

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL-3
)	(Emergency Planning
(Shoreham Nuclear Power Station,)	Proceeding)
Unit 1))	

AFFIDAVIT OF JOHN A. WEISMANTLE

My name is John A. Weismantle. I am the Manager of LERO. My professional qualifications have already been entered into the record of this proceeding (Tab 20 following page 4068 of the hearing transcript). This affidavit is made in response to the "Suffolk County and State of New York Submission Pursuant to McGuire Decision" of December 5, 1984.

1. It is true that some LERO members resigned following the strike of last summer. It is also true, however, that some of them subsequently rejoined LERO, and that others who were not formerly members have joined.

2. The result is that, as of the morning of December 6, 1984, a total of 2,110 LILCO employees were members of LERO. Our goal is to have 1,750 LERO members. Thus, we have a margin of 360 above our goal.

3. The 1,750-member goal includes the overstaffing that LILCO witnesses testified about during the hearings, for example, at pages 28-30 of LILCO's prefiled written testimony

on the training issues, located after page 11,140 of the hearing transcript. As that testimony shows, when we spoke of maintaining LERO staffing at 150%, we were talking about jobs that are needed only during evacuations, such as bus drivers and traffic guides. For these jobs, 100% staffing is the total number of bus drivers (for example) needed to provide a full ten-mile response; the extra 50% gives us assurance that the needed 100% will be available at any given time.

(Administrative support at the staging areas is staffed at 140%, as our testimony stated.) For LERO jobs that might have to be performed for a longer period than an evacuation would take, such as personnel at the EOC, staffing has been planned to support two 12-hour shifts plus a third, reserve shift.

4. Chairman Catacosinos's statement about LILCO's objective of building up the LERO roster 30%, as Attachment B to the Intervenor's December 5 Submission indicates, refers to 30% in excess of the goal of 1,750 referred to above. For jobs needed only during an evacuation, this means 30% over and above the 150%, for a total of 195% ($1.3 \times 1.5 = 1.95$).

5. Two other categories of people, not included in the 2,110, have volunteered for LERO and are considered "back-up" LERO workers. They are the following:

- (a) about 175 retired LILCO employees and
- (b) over 100 outside bus company bus drivers.

6. As of December 6, 1984, only 104 of the 2,110 LERO members lived inside the ten-mile plume exposure pathway EPZ.

7. Training for all LERO volunteers, including the "back-ups," is underway. LILCO expects that classroom training for everyone will be completed by January 31, 1984.

John A. Weismantle
John A. Weismantle

Subscribed and sworn to before me this 10th day of December, 1984.

My commission expires: 3/30/86.

Rosa Lee Oliveros
Notary Public

ROSA LEE OLIVEROS
Notary Public, State of New York
No. 30-4708263
Qualified in Nassau County
Commission expires Mar. 30, 1986

CERTIFICATE OF SERVICE

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
(Emergency Planning Proceeding)
Docket No. 50-322-OL-3

I certify that copies of the executed AFFIDAVIT OF JOHN A. WEISMANTLE, an unexecuted copy of which was attached to LILCO'S ANSWER TO SUFFOLK COUNTY AND STATE OF NEW YORK SUBMISSION PURSUANT TO MCGUIRE DECISION, filed December 10, 1984, were served this date upon the following by first-class mail, postage prepaid:

James A. Laurenson,
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 402A
4350 East-West Hwy.
Bethesda, MD 20814

Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 427
4350 East-West Hwy.
Bethesda, MD 20814

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 430
4350 East-West Hwy.
Bethesda, MD 20814

Bernard M. Bordenick, Esq.
Oreste Russ Pirfo, Esq.
Edwin J. Reis, Esq.
U. S. Nuclear Regulatory
Commission
7735 Old Georgetown Road
(to mailroom)
Bethesda, MD 20814

Donna Duer, Esq.
Law Clerk
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
East-West Tower, North Tower
4350 East-West Highway
Bethesda, MD 20814

Stewart M. Glass, Esq.
Regional Counsel
Federal Emergency Management
Agency
26 Federal Plaza, Room 1349
New York, New York 10278

Stephen B. Latham, Esq.
John F. Shea, Esq.
Twomey, Latham & Shea
33 West Second Street
P.O. Box 398
Riverhead, NY 11901

Fabian G. Palomino, Esq.
Special Counsel to the
Governor
Executive Chamber
Room 229
State Capitol
Albany, New York 12224

Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Christopher M. McMurray, Esq.
Kirkpatrick & Lockhart
8th Floor
1900 M Street, N.W.
Washington, D.C. 20036

MHG Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Mr. Jay Dunkleberger
New York State Energy
Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Gerald C. Crotty, Esq.
Counsel to the Governor
Executive Chamber
State Capitol
Albany, New York 12224

Hunton & Williams
707 East Main Street
Post Office Box 1535
Richmond, Virginia 23212

DATED: December 12, 1984

Ralph Shapiro, Esq.
Cammer & Shapiro, P.C.
9 East 40th Street
New York, New York 10016

James B. Dougherty, Esq.
3045 Porter Street
Washington, D.C. 20008

Jonathan D. Feinberg, Esq.
New York State Public Service
Commission, Staff Counsel
3 Rockefeller Plaza
Albany, New York 12223

Spence W. Perry, Esq.
Associate General Counsel
Federal Emergency Management
Agency
500 C Street, S.W., Rm. 840
Washington, D.C. 20472

Ms. Nora Bredes
Executive Coordinator
Shoreham Opponents' Coalition
195 East Main Street
Smithtown, New York 11787

Martin Bradley Ashare, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

James N. Christman