

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF JANET E. DUGAN
ON CONTENTION GG

County of Lake)
) ss.
State of Ohio)

JANET E. DUGAN, being duly sworn, deposes and says:

1. I have been employed by CEI since March 1982 at the Perry Nuclear Power Plant. Since April 1983, I have held the position of Associate Governmental Affairs Representative assigned to the Emergency Planning Unit of the Community Relation Section of CEI. My responsibilities in my current position have included coordination and support of the Evacuation Time Estimate Study prepared by HMM Associates, Inc., the offsite emergency response training, and the development of the prompt alert and notification system for the Perry plume EPZ. A current statement of my professional qualifications and experience is attached hereto. My business address is 10 North Center

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Street, Perry, Ohio 44081. I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in support of Applicants' Motion For Summary Disposition of Contention GG.

2. The purpose of this affidavit is to explain the basis for confidence that there are no identifiable population groups within the EPZ which do not use radios and TV (such as the Amish), and to explain the basis for confidence that -- in any case -- in the event of an evacuation of the Perry EPZ, any individuals without radio or TV would learn of the need for protective action.

3. In 1984, CEI conducted a study to determine the location of the Amish in northeastern Ohio, as a part of the Perry-Hanna transmission line proceedings. The results of that study indicate that there is no Amish population within the Perry plume EPZ.

4. The planning commissions of Lake, Ashtabula, and Geauga Counties have also been contacted. The representatives of these agencies were aware of no information indicating that there are any population groups within the plume EPZ which do not use radio and TV.

5. In addition, local Councils of Churches as well as parish priests and various other ministers throughout the EPZ were contacted. None of these persons was aware of any people within the EPZ whose religious beliefs would preclude use of radio or TV.

6. In any case, in the event of an evacuation of the Perry EPZ, any persons without radio or TV would learn of the need for protective action. The public information brochure to be mailed to all residents of the plume EPZ prior to fuel load and annually thereafter will include a special needs information card to be completed and returned to the respective County Disaster Services Agency by anyone who might need special assistance in an emergency. The special help categories on the card include persons without radio and persons without TV. In the event of an evacuation of the Perry EPZ, the appropriate County Disaster Services Agency would provide special personal notification to those individuals -- if any -- who have indicated that they have no radio or TV.

7. The public information brochure (and other media) will educate the public to tune to an Emergency Broadcast System ("EBS") radio or TV station when the sirens within the plume EPZ are sounded, to receive a message. Therefore, even if a household does not have a radio or TV, it will be aware of the need to seek additional information about the EBS message from friends or neighbors with TV or radio.

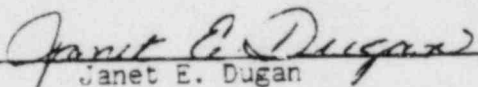
8. Finally, each of the offsite plans for the Perry EPZ includes a means for verifying that persons within the plume EPZ have received notification in an emergency. Prior to fuel

load, each household will be provided with a green card stating "WE HAVE BEEN NOTIFIED." In the event of an emergency, members of the public would use the card to indicate that they are aware of the need to take specific protective action. The brochure instructs the public:

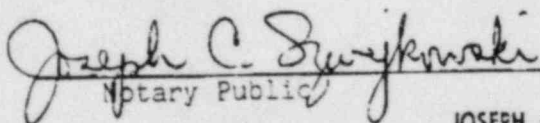
To show that you know about the emergency and you know what to do, put your green card in a window. Be sure it can be seen from the road. Or tie a towel to your front door or mailbox or to anything that can be seen from the road.

This same message will be repeated in the EBS announcement broadcast at the time of the emergency. Any household not displaying the card or a towel would be individually checked, and given the EBS message.

9. In summary, there is no identifiable population group within the Perry plume EPZ which does not use radio or TV. In any case, in the event of an evacuation of the EPZ, any individuals without radio or TV would learn of the need for protective action.


Janet E. Dugan

Subscribed and sworn to before me
this 1ST day of February, 1985.


Notary Public

JOSEPH C. SZWEJKOWSKI

Notary Public, State of Ohio - Cuyahoga County

My Commission expires: My Commission Expires July 14, 1986

Janet E. Dugan
Associate Governmental Affairs Representative
Emergency Planning Unit
Community Relations Section
The Illuminating Company; Perry Nuclear Power Plant

EDUCATION

B.S. Retail Merchandising
The Ohio State University
Columbus, Ohio 1969

EXPERIENCE SUMMARY

Ms. Dugan has been a resident of Perry (Lake County) Ohio for 14 years. She is active in both the professional and civic community there. She has been employed at the Perry Nuclear Power Plant since 1981 both as a construction buyer and an associate governmental affairs representative. She has worked extensively with response agencies and officials in Ashtabula, Geauga, and Lake Counties in the role of emergency planner. Her areas of experience include the Evacuation Time Estimate Study, the public alert and notification system, offsite emergency response training, and the emergency planning contention; interrogatories and responses.

PROFESSIONAL EXPERIENCE

- 1983 - Present The Illuminating Company; Perry Nuclear Power Plant
Associate Governmental Affairs Representative
- Coordinates the preparation and review process for the Evacuation Time Estimate Study being authored by HMM Associates.
 - Coordinates efforts between various Illuminating Company divisions and offsite agencies with regard to all aspects of the alert and notification system for the Perry Nuclear Power Plant.
 - Provides assistance to the county agencies, when requested, with regard to emergency response training. Coordinates in house record keeping of that training.
 - Is involved in the preparation of responses to offsite emergency planning interrogatories.
- 1981 - 1983 The Illuminating Company; Perry Nuclear Power Plant
Junior Buyer, Construction Buying Section
- Negotiated and prepared construction contracts.
 - Negotiated and prepared contract extensions and changes.

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