

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN) Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant))

AFFIDAVIT OF THOMAS I. HAWKINS IN SUPPORT
OF APPLICANTS' MOTION FOR SUMMARY DISPOSITION
OF CONTENTION EPJ-4(c)

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 EPJ-4(c).

2. Contention EPJ-4(c) contends:

Section E4d of State Procedures (p. 47) is deficient because --

In normal operation, each bus makes two runs each day. Thus, two round trips to the shelter sites would be required. (This factor was not considered in traffic control plans or evacuation time estimates.) Students who do not normally ride buses will be an extra burden, requiring even more round trips.

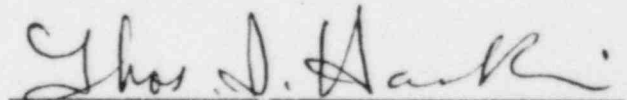
NUREG-0654, criterion J.10.g., requires that:

The organization's plans to implement protective measures for the plume exposure pathway shall include:

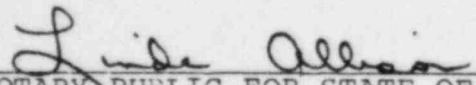
g. means of relocation;

The State Plan, Part I, E.4.a., E.4.b. (p. 46) does indeed include "means of relocation" and, therefore, complies with NUREG-0654.

Also, according to the affidavit of Jesse T. Pugh, III on EPJ-4(c) the evacuation of the schools within the Plant Harris EPZ would be accomplished in a single bus trip to the school evacuation shelters. FEMA staff has no reason to discount Mr. Pugh's statements regarding this contention.


Thomas I. Hawkins

Sworn to and subscribed before me this 1st day of February, 1985


NOTARY PUBLIC FOR STATE OF GEORGIA

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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NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

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

Docket Nos. 50-400 OL
50-401 OL

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

I hereby certify that copies of "NRC STAFF/FEMA RESPONSE IN SUPPORT OF APPLICANTS' MOTION FOR SUMMARY DISPOSITION OF CONTENTION EPJ-4(c)" 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 26th day of February, 1985:

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