

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF BOBBY T. LANCASTER
CONCERNING INTERVENOR'S CONTENTION 22 ON
EMERGENCY PLANNING

My name is Bobby T. Lancaster. My business address is Comanche Peak Steam Electric Station, Glen Rose, Texas 76043. A copy of my educational and professional qualifications is attached hereto as Attachment A. I am Radiation Protection Engineer, Texas Utilities Generating Company (TUGCO). I am responsible for coordination of radiological protection at the Comanche Peak Steam Electric Station (CPSES). The purpose of my affidavit is to discuss subpart (d) of Intervenor's Contention 22 on emergency planning, which contends as follows:

- d. There are no adequate plans for testing by periodic drills of emergency plans and provisions for participation in the drills by persons whose assistance may be needed other than employees of the applicant.

Section 12.0 of the CPSES Emergency Plan provides for conducting exercises and drills. A copy of the CPSES Emergency Plan is attached to the affidavit of Richard A. Jones which is

being filed simultaneously herewith. To test the emergency plan adequately and to familiarize plant personnel with their duties and responsibilities, an annual radiological emergency preparedness exercise will be performed at CPSES. This exercise will involve emergency situations based upon a pre-planned scenario developed in accordance with Emergency Plan Procedure EPP-104. The annual exercise will include mobilization of TUGCO, state, and local personnel and resources to the extent necessary to verify the adequacy of the integrated emergency response capability. Critical communications links between participating organizations will also be tested. The exercise scenario will vary from year to year to ensure that all basic elements of the various emergency plans and emergency organizations associated with CPSES are tested within a five-year period. (CPSES Emergency Plan § 12.1.)

Periodic drills for testing, developing and maintaining skills in particular areas will be conducted periodically. The drills will follow pre-planned scenarios developed to thoroughly test the response of the personnel involved. Drills will be conducted to test communication links, fire response, emergency medical support, radiological monitoring, health physics, and repair and damage control. (CPSES Emergency Plan § 12.2)

The communications links between CPSES the Texas Department of Public Safety, and the emergency operation center for Hood and Somervell Counties will be tested monthly. Communications between CPSES, and state and federal agencies involved in the ingestion

pathway emergency planning scenario will be tested quarterly. Communications between CPSES, the state, and local emergency operations centers and the radiological monitoring team will be tested annually. (CPSES Emergency Plan § 12.2.1)

Members of the on-site fire team will participate in quarterly drills as well as the annual exercise. The local county volunteer fire departments will participate in either the annual exercise or one of the periodic drills. (CPSES Emergency Plan § 12.2.2) On site personnel who are assigned to the Emergency Repair and Damage Control Group will receive annual instruction in handling injured contaminated individuals. (CPSES Emergency Plan § 12.2.3) Off-site ambulance and medical support services will participate in periodic drills or the annual exercise as well as training programs in transporting and handling radiologically injured persons. This is detailed in the Affidavit of Roger E. Linnemann, M.D. submitted simultaneously herewith. (See also CPSES Emergency Plan § 12.2.3). Station personnel who are assigned to the radiological monitoring teams will participate in annual drills which involve responses to all aspects of environmental monitoring, both on site and offsite. (CPSES Emergency Plan § 12.2.4) Health physics drills which involve response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment will be conducted semi-annually. (CPSES Emergency Plan § 12.2.5) Finally, personnel who are assigned to the emergency repair and damage control group shall participate in annual drills which

involve response to various scenarios concerning repair or recovery of damaged equipment and plant functions. (CPSES Emergency Plan § 12.2.6)

The sheriffs of Hood and Somervell Counties have entered into written agreements with TUGCO whereby it is understood and agreed that appropriate sheriff department personnel will participate in periodic drills, annual exercises and site specific emergency response training sessions provided by TUGCO personnel at mutually agreed times and locations. Copies of the agreements with the sheriffs are included in the CPSES Emergency Plan § 15.0 Appendix H which is attached to the Affidavit of Richard A. Jones as Attachment A. The training sessions will include, as a minimum, instruction regarding procedures for communication, the CPSES Emergency Plan, and CPSES emergency facilities. The Glen Rose - Somervell County Volunteer Fire Department and Ambulance Service has also agreed to participate in periodic drills, the annual exercise, and site specific training sessions. A copy of that agreement is found at Section 15.0 Appendix H of the CPSES Emergency Plan. These training sessions will include procedures for notification, basic radiation protection, site access, and emergency response functions. A similar letter of agreement with the Granbury Volunteer Fire Department is being renegotiated and will be added to the Plan when it becomes available.

Similarly, Hood General Hospital has agreed that its personnel will participate in site specific exercises, drills, and training provided by TUGCO. A copy of that agreement is in the CPSES Emergency Plan Section 15.0, Appendix H. At the state level, the Texas Department of Public Safety has agreed to participate in periodic communication drills and exercises involving CPSES. Attachment 4 to the State Fixed Nuclear Facility Response Plan (Texas Emergency Management Plan, Annex L, Appendix 7, Tab 1) (Attachment C to Jones Affidavit) specifies that the Bureau of Radiation Control of the Department of Health will participate, along with appropriate utility, local, state, and Federal agencies in annual exercises of Fixed Nuclear Facility Response Plans. Either in conjunction with or in addition to the major annual exercise, the Bureau will conduct monthly communications drills, message verification drills, and semi-annual health physics drills. Finally, Squaw Creek Park, Inc. (SCPI) has agreed to participate in exercises, drills, and site specific training with regard to evacuating the park and reservoir in the event of an emergency at CPSES. A copy of the agreement with SCPI is part of the CPSES Emergency Plan, Section 15.0 Appendix H.

The CPSES Emergency Plan provides for participation of local, state and private emergency organizations in periodic drills and exercises. These various organizations have committed to participate by Letters of Agreement submitted to TUGCO.

Bobby J. Lancaster
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STATE OF TEXAS

COUNTY OF SOMERVELL

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

Musty L. Burnett
Notary Public

My Commission expires:

Sept. 4, 1985

Bobby T. Lancaster - Radiation Protection Engineer

Education:

B.S. - Biology - Baylor University-1969

Experience:

- 1970 - Employed by Texas Electric Service Company at the Handley Plant as a Chemical Technician. Engaged primarily in learning fundamentals of power plant operations and water chemistry.
- 1970 - Transferred to Industrial Generating Company, Big Brown Steam Electric Station, as Results Technician. Primary duties included Plant Chemistry, Laboratory Instrumentation, and Lignite Analysis.
- 1974 - Assigned to Environmental Research Department, Big Brown Steam Electric Station, as Environmental Technician. Duties involved the implementation and operation of air and water pollution monitoring programs.
- 1974 - Assigned to present position of Chemistry and
To Present Health Physics Engineer at Comanche Peak Steam Electric Station.
- 1975 - Completed Oak Ridge Associated Universities' ten week Health Physics and Radiation Protection Course.
- 1978 - Completed Westinghouse 12 week PWR Chemistry School.

Activities:

Member-Health Physics Society
Member-EEI Health Physics Committee