

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of)
)
THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)
)
(Perry Nuclear Power Plant,)
Units 1 and 2))

Docket Nos. 50-440
50-441

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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AFFIDAVIT OF
GARY WINTERS
ON CONTENTION JJ

County of Dauphin)
) ss
Commonwealth of Pennsylvania)

Gary Winters, being duly sworn, deposes and says:

1. I am presently Project Coordinator and Emergency Planning Specialist, Energy Consultants, Inc. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. My responsibilities include coordination of offsite resource inventory and assessment efforts involving Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant, including the inventory and assessment of back-up power generation facilities. A current statement of my professional and technical qualifications is attached hereto. 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 JJ.

2. Contention JJ states that emergency plans do not provide for backup power so that evacuation procedures and activities can be carried out. Sunflower questions whether there will be sufficient energy to operate "sirens,

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emergency-set traffic lights, independent radiation monitoring equipment, gasoline pumps, and the like." Sunflower Alliance's Particularized Objections to Proposed Emergency Plans in Support of Issue No. 1, dated August 20, 1984, p. 27.

3. Alternate commercial power is available to PNPP through the Commercial Grid System as shown in the Affidavit of David Green on Contention JJ. However, in the very unlikely event of a total power outage, back-up systems are available.

4. Adequate backup power is available for all emergency functions.

a. Siren Operation. The prompt alert and notification system is self-contained. Each siren has a built-in battery and battery charger system, to allow for operation during a total power outage. Onsite Plan,^{1/} § 7.2.5.

b. Independent Radiation Monitoring Equipment. Radiation monitoring equipment onsite is backed up by diesel generators, and offsite monitoring equipment is self-contained. Onsite Plan, § 7.3.3.1. A listing of portable radiation monitoring equipment is shown in the Onsite Plan. Table 7-5. In addition to this, the State of Ohio has radiological monitoring equipment which is powered by battery and/or portable generators. State Plan,^{2/} Fig. II-H-1. The State radiological response kits include portable generators. Id.

^{1/} Emergency Plan for Perry Nuclear Power Plant, Rev. 3, April 23, 1984.

^{2/} State of Ohio Plan for Response to Radiological Emergencies at Licensed Nuclear Facilities (Edition of 1984).

c. Emergency Set Traffic Lights. If all available and alternate commercial power sources were shut down, traffic signals would lose power as well; however this will not jeopardize an evacuation, if ordered. Most traffic will be unidirectional (leaving the evacuated area) and major roads will have traffic control through various police departments and the Ohio National Guard if need be. Traffic control points are identified in the county plans and are represented in Table A. Lake Plan,^{3/} p. 135; Ashtabula Plan,^{4/} Appendix 27; Geauga Plan,^{5/} Appendix 25.

TABLE A

Traffic and Perimeter Control Points		
County	Traffic Control Points	Perimeter Control Points
Lake	65	8
Ashtabula	47	*
Gauga	33	6

*Same as traffic control points.

In addition, perimeter control points will also serve as

- ^{3/} Lake County Emergency Response Plan for the Perry Nuclear Power Plant, (Rev. 3, October 1984).
- ^{4/} Ashtabula County Radiological Emergency Preparedness Plan (May 10, 1984).
- ^{5/} Geauga County Radiological Emergency Response Plan (December 1983) (including Change No. 2 dated July 1984).

traffic control points until the evacuees have cleared the plume exposure pathway EPZ. Perimeter control points are identified in the county plans and are represented in Table A. Lake Plan, p. 137; Geauga Plan, Appendix 27. In all, a minimum of 159 locations are designated to direct traffic manually.

d. Gasoline Pumps. All school buses are kept refueled to handle normal day-to-day workloads. Secondly, the Lake County Garage has 30,000 gallons of gasoline and 1,000 gallons of diesel fuel. Its pumps are connected to a back-up generator. In Geauga County, the Sheriff's Department has 500 gallons of gas/diesel fuel and has hand pumps to retrieve it. The Chardon Oil Company has 12,000 gallons of regular gas, 15,000 gallons of unleaded gas and 30,000 gallons of diesel fuel. All storage tanks listed are above ground, allowing gravity flow access. In all, about 88,500 gallons of vehicle fuel are identified as available without the aid of commercial power.

e. Communication. All three county EOC's have back-up generators and radio capability to communicate with police, fire, ambulance and bus mobile units, as well as area hospitals, and reception centers.

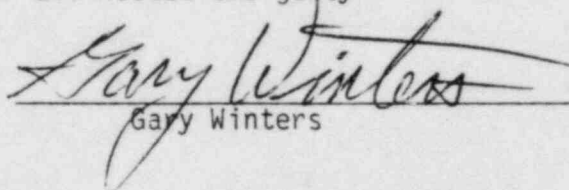
5. Should additional unidentified needs occur, the following Table B shows additional portable power sources available.

TABLE B

Portable Generating Equipment Available^{6/}
(Partial Listing: Road and Fire Departments)

County	Generators	Output Power	Fire Dept. with Gen.	Road Dept. with Gen.
Ashtabula	29	94 kw	11	1
Geauga	37	124 kw	13	8
Lake	72	231 kw	15	15
Totals	138	449 kw	39	24

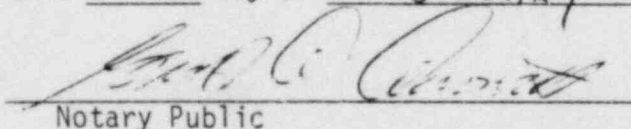
6. In summary, backup power is provided for all needed emergency functions.



Gary Winters

Subscribed and sworn before me

this 31st day of January, 1985



Notary Public

My Commission Expires:

GERALD A. BROWN, NOTARY PUBLIC
HARVESTING, DAUPHIN COUNTY
MY COMMISSION EXPIRES MAY 5, 1987
Member, Pennsylvania Association of Notaries

6/

A survey of portable equipment did not include all local agencies with generators. Therefore, portable generating equipment in addition to that listed in Table B is available to the counties.



ENERGY CONSULTANTS

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(717) 236-0031

Resume Current 01-11-85

GARY A. WINTERS

Education

1975 Bachelor of Science - Law Enforcement
Pennsylvania State University
University Park, Pennsylvania

Experience

9-81 to Present Energy Consultants
Harrisburg, Pennsylvania

Planner/Trainer, Emergency Management Services. Responsible for provision of direct consultant services to assist state and local governments and industry in emergency management planning, procedure preparation and program accreditation/licensing. Recent project assignment has included coordinating and performing a detailed audit of the offsite emergency preparedness program in support of the Perry Nuclear Power Plant Atomic Safety and Licensing Board hearings. Assignment as project coordinator involved responsibility for development of audit criteria; plan/procedure review; documentation of program weaknesses; and resource verification. Prior project assignments have included:

- Development of four county radiological emergency response plans in support of the Callaway Plant;
- Development of local emergency response agency implementing procedures in support of the Waterford 3 Steam Electric Station; and
- Revision of a county radiological emergency response plan in support of the Beaver Valley Power Station.

Gary A. Winters
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4-76 to 9-81

Dauphin County
Harrisburg, Pennsylvania

Juvenile Court Probation Officer. Managed caseloads, investigated cases of delinquency, prepared legal documents, and testified in court hearings; coordinated the delivery of human services to delinquent youth among various public and private institutions. Advanced to Assistant Supervisor of Predispositional Services.

9-67 to 10-70

U.S. Army
12th U.S. Army Security Agency Field Station
Chitose, Japan

Non-Morse Intercept Operator for the U.S. Army Security Agency. Advanced to search operator, Specialist 5, quality controller, and shift leader. Received a "top secret" security clearance.

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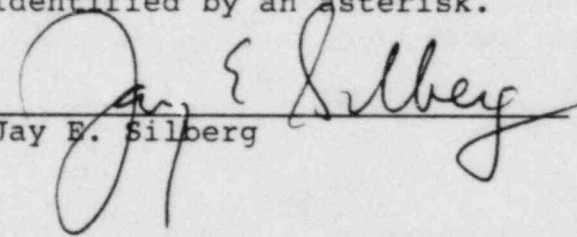
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Motion For Summary Disposition of Contention JJ," "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard on Contention JJ," "Affidavit of David R. Green on Contention JJ," and "Affidavit of Gary Winters on Contention JJ," were served this first day of February, 1985, by deposit in the U.S. mail, first class, postage prepaid, upon the parties listed on the attached Service List, except by express mail on those parties identified by an asterisk.


Jay E. Silberg

Dated: February 1, 1985

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SERVICE LIST

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John G. Cardinal, Esquire Prosecuting Attorney Ashtabula County Courthouse Jefferson, Ohio 44047	* Ms. Sue Hiatt 8275 Munson Avenue Mentor, Ohio 44060