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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Docket Nos. 50-440
50-441

AFFIDAVIT OF
MARIANTHE BOYD
ON CONTENTION B

County of Lake)
)
State of Ohio)

MARIANTHE BOYD, being duly sworn, deposes and says:

1. I am presently a Councilperson-at-Large for the City of Mentor, Ohio. My address is 6249 Brooks Blvd., Mentor, Ohio. Part of Mentor is included in the EPZ and is a corridor into which evacuees would flee. In my position I have councilmatic responsibilities involving an overview of road maintenance and enacting legislation affecting city road maintenance policy and equipment.

I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in support of Sunflowers Contention B.

2. There is an average of 6 feet of accumulated snowfall annually in Mentor and in some instances a 2 inch snowfall can be as hazardous as a 2 foot snowfall.

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3. During such snowfalls Mentor's 1984-1985 Snow & Ice Removal Manual acknowledges that congestion and heavy traffic tend to adversely affect the material spreader/plow equipment efficiency. Also, nowhere in that same manual does it mention any contingency plan for focusing our equipment on those roads which have been designated as evacuation routes out of the Perry EPZ if need arises.

4. In case this manual predated any planning by CEI officials, I recently contacted our appropriate city officials on this matter. They replied that they have not been approached about any weather evacuation problems of Perry's EPZ.

5. It has occurred just this month that during the recent adverse winter conditions we had used up our inventory of road salt and only 5 out of 14 snow vehicles were available for service. We have 177 miles of roadway and try to keep our roads clean and safe all the time but it is not always possible.

6. As a councilperson, I can recall no motion coming before Mentor City Council whereby our road equipment would be made available to augment the resources of any road department within the Perry EPZ. Our main obligation is to the people of Mentor. We have approximately 1,000 people of Mentor living within the Perry EPZ with only one two-lane road with no berm as a means of egress to the west. This road which crosses a swamp and is close to Lake Erie has caused serious problems in adverse weather.

Marianthe Boyd
MARIANTHE BOYD

Subscribed and sworn before me this 21st day of February, 1985.

Nancy A. Stumm
Notary Public

My commission expires: NANCY A. STUMM, Notary Public
STATE OF OHIO (Lake County)
My Commission Expires January 20, 1988