

January 14, 1985

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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)
MUNICIPAL POWER AGENCY)

Docket No. 50-400 OL

(Shearon Harris Nuclear Power)
Plant))

AFFIDAVIT OF JESSE T. PUGH, III
ON EPJ-4(d)

County of Wake)

State of North Carolina)

ss.

JESSE T. PUGH, III, being duly sworn, deposes and says:

1. I am the Director of the Division of Emergency Management of the North Carolina Department of Crime Control and Public Safety. In my position, I am responsible for the State's planning for and response to all emergencies, including accidents at any of the four nuclear plants that affect North Carolina. In that professional capacity, I have been involved in the development of the offsite emergency capability for the Shearon Harris plant as well as the Catawba, McGuire and Brunswick nuclear plants. Through the Division of Emergency Management, I have directed the State's response to more than 650 cases in the last year alone, including the tornadoes in

March and Hurricane Diana in September. A current statement of my professional qualifications and experience is attached hereto. My business address is 116 West Jones Street, Raleigh, North Carolina 27611. I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in response to EPJ Contention 4(d).

2. The purpose of this affidavit is to explain the basis for my confidence that parents of children in schools within the EPZ will cooperate with school emergency procedures and allow their children to be evacuated to school evacuation shelters, and to explain that -- even if parents did attempt to pick up their children at school -- the evacuation of schools would not be impeded.

3. The offsite emergency plans for Harris are designed to facilitate the expeditious evacuation of school children, directly from their schools within the EPZ to predesignated school evacuation shelters outside the EPZ. In the event of an emergency at the Harris plant, officials at the nine public schools within the EPZ would receive direct notification of the emergency from, respectively, the Wake County and Chatham County Superintendents' Offices. The Wake Chapel School, a private school in Fuquay-Varina, would receive direct notification of the emergency from the Fuquay-Varina Police Department. Due to the timing involved in the activation of the Alert and Notification System (the sirens and the Emergency

Broadcast System -- "EBS") used to notify the public at large,^{1/} warning and notification of school officials will precede (to some extent) public notification. In the event of an evacuation, school district officials estimate that busloads of school children would depart the school premises from 5 to 10 minutes after school notification (in those cases where the school buses and drivers are already on premises) and about 15 minutes after school notification (where the buses and/or drivers would arrive from a nearby school). Thus, school evacuation would be well underway -- perhaps even completed -- before parents could receive and react to notification of the emergency and travel to the schools.

4. The EBS announcements for broadcast in the event of an evacuation will advise parents of the evacuation of the schools and of the shelter to which each school's students have been evacuated. The EBS announcements also will emphasize that parents should not attempt to pick up their children at school, but rather should pick them up at the appropriate evacuation shelter outside the EPZ. The emergency public information brochure (for distribution throughout the EPZ prior to fuel load, and annually thereafter) will provide this same

^{1/} The emergency planning regulations and guidance authorize up to "about 15 minutes" for notification of the public at large (from the time of the decision to activate the public notification system.)

information about school evacuation, and will similarly instruct parents not to go to the schools to pick up their children. (See pages 1, 5, 8 and 9 of the brochure). Finally, although beyond what is required by NRC/FEMA regulations, a "school brochure" is being prepared for distribution through the schools within the Harris EPZ prior to fuel load and annually thereafter. This brochure will be modeled on the Catawba "school brochure," and -- again -- will provide information to parents and students about school evacuation plans, and will instruct parents not to attempt to pick up their children at school in the event of an emergency at Harris.^{2/}

5. In limited experience with early school dismissal due to "snow emergencies," some parents have picked up their children at school. However, that past experience has no applicability to an emergency at the Harris plant, since the TV and radio broadcasts notifying the public of early school dismissal due to weather conditions have never asked parents not to pick up their children at school. Provided that the EBS announcements broadcast at the time of an emergency at Harris

^{2/} To further inform interested parents about school evacuation procedures (and emergency planning for Harris in general), a comprehensive presentation is being planned for each of the Parent/Teacher Organizations in the EPZ. These presentations are scheduled for completion by Fall 1985.

advise parents of the school evacuation plans (including the evacuation destinations of their children), and instruct parents not to attempt to pick up their children at school, I believe that the number of parents who would fail to cooperate with school procedures would be insignificant.^{3/}

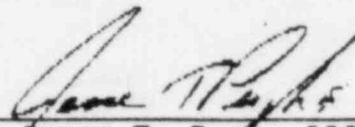
6. Nevertheless, even if parents ignored the information provided in the brochures and in the EBS broadcasts and did go to the schools to pick up their children in an emergency, school evacuation would not be seriously impeded. All the school campuses have multiple entrances and exits, and the entrances which parents normally use to pick up their children at school are separate from the bus exits from campus (which are either not accessible or not convenient to parent drivers, and with which parent drivers would generally be unfamiliar). Further, officials at each of the schools within the EPZ are prepared to provide trained traffic control personnel from their school staffs, to direct buses (and, in the case of the Wake Chapel School, the school staff vehicles carrying children) out of the loading area, and to prevent extraneous traffic from entering the loading area, if necessary, during an emergency. (Indeed, at a number of the schools, school personnel routinely provide traffic control when buses depart

^{3/} Should some parents arrive at the schools before their children are loaded onto buses and evacuated, school officials would release the parents' children to them.

at the end of the school day). If such traffic control is indicated at the time of an emergency, a maximum of two persons per school would be needed, for a very limited period of time (i.e., until the buses have departed the school campus).

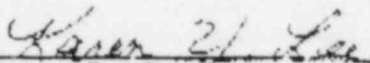
7. In summary, the offsite emergency plans for Harris are designed to facilitate the expeditious evacuation of school children. In the event of an emergency at Harris, school evacuation would be well underway -- perhaps even completed -- before parents could arrive at the schools to pick up their children. Because plans provide for the evacuation of children directly from their schools to predesignated school evacuation shelters outside the EPZ, EBS announcements would advise parents of the shelter to which each school's students had been evacuated, and would direct parents not to attempt to pick up their children at their schools within the EPZ. (This same information will be provided to parents in the brochures). Based on contacts with school authorities in the EPZ, I am confident that parents would cooperate with school procedures, provided that they have been informed of the arrangements made for their children's safety. Nevertheless, even if parents did attempt to pick up their children at school in an emergency, school evacuation would not be seriously impeded. Bus traffic is routed away from school campuses by separate exits which are not easily accessible to parent drivers. Moreover, officials at each of the schools are prepared to provide traffic control

to direct buses and other school evacuation vehicles out of the loading area, if necessary, during an emergency. Therefore, EPJ Contention 4(d) has no basis in fact.



Jesse T. Pugh, III

Sworn to and subscribed before me this 14th day of January, 1985.



Notary Public

My Commission expires:

12-27-89



JESSE THOMAS PUGH, III

Professional Qualifications

EDUCATION

Graduated Asheboro High School, Asheboro, North Carolina, 1965

North Carolina State University, Raleigh, North Carolina, 1969,
B.S., Textile Technology

Computer Application Certificate Program, NCSU, Spring 1982

Enrolled in Master of Public Administration Program, NCSU

Graduate, Government Executives Institute, University of North
Carolina, Chapel Hill, 1980

EMPLOYMENT

Area Coordinator, Division of Civil Preparedness, Asheboro, North
Carolina, July 1978 - May 1979. Responsible for 15-county area,
working with local coordinators and governmental officials in
preparing plans to prevent and/or respond to disasters, both
natural and man-made. Also responsible for arranging specialized
training for local volunteers and governmental employees.

Assistant Director, Division of Emergency Management, May 1979 -
May 1980, promoted to **Deputy Director** May 1980. Responsible for
daily operations of the Division. Supervise 53 employees,
administer budget of approximately \$2 million, managed grant
program to local governments, represent the State in business
transactions and in meetings with local and federal government.

Division Director, Division of Emergency Management, May 1982 to
present. Responsible for the State of North Carolina emergency
response and planning. This includes the coordination of all
emergency response activities of the 17 State agencies. Serve as
State Coordinating Officer and Governor's Authorized
Representative in all disaster related matters. In emergencies
serve as leader of the State Emergency Response Team.

MILITARY

United States Marine Corps, June 1969 - April 1982, highest rank:
First Lieutenant

TRAINING

Radiological Monitoring Instructor Course, August 1978

Basic Seminar for Civil Preparedness Personnel, September 1978

Civil Preparedness Career Development, Phase I, September 1978

Basic Radiological Defense Officer Course, September 1979

United State Coast Guard National Search and Rescue School,
Governor's Island, New York, March 1984.

PROFESSIONAL ORGANIZATIONS

North Carolina Emergency Management Association

National Coordinating Council on Emergency Management

National Association for Search and Rescue

National Emergency Management Association