

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
GARY WINTERS
ON CONTENTION Q

County of Dauphin)
) ss.
Commonwealth of Pennsylvania)

GARY WINTERS, being duly sworn, deposes and says:

1. I am presently a Project Coordinator and Emergency Planning Specialist for the Emergency Management Services Department of Energy Consultants. 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. Project activities have included the interview of response agency/facility administrators for resource information, preparation of county resource documents and analysis of offsite resource capability to respond to an accident at the Perry Plant. A current statement of my professional qualifications and experience 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 Q.

2. The purpose of this affidavit is to demonstrate the availability of sufficient resources to evacuate all schools (grades K-12) within the plume exposure pathway emergency planning zone ("EPZ") in a single trip, to identify the specific measures being taken to assure that parents of children in schools within the EPZ will cooperate with plans for the evacuation of the schools, and to explain that -- even if some parents did attempt to pick up their children at school -- the evacuation of schools would not be impeded.

I. School Buses

3. A recent survey of the superintendents of all school districts within the Perry EPZ indicates that current total enrollment in EPZ schools is approximately 19,802 students.

4. The licensed capacity for EPZ and support school buses^{1/} is an average of 59.3 students per bus; the actual evacuation capacity is an average of 55.0 students per bus.^{2/}

^{1/} Support school buses are school buses from schools within the three county area (but outside the EPZ) which are available to assist with the evacuation of EPZ schools in the event of an emergency at Perry.

^{2/} The average licensed capacity of EPZ and support school buses was determined by averaging the licensed capacity of these buses. The average actual evacuation capacity of these buses was determined by averaging licensed capacity

(Continued next page)

Thus, the actual number of buses needed to evacuate EPZ schools in a single trip -- based on actual evacuation capacity -- is 384 buses.^{3/} A county-by-county breakdown is shown in Table A below.

TABLE A
SCHOOL BUSES

County	Support Buses	Buses Within EPZ	Total Buses Needed For School Evacuation	Surplus Buses
Lake	246	120	303	63
Ashtabula	182	34	64	152
Geauga	<u>65</u>	<u>14</u>	<u>17</u>	<u>62</u>
TOTALS	493	168	384	277

5. As Table A indicates, the schools within the EPZ do not have sufficient bus capacity to evacuate their students in a single trip without assistance. However, Standard Operating Procedures developed with school districts in the three

(Continued)

to grade level for all schools within the EPZ, and assigning two or three students per seat (based on three per seat for grades K-9, and two per seat for grades 10-12). The total number of buses needed was then determined, and an average per bus capacity calculated.

^{3/} The actual number of buses needed to evacuate EPZ schools in a single trip was determined by matching actual evacuation seat capacity to individual school enrollment and calculating the number of buses needed to evacuate each school in a single trip.

counties provide for the use of resources (school buses and drivers) from outside the EPZ to evacuate schools within the EPZ in an emergency. See also Lake County Plan,^{4/} §§ J-06, J-11, and Attachment A-1; Ashtabula County Plan,^{5/} Appendices 6 and 9, and § J.4.1; Geauga County Plan,^{6/} Appendices 4 and 24. Letters of agreement are being obtained for the use of these resources. Table A clearly demonstrates the availability of adequate numbers of buses to evacuate all school students from the EPZ in a single trip. Indeed, Table A indicates a surplus of 277 buses available within the three counties, over and above the buses needed to evacuate the schools in the EPZ.

II. Bus Drivers

6. Table B below shows the pool of licensed school bus drivers (both regular and substitute drivers) available within the three counties to support evacuation in the event of an emergency at the Perry Plant. As Table B indicates, there are many more than enough school bus drivers available to drive the 384 buses needed to evacuate the schools within the EPZ in a single trip.

^{4/} Lake County Emergency Response Plan For The Perry Nuclear Power Plant (Rev. 3, October 1984).

^{5/} Ashtabula County Radiological Emergency Preparedness Plan (May 10, 1984).

^{6/} Geauga County Radiological Emergency Response Plan (December 1983) (including Change No. 2 dated July 1984).

TABLE B
SCHOOL BUS DRIVERS

County	Regular	Substitute	Totals
Lake	314	78	392
Ashtabula	174	68	242
Geauga	65	19	<u>84</u>
			718

7. Each of the three county plans provides for the training of emergency workers, including bus drivers. Lake County Plan, Attachment 0-1; Ashtabula County Plan, Appendix 34; Geauga County Plan, Appendix 36. The training being provided to each bus driver prior to fuel load includes (at a minimum):

- a. An explanation of basic radiation concepts (including the use of dosimetry).
- b. An overview of the offsite emergency plans.
- c. Instruction on each driver's specific duties.

In addition, the training includes making the bus drivers aware of the advantages of informal pre-emergency family contingency planning.

8. All school bus drivers assisting with the evacuation of schools within the plume EPZ in the event of an emergency at Perry would be provided with personnel dosimetry, both self-reading and permanent record types.

III. Parents' Response

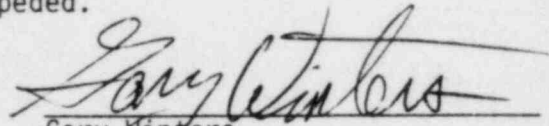
9. The EBS announcements for broadcast in the event of an evacuation will advise parents of the evacuation of the schools and of the location to which each school's students are being evacuated. The EBS announcements also will emphasize that parents should pick up their children at the appropriate receiving school outside the EPZ. The emergency public information brochure (for distribution throughout the EPZ prior to fuel load, and annually thereafter) will provide this same information about school evacuation, and will also instruct parents not to go to the schools to pick up their children. Lake County Plan, §§ G-01, G-02, G-03; Ashtabula County Plan, §§ E.4, G.2; Geauga County Plan, §§ E-6, G-3.

10. The offsite plans for the Perry EPZ are designed to facilitate the expeditious evacuation of school children, directly from their schools within the EPZ to predesignated receiving schools (reception centers) outside the EPZ. In the event of an emergency at Perry, evacuation of approximately half the schools within the EPZ would begin within 15 minutes of the order to evacuate. Therefore, many school children would already be enroute to receiving schools by the time parents could receive and react to notification of an evacuation and travel to the schools.

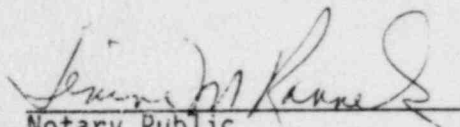
11. Nevertheless, even if some parents ignored the information provided in the brochure and in the EBS broadcasts and did go to the schools to pick up their children in an

emergency, school evacuation would not be seriously impeded. Normal school dismissal procedures would be followed, including the stationing of school personnel to direct buses out of the loading areas, and to prevent extraneous traffic from entering the loading area, if necessary.

12. In summary, ample resources (school buses and drivers) are available to evacuate all schools within the EPZ in a single trip. Provisions for the dissemination of information about school evacuation in an emergency provide assurance that parents of children in schools within the EPZ will cooperate with plans for the direct evacuation of their children to receiving schools outside the EPZ. Nevertheless, even if some parents did attempt to pick up their children at school, the evacuation of schools would not be impeded.


Gary Winters

Subscribed and sworn to before
me this 4th day of February, 1985.


Notary Public

JENINE M. RANNELS, NOTARY PUBLIC
HARRISBURG, DAUPHIN COUNTY
My Commission expires: MY COMMISSION EXPIRES DEC. 12, 1988
Member, Pennsylvania Association of Notaries



ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110
(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.

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.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ILLUMINATING COMPANY) 50-441
)
(Perry Nuclear Power Plant,)
Units 1 and 2))

AFFIDAVIT OF
JOHN BAER
ON CONTENTION 2

County of Dauphin)
) ss
State of Pennsylvania)

John Baer, being duly sworn, deposes and says:

1. I am presently Project Manager for Emergency Management Services, Energy Consultants, Inc. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. In my position, I am project manager for off-site radiological emergency response planning being provided to Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant. 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 2.

2. Contention 2 claims that the emergency plans do not provide "decontamination protection for bus drivers during an emergency." Sunflower believes that bus drivers, in addition to the dosimeters they will have, should also be provided with protective gear such as respirators and goggles.

~~Dupe 8502010567~~

3. There is no regulatory requirement and no regulatory guidance that calls for bus drivers to be provided with protective gear such as respirators and goggles. The NRC regulations require that there be means for controlling radiation exposures to emergency workers. 10 C.F.R. § 50.47(b)(11). Further guidance on this topic is contained in NUREG-0654, Criterion K.3, which describes provision for supplying dosimetry to emergency workers. Neither NRC regulations nor NUREG-0654 nor other guidance documents suggest that respiratory devices or goggles should be provided for emergency workers such as bus drivers.

4. The county emergency plans provide for the distribution of personnel dosimetry, both self-reading and permanent record types, and associated recordkeeping materials to those bus drivers who will be serving as emergency workers.

5. Bus drivers have access to dosimetry at assembly areas from which they will be deployed. Each bus driver will wear dosimetry equipment at all times. Training in the use of and associated recordkeeping of dosimetry has been, and will continue to be provided to bus drivers. This includes "reading" dosimeters regularly while performing emergency duties. Procedures require that bus drivers, as well as other emergency workers, read their dosimeters and record their readings at least once an hour. If the bus driver's self-reading dosimeter indicates any radiation exposure, the procedures call for him to report to a monitoring and

decontamination station (all of which are outside the plume exposure pathway EPZ) for monitoring and, if needed, decontamination. This monitoring would show any differing exposure levels to different parts of the body. Upon completion of a mission or shift, each bus driver is required to turn in his or her dosimetry to be checked and recorded. Dosimetry records are forwarded to the county EOC and retained.

6. In each school district emergency procedure there is a section that details radiological exposure control procedures for bus drivers. Information contained in this section includes:


- The distribution and use of dosimeters;
- Associated exposure control recordkeeping; and
- Availability of monitoring and decontamination services at specified worker decontamination stations.

7. There are several other factors that reduce the chance of bus drivers being exposed to any radiation hazard.

- a. Emergency response plans have been written so that an evacuation can be completed before the release of significant radioactivity occurs.
- b. The nature of bus drivers' duties will have them spending less time inside the plume exposure pathway emergency planning zone than most other emergency workers, i.e., bus drivers leave the risk area as soon as their buses are loaded.
- c. Every bus driver will have a radio in his bus which will ensure prompt receipt or transmission of pertinent information, including radiological information.


- d. State and CEI radiological monitoring teams will be reading radiation levels and can provide radiological data through emergency management channels that can be relayed to bus drivers. Each of the three county plans provides for the dissemination of information originating with the state radiological monitoring teams. Lake Plan, Annex H, p. 100; Ashtabula Plan, Section H, p. 3; Geauga Plan, Section H, p. 3. The dissemination of radiological or other information is yet another way to protect bus drivers.

8. In light of the information and procedures in the emergency response plans relevant to the proper dosimetry, exposure control recordkeeping and monitoring services, bus drivers are well protected. There is no need for bus drivers to have goggles, protective clothing or respirators.



John Baer

Subscribed and sworn before me
this 30th day of January, 1985



Notary Public

My Commission Expires: CYNTHIA T. LENTZ, NOTARY PUBLIC
My Commission Expires August 8, 1987
Harrisburg, PA Dauphin County



ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110
(717) 236-0031

Resume Current 01-11-85

JOHN W. BAER

Education

- 1970 Post Graduate Study - Political Science
American University
Washington, D.C.
- 1966 Bachelor of Arts - Political Science
Western Maryland College
Westminster, Maryland

Experience

- 1981 to Present Energy Consultants
Harrisburg, Pennsylvania
- Project Manager, Emergency Management Services. Responsible for providing supervision and technical assistance to project staff. Assigned responsibility for emergency management planning, procedure preparation, personnel training, drill/exercise preparation, licensing support, and scheduling and coordinating project work with the client. Recent project assignments have included:
- managing the offsite radiological emergency preparedness programs for the Counties of Ashtabula, Geauga and Lake (Ohio) to support response to incidents at the Perry Nuclear Power Plant including establishing operational readiness of county emergency operations centers, offsite drill and exercise preparation and ASLB hearing support;
 - managing the offsite radiological emergency preparedness re-training program to support response to incidents at the Waterford 3 Steam Electric Station;
 - coordinating the offsite radiological emergency preparedness program to support response to incidents at the Callaway Plant including direct responsibility for revision of the Missouri State

Nuclear Accident Plan and associated local radiological emergency response plans, preparation of affidavits to support motions for summary disposition of licensing contentions, development of local RERP implementing procedures, establishing operational readiness of local emergency operations centers, development of emergency response training programs for local EOC staff officers and emergency workers, and development/conduct of the offsite drill and exercise program;

- evaluating and preparing revisions to the station and offsite radiological emergency preparedness plans in support of the Palo Verde Nuclear Generating Station;
- development of the Louisiana Office of Emergency Preparedness implementing procedures and lesson plans for training of state, parish and local emergency response personnel in support of the Waterford 3 Steam Electric Station; and
- preparation of lesson plans and conduct of training programs for state, county and local emergency response personnel in support of the R. E. Ginna Nuclear Station.

1973 to 1980

Southcentral Regional Planning Council
Harrisburg, Pennsylvania

Director. Responsible for administration of an eight-county planning and evaluation program for the Commonwealth of Pennsylvania. Assisted local governments in planning and development of criminal justice/emergency response communications and automated information systems. Developed and revised training courses in data analysis for use by planning and operational personnel at the state and local government level. Assisted with delivery of six 35-hour training sessions for criminal justice personnel within a ten-state region. Developed and conducted practical group exercises for course participants.

Planner (1973 to 1978). Assisted local governments in planning and development of a range of criminal justice programs, criminal justice system communications and automated information systems.

John W. Baer
Page 3

1971 to 1973

Lord Fairfax Planning District Commission
Front Royal, Virginia

Planner. Performed general planning tasks, including criminal justice and emergency response planning for a five-county region of Northern Virginia.

1966 to 1968

U.S. Department of Defense
Fort Meade, Maryland

Security Specialist. Evaluated security measures for a federal security agency. Provided recommendations for security requirements. Top secret/crypto security clearance.

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AFFIDAVIT OF
JOHN BAER
ON CONTENTION BB

County of Dauphin)
) ss
State of Pennsylvania)

John Baer, being duly sworn, deposes and says:

1. I am presently Project Manager for Emergency Management Services, Energy Consultants, Inc. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. In my position, I am project manager for off-site radiological emergency response planning being provided to Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant. A current statement of my professional and technical qualifications is attached hereto as Attachment "A". 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 BB.

~~Dupe
8502012588~~

2. Contention BB claims that the off-site emergency plans for the Perry facility are inadequate due to the planning deficiencies set forth in the Interim Report on Off-site Radiological Emergency Planning for the Perry Nuclear Power Station, dated January 10, 1984 ("FEMA Interim Report").

3. The conclusion of the Interim Report was that "there is reasonable assurance that the plans are adequate and capable of being implemented in the event of an accident at the site."

4. The FEMA Interim Report reflects the review by the FEMA Regional Assistance Committee ("RAC") of draft Ashtabula, Geauga and Lake County Emergency Plans submitted for review by the State of Ohio on March 17, 1983, and the schedule of corrections to the RAC review received by FEMA from the State on August 30, 1983. As reflected in the FEMA Interim Report, more than half of the planning deficiencies identified by the RAC were corrected and the corrective action accepted by FEMA in the Interim Report itself. A subsequent submittal of corrections to be made to the county plans was made by the State to FEMA on March 29, 1984.

5. Each of the county plans was revised in response to the FEMA Interim Report. The Ashtabula County Plan was revised in May 1984. The Geauga County Plan was revised in March 1984 and in July 1984. The Lake County Plan was revised in June and October 1984. The plan revisions reflect corrective actions made in direct response to the planning deficiencies noted in the FEMA Interim Report.

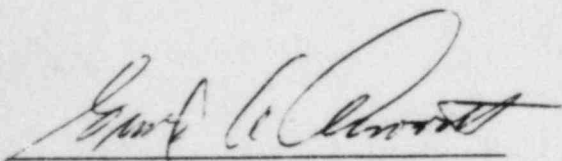
6. My independent review of the Lake, Ashtabula, and Geauga County Plans shows that, of the total of 145 planning deficiencies listed in the Interim Report, all have been corrected or are being addressed. Attachment "B" hereto shows the planning deficiencies noted in the FEMA Interim Report, those deficiencies acknowledged by FEMA to have been corrected by the August 30, 1983 State submission, those remaining deficiencies corrected by the plan revisions made subsequent to the Interim Report and where in revised plans the remaining deficiencies were corrected. The few items still being addressed involve emergency information material which will be distributed prior to fuel load.

7. Attachment "B" hereto shows that each of the planning deficiencies has been, or is being, resolved. These resolutions further support FEMA's conclusion that the county plans are adequate. It is therefore incorrect to claim that the planning deficiencies noted in the FEMA Interim Report indicate that the county plans are inadequate.



John Baer

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



Notary Public

My Commission Expires:

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

ATTACHMENT A



ENERGY CONSULTANTS

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JOHN W. BAER

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1973 to 1980

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Fort Meade, Maryland

Security Specialist. Evaluated security measures for a federal security agency. Provided recommendations for security requirements. Top secret/crypto security clearance.

ATTACHMENT B

RESPONSES TO FEMA INTERIM REPORT

Lake County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision Subsequent to Interim Report	Reference In County Plan
A. Assignment of Responsibility			
A.1.b.		X	Att. 6-1
A.1.e	X		
A.2.a		X	Att. A-7
A.3	X		
A.4	X		
C. Emergency Response Support and Resources			
C.4	X		
D. Emergency Classification System			
D.4	X		
E. Notification Methods			
E.6	X		
E.7	X		
F. Emergency Communications			
F.1.d	X		
F.2	X		
G. Public Education and Information			
G.1	(Will be addressed in PNPP emergency brochure and telephone directory inserts)		
G.2	(Will be addressed in PNPP emergency brochure and telephone directory inserts)		
G.3.a		X	§ G-03
G.4.b		X	§ G-03
G.4.c	X		
G.5	X		

Lake County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision	Reference In County Plan
H. Emergency Facilities and Equipment			
H.3	X		
H.7	X		
H.10	X		
H.11	X		
H.12		X	§ H-08
I. Accident Assessment			
I.7	X		
I.8	X		
J. Protective Response			
J.9	X		
J.10.a	X		
J.10.b	X		
J.10.c		X	§ E-07
J.10.d	X		
J.10.e & f	X		
J.10.g		X	Att. 6-1
J.12	X		
K. Radiological Exposure Control			
K.3.a		X	Att. K-2
K.3.b	X		
K.4		X	§ K-03
K.5.a	X		
L. Medical and Public Health Support			
L.1		X	§ L-03
L.4		X	App. 4
M. Recovery and Reentry			
M.1		X	§ M-02
N. Exercises and Drills			
N.1.a		X	§ N-01
N.1.b		X	§ N-01
N.2.a		X	§ N-02
N.2.d		X	§ N-02

Lake County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision	Reference In County Plan
N.3.a		X	§ N-03
N.3.c		X	§ N-03
N.3.d		X	§ N-03
N.3.e		X	§ N-03
N.4		X	§ N-04
N.5		X	§ N-05
O. Radiological Emergency Response Training			
0.4.b.		X	Att.0-2
0.4.c		X	Att.0-2
0.4.d.		X	Att.0-1, Att.0-2
0.5		X	§ 0-02
P. Responsibility for Planning			
P.7		X	App. 4

RESPONSES TO FEMA INTERIM REPORT

Ashtabula County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision Subsequent to Interim Report	Reference In County Plan
A. Assignment of Responsibility			
A.1.a	X		
A.1.b	X		
A.1.c	X		
A.2.a	X		
A.3	X		
A.4	X		
E. Notification Methods			
E.5	(Will be addressed in the PNPP emergency brochure and telephone directory inserts)		
E.7	X		
F. Emergency Communications			
F.1.c	X		
G. Public Education and Information			
G.1	X		
G.2	(Will be addressed in PNPP emergency brochure and telephone directory inserts)		
G.3.a	X		
G.4.b		X	§ G.3
H. Emergency Facilities			
H.10	X		
H.11	X		
H.12		X	§ H.4
J. Protective Response			
J.10.a	X		
J.10.c	X		
J.10.d	X		
J.10.e & f		x	§ J.5, App. 31

Ashtabula County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision	Reference In County Plan
J.10.g	X		
J.12	X		
K. Radiological Exposure Controls			
K.3.a		X	§ K.2
K.3.b	X		
K.4	X		
K.5.a	X		
K.5.b		X	§ K.6
L. Medical and Public Health Support			
L.1	X		
L.4		X	App. 8
N. Exercises and Drills			
N.1.b		X	§ N.2
N.2.a		X	§ N.3
N.2.c		X	§ N.3
N.3.a		X	§ N.4
N.3.b		X	§ N.4
N.3.c		X	§ N.4
N.3.d.		X	§ N.4
N.3.e		X	§ N.4
N.5		X	§ N.6
O. Radiological Emergency Response Training			
O.4.h	X		
O.5	X		
P. Responsibility for Planning			
P.7	X		
P.10	X		

RESPONSES TO FEMA INTERIM REPORT

Geauga County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision Subsequent to Interim Report	Reference In County Plan
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A. Assignment of Responsibility

A.1.a	X		
A.1.b		X	App. 24
A.1.c	X		
A.1.e.	X		
A.2.a	X		
A.3	X		
A.4			

C. Emergency Response Support and Resources

C.4		X	App. 24
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D. Emergency Classification System

D.4	X		
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E. Notification Methods and Procedures

E.5	X		
E.7	X		

F. Emergency Communications

F.1.c	X		
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G. Public Education and Information

G.1	X		
G.2	X		
G.3.a		X	§ G-4
G.4.L		X	§ G-4
G.4.c	X		
G.5	X		

H. Emergency Facilities and Equipment

H-10	X		
H-11	X		
H-12		X	§ H-5

Geauga County

0654 Planning Deficiency	Corrected Per Interim Report	Corrected By Plan Revision	Reference In County Plan
J. Protective Response			
J.10.a		X	§ J-3, App. 21 § J-6, App. 27 & 28
J.10.c	X		
J.10.d	X		
J.10.e & f		X	§ J-8
J.10.g	X		
J.12		X	§ J-4(d)
K. Radiological Exposure Controls			
K.3.a		X	§ K-2
K.3.b	X		
K.4	X		
K.5.a	X		
K.5.b	X		
L. Medical and Public Health Support			
L.1	X		
L.4		X	App. 7
N. Exercises and Drills			
N.1.b		X	§ N-2
N.2.a		X	§ N-3
N.3.a		X	§ N-4
N.3.c		X	§ N-4
N.3.d		X	§ N-4
N.3.e		X	§ N-4
N.5		X	§ N-6
O. Radiological Emergency Response Training			
O.4.h		X	§ O-3, App. 36
O.5		X	
P. Responsibility for Planning Effort			
P.4.	X		
P.7		X	§ P-5, App. 37
P.10	X		



ENERGY CONSULTANTS

Riverside Office Center 3 • 2101 N. Front St. • Harrisburg, PA 17110
(717) 236-0031

Resume Current 01-11-85

JOHN W. BAER

Education

- 1970 Post Graduate Study - Political Science
American University
Washington, D.C.
- 1966 Bachelor of Arts - Political Science
Western Maryland College
Westminster, Maryland

Experience

1981 to Present Energy Consultants
Harrisburg, Pennsylvania

Project Manager, Emergency Management Services. Responsible for providing supervision and technical assistance to project staff. Assigned responsibility for emergency management planning, procedure preparation, personnel training, drill/exercise preparation, licensing support, and scheduling and coordinating project work with the client. Recent project assignments have included:

- managing the offsite radiological emergency preparedness programs for the Counties of Ashtabula, Geauga and Lake (Ohio) to support response to incidents at the Perry Nuclear Power Plant including establishing operational readiness of county emergency operations centers, offsite drill and exercise preparation and ASLB hearing support;
- managing the offsite radiological emergency preparedness re-training program to support response to incidents at the Waterford 3 Steam Electric Station;
- coordinating the offsite radiological emergency preparedness program to support response to incidents at the Callaway Plant including direct responsibility for revision of the Missouri State

Nuclear Accident Plan and associated local radiological emergency response plans, preparation of affidavits to support motions for summary disposition of licensing contentions, development of local RERP implementing procedures, establishing operational readiness of local emergency operations centers, development of emergency response training programs for local EOC staff officers and emergency workers, and development/conduct of the offsite drill and exercise program;

- evaluating and preparing revisions to the station and offsite radiological emergency preparedness plans in support of the Palo Verde Nuclear Generating Station;
- development of the Louisiana Office of Emergency Preparedness implementing procedures and lesson plans for training of state, parish and local emergency response personnel in support of the Waterford 3 Steam Electric Station; and
- preparation of lesson plans and conduct of training programs for state, county and local emergency response personnel in support of the R. E. Ginna Nuclear Station.

1973 to 1980

Southcentral Regional Planning Council
Harrisburg, Pennsylvania

Director. Responsible for administration of an eight-county planning and evaluation program for the Commonwealth of Pennsylvania. Assisted local governments in planning and development of criminal justice/emergency response communications and automated information systems. Developed and revised training courses in data analysis for use by planning and operational personnel at the state and local government level. Assisted with delivery of six 35-hour training sessions for criminal justice personnel within a ten-state region. Developed and conducted practical group exercises for course participants.

Planner (1973 to 1978). Assisted local governments in planning and development of a range of criminal justice programs, criminal justice system communications and automated information systems.

John W. Baer
Page 3

1971 to 1973

Lord Fairfax Planning District Commission
Front Royal, Virginia

Planner. Performed general planning tasks, including criminal justice and emergency response planning for a five-county region of Northern Virginia.

1966 to 1968

U.S. Department of Defense
Fort Meade, Maryland

Security Specialist. Evaluated security measures for a federal security agency. Provided recommendations for security requirements. Top secret/crypto security clearance.

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 CC

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 (CEI). 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 responding to resolution items identified by the NRC Staff on its review of the PNPP Emergency Plan. A current statement of my professional and technical qualifications is attached hereto. I have personal knowledge

D. H. 8502010599

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 CC.

2. Contention CC states that the resolution items set forth by the NRC Staff in Supplement 4 (February 1984) to the Safety Evaluation Report, NUREG-0887 (SSER 4), pages 13-1 to 13-22, are uncorrected deficiencies in the emergency plan. The referenced pages in SSER 4 set forth the NRC Staff's evaluation of the PNPP Emergency Plan (through Revision 2) and identified 35 items which required resolution.

3. By letter dated April 28, 1984 (PY-CEI/NRR-0105 L), CEI transmitted to the NRC Staff Revision 3 to the PNPP Emergency Plan, as well as a cross-reference between the resolution item in SSER 4 and where in Revision 3 those items had been resolved. By letters dated August 20, 1984 (PY-CEI/NRR-0135 L) and October 29, 1984 (PY-CEI/NRR--149 L), CEI provided to the NRC Staff additional clarification of changes to the PNPP Emergency Plan which relate to resolution items in SSER 4 and which will be incorporated in Revision 4 to the PNPP Emergency Plan, scheduled for submission on February 28, 1985. The information contained in Revision 3 and the subsequent correspondence demonstrates that all the resolution items in SSER 4 have been addressed and that they are not uncorrected deficiencies in the PNPP emergency plan.

4. The following paragraphs summarize each resolution item and CEI's response.

a. Item 13.3.2.2(1) requested that augmented shift staffing be made consistent with Table 2 to NUREG-0737, Supp. 1. This consistency was achieved in the October 29, 1984 CEI letter (§§ 5.2.2.2, 5.2.2.4, 5.2.3 and Table 5-1 of the PNPP Emergency Plan).

b. Item 13.3.2.2(2) requested additional detail on the process of transferring responsibilities to the Emergency Coordinator. This information was provided in §§ 5.2.2.4 and 6.1.3 of the Plan (Rev. 3).

c. Item 13.3.2.2(3) requested clarification that the Emergency Coordinator could not delegate the duties of notifying and making protective action recommendations to offsite authorities. This was done in §§ 5.2.2.1, 5.2.2.3 and 5.2.2.4 of the Plan (Rev. 3).

d. Item 13.3.2.2(4) requested clarification that the Emergency Coordinator maintains unilateral control of the overall emergency response. This was accomplished in Rev. 3 of the Plan, §§ 5.2.1, 5.2.2.1, 5.2.2.3, 5.2.2.4 and 6.1.2.

e. Item 13.3.2.3(1) requested that the expected arrival times of federal assistance be indicated. This information was incorporated in § 5.4.4 of the Plan (Rev. 3).

f. Item 13.3.2.3(2) requested clarification of the radiation detection capabilities of the Post Accident Monitoring System (PASS) and the capabilities of Technical Support Center (TSC) and Emergency Operator Facility (EOF) laboratory equipment. This information was provided in Plan (Rev. 3), § 7.3.9, with clarification in the August 20, 1984 letter, and further revision to § 7.3.9 in the October 29, 1984 CEI letter.

g. Item 13.3.2.3(3) requested that provisions for backup laboratory facilities be made consistent with NUREG-0737. This was added in Rev. 3 of the Plan, § 7.3.9 and further clarified in the August 20, 1984 letter.

h. Item 13.3.2.4(1) asked that the Plan incorporate into the emergency classification scheme comments contained in NRC Staff's January 11, 1984 letter. This was done in Rev. 3, Table 4-1, except for the comment on low water level, which CEI showed to be inapplicable to Perry in the April 28, 1984 letter. Further clarification was provided by the August 20, 1984 letter.

i. Item 13.3.2.4(2) called for the Plan to indicate that Emergency Action Levels are agreed upon by state/local authorities and are reviewed annually. This was included in § 8.2 of the Plan (Rev. 3) and further updated by the August 20, 1984 letter.

j. Item 13.3.2.4(3)(a), which called for the Plan to discuss nonradiological means of core status determination, was withdrawn by the NRC Staff by letter dated February 29, 1984.

Item 13.3.2.4(3)(b) requested a discussion of the relationship between gap activity and failed fuel percentage as it relates to protective action recommendations. This was provided in Rev. 3, §§ 4.1.4 and 6.4.3, with minor changes to the Tables in these sections added by the October 29, 1984 letter.

Item 13.3.2.4(3)(c) requested that the Plan discuss how the core status graph (Fig. 4-1) will be used in the emergency action level scheme. This was provided in Rev. 3, §§ 4.1.4 and 6.4.3, with minor changes to the Tables in these sections added by the October 29, 1984 letter.

k. Item 13.3.2.5(1) requested that the Plan describe the methods for prompt notification of the public in a rapidly escalating emergency. This was addressed in § 6.4.2 of the Plan (Rev. 3), and further clarified in the August 20, 1984 letter.

l. Item 13.3.2.5(2) called for the Plan to address periodic testing of the sirens. This was done in Rev. 3, § 7.2.5.

m. Item 13.3.2.6(1) requested Applicants to provide for backup communications capabilities between the site and all state/local authorities with primary response responsibilities. Backup communications capabilities are provided, as described in § 7.2.2 and Fig. 7-6 of the Plan (Rev. 3), as further clarified by the August 20 and October 29, 1984 letters.

n. Item 13.3.2.6(2) requested a coordinated communications link for fixed and mobile medical support facilities. Information on this link was provided in Rev. 3, § 7.2.2.8, and by the August 20, 1984 letter.

o. Item 13.3.2.7(1) requested that Applicants provide finalized emergency information brochures and other emergency information materials to the public before fuel load. This commitment was added in Rev. 3, § 8.4.1.1.

p. Item 13.3.2.7(2) called for the Plan to specify the location of the Joint Public Information Center. Rev. 3 of the Plan added this in § 7.1.4.

q. Item 13.3.2.8(1) requested that the Plan specify the time required to bring the TSC and EOF to functional readiness. This information was added in Rev. 3 of the Plan, § 5.2.3.

r. Item 13.3.2.8(2) requested that the Plan indicate that emergency equipment and supplies will be available in the control room. The Plan should also specify the calibration frequency for emergency instruments and that instruments removed from service will be replaced by comparable instruments. NRC withdrew the request to specify calibration frequency by letter dated February 29, 1984. The remaining information was provided in Rev. 3, § 8.3 and Appendix C and in the August 20, 1984 letter.

s. Item 13.3.2.8(3) called for the Plan to describe the capability to obtain 24 hour/day regional weather information, consistent with NUREG-0737, Supp. 1. This information was provided in the August 20, 1984 letter (§ 7.3.7) and in a letter of agreement to be added to Appendix B.

t. Item 13.3.2.8(4) requested a commitment that permanent emergency response facilities and equipment be operational before fuel loading or that adequate interim facilities and capabilities be in place. As noted in the April 28, 1984 letter, this commitment had previously been made by letter from M.R. Edelman to B.J. Youngblood dated April 15, 1983 (PY-CEI/NRR-0032).

u. Item 13.3.2.9(1) called for additional information in the Plan on radiation monitoring teams, including staffing levels consistent with NUREG-0737,-

Supp. 1, and transportation availability. This information was provided in the August 20 and October 29, 1984 letters (§§ 5.2.2.2, 5.2.2.4, 5.2.3, Table 5-1).

v. Item 13.3.2.10(1) requested more details in the Plan on evacuating visitor and/or contractor personnel. This information was incorporated in Rev. 3, § 6.4.1 and Figure 6-7, and further addressed in the October 29, 1984 letter.

w. Item 13.3.2.10(2) called for the Plan to describe personnel monitoring methods and decontamination supplies, and to indicate that personnel accountability will be accomplished within 30 minutes. This was done in Rev. 3 in § 6.4.1, 6.5.3 and Appendix C.

x. Item 13.3.2.10(3) called for the evacuation time estimate study to address the effects of adverse weather (i.e. thunderstorm) on a summer Sunday evacuation and to indicate that the evacuation time estimates have been reviewed by appropriate state/local individuals. The April 28, 1984 letter stated that the evacuation time estimate study was being reviewed by State and local officials and that adverse weather effects were addressed in the time estimate study incorporated in Rev. 3 of the Plan.

y. Item 13.3.2.11(1) stated that the Plan should indicate that each emergency worker will receive a self-reading and a permanent record dosimeter and the emergency personnel dosimetry program has the capability of 24 hour/day dose determination. This was done in Rev. 3, § 6.5.1.

z. Item 13.3.2.11(2) requested the Plan to specify contamination action levels and to indicate that decontamination supplies include materials capable of radioiodine skin decontamination. This was added in Rev. 3, § 6.4.4.1, 6.5.3 and Appendix C.

aa. Item 13.3.2.12(1) called for the Plan to include a letter of agreement with Northwestern Memorial Hospital. As stated in the April 28, 1984, letter, and in Rev. 3, § 5.3.3.2, the arrangements with Northwestern Memorial Hospital were made through CEI's medical consultant, Radiation Management Corporation (RMC). CEI has a letter of agreement with RMC which is included in the Plan, App. B.

bb. Item 13.3.2.12(2) requested a more detailed discussion in the Plan on first aid personnel, including training at least equivalent to Red Cross Multi-Medic training and 24 hour/day availability. This information was provided in Rev. 3, §§ 6.5.3, 8.1.3.

cc. Item 13.3.2.14(1) called for the Plan to reflect the regulatory requirements on the frequency of emergency exercises and drills. This was done in Rev. 3, § 8.5.4.2, and in the August 20 and October 29, 1984 letters (§ 8.5.4.1).

dd. Item 13.3.2.14(2) requested that the Plan indicate that the exercise scenario will be varied over a 5-year period to ensure testing of all major portions of the Plan, that the exercise will include public notification system testing, and that the exercise will be conducted under various weather conditions. This commitment was provided in Rev. 3, § 8.5.4.1.

ee. Item 13.3.2.14(3) called for the Plan to indicate that part of each communication drill will involve evaluating message understandability. This information was provided in Rev. 3, § 8.5.4.3, as supplemented by the August 20, 1984 letter.

ff. Item 13.3.2.15(1) requested the Plan to indicate that initial and annual retraining of emergency personnel will be provided. This information was provided in Rev. 3, § 8.1.3.

gg. Item 13.3.2.16(1) called for the Plan to specify that the Nuclear Safety Review Committee has no direct responsibility for emergency preparedness planning, to describe in more detail the Committee's scope of review, and to indicate that there are administrative means for correction of deficiencies. This was done in Rev. 3, § 8.2, as supplemented by the October 29, 1984 letter.

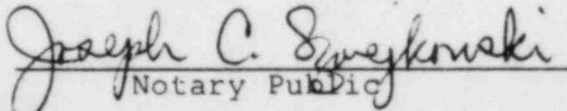
hh. Item 13.3.2.16(2) requested more description of the administrative procedures for revising the Plan and implementing procedures, including an indication that revised pages are dated and marked to show the changes. This information was provided in Rev. 3, § 8.2.

ii. Item 13.3.2.16(3) requests that Appendix F of the Plan be updated. Revision 3 of the Plan updated Appendix F.

5. In summary, CEI has responded to and has resolved (or is resolving) all the resolution items set forth by the NRC Staff in Supplement 4 to the Safety Evaluation Report, pages 13-1 to 13-22. These items are not uncorrected deficiencies in the PNPP Emergency Plan.


Daniel D. Hulbert

Subscribed to and sworn by me this 30th day of January, 1985.


Notary Public

JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio Guya. Ctv
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.

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 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

DUGAN 8502050679

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.

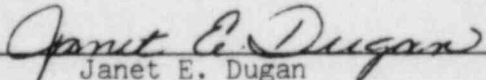
8. Finally, each of the offsite plans for the Perry EPZ includes a means for verifying that persons within the plume EPZ have received notification in an emergency. Prior to fuel

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:

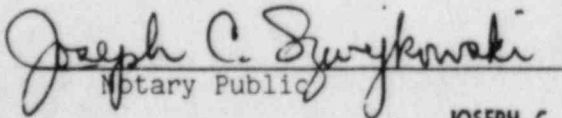
To show that you know about the emergency and you know what to do, put your green card in a window. Be sure it can be seen from the road. Or tie a towel to your front door or mailbox or to anything that can be seen from the road.

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 - Cuya. Cty

My Commission expires: ~~My~~ Commission Expires July 14, 1986

Jane 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

- 1981 - Present The Illuminating Company; Perry Nuclear Power Plant
Associate Governmental Affairs Representative
- Coordinates the preparation and relief process for the Evacuation Time Estimate Study being authored by HMI 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.

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

EDUCATION

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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.

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
DAVID R. GREEN
ON CONTENTION JJ

County of Lake)
) ss
State of Ohio)

David R. Green, being duly sworn, deposes and says:

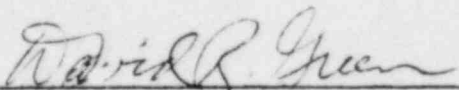
1. I am a Senior Project Engineer, Nuclear Engineering Department of The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. I am the head of Systems and Equipment Design in the Nuclear Design and Analysis Section and am responsible for all the electrical systems and the electrical technical support for the plant. 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.

D.R.G. 8502050763

2. Contention JJ states that the emergency plans do not provide for back-up power so that evacuation procedures and activities can be carried out. Sunflower Alliance's explanation of this contention argues that the emergency plans should address the availability of electrical power "to compensate for the loss of power from PNPP that would accompany an accident." Sunflower Alliance's Particularized Objections to Proposed Emergency Plans in Support of Issue No. 1, dated August 20, 1984, p. 17.

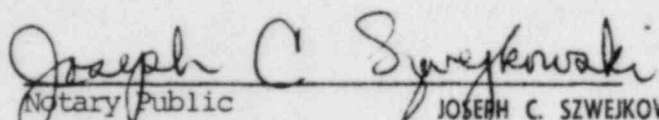
3. Sunflower's argument incorrectly assumes that an accident at Perry would cause a loss of power in the area surrounding the plant. The Final Safety Analysis Report, Section 8.2.2.2, addresses the availability of electrical power from the transmission system under the conditions that would accompany an accident, i.e., the loss of power from PNPP. As shown in the FSAR, load flow and stability studies show that a full load trip of both units or the tripping of one unit with the other online or offline will not impair the ability of the preferred source to provide power to the Class IE System. FSAR § 8.2.2.2. The "preferred source" mentioned in the FSAR is the offsite power from the transmission grid system. This power is available from generating stations other than PNPP through the transmission grid and distribution system. Therefore, sufficient power would be available in the area to "operate sirens, emergency-set traffic lights, independent radiation

monitoring equipment, gasoline pumps and the like" even if the Perry facility were to shut down because of an accident.



David R. Green

Subscribed and sworn before me
this 1st day of FEBRUARY, 1985



Notary Public JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio - Cuya. Cty.
My Commission Expires: My Commission Expires July 14, 1986

DAVID R. GREEN

PROFESSIONAL QUALIFICATIONS

My name is David R. Green. I am employed as a Senior Project Engineer in the Nuclear Engineering Department of The Cleveland Electric Illuminating Company. I have extensive and intensive experience in design, construction, startup, operations, maintenance, and electrical equipment failure diagnosis and repair engineering for both nuclear and fossil-fueled power plants. I also act as CEI's Rotating Electrical Machinery Specialist.

- EXPERIENCE - The Cleveland Electric Illuminating Company since 1955
- 1983-Present Senior Project Engineer; Electrical, Instrumentation and Control, Chemical, Environmental and Equipment Qualification, Nuclear Design and Analysis Section of the Nuclear Engineering Department.
- 1981-83 Senior Project Engineer, Engineering Unit, Nuclear Design Section of Nuclear Engineering Department - responsible for construction and startup support engineering (electrical and mechanical) for Perry Nuclear Power Plant. Also responsible to serve as CEI's Rotating Electrical Machinery Specialist.
- 1979-81 Senior Project Engineer, Electrical and Instrumentation and Control - responsible for electrical, instrumentation and control design for Perry Nuclear Power Plant.
- 1975-79 Senior Electrical Engineer - responsible for all electrical design for Perry Nuclear Power Plant.
- 1973-75 Project Electrical Engineer - responsible for electrical design construction and startup for Avon 10 and Eastlake 6 plants, both 35-MW gas turbine projects.
- 1968-72 Project Electrical Engineer - responsible for electrical engineering on all phases of Eastlake Plant, a 650-MW coal-fueled unit, including the direction of the electrical check, test and startup.
- 1969-71 Project Engineer - responsible for design, construction, startup on the world's first 345 KV SF6 Gas-Insulated Bus, installed at the Eastlake Plant.

1965-68

Project Electrical Engineer - participated in various engineering positions on the following projects: Avon 9 (a 650-MW fossil plant), Lakeshore 18, Avon 8, Ashtabula 5, and Eastlake 4 (all 250-MW coal-fueled plants).

Served as Plant Electrical Operator during two company strikes for periods totaling six months (1968 and 1973).

EDUCATION: B.S. Electrical Engineering, Case Institute of Technology, 1955.
Power Systems Engineering Course (9 months), General Electric, 1966-67.
Numerous seminars and short courses including General Electric BWR training.

REGISTRATION: Professional Engineer, Ohio, 1958.

SOCIETIES: IEEE Memberships include:
Rotating Machinery Committee, 1967-present.
Synchronous Machinery Subcommittee, 1967-present.
Working Group Chairman - Turbine Generator Shaft Stress, 1972-present.
Excitation Systems and Equipment - 1967-present.
Nuclear Power Engineering - Qualification Subcommittee, 1975-present.
Working Group Member, IEEE 649 Qualification of Motor Control Centers for Nuclear Plant Use, 1977-present.
Working Group Member, IEEE 323 Electrical Equipment Qualification for Nuclear Plants, 1975-78.
Liaison IEEE 387 Diesel-Generators for Nuclear Plant Use, 1980-present.

ANSI Memberships include:
Rotating Synchronous Machinery (C50.10-14).
Power Plant Motors (C50.19).

PUBLICATIONS: IEEE 62-970 - Proper Motor Application and Engineering Can Reduce Costs and Improve Reliability.
IEEE 70 CP 217 - Electrical Features of Avon Unit 9.
Electrical World - 1973, World's First 345 KV SF6 Bus.