

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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
DANIEL D. HULBERT
ON CONTENTION J

County of Lake)
) ss
State of Ohio)

Daniel D. Hulbert, being duly sworn, deposes and says:

1. I am presently Emergency Planning Coordinator, Perry Plant Technical Department, The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. In my position, I am responsible for developing, maintaining, and evaluating the Perry Nuclear Power Plant (PNPP) Emergency Plan, including coordinating emergency preparedness among various PNPP departments and developing emergency planning documents and specification of response requirements. These responsibilities include the development of Emergency Action Level ("EAL") indications. 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 J.

2. Contention J states that the Emergency Action Level indications in the Perry Emergency Plan are incomplete. The contention was based on Sunflower's reading of Table 4-1 of the Perry Emergency Plan, Rev. 3, in which according to Sunflower critical measurements or standards are left incomplete. Sunflower Alliance's Particularized Objections to Proposed Emergency Plans in Support of Issue No. 1, dated August 20, 1984, page 16.

3. Emergency Action Levels (EAL's) describe specific plant conditions at which one of the four Emergency Classifications (Unusual Event, Alert, Site Area Emergency, General Emergency) are to be declared. Table 4-1 of the Perry Emergency Plan, Rev. 3, sets forth more than 200 individual EAL indications.


4. Of the 200 individual EAL indications, only 13 were "incomplete" in Revision 3 of the Perry Emergency Plan. Table 4-1, EAL, §§ 1.3.1.e(1) and (2), II.1.a(1), III.11.a, b and c; IV.6.a(2), b. In each case, the value to be included later was not available at the time Revision 3 of the Plan was issued, because the value could only be determined after the detailed technical data became available.

5. In each of the 13 cases where a value was to be added later, a comparable value was specified. For example, Table 4.1, EAL § 1.3.a.1 states:

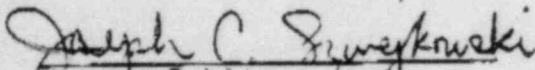
Off-gas pretreatment process radiation monitor high alarm with indication of (1) increase of (later) mrem/hr in 30 min. (equiv. to 100,000 uCi/sec).

6. In each of the 13 cases, the "missing" values have been developed based upon additional detailed information which became available after Revision 3 was issued and will be included in Revision 4 to the Perry Emergency Plan.

7. In summary, the few EAL's with "missing" values already have comparable values specified and the "missing" values will be included in the PNPP Emergency Plan prior to fuel load.


DANIEL D. HULBERT

Subscribed and sworn
to before me this 30th day
of JANUARY, 1985.


Notary Public

JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio - Cuyahoga County
My Commission Expires July 14, 1986

My Commission Expires:

Name: Daniel D. Hulbert, Emergency Planning Coordinator, Perry Plant
Technical Department

Formal Education and Training:

Electrician's Mate School, U. S. Navy, 1973-1974
Nuclear Power Training, U. S. Navy, 1974-1975
Engineering Laboratory Technician School, U. S. Navy, 1975
One-Week Basic BWR Systems (PDP), 1980
Fifteen-Week Davis-Besse Nuclear Power Station (Emergency Planning), 1980
Eight-Week Davis-Besse Nuclear Power Station (Evacuation Time Estimates),
1981
One-Week Electrical Fundamentals II, 1981
One-Week Planning for Nuclear Emergencies Course, Harvard School of Public
Health, 1982

Experience:

1979 - Present: The Cleveland Electric Illuminating Company

Joined CEI as an Engineering Technician and assigned to development of the PNPP Emergency Plan. Assisted in the preparation of the Davis-Besse Nuclear Power Station Emergency Plan, implementing procedures, and the Davis-Besse education time estimates. Participated in several Emergency Plan exercises at other Nuclear Power Plants as an official Exercise Observer. In 1982 promoted to present position of Emergency Planning Coordinator. Reports directly to the Technical Superintendent, Perry Plant Technical Department.

1973 - 1979: U. S. Navy

Electrician's Mate - Qualified as Engineering Laboratory Technician, Electrical Operator and Shutdown Reactor Operator on a S5W Class Submarine. Duties included operation and maintenance of electrical systems, chemistry controls for both primary and secondary plant, and routine and emergency health physics coverage. Assignments included one tour on an S5W Submarine and one tour assigned to the Radiological Controls Division of a Submarine Tender.

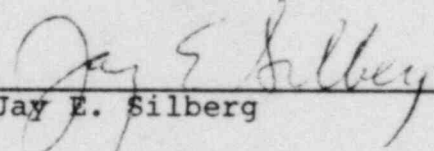
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Motion For Summary Disposition of Contention J," "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard on Contention J" and "Affidavit of Daniel D. Hulbert on Contention J," were served this 30th day of January, 1985, by deposit in the U.S. mail, first class, postage prepaid, upon the parties listed on the attached Service List.



Jay E. Silberg

Dated: January 30, 1985

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