

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
LOUISIANA POWER AND LIGHT COMPANY) Docket Nos. 50-382
(Waterford Steam Electric Station,)
Unit 3))

AFFIDAVIT OF DONALD J. PERROTTI
ON PUBLIC INFORMATION BROCHURE

I, Donald J. Perrotti, being duly sworn, do depose and state:

Q.1. By whom are you employed, and what is the nature of the work you perform?

A.1. I am employed by the U.S. Nuclear Regulatory Commission ("NRC") as an Emergency Preparedness Specialist in the Emergency Preparedness Licensing Branch, Office of Inspection and Enforcement.

Q.2. Please describe the nature of the responsibilities you have had with respect to nuclear power plant emergency preparedness.

A.2. Since October 1980, I have had responsibility for the review and evaluation of radiological emergency plans submitted by licensees and applicants for licenses, in order to to assure that the proposed plans meet the regulatory requirements and guidance of the Commission. I also function as a Team Leader and Team Member of Emergency Preparedness Appraisal Teams engaged in the onsite inspections of the implementation phase of licensee emergency

programs. I observe nuclear power plant emergency drills and exercises involving State and local government response agencies, and participate in interagency critiques.

For the four year period prior to the assumption of my present responsibilities, I was the lead inspector at the NRC's Region II Office of Inspection and Enforcement in Atlanta, Georgia, where I was responsible for planning, conducting and documenting inspections of licensees' emergency plans and procedures, emergency facilities and equipment, emergency training, tests and drills, and coordination with offsite support agencies.

Q.3. Have you prepared a statement of professional qualifications?

A.3. Yes. A copy was attached to my pre-filed written direct testimony on Contention 17/26.

Q.4. Have you read the draft of the Applicant's Public Information Brochure for Waterford-3?

A.4. Yes. I have read the draft Public Information Brochure for the 10-mile emergency planning zone ("EPZ") around Waterford-3.

Q.5. Did you provide your comments regarding the Applicant's Public Information Brochure to the Applicant?

A.5. I provided my comments on the brochure to the Applicant approximately two months ago. However, the review and evaluation of the adequacy of the Public Information Brochure is primarily a

Federal Emergency Management Agency ("FEMA") function, since it relates to off-site matters. Accordingly, my comments were informal in nature.

Q.6. Did you read Applicant's Exhibit 11, which is identified as a printer's proof of the Public Information Brochure for Waterford 3?

A.6. Yes. I read Applicant's Exhibit 11, which I received on approximately August 21, 1982.

Q.7. Did you provide your comments on the printer's proof version of the brochure to FEMA?

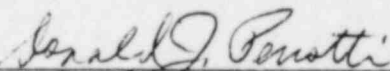
A.7. Yes, I provided my comments to FEMA during a telephone conference call on August 26, 1982.

Q.8. Will the NRC Staff ("Staff") review the adequacy and implementation of the coordinated public information and education program, which includes the development and dissemination of Public Information Brochure?

A.8. Yes. The Staff will consider FEMA's comments on the adequacy of the brochure, and will review the Applicant's incorporation of the FEMA comments into the brochure prior to the grant of a full power operating license for Waterford-3. The Staff will also confirm that the brochure will be disseminated to the residents located within the 10 mile EPZ for Waterford-3. This confirmation of the dissemination of the brochure

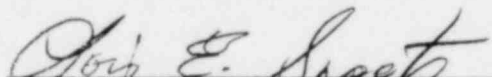
will occur during the Staff's onsite Emergency Preparedness Implementation Appraisal to be conducted in early 1983, as well as during the Applicant's joint exercise which will be conducted prior to full power operation.

The above statements are true and correct to the best of my personal knowledge and belief.



Donald J. Perrotti

Subscribed and sworn to before
me this 15th day of September, 1982.



Notary Public

My Commission expires: July 1, 1986

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

LOUISIANA POWER AND LIGHT COMPANY

(Waterford Steam Electric Station,
Unit 3)

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Docket No. 50-382

AFFIDAVIT OF JOHN W. BENTON AND ALBERT L. LOOKABAUGH
CONCERNING THE EMERGENCY INFORMATION BROCHURE

Q.1 Mr. Lookabaugh, please state your name and occupation.

A.1 My name is Albert L. Lookabaugh. I am the Supervisor, Community Planner, Natural and Technological Hazards ("NTH") Division, Region VI, of the Federal Emergency Management Agency ("FEMA") in Denton, Texas. A copy of my professional qualifications was attached to my pre-filed written direct testimony on Contention 17/26.

Q.2 Mr. Benton, please state your name and occupation.

A.2 My name is John W. Benton, Community Planner, NTH Division, Region VI, of FEMA. A copy of my professional qualifications was attached to my pre-filed written direct testimony on Contention 17/26.

Q.3 Please describe the nature of the responsibilities you have had regarding nuclear power plant emergency preparedness?

A.3 We are responsible for the review and evaluation of all off-site Radiological Emergency Preparedness Plans ("REPs") for fixed nuclear generating facilities within FEMA's Region VI.

Q.4 Prior to the submission of your written direct testimony on Contention 17/26, and your appearance as a FEMA witness during the Waterford-3 hearing session which commenced on May 3, 1982, did you review the Applicant's Public Information Brochure for Waterford-3?

A.4 No. While we both prepared testimony and presented that testimony at the May, 1982 hearing session, we had not received or reviewed the Public Information Brochure for Waterford-3.

Q.5 Since that time, have you received and reviewed a draft version of the Public Information Brochure?

A.5 Yes. We have reviewed a copy of the draft brochure, which we received in June, 1982.

Q.6 Did you provide comments regarding the Public Information Brochure, to the Applicant?

A.6 Yes. Our comments on the brochure were sent to Applicant in a letter dated June 23, 1982, which is attached.

Q.7 Did the Applicant revise the Public Information Brochure to reflect your comments?

A.7 Yes. The Applicant has revised the brochure to incorporate FEMA's comments. The revisions are reflected in Applicant's Exhibit 11, which we understand to be a printer's proof of the brochure.

Q.8 What guidance criteria does FEMA utilize in reviewing and evaluating the Public Information Brochure?

A.8 FEMA's guidance criteria for evaluating public information brochures is contained in Section II, Part G of NUREG-0654/FEMA-REP-1, Revision 1. Criterion 1 provides that public information brochures shall include:

- "a. educational information on radiation;
- b. contact[s] for additional information;
- c. protective measures, e.g. evacuation routes and relocation centers, sheltering, respiratory protection, radioprotective drugs; and
- d. special needs of the handicapped."

Q.9 Does the Applicant's Public Information Brochure satisfy the guidance criterion concerning educational information on radiation?

A.9 We find that educational information on radiation is clearly and concisely presented on four contiguous panels of the brochure, under four sections. These sections are entitled:

- (1) A Nuclear Energy Glossary
- (2) Some Facts About Radiation
- (3) The Barriers That Protect Us From Radiation
- (4) How Waterford 3 Works

The information on radiation is generally accurate. There is, however, an error in the discussion in the section of the brochure entitled, "The Barriers That Protect Us From Radiation." Contrary to the information in this section, fuel pellets and fuel rods are not barriers for shielding or protection from radiation. If this problem

is resolved, the brochure will meet Criterion G.1(a) for provision of information on radiation.

Q.10 Does the Applicant's brochure meet Criterion G.1(b), concerning information on contacts for information?

A.10 With regard to Criterion G.1(b), we find that the brochure has a subsection entitled, "For Additional Information" within the section entitled, "Emergency Action Plan." This subsection clearly directs the reader to call the St. Charles Parish Department of Emergency Preparedness, or St. John the Baptist Parish Civil Defense for further information, or for answers to questions regarding the brochure. The correct telephone numbers for each of these organizations is listed immediately after their reference in the text of the subsection. Since accurate, concise information regarding sources of additional information is provided in the brochure, we find that Criterion G.1(b) is adequately met.

Q.11 Does the brochure provide adequate information on evacuation routes, transportation of school children, and other evacuation planning for the public, in accordance with FEMA Criterion G.1(c)?

A.11 The evacuation route map and accompanying "Protective Action Sectors" table, which identifies the school and public transportation pick-up points, evacuation routes, and reception centers by sector, parish and community, is clear, comprehensible, and accurate. The evacuation map, while not identifying every road in the EPZ, is adequate to show the routes to be utilized in the event of an evacuation.

Nonetheless, there are some problems with the brochure. The evacuation map does not include provisions for evacuations of the transient population who might be on the Mississippi River during an incident at Waterford-3. In particular, the section lines for Sectors A-4, A-2, A-1, B-1, B-3, D-3, D-1, C-1 and C-3 excludes the river from any sector. Second, while the City of Johnson is shown on the evacuation map, the Protective Action Sectors table does not include the City, which should be included in Sector C-3. Furthermore, the sector descriptions in the brochure table are inconsistent with the descriptions contained in the Emergency Broadcast System ("EBS") inserts in the State of Louisiana Peacetime Radiological Response Plan ("State Plan"). The EBS inserts in the State Plan should be revised to be consistent with the Public Information Brochure. We have also examined the color overlay to the evacuation map (Applicant's Exhibit 12). It is difficult to determine whether the map, as finally printed, will be enhanced by the color printing. Colors will assist the public in identifying the protective action sectors, but we cannot determine whether the colors may obscure roadways, route numbers, and place names on the map. While this may not make the brochure unacceptable to FEMA, the goal is to make the map as readable as possible. Accordingly, careful consideration should be given to assuring that the evacuation map's clear printing does not obscure the designation of roadways, route numbers, and place names on the map. If these problems are adequately resolved by the Applicant, the brochure will meet Criterion G.1(c).

Q12. Does the brochure meet FEMA's guidance criterion for provision of information regarding special needs of the handicapped?

A.12 The brochure states in the section entitled, "If You Need Transportation", that parish officials will arrange for special transportation assistance. In addition, the brochure instructs all persons who require "special transportation assistance (for example, you use a wheelchair or are bedridden)", to fill out and return an enclosed card, which will assist parish officials in arranging special transportation for them. We have not received or reviewed this card. Therefore, we cannot comment whether the information being solicited by the card is adequate to meet Applicant's needs. Except for this card, we find that the brochure clearly, concisely, and adequately meets Criterion G.1(d) of NUREG-0654/FEMA-REP-1, Revision 1.

Q.13 Have you reviewed the brochure for its overall clarity and organization?

A.13 Yes, we find that this brochure is clear, concise and well organized. Emergency telephone numbers are prominently displayed on the outside fold. Information on what to do if the sirens are activated is set out in bold face type on the first inside fold. Directions on where to tune for emergency information appears in bold face type in five (5) different places in the brochure. The information about radiation is placed so that it does not distract from the Section entitled "What to Do in an Emergency."

Q.14 What is your conclusion, with regard to the adequacy of the printer's proof of the Public Information Brochure?

A.14 Based on our review of the brochure against the criteria set forth in NUREG-0654/FEMA-REP-1, Revision 1, we conclude that the brochure meets those criteria, with the few exceptions stated above. The Applicant's brochure compares favorably to other public information brochures we have reviewed.

The above statements are true and correct to the best of our personal knowledge and belief.

John W. Benton

Albert L. Lookagaugh

Subscribed and sworn to before me
this day of September, 1982.

Notary Public

My Commission Expires:



Federal Emergency Management Agency

Region VI

Federal Center

Denton, Texas 76201

June 23, 1982

Mr. L. V. Maurin
Vice President, Nuclear Operations
Louisiana Power & Light Co.
P. O. Box 6008
New Orleans, Louisiana 70174

FEMA

Dear Mr. Maurin:

In accordance with your request, the Public Information Brochure for Waterford 3 SES has been reviewed and the following comments are offered for your consideration.

(1) While the evaluation criteria for the public information program requires annual updating, it does not require that the public information brochure be reprinted annually. Since this could become quite expensive, we would suggest that dates not be used on the brochure. Pictures, as are implied, also date documents but to a lesser extent.

(2) Nuclear Energy Glossary:

~~(a)~~ It may not be understood that the Maximum Permissible Dose is 5-15 mrem per year above background.

(b) Under the definition of 'Maximum Permissible Dose', it is noted that the dose from Waterford 3 (above background) would be less than 1 mrem per year. Under the definition of 'Background Radiation', both .01 mrem and 1 mrem per year values are cited. While both are technically correct, to minimize the chance of confusion, the same value could be used throughout (less than 1 mrem per year).

(3) Emergency Action Plan:

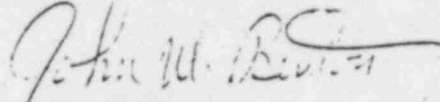
(a) Under 'Ad Hoc Respiratory Protection', if some examples of limiting the outside air intake were given, such as closing windows and doors and turning off external ventilation devices, it would clarify the definition.

(b) Under 'School Children', the word "do" (hi-lited) appears twice unnecessarily. If known, it would be helpful if the brochure indicated how and when the school board would notify people of the centers where their children could be picked up.

These comments are rather minor and even trivial in some cases, but may serve to further clarify what we feel the intent of the brochure is.

If we can be of further assistance regarding the "off-site" portion of the Radiological Emergency Preparedness Plans, let us know.

Sincerely,

A handwritten signature in cursive script, appearing to read "John M. Benton".

John Benton
Emergency Management Specialist
Technical Hazards
Technological and Natural
Hazards Division

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing letter dated August 19, 1982 from Bruce W. Churchill to the Licensing Board and "Applicant Exhibit 11" were served, by deposit in the U.S. Mail, first class, postage prepaid, to all those on the attached service list, on the 19th day of August, 1982.


Bruce W. Churchill

Dated: August 19, 1982

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* w/out enclosure