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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC	)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>ET AL.</u>	)	50-441
	)	
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	

APPLICANTS' DIRECT TESTIMONY  
OF DANIEL D. HULBERT  
ON ISSUE NO. 1 - CONTENTION J

1. I am presently Emergency Planning Coordinator, Perry Plant Technical Department, The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. In my position, I am responsible for developing, maintaining, and evaluating the Perry Nuclear Power Plant (PNPP) Emergency Plan, including coordinating emergency preparedness among various PNPP departments and developing emergency planning documents and specification of response requirements. These responsibilities include the development of Emergency Action Level ("EAL") indications.

2. Contention J states:

Emergency Action Level indicators are incomplete in the Applicants' emergency plan.

The contention was based on Sunflower's reading of Table 4-1 of the Perry Emergency Plan, Rev. 3, in which according to Sunflower critical measurements or standards are left

incomplete. Sunflower Alliance's Particularized Objections to Proposed Emergency Plans in Support of Issue No. 1, dated August 20, 1984, page 16.

3. Emergency Action Levels (EALs) describe specific plant conditions at which one of the four Emergency Classifications (Unusual Event, Alert, Site Area Emergency, General Emergency) are to be declared. Table 4-1 of the Perry Emergency Plan, Rev. 3, sets forth more than 200 individual EAL indications.

4. Of the 200 individual EAL indications, only 13 were "incomplete" in Revision 3 of the Perry Emergency Plan. Table 4-1, EAL §§ I.3.a.(1) and (2), II.1.a(1), III.11.a, b and c; IV.6.a(2), b. In each case, the value to be included later was not available at the time Revision 3 of the Plan was issued, because the value could only be determined after the detailed technical data became available.

5. In each of the 13 cases where a value was to be added later, a comparable value was specified. For example, Table 4.1, EAL § I.3.a(1) states:

Off-gas pretreatment process radiation  
monitor high alarm with indication of (1)  
increase of (later) mrem/hr in 30 min.  
(equiv. to 100,000 uCi/sec).

6. In each of the 13 cases in Revision 3, either the "missing" values have now been developed based upon additional detailed information which became available after Revision 3 was issued, or alternate indications have been selected. In all cases, these have been included in Revision 4 to the Perry

Emergency Plan, which was issued in February 1985. There are no incomplete EALs.