

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
TEXAS UTILITIES GENERATING)
COMPANY, et al.) Locket Nos. 50-445
) 50-446
(Comanche Peak Steam Electric)
Station, Units 1 and 2))

AFFIDAVIT OF RICHARD A. JONES
CONCERNING INTERVENOR'S CONTENTION 22 ON
EMERGENCY PLANNING

My name is Richard A. Jones. My business address is Comanche Peak Steam Electric Station, Glen Rose, Texas 76043. I am Manager of Plant Operations for Texas Utilities Generating Company (TUGCO). A statement of my educational and professional qualifications was received into evidence at Tr. 513 as Attachment A to Applicants' Exhibit 10. My responsibilities include overall management of operations in the event of an emergency at the Comanche Peak Steam Electric Station (CPSES). The purpose of my affidavit is to discuss subparts (a), (b), (c) and (f) of Intervenor's Contention 22 on emergency planning. Contention 22.a. reads as follows:

- a. The FSAR does not identify state or regional authorities responsible for emergency planning or who have special qualifications for dealing with emergencies.

The Comanche Peak Steam Electric Station Emergency Plan, Revision 3, dated May 21, 1982 identifies the various state and regional authorities responsible for emergency planning. A copy of the CPSES Emergency Plan is attached hereto as Attachment A. The key emergency planning organizations involved at the local level with emergencies at CPSES are the Hood County and Somervell County emergency organizations. These organizations are primarily responsible for developing and implementing protective measures for citizens in their respective counties. At the state level, the Texas Department of Public Safety and the Bureau of Radiation Control of the Texas Department of Health are the agencies charged with primary responsibility in the event of an emergency at CPSES.

Local agencies. The county judge is the local official responsible for the county emergency organizations, and he directs the operations of the county's emergency agencies. Letters of agreement with individual county agencies delineating their support are included in the CPSES Emergency Plan at Section 15.0, Appendix H. Each county has an "Emergency Operations Plan," a "Fixed Nuclear Facility Response Plan," and a "Manual of Emergency Procedures" which describe the county emergency organization, assign specific responsibility and tasks to individual agencies, and prescribe a response based on a particular emergency action level. Copies of the Hood County and Somervell County Plans are attached hereto as Attachment B.

The principal local agencies are the Sheriff's Departments, Fire Departments, Ambulance Services, and Medical Support Facilities. TUGCO has agreements with the Somervell and Hood County Sheriff's Departments to support the CPSES emergency response by providing officers and vehicles to assist in evacuation efforts, traffic control, security, and communications. CPSES Emergency Plan § 15.0 Appendix H. Local firefighting support will be provided to CPSES and assured by written agreements with the Glen Rose-Somervell County Volunteer Fire Department and the Granbury Volunteer Fire Department. A copy of the Letter of Agreement with the Glen Rose-Somervell County Fire Department is in Section 15.0 Appendix H to the CPSES Emergency Plan. The Letter of Agreement with the Granbury Fire Department is being renegotiated and will be included in the CPSES Plan when available. The Glen Rose-Somervell County Volunteer Fire Department and Ambulance Service and the Hood General Hospital Ambulance Service have agreed to provide backup assistance to CPSES to transport persons needing medical care. The agreement with Glen-Rose Somervell is part of the Letter of Agreement with the fire department. The Letter of Agreement with Hood General Hospital is in Section 15.0 Appendix H of the CPSES Emergency Plan. Hood General Hospital in Granbury has agreed to receive and treat injured personnel from CPSES who may be contaminated with radioactive material or who have an overexposure requiring medical evaluation. Injured plant personnel whose medical treatment is

TUGCO has a written agreement with Texas Department of Public Safety (DPS) to provide support to local law enforcement agencies for the evacuation of the public from the ten mile EPZ. A copy of this letter is in the CPSES Emergency Plan at Section 15.0 Appendix H. DPS will also provide its communications network to coordinate local agencies such as Sheriff and Fire Departments within the 50 mile ingestion pathway EPZ.

Federal agencies. The Nuclear Regulatory Commission (NRC), Federal Emergency Management Agency (FEMA), and Department of Energy (DOE) are the primary federal response organizations in the event of an emergency at CPSES. CPSES Emergency Plan § 1.3.3 Additional federal agencies, such as the Environmental Protection Agency, Federal Aviation Administration, Department of Commerce, and National Weather Service may provide ancillary services in support of the primary emergency response agencies. Id.

The NRC, because of its familiarity with CPSES operations and reactor specific terminology, is responsible for coordinating the overall technical aspects of the federal response. Primarily, NRC activities are focused on the activities occurring onsite and mitigation of the emergency. See CPSES Emergency Plan § 1.3.3.1.

FEMA provides assistance to the state and local governments in the preparation, review, and testing of radiological emergency response plans. FEMA is also the normal interface between other federal agencies and the local governments. FEMA coordinates the non-technical aspects of the

not complicated with radiological considerations may be sent to either Hood General Hospital or Marks English Hospital in Glen Rose.

State Agencies. Overall direction and control of state agency activities is the responsibility of the Director, Division of Emergency Management, Texas Department of Public Safety. Emergency radiological response is the responsibility of the Chief, Bureau of Radiation Control of the Texas Department of Health. The Bureau of Radiation Control is the responsible state agency for radiological emergencies. Radiological emergency planning is contained in Appendix 7 to Annex L of the Texas Emergency Management Plan, and planning for fixed nuclear facility accidents is contained at Tab 1 to Appendix 7 of Annex L to the state plan. The Department of Public Safety emergency communications system is described in Annex R to the State Plan. A copy of the Texas Emergency Management Plan; Annex L, Appendix 7 and Tab 1; and Annex R are attached hereto as Attachment C. See also CPSES Emergency Plan § 1.3.2.

In the event of an emergency at CPSES, the Texas Department of Health will be notified by the Department of Public Safety regional office in Waco. Upon notification of a general emergency at CPSES, the Bureau will send a response team to the ten-mile plume exposure pathway emergency planning zone (EPZ) capable of providing environmental and radiological monitoring and assessment of off-site hazards and protective actions. See CPSES Emergency Plan § 1.3.2.

federal response, including transportation, communications, housing and implementation of off-site protective action measures. See CPSES Emergency Plan § 1.3.3.2.

The Department of Energy is responsible for coordinating federal offsite radiological monitoring and assessment and for relaying this information to the NRC assessment personnel at the site. DOE will provide radiological assistance teams, communication equipment, aircraft for airborne monitoring and transportation, mobile labs for surface monitoring, radiation specialists, a DOE emergency coordinator and, other support personnel as may be needed. See CPSES Emergency Plan § 1.3.3.3.

Private Agencies. Radiation Management Corporation (RMC) will provide medical support services and provide back-up hospital facilities for onsite radiological injuries. CPSES Emergency Plan § 10.1, 15.0 Appendix H; see Affidavit of Roger E. Linnemann, M.D. and Attachment B thereto. Squaw Creek Park, Inc. (SCPI) operates and maintains Squaw Creek Park, a 470 acre recreation area adjacent to Squaw Creek Reservoir and north of the station. CPSES Emergency Plan § 1.3.4.1. SCPI is responsible for controlling access to the park and reservoir and, by letter of agreement, is responsible for accountability and evacuation of the park and reservoir in the event of an emergency at CPSES. CPSES Emergency Plan § 15.0 Appendix H. Westinghouse Electric Corporation, in its capacity as supplier of the nuclear steam supply system at CPSES can supply emergency assistance on a 24-hour basis. CPSES Emergency Plan § 1.3.4.2.

Contention 22.b. reads as follows:

- b. No agreements have been reached with local and state officials and agencies for the early warning and evacuation of the public, including the identification of the principal officials by titles and agencies.

Section 3.0 of the CPSES Emergency Plan describes the methods and procedures for emergency notification of the public. Emergency Plan Procedure EPP-203, "Emergency Notification and Communication" delineates the notification criteria for each emergency action level, the time constraints on initial and close-out information messages, the methodology for notifying emergency response personnel, and the details on call back verification of telephone and radio communications. Public alerting is accomplished using an outdoor alerting system consisting of 40 acoustical sirens and a warning system that utilizes the Emergency Broadcast System (EBS). Texas Utilities owns and maintains the outdoor siren system; however, each county is responsible for activating the portion of the system that is within their jurisdiction and for ensuring that EBS has the proper message to broadcast. All forty sirens can be activated simultaneously from either county's Emergency Operation Center.

In the event of an emergency, notification to local and state officials would include initial and follow-up messages. Notification messages broadcast over the EBS will convey information concerning the type and nature of the emergency condition, the affected area, the protective actions which should be taken by the affected public, e.g. take shelter, close all

doors and windows, turn off air conditioning units, and listen to the radio or television for additional instructions. Additional messages may include, when necessary, evacuation instructions, e.g. location of shelter areas, what to take with you, and what equipment and facilities will be available at the shelter area. The EBS would also be used to advise the public of changes in recommended protective actions and to issue an all clear announcement.

Texas Utilities has obtained written agreements with the various state and local agencies responsible for warning and evacuation of the public in the event of an emergency at CPSES. Copies of the Letters of Agreement are in the CPSES Emergency Plan § 15.0 Appendix H. The Sheriff of Hood County has agreed to make available Hood County Sheriff's Department equipment and personnel to: authenticate notification of an emergency by calling back the agency which made the initial notification; notify the key officials as described in the appropriate "call list"; activate the warning of Hood County citizens within the 10 mile emergency planning zone; provide traffic control; and coordinate with the Granbury Police Department and the Texas Department of Public Safety in establishing detour routes if required. Id. The Sheriff of Somervell County has entered into a similar written agreement to provide Sheriff's department equipment and personnel in the event of an emergency at CPSES. CPSES Emergency Plan § 15.0 Appendix H.

The Texas Department of Public Safety has agreed and assured TUGCO that in the event of an emergency at CPSES, the Department of Public Safety will serve as the primary communications contact and coordinate emergency communications between CPSES and the State of Texas, Hood and Somervell counties; and that the department will coordinate with local law enforcement officials and assist in maintaining traffic control, protecting life and property, establishing road-blocks, and alerting and warning persons in the affected area. A copy of the Letter of Agreement is in the CPSES Emergency Plan § 15.0 Appendix H.

- f. There is no provision for emergency planning for Glen Rose for the Dallas/Fort Worth Metroplex.

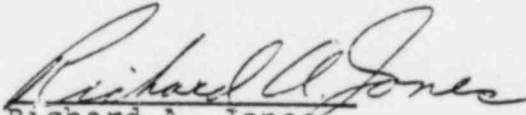
The Somervell County - City of Glen Rose Emergency Operations Plan provides for emergency operation in Somervell county, the City of Glen Rose, and the unincorporated towns within the county. See Somervell County-City of Glen Rose Plan (Attachment B). The plan assigns specific responsibilities and tasks to members of the city government and city departments and agencies. The mayor of Glen Rose and members of the city council are responsible for directing city departments and volunteers in all types of planning and emergency actions, informing citizens of the situations and actions required, making emergency policy decisions, requesting aid from the state and federal governments and supervising and directing activities operating within the city. The Somervell County Sheriff's Department is responsible for law and order within the City of Glen Rose, the Glen Rose City

secretary is responsible for warning and communications, fire protection and rescue is the responsibility of the Glen Rose fire chief, coordination with private utilities is charged to the mayor, the hospital administrator is charged with health and medical support, emergency rehabilitation services and emergency transportation are the responsibility of the county school superintendent, dissemination of emergency public information is the responsibility of the mayor, provision for sheltering of the population is charged to the Glen Rose school superintendent, and radiological defense is the responsibility of the Glen Rose radiological defense officer. Somervell County-City of Glen Rose Plan § VI.

In the event of an off-site release warning at CPSES the plan provides for notification, of the appropriate city officials and the hospital will be notified, a determination made if evacuation is necessary, and preparation to evacuate persons from affected areas and to block entrance roads to that area will be instituted. Id. § VI.A. The city-county plan provides for lines of succession in Glen Rose running from the mayor to the mayor pro tem to the remaining councilmen. Id. § IX.

Annex F to the Somervell County Plan establishes the specific response plan for fixed nuclear facility accidents. The responsibility for emergency operations and the assignment of specific responsibilities as regards to the City of Glen Rose are set forth at Section 5 of Annex F and parallel those already discussed under the county plan.

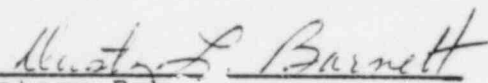
The Dallas/Fort Worth Metroplex lies outside the 10-mile emergency planning zone (EPZ). Although Tarrant County and a small portion of Dallas County lie within the 50-mile ingestion exposure pathway EPZ, they are not subject to the emergency planning requirements applicable to the 10-mile EPZ.


Richard A. Jones

STATE OF TEXAS

COUNTY OF SOMERVELL

Sworn to and subscribed
before me this 20 day
of August, 1982


Notary Pub.

My Commission expires:

Sept 4, 1985