

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN) Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power Plant))
)

AFFIDAVIT OF JESSE T. PUGH, III ON EDDLEMAN 57-C-7

County of Wake)
) SS:
State of North Carolina)

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

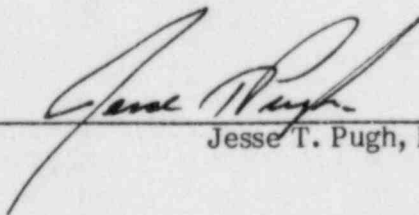
1. I am the Director of the Division of Emergency Management of the North Carolina Department of Crime Control and Public Safety. In my position, I am responsible for the State's planning for and response to all emergencies, including accidents at any of the four nuclear plants that affect North Carolina. 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 57-C-7. I have reviewed this contention and am familiar with the substance of the allegations contained therein.

2. Through the Division of Emergency Management, I have directed the State's response to more than 650 emergency cases in the last year alone, including the tornadoes in March and Hurricane Diana in September. In my professional capacity, I

have been involved in the development of the off-site emergency response capability for the Shearon Harris Nuclear Power Plant as well as the Catawba, McGuire and Brunswick nuclear plants. A current statement of my professional qualifications and experience is attached hereto as Attachment 1.

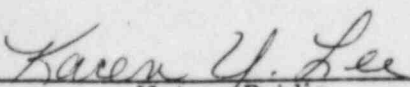
3. One of the primary responsibilities of the Division of Emergency Management as set forth in the state Emergency Response Plan (ERP) for the Harris Plant is the preparation and maintenance of that plan. Part 1, Section V.B.3. of the ERP lists the hospitals which will support the plant and surrounding communities in the event of radiological emergencies. Of those hospitals, Duke University Medical Center and North Carolina Memorial Hospital may be considered regional facilities from the standpoint that they provide medical treatment for patients from across North Carolina and the southeastern United States.

4. I have reviewed the affidavits of Dr. Fred A. Mettler, Jr. and Dayne H. Brown as to the capabilities both of the hospitals listed in the ERP and of the Oak Ridge REAC/TS unit to treat cases of severe radiation exposure per se. The Division of Emergency Management will proceed to include that information in the NC ERP.



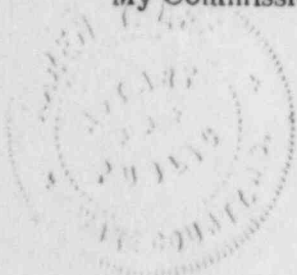
Jesse T. Pugh, III

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