) While the Commonwealth did have some CD V-730s, they have been issued for other plants or to State personnel. There are none on hand for issue to emergency workers concerned with SSES. This distribution is required by the Commonwealth of Pennsylvania's Disaster Operations Plan, Annex E, Fixed Nuclear Incidents, Appendix 16 (Radiological Exposure Control), Section V.B (page E-16-5).

6. It was originally indicated that 3,192 CD V-730 dosimeters were needed for State, county, and municipal workers for SSES. There have, however, been 1,500 CD V-730s issued to the State Police and National Guard. When this is taken into account, 303 can be prorated for SSES, which reduces the CD V-730 requirement for that site to 2,889. The number of emergency workers, however, is still 3,192.

7. The Commonwealth had originally planned to provide CD V-730s to all emergency workers. After further consultation with the Bureau of Radiation Protection, it was determined that a TLD would provide adequate exposure data for workers in support counties, who do not

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enter the plume exposure pathway emergency planning zone. (They will also have a CD V-742 to provide redundancy.) (The basis for this statement is included in the Reilly affidavit.) This will reduce the CD V-730 requirement by approximately 400 to 2,489.

8. CD V-730 dosimeters are not readily available from manufacturers or other suppliers. Upon contacting the Dosimeter Corporation of America, Cincinnati, Ohio, it was learned they could not start production until 120 days after an order was received. After this start-up time, they could produce at the rate of 500 per month. The entire 2,500 could thus be available in about 9 months.

The total cost of CD V-730 dosimeters is approximately \$187,500
based on 2,500 dosimeters x approximately \$75/dosimeter.

Thermoluminescent Dosimeters (TLDs)

10. The Commonwealth believes <u>all</u> 3,192 emergency workers should be provided with TLDs. (The basis for this statement is contained in the Reilly affidavit.) The Commonwealth currently has no TLDs for this purpose. This distribution is required by the Commonwealth's Disaster Operations Plan, Annex E, Fixed Nuclear Incidents, Appendix 16 (Radiological Exposure Control), Section V.B. (page E-16-5).

11. TLDs are readily available from manufacturers, with delivery time of approximately 2 weeks (based on manufacturer estimates).

12. The total cost of leasing TLDs, including reading of TLDs by the supplier, is approximately \$11,200/year, based on 3,200 dosimeters x approximately \$3.50/dosimeter/year.

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Conclusion

The CD V-742s already issued, or available for distribution from State supply, coupled with provisions for obtaining 2,500 CD V-730s and approximately 3,200 TLDs, would provide adequate protection for the health and safety of the emergency workers involved. When the stipulated number of both self-reading dosimeters and the TLDs are available and predistributed by the Commonwealth to the risk counties, the dosimetry issue will have been met and the concern previously expressed will have been eliminated.

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Sworn to and subscribed before me this study of lept, 1982.

LINDA A. KINSEY, NOTARY PUBLIC HARRISBURG, DAUPHIN COUNTY MY COMMISSION EXPIRES MAY 28, 1983 Member, Pennsylvania Association of Notaries

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and	1				
ALLEGHENY ELECTRIC COOPERATIVE,	1.1.1	Docket	Nos.	50-387	
INC. (Susquehanna Steam Electric	27			50-388	
Station, Units 1 and 2)	1 2				

CERTIFICATE OF SERVICE

Copies of the documents listed below were served on the Appeal Board on the 9th day of September, 1982, by hand delivery. The remainder of the attached Service List was served on the 10th day of September, 1982, by first class mail, postage prepaid.

1. Commonwealth of Pennsylvania's Conditional Motion to Withdraw Appeal.

- 2. Stipulation of Withdrawal of Exceptions.
- 3. Affidavit of Margaret A. Reilly.
- 4. Affidavit of Adolph J. Belser and Ralph J. Hippert.

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Assistant Counsel Commonwealth of Pennsylvania

cc: Atomic Safety and Licensing Appeal Board (w/o attachments)

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Station, Units 1 and 2)	*				

SERVICE LIST

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