

January 14, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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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 JESSE T. PUGH, III
ON WILSON 12(b)(3) AND EPJ-2

County of Wake)
) ss.
State of North Carolina)

JESSE T. PUGH, III, being duly sworn, deposes and says:
1. I am the Director of the Division of Emergency Management ("DEM") 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 Wilson Contention 12(b)(3) and EPJ Contention 2.

2. The purpose of this affidavit is to explain the measures being taken to provide transportation for those members of the general public who might need transportation assistance from emergency response officials in the event of an evacuation due to an emergency at the Harris plant.

3. The Harris "Safety Information" brochure (for distribution throughout the plume EPZ prior to fuel load, and annually thereafter) will include a special needs response card, to elicit information identifying persons who may need transportation assistance in an emergency. (A copy of the special needs card is appended hereto as "Attachment A"). Copies of the brochure (with the special needs card) will be supplied to area CP&L offices and electric membership cooperative offices for distribution to new customers. The brochure reminds people to return the completed cards, so that appropriate arrangements can be made in advance of an emergency. (See pages 5 and 8 of the brochure, appended hereto as "Attachment B"). The completed response cards will be analyzed by the four county emergency

management agencies. This information will serve as a basis for the counties' listings of persons needing official emergency transportation assistance, which will be updated to reflect each new special needs card as it is received.^{1/}

4. Detailed plans for official transportation assistance for Harris EPZ residents who may need such assistance are being developed by the Emergency Management Offices of Chatham, Harnett, Lee, and Wake Counties. The four county plans share two main common elements:

- * All public information will encourage the sharing of rides with persons without transportation. The brochure reminds people to share transportation with friends and relatives. (See page 5 of the brochure, in "Attachment B" hereto). Reminders will also be included in the EBS announcements broadcast at the time an evacuation is ordered, and in media releases disseminated to the public in an emergency.

- * "Pickup points" will be identified in the EBS announcements broadcast at the time an evacuation is ordered. An inventory of

^{1/} To facilitate the selection of pickup points for persons needing official transportation assistance, and to facilitate the development of Standard Operating Procedures, DEM will be making a separate mailing of the special needs card (without the brochure) to all EPZ residents prior to the first distribution of the brochure. A copy of that card is appended hereto as "Attachment C." Thereafter, special needs cards will be distributed in conjunction with the brochure.

potential pickup points is being developed as part of the Standard Operating Procedures in each county. The pickup points actually selected during an evacuation would depend on the area to be evacuated. No one within the EPZ will be more than one mile from a pickup point.

Specific elements of each county's planning for residents needing official transportation assistance are detailed below.

Chatham County

5. Chatham County EPZ residents who may need official transportation assistance will initially be identified by the special needs card. The list of individuals compiled from the completed "special needs cards" will be reviewed, and expanded (as appropriate), through meetings among County emergency management officials and the Chatham County Health Department, the Chatham County Department of Social Services, the Moncure Volunteer Fire Department, the North Chatham Volunteer Fire Department, and the East Chatham Rescue Squad. The list of persons needing official transportation assistance will be maintained at the Chatham County EOC, at the Chatham County Sheriff's Department, and at the North Chatham and Moncure Volunteer Fire Departments.

6. Should an evacuation be required, members of the North Chatham and Moncure Volunteer Fire Departments ("VED")

would use their private vehicles to pick up residents on the list of those needing official transportation assistance, and transport them to the nearest traffic control point outside the EPZ. Standard Operating Procedures now being developed will allocate a portion of the available vehicles to pick up people on this list; the remaining resources will be allocated to stop at pickup points, which are presently being designated by the Chatham County Emergency Management Department. However, pickup points will be used only as gathering places for persons who need official transportation assistance, but did not identify themselves prior to the emergency. All evacuees will be transported to traffic control points outside the EPZ. Agency personnel will continue to circulate among pickup points to assure that all evacuees have been provided with transportation. Members of the North Chatham and Moncure VFDs will commence picking up people requiring official transportation assistance as soon as they have completed their notification duties, or approximately 45 minutes after the order to evacuate. Approximately 40 private cars with VFD drivers have been identified and are available to fill this function in an emergency. The private cars would each accommodate three evacuees plus a driver, providing a total capacity of 120 evacuees.

7. At the traffic control points outside the EPZ, the evacuees would be transferred to school buses, vans or Sheriff's vehicles and evacuated to the appropriate shelter.

Chatham County has identified between five and ten school buses (driven by adult Chatham County school department employees) which would be available, if necessary, to fill this function in an emergency. Each school bus has a capacity of 60 persons plus the driver. These school buses, vans, and/or Sheriffs' vehicles, with drivers, would be made available as soon as they can be mobilized subsequent to the order to evacuate (within approximately 30 minutes). A bus, van, or Sheriffs' vehicle will circulate among traffic control points until it has been filled with evacuees, at which time it will proceed to the designated shelter. Another vehicle will then circulate among the traffic control points, and likewise continuing until filled, followed by additional vehicles as needed. I am confident that sufficient resources (vehicles and drivers) will be available to provide evacuation transportation for the estimated (maximum) 67 residents of the Chatham County portion of the EPZ who may need official transportation assistance. With the above resources, even assuming each vehicle is used only once (a conservative assumption), sufficient excess capacity exists to provide transportation for anyone who would normally have access to an automobile, but whose car is being repaired at the time or is temporarily inoperable, and other such cases.

Lee County

8. Lee County EPZ residents who may need official transportation assistance will initially be identified by the special needs card. The list of individuals compiled from the completed "special needs cards" will be reviewed, and expanded (as appropriate), through meetings among County emergency management officials and the Lee County Department of Social Services, the Deep River Fire Department, and the Cape Fear Fire Department. The list of persons needing official transportation assistance will be maintained at the Lee County EOC, and the Lee County Sheriff's Department.

9. In the event of an evacuation, those on the list of persons needing official transportation assistance will be picked up at their residences and transported directly from there to the appropriate shelters. Standard Operating Procedures now being developed will allocate a portion of the available vehicles to pick up people on the list; the remaining resources will be allocated to stop at pickup points, which are presently being designated by the Lee County Emergency Management Department. However, pickup points will be used only as gathering places for persons who need official transportation assistance, but did not identify themselves prior to the emergency. All evacuees will be transported directly to shelters. Agency vehicles will return to the EPZ and continue to circulate among pickup points to assure that all evacuees have been provided with transportation.

10. The Lee County Sheriff's Department will provide 12 vehicles with a capacity of 36 evacuees, for those people needing official transportation assistance. Personnel from the Sheriff's Department will be available within a maximum of 30 minutes of the order to evacuate. Backup for these vehicles is available from school buses maintained by the Lee County School System, which controls 82 school buses. (School buses made available for this purpose would be driven by adult drivers). I am confident that sufficient resources (vehicles and drivers) will be available to provide evacuation transportation for the estimated (maximum) 28 residents of the Lee County portion of the EPZ who may need official transportation assistance. With the Sheriff's cars discussed above, even assuming each vehicle is used only once (a conservative assumption), sufficient excess capacity exists to provide transportation for anyone who would normally have access to an automobile, but whose car is being repaired at the time or is temporarily inoperable, and other such cases.

Harnett County

11. Harnett County EPZ residents who may need official transportation assistance will be initially identified by the special needs card. The list of individuals compiled from the completed "special needs cards" will be reviewed, and expanded (as appropriate) in meetings with the Harnett County Department

of Social Services, and the Harnett County Health Department. The list of persons needing official transportation assistance will be maintained at the Harnett County EOC, the Harnett County Sheriff's Department, and the rescue squads and fire departments listed in paragraph 13.

12. Should an evacuation be required, people on the list of those needing official transportation assistance will be picked up at their residences and transported in fire department and rescue squad vehicles (driven by agency personnel) directly to the appropriate shelters. Standard Operating Procedures now being developed will allocate a portion of the available vehicles to pick up people on this list; the remaining resources will be allocated to stop at pickup points, which are presently being designated by the Harnett County Emergency Management Department. However, pickup points will be used only as gathering places for persons who need official transportation assistance, but did not identify themselves prior to the emergency. All evacuees will be transported directly to shelters. Agency vehicles will continue to circulate among pickup points to assure that all evacuees have been provided with transportation.

13. The sources and capacities of the vehicles which will be available to evacuate those needing official transportation assistance are: 2/

2/ In determining the numbers and capacities of available vehicles, the following assumptions were used: each rescue

(Continued next page)

	<u>Vehicles</u>	<u>Evacuee Capacity</u>
Angier Rescue Squad	1	4
Benhaven Rescue Squad	1	4
Boone Trail Rescue Squad	1	4
Coats Rescue Squad	1	4
Dunn Rescue Squad	1	4
Erwin Rescue Squad	1	4
Angier VFD	1	2
Buies Creek VFD	1	2
Boone Trail VFD	2	4
Coats VFD	2	4
Lillington VFD	1	2
Sumnerville VFD	1	2
Harnett County EMS	2	8

The above designated vehicles have a combined capacity of 48 evacuees. These vehicles will be available as soon as the agencies have mobilized after the order to evacuate. The mobilization time will not exceed a few minutes duration. I am confident that sufficient resources (vehicles and drivers) will be available to provide evacuation transportation for the estimated (maximum) 30 residents of the Harnett County portion of the EPZ who may need official transportation assistance. With the above resources, even assuming each vehicle is used only once (a conservative assumption), sufficient excess capacity

(Continued)

squad would reserve one of its vehicles for use in the event of a medical emergency, and each fire department would reserve at least two vehicles (one tanker and one pumper) for use in the event of a fire; for evacuation of nonambulatory persons, two ambulances from Angier Rescue Squad, one from Harnett County EMS, and one from the Coats Rescue Squad have been deducted from the list; and each ambulance can accommodate four ambulatory evacuees and other vehicles can accommodate two evacuees each.

exists to provide transportation for anyone who would normally have access to an automobile, but whose car is being repaired at the time or is temporarily inoperable, and other such cases.

Wake County

14. Wake County EPZ residents who may need official transportation assistance will be initially identified by the special needs cards. The list of individuals compiled from the completed "special needs cards" will be reviewed, and expanded (as appropriate) in meetings with the Wake County Department of Social Services, the Wake County Health Department, the rescue squads from Apex and Fuquay-Varina, and the Apex, Holly Springs and Fuquay-Varina Volunteer Fire Departments. The list of persons needing official transportation assistance will be maintained at the Wake County EOC, and the Wake County Sheriff's Department.

15. In the event of an evacuation, EBS announcements would instruct people needing official transportation assistance to proceed to the nearest pickup point.^{3/} Pickup points would serve as gathering places for persons on the list of people needing official transportation assistance, as well as for persons who need official transportation assistance, but did not identify themselves prior to the emergency. Emergency

^{3/} Pickup points are currently being designated by the Wake County Emergency Management Agency; this process will be completed after the people who may need official transportation assistance are identified through the special needs cards, as discussed above.

transportation would be provided from the pickup points to evacuation shelters outside the EPZ. Vehicles from the inventory of resources listed below will circulate among pickup points. As each vehicle becomes filled, it will proceed to a shelter. Other vehicles will continue to circulate among pickup points to assure that all evacuees have been provided with transportation.

16. Transportation would be provided by buses owned and operated by Carolina Trailways Company, and by vehicles leased, owned, and operated by Raleigh Transportation Services ("RTS"). Carolina Trailways would provide 10 buses (with drivers) for evacuation of persons needing official transportation assistance in an emergency. These buses, normally based in Raleigh, would be in the EPZ within one hour after notification to Carolina Trailways. Each bus has a capacity of 46 seated passengers (plus an additional 16 persons standing). RTS leases a fleet of 15 vehicles from Wake County, 12 of which would be available (with drivers) for evacuation of persons needing official transportation assistance in an emergency. Each of these 12 vans has a capacity for 15 passengers, and would be available within 20 minutes of notification. In addition, if needed, RTS would also provide five 40-passenger buses within 1 hour.

17. Backup for these vehicles is available from school buses maintained by the Wake County School System, which

controls over 500 school buses. (School buses made available for this purpose would be driven by adult drivers).

18. An estimated maximum of 430 people in Wake County may need official transportation assistance in an emergency. Between Carolina Trailways Company and RTS, a total of 32 vehicles with an aggregate capacity of 840 passengers would be available within one hour or less. Therefore, sufficient excess capacity exists to provide transportation for anyone who would normally have access to an automobile, but whose car is being repaired at the time or is temporarily inoperable, and other such cases. I am confident that sufficient resources (vehicles and drivers) will be available.

19. In summary, those members of the general public within the EPZ who may need official transportation assistance in the event of an evacuation are being identified in advance through "special needs cards." Detailed plans for official transportation assistance for the persons in the Harris EPZ who may need such assistance are being developed by the Emergency Management Offices of Chatham, Harnett, Lee, and Wake Counties. Pickup points are being designated, and will be identified in the EBS announcements. I am confident that, in an emergency, sufficient resources (vehicles and drivers) will be available to accommodate the estimated maximum number of EPZ residents who may need official transportation assistance, with

sufficient excess capacity to accomodate any individuals who normally have cars (which are being repaired at the time of the emergency), and other such cases. Thus, Wilson 12(b)(3) and EPJ-2 have no basis in fact.



Jesse T. Pugh, III

Sworn to and subscribed before me this 14 day of January, 1955



Notary Public



My Commission expires:

MY COMMISSION EXPIRES DECEMBER 30, 1957

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

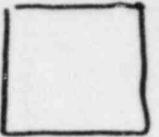
North Carolina Emergency Management Association

National Coordinating Council on Emergency Management

National Association for Search and Rescue

National Emergency Management Association

N. C. Division of Emergency Management
116 West Jones Street
Raleigh, N. C. 27611



Postage paid

Some people may need special help if there is an emergency at the Harris plant. If you, or someone you know, needs help to travel or has a physical problem, **please fill out this card and send it in now.** That way, officials can make plans to be ready to help.

Fill out only one card for yourself or each person who needs help. Please type or print clearly. If you want more cards, check the space below.

Name of person who needs help: _____

Home address (street or rural route) _____

City, County, ZIP Code _____

Telephone (include area code) Home _____ Work _____

Please check the reason or reasons that help is needed.

This person:

- Has no way to travel.
- Is deaf or hard of hearing
- Is blind or does not see well
- Uses a wheelchair
- Must stay in bed
- Requires a kidney machine or other support machine
- Has some other problem. What is it? _____

Please send me:

- More of these cards. Number needed: _____
- More copies of the booklet. Number needed: _____
- Some other information. Please say what it is.

Evacuate

What does it mean to **evacuate**? This means to move to a safe place more than 10 miles from the Harris plant. Do you need to **evacuate** as soon as you hear the sirens? No, some people may be told to evacuate, but not others.

How can you know if you need to **evacuate**? Your EBS station will tell you which sub-zones need to evacuate. If you have not yet turned to the map on page 6 and the chart on page 7, do so now. Figure out which sub-zone you live in and put the sub-zone number in the blank on page 1. Also, figure out your evacuation route and Evacuation Shelter. Put the route and Evacuation Shelter in the blanks on page 1.

What is the best way to travel in an evacuation? Use your own car, and take others if you can. Offer a ride to nearby friends and relatives who have no way to travel.

Should you get your children from school and take them to your Evacuation Shelter? No, if school is in session, your children will be taken by bus to an Evacuation Shelter. Do not try to pick up your children at school. This includes public, private and nursery schools. It also includes day care centers. You can pick children up at their Evacuation Shelter after you sign in at your own Evacuation Shelter. Look at the chart on page 9 to find out which Evacuation Shelter your children will go to. Put that information in the blank on page 1.

What is the best way to be sure your whole family knows what to do in an evacuation? Share the information about your sub-zone number, evacuation route, and Evacuation Shelter. You might be in different sub-zones at the time of an emergency. Plan ahead on a good place to meet that is more than 10 miles from the Harris plant. Be sure all members of your family know where that is.

What if you have a handicap, or have no way to travel? Read page 8 and send in the information card. You must send in this card ~~now~~ so plans can be made to help you if you need help.

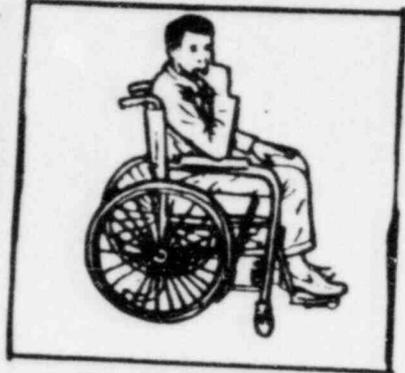
Now, what if your sub-zone is told to evacuate? Follow these steps.

- Stay calm. You will have time to evacuate.
- Turn off all water faucets and lights.
- Turn off all appliances except refrigerators and freezers.
- Pack these things to take with you.
 - This booklet
 - 2 blankets or a sleeping bag for each person
 - 2 sets of clothes for each person
 - Toilet articles and bath towels
 - Needed medicines
 - Baby needs
 - Some means of identification, such as a driver's license
 - Car registration
 - Credit cards, checkbook, and cash
 - Flashlight and batteries
 - Portable radio and batteries

- Shelter livestock and pets. Leave them food and water for two days. Or you may take pets with you if you do not plan to stay at the Evacuation Shelter. You may want to stay at a motel or with friends or relatives.
- Lock all windows and doors.
- Close car windows and vents. Leave air conditioning and heaters off.
- Stay tuned to an EBS station as you drive.
- Follow your evacuation route to your Evacuation Shelter.
- Sign in at your Evacuation Shelter. That way family and friends will know you are safe. Also, you can get checked for radiation and treated if needed. After you sign in, you may stay at the Evacuation Shelter. Or, you may stay at some other place more than 10 miles from the Harris plant.
- Listen to EBS stations for news about the emergency. Federal, state and local officials will be checking radiation levels. They will use the EBS stations to tell you when it is safe to go home.
- Plan to be gone from home for several days. If the evacuation lasts longer than that, you may be allowed to go home to feed pets and livestock. Tell officials if you need to care for livestock more often than that, so that they can help you.

Turn to the next two pages, with the map and chart, if you have not yet done that. These pages tell you how to figure out the sub-zone where you live. They also tell you the route to take to get to your Evacuation Shelter. Be sure you have that information in the blanks on page 1. If you want more information about travel in an evacuation, turn to page 8.

What About Those Who Need Special Help ?



What if you need help to travel because of a handicap? Fill out the card below and send it in **now**. That way officials can make special plans to drive you. If you know someone else who needs help, be a good friend and fill out the card for them. **Be sure to send the card in now.**



What if you are deaf or hard of hearing and cannot hear the sirens? Fill out the card below and send it in **now**. Officials can then make plans to let you know of a problem some other way. Be a friend to someone else who cannot hear and fill out the card for them. **Be sure to send the card in now.**



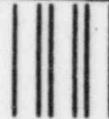
What if you have no way to ride? You may have no car, cannot drive, or cannot ride with someone else. In that case, fill out the card below and send it in **now**. Officials can then make plans for special places to pick you up. These places will be broadcast on EBS stations. **Be sure to send the card in now.**



What if you have children in school? Officials will take them by bus to Evacuation Shelters more than 10 miles from the plant. **Do not go to the school to pick up your children.** Children in day care centers and in public, private and nursery schools will be evacuated by bus to Evacuation Shelters. Look at page 9 to find out where your children will be taken. You can pick them up there after you sign in at your own Evacuation Shelter.



What if you have someone in a hospital? Or a nursing home or rest home? **Do not go to pick them up.** Officials will care for these people. Persons who **do not** need medical care would be taken to Evacuation Shelters for their sub-zones. Persons who **do** need medical care would be taken to hospitals more than 10 miles from the plant. Patients at Southern Wake Hospital will be taken to Wake Memorial Hospital in Raleigh.



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IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY CARD
FIRST CLASS PERMIT NO 56 RALEIGH, N. C.

Postage will be paid by addressee

N. C. Division of Emergency Management
Attn: SHNPP
116 W. Jones St.
Raleigh, N. C. 27611



In the unlikely event of an emergency at the Harris plant, some people might need special help. If you, or someone you know, needs help to travel or has a physical problem, **please fill out this card and send it in now**. That way, officials can make plans to be ready to help.

Fill out only one card for yourself or each person who needs help. Please type or print clearly. If you want more cards, check the space below.

Need more cards. How many? _____

Name of person who needs help: _____

Home address (street or rural route) _____

City, Zip Code _____

County _____

Telephone: Home _____ Work _____

Please check the reason or reasons that help is needed.

This person:

- Has no way to travel
- Is deaf or hard of hearing
- Is blind or does not see well
- Uses a wheelchair

- Must stay in bed
- Requires a kidney machine or other support machine
- Has some other problem. What is it?
