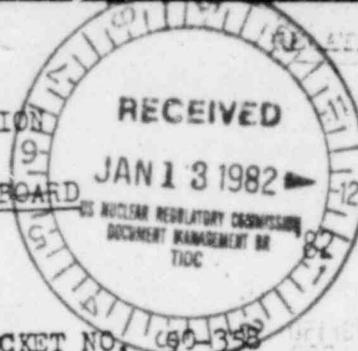


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD



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In the Matter of
CINCINNATI GAS & ELECTRIC
COMPANY, et al.
(William H. Zimmer Nuclear
Power Station)

DOCKET NO. 60-358

APPLICATION FOR AN OPERATING LICENSE

DIRECT TESTIMONY OF ROGER BEITING, ADDRESSING THE ZIMMER AREA CITIZENS-
ZIMMER AREA CITIZENS OF KENTUCKY AND CITY OF MENTOR CONTENTIONS 36, (B).

State of Kentucky)
) SS:
County of Campbell

Roger Beiting, being duly cautioned and sworn, as his testimony states as follows.

I, Roger Beiting, have been a lifetime resident of Campbell County, Kentucky. I presently reside on Nelson Road near Melbourne, Kentucky. I have read the Campbell County Radiological Emergency Plans in part, including the report by Stone and Webster.

I am familiar with the roads in Campbell County. Campbell County evacuation Routes 1121, California Cross Road and Persimmon Grove Pike are narrow, winding and hilly with steep inclines. Lickert Toad has four 90 degree turns and a narrow bridge impeding evacuation; where it intersects U.S. 27 there is no access point of control to direct traffic flow. A designated major evacuation route, Kentucky Route 8, is dangerous in places for ordinary use and obviously unfit for emergency evacuation purposes. In particular, south of Twelve Mile Creek the road is built into the side of a steep hill and is frequently subject to slippages, some of them so severe that the north bound lane has been practically unusable for weeks at a time. Piles have been driven recently in an effort to support the roadway, but the road surface is dangerously irregular and convoluted and would be particularly hazardous during emergency evacuation conditions. Wesley Chapel Road and 1121 are narrow, hilly ridge roads. Kentucky 10 is a narrow and winding road. Flooding is so wide spread along the roads which follow creeks that, if it has been raining,

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I stick to the ridges. The evacuation of the Campbell County population directed in a generally north direction of Persimmon Grove Road to proceed in a generally northwesterly direction on evacuation routes Ky 10 and Ky 8 are inadequate where the plume pathway of radiation release from the Zimmer Station is generally northwesterly proceeding in the same path as the evacuation routing, and is inadequate in the failure to evacuate that portion of the population away from the plume pathway; and the evacuation of the Campbell County population directed in a generally south direction of Persimmon Grove Road to proceed in a generally westerly direction on evacuation routes 1121, 1280 and U.S. 27 are inadequate where the plume pathway of radiation release from the Zimmer Station is generally westerly proceeding in the same path as the evacuation routing, and is inadequate in the failure to evacuate that portion of the population away from the plume pathway. Implementation of the evacuation under the stated circumstances provides no reasonable assurance that the health and safety of the affected population is protected.

The use of school buses as vehicles for evacuation of the general public without transportation is incapable of affording timely and prompt evacuation of that segment of the population. There are no posted school bus stops or routes and there is no plan provision to educate the public where they are to assemble for school bus transportation to afford timely and prompt evacuation of that segment of the population. The roadways within approximately eight miles of the Zimmer Station are inadequate for TANK bus travel and maneuverability, particularly Route 8. There are few places to turn around and under snow and ice conditions use of buses would be extremely hazardous.

In addition, the Stone and Webster evacuation time study does not indicate the critical assumptions which underlie the time estimates. For example, no different time estimates exist for the following conditions: day versus night, workday versus weekend, peak transient versus off-peak transient, and evacuation on adjacent sectors versus non-evacuation. Nor does the plan take into consideration that people from outside the 10 mile EPZ, as well as those inside, would probably

rush home to evacuate their families. Regardless of what the plan calls for, I believe that most people would take the fastest way out of the area and go to the nearest relative's house outside the 10 mile zone. For the above stated reasons I do not believe that the Campbell County Evacuation Plan could be carried out in a safe and timely manner.

Roger Beiting
ROGER BEITING

Sworn to and subscribed in my presence this 7th day of January, 1982.

Deborah Fulver Webb
NOTARY PUBLIC

My commission expires: 10/28/85