

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CARCLINA 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 EDDLEMAN CONTENTION 30

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

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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 Eddleman Contention 30.

2. Eddleman Contention 30 states:

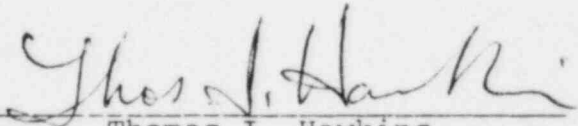
The plan's provisions (Part 1 pp. 49-50) for Potassium Iodide do not comply with the requirements of NUREG-0654 II.J.10.e. (pg. 63) that the plans must include "quantities" for persons whose "evacuation may be infeasible or very difficult" who are in the plume EPZ.

NUREG-0654, criterion J.10.e., requires that the ERP shall include: "Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution." (Emphasis added.)

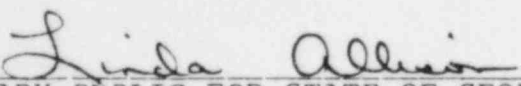
NUREG-0654 does not require that specific quantities of KI be listed in the plan but that provisions for the use, quantities and distribution be included in the plan. This is done on pages 48, 49, Part 1 of the ERP where the plan states that DHS will establish a "program to insure that a sufficient number of potassium iodide units are conveniently and strategically located in the vicinity of the Shearon Harris Plant." Succeeding paragraphs of the plan discuss the distribution of KI.

DHS's program will include a running inventory of quantities of KI on-hand and on-order and where those quantities are located. Since the quantities fluctuate, it would be misleading and/or cumbersome (because of necessary updating) to include those figures in the North Carolina Emergency Response Plan document per se.

FEMA and the RAC have determined that the ERP provisions fully
comply with NUREG-0654.


Thomas I. Hawkins

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


NOTARY PUBLIC FOR STATE OF GEORGIA

My Commission Expires: Notary Public, Georgia, State at Large
My Commission Expires Nov. 12, 1985

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

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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 EDDLEMAN CONTENTION 30" 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 27th day of February, 1985:

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Marjorie U. Rothschild

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