

DATE: February 1, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station,
Unit 1)

Docket No. 50-322-OL-3
(Emergency Planning)

AFFIDAVIT OF JAMES C. BARANSKI

STATE OF NEW YORK)
) SS:
COUNTY OF ALBANY)

James C. Baranski, being duly sworn, hereby states as follows:

1. I am a nuclear facilities specialist with the State of New York's Radiological Emergency Preparedness Group ("REPG"). I also hold the title of Exercise Director of REPG. As a result of my duties with REPG, I have become familiar with emergency planning regulations and requirements of the NRC and FEMA, and the emergency planning principles behind those regulations and requirements. A statement of my qualifications can be found in the OL-3 record as an attachment to New York State Exhibit 1 in the 1987 reception center proceeding, where I appeared as a witness, and in the OL-5 record as an attachment to New York State Exhibit 2 in the 1987 exercise proceeding, where I also

appeared as a witness.

2. I have read and am familiar with LILCO's Motion for Summary Disposition of Contentions 1, 2 and 9 -- Immateriality (December 18, 1987) (hereafter, "LILCO's Motion"), which seeks summary disposition of Contentions 1, 2 and 9 on grounds of "immateriality." The basis for LILCO's Motion is that it is immaterial whether LILCO is capable of implementing traffic control in the event of a radiological emergency requiring evacuation. LILCO supports this assertion with revised evacuation time estimates showing that there is a 35-minute difference between a "controlled" and an "uncontrolled" evacuation.

3. In my capacity as REPG's Exercise Director, I have become familiar with the radiological emergency preparedness plans for the nuclear plants in New York State at the Indian Point, Nine Mile Point and Ginna sites. None of these plans for nuclear plants in New York State lack traffic control capabilities.

4. There are many sound reasons for including traffic control capabilities in radiological emergency preparedness plans. One significant reason is that FEMA interprets NUREG-0654 as requiring that plans contain traffic control provisions. Specifically, FEMA relies on NUREG-0654 elements J.10.g and

J.10.j. A radiological emergency preparedness plan for a nuclear plant in New York State would not be approved by FEMA without satisfying these elements.

5. To demonstrate compliance with NUREG-0654 elements J.10.g and J.10.j, FEMA has required that at least one traffic control point be established in every exercise that I have been involved in in New York State. Further, as part of FEMA's exercise evaluation process, FEMA provides a "Field Activity Module" to the evaluators as guidance. In the section under "Traffic and Access Control," FEMA cites NUREG-0654 elements J.10.g and J.10.j and provides the following guidelines concerning satisfaction of these elements:

1. What traffic or access control point(s) did you observe?
2. At what time did emergency personnel arrive at the above location(s)?
3. Were personnel at each location:
 - familiar with the evacuation routes?
 - familiar with the location of reception/care centers?
 - able to communicate with the local (or State) EOC by radio?
 - able to communicate with personnel at other control points?
4. Did they periodically report in/get updates?
9. Were protective action areas changed in the course of the exercise?(e.g. because of wind shift)
10. If so, were access control personnel
 - informed?
 - reassigned?

Thus, FEMA interprets NUREG-0654 as not only requiring that plans

contain traffic control provisions, but that exercises of those plans demonstrate that traffic control can be implemented.

6. Besides being required by FEMA, there are other reasons why traffic control is one of the most basic elements of emergency planning and is necessary to implement the protective action of evacuation. Traffic control is important because emergency planners cannot predict precisely what circumstances will develop during an evacuation. Responses to unexpected events must necessarily be flexible. It would be unwise to anticipate that an evacuation will go so smoothly that traffic control is not necessary. For instance, as reflected in FEMA's Field Activity Module, traffic control personnel are critical to detecting bottlenecks, congestion, accidents and similar obstructions to the flow of traffic. Upon detection of such obstructions, personnel can: (1) take action themselves to ease or eliminate the obstruction; and/or (2) inform evacuation controllers of the obstruction so that methods can be considered for diverting the traffic around the obstruction and maintaining a smooth orderly flow.

7. There are many other circumstances in which traffic control would be necessary to implement an evacuation successfully. Adverse weather is one circumstance. The pertinent point, though, is that chaos could result if evacuees attempted to leave an EPZ without any direction from qualified

personnel.

8. The above facts and opinions are true and accurate to the best of my knowledge and belief. I am competent to testify to such facts and opinions and would so testify in any formal proceeding on this matter.

James C. Baranski
James C. Baranski

Sworn to and subscribed before me this 1ST day of February, 1988.

Richard J. Zahnleuter
Notary Public

RICHARD J. ZAHNLEUTER
Notary Public, State of New York
Qualified in ~~Albany County~~ Saratoga County
No. 476694B
Commission Expires March 30, 1989
Nov 30, 1988