#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## Before the Atomic Safety and Licensing Board

In the Matter of )	
LONG ISLAND LIGHTING COMPANY	Docket No 50-322-0L-3 (Emergency Planning Proceeding)
(Shoreham Nuclear Power ) Station, Unit 1)	

AFFIDAVIT OF THOMAS E. BALDWIN, JOSEPH H. KELLER ROGER B. KOWIESKI and PHILIP H. MCINTIRE

- 1. Our names are Thomas E. Baldwin, Joseph H. Keller, Roger B. Kowieski and Philip H. McIntire. We have appeared before the Atomic Safety and Licensing Board in the above captioned proceeding. Our professional qualifications and affilations appear in our pre-filed testimony following page 12,174 of the transcript of that proceeding.
- 2. Our affidavit is based on a review of the Affidavit of Elaine D. Robinson and the attachments thereto; NUREG 0654, FEMA REP-1, Rev. 1; on our previous testimony in this proceeding, and the review of the applicable sections of the Long Island Lighting Company, Local Offsite Radiological Emergency Response Plan, Transition Plan, Revision 4.
- 3. It should be noted that NUREG 0654, FEMA-REP-1, Rev. 1 contains two citations with regard to relocation centers, J.10.h and J.12. In emergency response plans the functions to be performed in a relocation center can be divided into two (2) principal functions:
- reception center functions including the registration, monitoring and decontamination of evacuees, if required
  - congregate care functions including the temporary housing, feeding and provisions for first aid of proven uncontaminated evacuees

The above two (2) functions can be co-located or may be conducted in separate facilities. Revision 4 of the LILCO Transition Plan states that these two functions are to be performed in the same facility (see page 4.2-1 lines 37-44). It is our understanding that during the hearing before the ASLB LILCO stated that these two functions were to be conducted at separate facilities. (Tr. ff 14, 707 at p. 15-16, Tr. 14, 779, 14, 801-802, 14, 812-14, 813).

- 4. The Nassau Veterans Memorial Coliseum is being offered as the sole reception center for use by LERO in the event of a radiological emergency at the Shoreham Nuclear Power Station.
- 5. Its distance from the Shoreham Nuclear Power Station does not preclude utilization of the Nassau Veterans Memorial Coliseum as a reception center.

- 6. Based upon an examination of the material submitted to FEMA the Nassau Veterans l'emprial Coliseum appears to be a suitable facility for LILO to use as a reception center. It has parking areas, showers and other emenities normally needed at reception centers.
- 7. Final approval of the Nassau Veterans Memorial Coliseum as a reception center would be contingent upon two (2) considerations:
  - details of the separation of the reception and congregate care functions must be incorporated within the LILCO Transition Plan and be reviewed and approved by the Regional Assistance Committee
  - an exercise must be held in which a demonstration of the reception center function can be evaluated.

Dated: February , 1985

Subscribed and sworn to before me a Notary Public by Thomas E. Baldwin. Hoth day of February, 1985.

otary Public ty commission expires:

MICHEL EVANUSA Hotary Public, State of New York No. 31-4523786 Qualified in New York County Commission Expires March 30, 1986

Joseph H. Keller

Subscribed and sworn to before me a Notary Public by Joseph H. Keller. day of February, 1985.

Notary Public My Commission expires:

Subscribed and sworn to before me a Notary Public by Roger B. Kowieski. 5th day of February, 1985.

thy Commission expires: MICHEL EVANUSA Notary Public, State of New York No. 31-4823786

Qualified in New York County Commission Expires March 30, 19.86

Subscribe and sworn to before me a Notary Public by Philip H. McIntire. This. 15th day of February, 1985

ty Commission expires:

MICHEL EVANUSA Notary Public, State of New York Qualified in New York County Commission Expires March 30, 198

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### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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### CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF/FEMA RESPONSE TO MEMORANDUM AND ORDER GRANTING LILCO'S MOTION TO REOPEN THE RECORD" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by a double asterisk by hand delivery or telecopier this 19th day of February, 1985.

Morton B. Margulies, Chairman\*\*
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Washington, D.C. 20555

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