

January 2, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN )  
MUNICIPAL POWER AGENCY )

Docket No. 50-400 OL

(Shearon Harris Nuclear Power Plant) )  
)

AFFIDAVIT OF JESSE T. PUGH, III IN SUPPORT OF APPLICANTS'  
MOTION FOR SUMMARY DISPOSITION OF EDDLEMAN CONTENTION 240

County of Wake )

State of North Carolina )

SS:

JESSE T. PUGH, III, being duly sworn, deposes and says:

1. I am the Director of the Division of Emergency Management ("DEM") of the North Carolina Department of Crime Control and Public Safety. In my position, I am responsible for the State's planning for and response to all emergencies, including accidents at any of the four nuclear plants that effect North Carolina. In that professional capacity, I have been involved in the development of the off-site emergency capability for the Shearon Harris Plant as well as the Catawba, McGuire and Brunswick nuclear plants. Together with local emergency preparedness officials in the four counties (Chatham, Harnett, Lee and Wake) within the plume exposure emergency planning zone of the Harris plant, the Division of Emergency Management is responsible for developing the North Carolina Emergency Response Plan in Support of the Shearon Harris Nuclear Power Plant (the "ERP" or "off-site emergency plan"). Through DEM, I

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have directed the State's response to more than 650 cases in the last year alone, including the tornadoes in March and Hurricane Diana in September. A current statement of my professional qualifications and experience is attached hereto as Attachment A. My business address is 116 West Jones Street, Raleigh, North Carolina 27611. I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this Affidavit in response to Eddleman Contention 240.

2. The purpose of this Affidavit is to clarify the ERP by identifying those emergency response organizations which are assigned the responsibility of providing support for decontamination of evacuees at shelters in Harnett, Lee and Wake Counties. I have reviewed the Affidavit of Mark Scott in Support of Applicants' Motion for Summary Disposition of Eddleman Contention 240. I believe that Mr. Scott's Affidavit accurately describes the organizations with responsibility for decontamination of evacuees at shelters in Chatham County and organizations with responsibility for providing support for such decontamination in Chatham County.

3. Backup support for decontamination of evacuees in Harnett County shelters will be provided by local rescue squads and ambulance services. The following organizations will provide backup support for decontamination in Harnett County: Anderson Creek Rescue Squad, Angier Rescue Squad, Benhaven Rescue Squad, Boone Trail Rescue Squad, Coats Rescue Squad, Dunn Rescue Squad, Erwin Rescue Squad and the Harnett County Ambulance Service. Assignments of these organizations to specific shelters will be made in the Standard Operating Procedures (SOPs) for Harnett County.

4. Fire departments and rescue squads will be responsible for providing backup support for decontamination of evacuees at shelters in Lee County. Which particular organizations provide backup support will depend upon which shelters are opened. If West Lee Junior High School is used as a shelter, support will be provided by North View Fire Department. If East Lee Junior High School is used, support will be provided by Lee

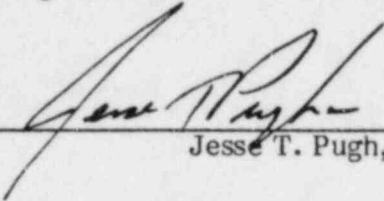
County Rescue Squad. If Greenwood Elementary School is used as a shelter, the Sanford City Fire Department will provide support. Additional support at any of these shelters will be available, if needed, from the Lee County Sheriff's Department and the Sanford City Fire Department.

5. Fire departments and rescue squads will be responsible for providing backup support for decontamination of evacuees at shelters in Wake County. Such support will be available from the following organizations: Northern Wake Rescue Squad, Wake Forest Fire Department, Rolesville Fire Department, Hopkins Fire Department, Zebulon Fire Department, Wendell Fire Department, Knightdale Fire Department, and Six Forks Fire Department. These organizations have not been assigned to specific shelters. A determination of which organization will provide backup support at specific shelters will be made at the time such support is needed.

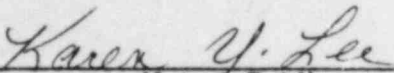
6. Radiation specialists and health physicists from Carolina Power & Light Company will also be available, if needed, to provide support for decontamination at shelters in each of the four counties. As stated in the county sections to Revision 1 of the ERP, the State of North Carolina Radiation Protection Section may provide additional expert personnel to assist and consult in the event of more serious contamination problems at the shelters. See ERP (Rev. 1) at Part 2, Figure 6; Part 3, Figure 5; Part 4, Figure 6; and Part 5, Figure 7.

7. Based on the information in this Affidavit and in the Affidavit of Mark Scott, the appropriate sections of the ERP will be amended to provide additional information about which organizations have primary responsibility for decontamination of evacuees at the Chatham County shelters and which organizations have responsibility for backup support for decontamination at shelters within each of the four counties. The ERP will be amended to reflect the types of organizations (e.g., rescue squads, fire departments,

ambulance services) with decontamination responsibilities. Particular organizations and assignments will be listed in the Standard Operating Procedures for each county.

  
\_\_\_\_\_  
Jesse T. Pugh, III

Subscribed and sworn to before me  
this 2 day of January 1985.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 12-27-89



**JESSE THOMAS PUGH, III****Professional Qualifications****EDUCATION**

Graduated Asheboro High School, Asheboro, North Carolina, 1965

North Carolina State University, Raleigh, North Carolina, 1969,  
B.S., Textile Technology

Computer Application Certificate Program, NCSU, Spring 1982

Enrolled in Master of Public Administration Program, NCSU

Graduate, Government Executives Institute, University of North  
Carolina, Chapel Hill, 1980

**EMPLOYMENT**

**Area Coordinator**, Division of Civil Preparedness, Asheboro, North Carolina, July 1978 - May 1979. Responsible for 15-county area, working with local coordinators and governmental officials in preparing plans to prevent and/or respond to disasters, both natural and man-made. Also responsible for arranging specialized training for local volunteers and governmental employees.

**Assistant Director**, Division of Emergency Management, May 1979 - May 1980, promoted to **Deputy Director** May 1980. Responsible for daily operations of the Division. Supervise 53 employees, administer budget of approximately \$2 million, managed grant program to local governments, represent the State in business transactions and in meetings with local and federal government.

**Division Director**, Division of Emergency Management, May 1982 to present. Responsible for the State of North Carolina emergency response and planning. This includes the coordination of all emergency response activities of the 17 State agencies. Serve as State Coordinating Officer and Governor's Authorized Representative in all disaster related matters. In emergencies serve as leader of the State Emergency Response Team.

**MILITARY**

United States Marine Corps, June 1969 - April 1982, highest rank:  
First Lieutenant

## TRAINING

Radiological Monitoring Instructor Course, August 1978

Basic Seminar for Civil Preparedness Personnel, September 1978

Civil Preparedness Career Development, Phase I, September 1978

Basic Radiological Defense Officer Course, September 1979

United State Coast Guard National Search and Rescue School,  
Governor's Island, New York, March 1984.

## PROFESSIONAL ORGANIZATIONS

North Carolina Emergency Management Association

National Coordinating Council on Emergency Management

National Association for Search and Rescue

National Emergency Management Association

Association of State Dam Safety Officials