

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

MAR -5 AM 11:15

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant))

Docket No. 50-400 (L

AFFIDAVIT OF THOMAS I. HAWKINS IN SUPPORT
OF APPLICANTS' MOTION FOR SUMMARY DISPOSITION
OF CONTENTION CCNC-2

County of Fulton)
) ss.
State of Georgia)

Thomas I. Hawkins, being duly sworn, deposes and says:

1. My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. Included among my responsibilities is the radiological emergency planning liaison function between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within those States.

I have held this position since December 1981. I have been employed by FEMA since July 1978. A current statement of my

professional qualifications is attached hereto. My business address is 1371 Peachtree Street, NE - Suite 736 - Atlanta, Georgia, 30309. I have personal knowledge of the matters discussed herein and believe them to be true and correct. I make this affidavit in response to Contention CCNC-2.

2. Contention CCNC-2 contends:

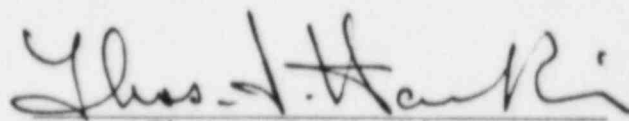
Sheltering as the recommended response to the release of radiation is not adequate to protect the public health. The typical rural house found around the plant site is not well-insulated and air in it is exchanged several times each hour.

NUREG-0654, Criterion J.10.m., states that "The organization's plans to implement protective measures for the plume exposure pathway shall include: The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include local protection afforded in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.." (Footnote excluded.) FEMA staff and the RAC are of the opinion that the ERP meets this requirement on page 49, Part 1; pages 29-30, Part 2; page 26, Part 3; page 28, Part 4; and page 31, Part 5.

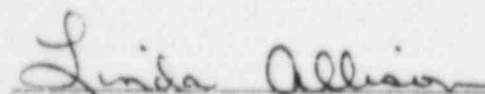
FEMA guidelines do not suggest in any way that in place sheltering be excluded from consideration as a protective measure because of "inadequate" housing or because of housing which is not well-insulated. Further, sheltering is not "the recommended response to the release of radiation" as indicated in Contention CCNC-2. Neither the ERP nor the FEMA guidelines imply that sheltering is the "recommended response." They do indicate that sheltering is one available option under certain conditions.

According to the Applicants' Affidavit in response to CCNC-2 and Eddleman 57-C-10, applicants have performed a survey of housing in the EPZ and determined the protection factors for that housing using the information contained in EPA 520, a standard reference referred to in NUREG-0654, for the determination of protective factors.

FEMA knows of no reason why the above information would not be appropriate for the Plant Harris EPZ.


Thomas I. Hawkins

Sworn to and subscribed before me
this 22nd day of February, 1985.


NOTARY PUBLIC FOR STATE OF GEORGIA

My Commission Expires: Notary Public, Georgia, State at Large
My Commission Expires Nov. 12, 1985

Thomas I. Hawkins

Professional Qualifications

My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. I am assigned to the Radiological Emergency Planning liaison position between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological emergency plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within these States.

I have held the position of Emergency Management Program Specialist (or its equivalent) since December 1981. I have been employed by FEMA since July 1978.

From April 1964 to January 1977 I was employed as Planning Director of Clayton County, Georgia.

My formal education is as follows:

- AB Degree, Emory University, Atlanta, GA, 1958
- Master of City Planning Degree, Georgia Tech., Atlanta, GA, 1963
- Completed Radiological Emergency Response Course at the U.S. Department of Energy's Nevada Test Site, April 1982
- Completed Radiological Defense Officer and Radiological Defense Instructor Course, Georgia Emergency Management Agency, Atlanta, GA, March 1982
- Completed Basic Management Seminar for Emergency Management Personnel, Valdosta State College, Thomasville, GA, Winter Quarter, 1980
- Completed Radiological Emergency Planning Seminar, National Emergency Training Center, Emmitsburg, Maryland, October 1982
- Completed Radiological Accident Assessment Course, National Emergency Training Center, Emmitsburg, Maryland, August 1984

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In the Matter of

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

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-400 OL
50-401 OL

I hereby certify that copies of "NRC STAFF/FEMA RESPONSE TO APPLICANTS' MOTIONS FOR SUMMARY DISPOSITION OF CCNC CONTENTION 2 AND EDDLEMAN CONTENTION 57-C-10" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or deposit in the Nuclear Regulatory Commission's internal mail system (*), this 27th day of February, 1985:

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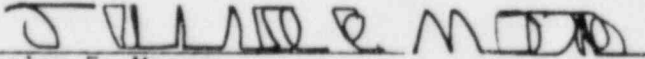
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