

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

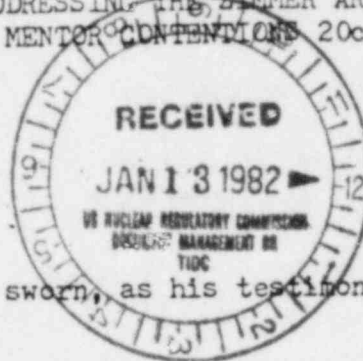
In the Matter of  
CINCINNATI GAS & ELECTRIC  
COMPANY, et al.  
(William H. Zimmer Nuclear  
Power Station)

DOCKET NO. 50-358  
APPLICATION FOR AN OPERATING LICENSE

'82 JAN-11 P12-08  
*els*

DIRECT TESTIMONY OF DELBERT BROWN, ADDRESSING THE ZIMMER AREA CITIZENS-  
ZIMMER AREA CITIZENS OF KENTUCKY AND CITY OF MENTOR CONTENTIONS 20c, (7), (8),  
(9), (10); 36, (B), (C), (D), (I).

State of Kentucky }  
County of Campbell } SS:



Delbert Brown, being duly cautioned and sworn, as his testimony states as follows.

I, Delbert Brown, have been a lifetime resident of Campbell County, Kentucky. I presently live on Washington Trace Road, where I have resided for the past three years. Washington Trace Road is within the 10 mile emergency planning zone. I have read the Campbell County Radiological Emergency Plan in part.

I am familiar with the roads in Campbell County. 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. Route 10 is very poorly maintained by the State. Kentucky 10 is a narrow and winding road. It parallels Twelve Mile Creek and during flooding this portion of Kentucky 10 is impassable. This road floods approximately two times a year. Route 8, one mile south of Twelve Mile Creek, is slipping into the river; traffic must reduce its speed by one half, during clear weather cars may proceed at 15 miles per hour and

during snowy conditions at 10 miles per hour. Oneonta floods approximately 9 days

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a year. Four and Twelve Mile floods approximately once a year but may remain flooded for days at a time. California Cross Road at Gubser Mill floods twice a year and blocks Wesley Chapel and Persimmon Grove. The intersection at Nelson and Four and Twelve Mile floods approximately once a year. Smith Road near Route 10 floods at least once a year.

The plan assumes that electrical service will be maintained throughout the emergency. Electricity is needed to operate televisions and radios as part of the prompt notification system among other things. My house is serviced by Owen County Rural Electric Company. Occasional power outages by Owen County Rural Electric Company are frequent enough to be a cause for concern.

The plan does not 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. If I have any serious doubts in the event of an accident that evacuation is taking place in a haphazard manner, I would not hesitate to reenter the area in order to take care of my family. Based on my familiarity with the plan at this point I have serious doubts as to whether an evacuation could be carried out in a safe and timely manner.

Delbert Gene Brown  
DELBERT BROWN

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

Delbert F. Walker  
NOTARY PUBLIC

My commission expires: 10/28/85