

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
GEORGIA POWER COMPANY, et al. ) Docket No. 50-424  
(Vogtle Electric Generating ) 50-425  
Plant, Units 1 and 2) )

AFFIDAVIT OF FEMA EMERGENCY MANAGEMENT PROGRAM  
SPECIALIST CHERYL L. STOVALL IN SUPPORT OF AP-  
PLICANTS' MOTION FOR SUMMARY DISPOSITION OF  
JOINT INTERVENORS' CONTENTION EP-1/EP-1(a)/  
EP-2(b) (24 HOUR STAFFING REQUIREMENT OF BURKE  
COUNTY ENN LINK)

County of Fulton )  
 )  
State of Georgia )

Cheryl L. Stovall, 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 Georgia, Alabama, Florida and Tennessee. In this position, I am responsible for the review of radiological plans and preparedness for these States and for the local governments within these States.

I have held this position since December 1981. I have been employed by FEMA since June 1980. A current statement of my professional qualifications is attached hereto. My business address is 1371 Peachtree Street, N.E., Suite 706, Atlanta, Georgia 30309. I have personal knowledge of the matters discussed herein

and believe them to be true and correct.

2. I make this affidavit in response to contentions EP-1, EP-1(a), EP-2(b).

EP-1 contends:

Applicants fail to show that each principal response organization has the staff to respond and to augment its initial response on a continuous basis, as required by 10 CFR 50.47(b)(1).

EP-1(a) contends:

Applicants rely upon the Burke County Emergency Management Agency to coordinate emergency planning and operation activities. Applicants fail to note, however, that Burke County has no full-time emergency manager or office.

EP-2(b) contends:

[T]he Acting Director of Emergency Management of Richmond County, Pam Smith, states that she occasionally has difficulty contacting emergency personnel in Burke County due to the lack of a full-time emergency planner.

NUREG-0654/FEMA-REP-1-Rev. 1. Planning Standard A, Assignment of Responsibility, establishes the following planning standard:

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

This standard is measured by the following evaluation criteria:

- A.1.d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.
- A.1.e. Each organization shall provide for 24-hour-per-day emergency response, including 24-hour day manning of communications links.

- A.4. Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.

3. In response to EP-1, EP-1(a) and EP-2(b), the Burke County Radiological Emergency Plan addresses NUREG 0654 criteria A.1.d. on page number 34. The county plan identifies the EMA Director as the specific individual by title who shall be in charge of the emergency response. Information presented in the affidavit of Richard L. Bryant establishes in paragraph #1, that the EMA Director is a full-time paid position.

This position is described in Mr. Bryant's affidavit in Exhibit A, paragraph #2. "As Director, Mr. Bryant has responsibility for fire, rescue, and ambulance services on a county-wide basis, as well as responsibility for planning and implementing the response to the full range of natural and technical disasters potentially affecting Burke County".

From review of paragraph #5 of Mr. Bryant's affidavit, information is provided which establishes a "24-hour" dispatching system. This dispatch system will be consolidated for emergency response organizations and will be located in the Burke County Emergency Management Agency's Emergency Operations Center (EOC). Burke County will staff a central dispatcher's position to man the consolidated dispatching system on a 24-hour-per-day basis.

As required in NUREG 0654 criteria A.1.e. and A.4. the Burke County Plan, page number 50, Attachment F, Communications, states:

The Burke County Emergency Management Agency can be contacted 24-hours daily through one of the following means:

1. Telephone (404) 554-6666 (EMA EOC).
2. GEMA statewide radio network frequency on 45.56 MHz (EMA EOC).
3. Telephone (404) 554-2133 (Burke County Sheriff's Department).
4. Burke County Sheriff's Department/ICC radio network on frequency 154.905/154.935 MHz.
5. Emergency Notification Net (ENN) by Georgia Emergency Management Agency (GEMA) and Plant Vogtle officials (dedicated circuit).
6. Burke County Emergency Management Agency radio network on frequency 39.98 MHz by Plant Vogtle officials.

Further in Exhibit A of Mr. Bryant's affidavit, paragraph #3, states that as director "he supervises a paid staff of approximately 30 people as well as more than 50 volunteers".

Therefore I conclude from the Burke County Plan and Mr. Bryant's affidavit that Burke County does have adequate staff and a full time director to manage the emergency response operations that are necessary on a 24-hour-per-day basis.

4. Emergency Communications in NUREG 0654, Planning Standard F. requires that "Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public".

The emergency communications standard is measured by the following evaluation criteria:

- F.1. The communications plans for emergencies shall include organizational titles and alternatives for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be



compatible with one another. Each plan shall include:

- F.1. a. provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions;
- F.1. d. provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams;
- F.1. e. provision for alerting or activating emergency personnel in each response organization....

Emergency communications at a minimum require a telephone link and alternate to comply with NUREG 0654 criteria. As required in F.1, F.1.a., F.1.d., and F.1.e. personnel must provide 24-hour-per-day communications notification by a reliable primary and back-up system for communication with the licensee, local and State response organizations.

As discussed in Item #3 of this affidavit, staffing has been established which can adequately provide for a 24-hour-per-day capability for emergency response.

Equipment and communication systems to be used in emergency response have been identified in the Burke County Radiological Emergency Plan on page 50. The communications include:

1. Telephone (404) 554-6666 (EMA EOC).
2. GEMA statewide radio network frequency on 45.56 MHz (EMA EOC).
3. Telephone (404) 554-2133 (Burke County Sheriff's Department).
4. Burke County Sheriff's Department/ICC radio network on frequency 154.905/154.935 MHz.
5. Emergency Notification Net (ENN) by Georgia

- Emergency Management Agency (GEMA) and Plant Vogtle officials (dedicated circuit).
6. Burke County Emergency Management Agency radio network on frequency 39.98 MHz by Plant Vogtle officials.

The six identified systems provide redundant communications capabilities. In Mr. Bryant's affidavit, paragraph #3, he identifies "four means--one primary and three back-up means--by which Burke County could be notified of an emergency at Plant Vogtle.

On page 53 of the Burke County Plan the following notification procedures are established.

D. Notification Procedures

In the event of a radiological emergency at Plant Vogtle, the Georgia Power Company official designated as Emergency Director will be responsible for notifying state and local authorities utilizing the Emergency Notification Network (ENN) in accordance with Section E., Vogtle Electric Generating Plant Emergency Plan, Volume 1.

1. Should the ENN be inoperable, Burke County Emergency Operating Center will be notified at the following 24 hour a day telephone number: 404/554-6666.
2. In the event the above number cannot be reached, the Burke County Sheriff's Department will be notified at the following 24 hour a day telephone number: 404/554-2133.
3. The Burke County EMA radio network on frequency 39.98 MHz will serve as a backup channel between Plant Vogtle EOF and Burke County EOC.
4. The Burke County Emergency Management Agency's key staff, emergency workers and other emergency response personnel will be notified in accordance with procedures outlined in Section V., paragraph F, and Attachment C of this plan.

5. Burke County EMA will initiate request through GEMA for assistance from DOE Savannah River Plant and/or State of South Carolina relative to notification and warning of transient population along Savannah River.

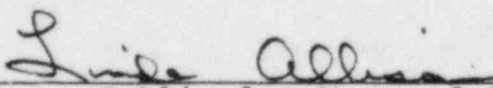
These procedures are also identified in affidavit submitted by Mr. Bryant in paragraph #4,5 and 6.

Given the established communications links, procedures are described in Mr. Bryant's affidavit paragraph #7 which establishes the authority to activate the Burke County Plan and what actions will be taken by the central dispatcher. "The central dispatcher will contact one of the following persons in succession: EMA Director, first Deputy EMA Director, second Deputy EMA Director, EMA Operations Officer and EMA Training Officer." Mr. Bryant further states, "the line of succession (as described above) will be included in the next revision of the Burke County Plan.

From information contained in the Burke County Plan and supporting affidavit submitted by Burke County EMA Director there are adequate links for communications and notification in the event of an emergency at Plant Vogtle.

  
CHERYL L. STOVALL

Sworn to and subscribed before me this 18th day of February 1986.

  
Notary Public for State of Georgia

My Commission Expires: Notary Public, Georgia, State at Large  
12, 1987

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
GEORGIA POWER COMPANY,	)	Docket Nos. 50-424
<u>et al.</u>	)	50-425
	)	(OL)
(Vogtle Electric Generating Plant,	)	
Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO 'APPLICANTS' MOTION FOR SUMMARY DISPOSITION OF JOINT INTERVENORS' CONTENTIONS EP-1/EP-1(a)/EP-2(b) (24-HOUR STAFFING OF BURKE COUNTY ENN LINK)" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 20th day of February, 1986.

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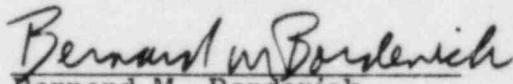
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