

August 31, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE DIRECTOR, OFFICE OF NUCLEAR REACTOR REGULATION

In the Matter of)
)
THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY,) Docket Nos. 50-440
et al.,) 50-441
) (10 C.F.R. § 2.206)
(Perry Nuclear Power)
Plant, Units 1 and 2))

THIRD AFFIDAVIT OF DANIEL D. HULBERT

County of Lake)
) ss.
State of Ohio)

DANIEL D. HULBERT, being duly sworn, deposes and says:

1. I am presently the Emergency Planning Supervisor, Perry Services Department, The Cleveland Electric Illuminating Company ("CEI"). My business address is 10 Center Road, Perry, Ohio 44081. In my position, I am responsible for developing, maintaining, and evaluating the emergency preparedness program for the Perry Nuclear Power Plant ("Perry"), including coordination with local, state and federal agencies to ensure the effectiveness of that program. I have been involved in emergency planning for Perry since 1980, and have been responsible for coordination of the exercises conducted at Perry.

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2. I have reviewed the Concerned Citizens' July 25, 1988 letter to the NRC, as well as the FEMA and EPA documents referenced in that letter. I have prepared this affidavit in response to the Concerned Citizens' letter, supplementing my affidavits of March 8, 1988 and August 2, 1988. I have personal knowledge of the matters stated herein and believe them to be true and correct.

3. FEMA expressed concerns about the use of receiving schools in a February 26, 1988 memorandum to the NRC, which was supplemented by a second memorandum to the NRC dated April 19, 1988. In subsequent discussions with the NRC and with counsel for Licensees, FEMA clarified that its concern is not with either the concept of receiving schools or with the location of those schools. Rather, FEMA is concerned that existing emergency plans do not expressly provide for the monitoring and decontamination of evacuating school children who may have been exposed to a passing plume and therefore may be contaminated. To resolve this concern, the county plans will be revised to clearly indicate that any evacuating school children who have been potentially exposed (and therefore potentially contaminated) will be promptly monitored, and decontaminated if necessary. In some cases, these students would be re-routed to a Care Center for monitoring and decontamination. In other cases, available monitoring/decontamination teams would be deployed to the appropriate receiving school(s) to accomplish the task there. In addition,

the EBS Standard Operating Procedure ("SOP") will be revised to ensure that parents would be promptly advised at the time of an emergency if any school children were being routed to a Care Center rather than to their designated receiving school. The changes to the plans and to the EBS SOP will be completed by the end of September 1988, with any related changes to other procedures completed during the fall/winter season. FEMA officials have advised counsel for Licensees that these actions resolve FEMA's concern.

4. The present system for provision of emergency information to transients in the Perry area includes the posting of signs in recreation areas frequented by transients. FEMA recognized that the signs already had been posted in Geauga County, but expressed concern that Lake County and Ashtabula County had planned to post their signs at the time of an emergency. In response to FEMA's concern, the posting of the signs in state, county and municipal parks, at public campgrounds, at scout and church camps, and at public beaches and marinas was completed in the Spring of 1988. Through spot checks in early June, FEMA Region V representatives have confirmed that the emergency information signs have been posted.

5. To enhance existing public education efforts, the Ohio Emergency Management Agency is hiring an additional Public Information Officer ("PIO"). As recommended by the State's

Emergency Evacuation Review Team, this new PIO will develop additional methods of increasing the awareness of emergency information among those with disabilities.

5. The development of the 1989 Calendar will include consideration of other FEMA recommendations, specifically those on the subjects of:

- (a) The identification of Perry as a nuclear plant;
- (b) The inclusion of the names, addresses and phone numbers of the emergency management agencies in the introductory letter;
- (c) The typography and graphic design of the list of 24-hour radio and TV stations;
- (d) The degree of emphasis on the utility of portable radios in an emergency;
- (e) The inclusion of additional text describing the characteristics of radioactive material in the plant and the potential health effects of a large release;
- (f) The clarification of the text on page 6 of the 1988 Calendar, to indicate that evacuees may stay with friends or family outside the EPZ, or at a Care Center;
- (g) The inclusion of a statement explaining how persons can learn the location of evacuated hospital and nursing home patients;
- (h) The wording of the discussion of care for livestock in an emergency; and
- (i) The format of the map of the Emergency Planning Zone.

6. In the spirit of accommodation, the last paragraph of the section of the 1988 Calendar entitled "Sources of Radiation" will be deleted in the 1989 Calendar, and will be replaced with the following text:

Radiation levels at nuclear plants are checked constantly. The law limits levels released from a plant. If you would like more information on radiation, write to The Illuminating Company, Perry Plant, Community Relations Section, P.O. Box 97, Perry, Ohio 44081.

7. The Special Needs Information Card for inclusion with the 1989 Calendar will be revised to clarify that responses are necessary only from those whose physical or mental disabilities would necessitate special assistance in an emergency.

8. Licensees historically have made all reasonable good faith efforts to provide pre-emergency public information to area businesses and to encourage them in turn to make that information available to transients. For example, Licensees distributed supplies of the 1988 Calendar to motels throughout the EPZ (for placement in guest rooms), and supplied motel operators with copies of emergency information telephone directory insert (for posting in directories in guest rooms). While the proprietors of private businesses cannot be forced to make such information available to transients, Licensees and local officials will continue their efforts in this area.

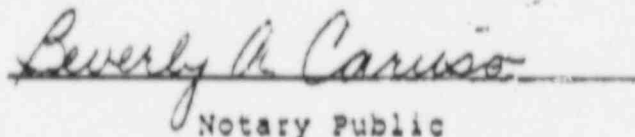
9. CEI's internal procedures have been formalized to ensure coordination between the utility and the various telephone companies so that emergency public information is not omitted from future editions of the phone directories. Indeed, the 1988-89 Ohio Bell directory for the Painesville area has been distributed, and it includes the two pages of emergency information.

10. None of the issues raised in the Concerned Citizens' letter raises a substantial health and safety issue or calls into question the adequacy of emergency planning for the Perry area.



Daniel D. Hulbert

Sworn to and subscribed before me this 31st day of August, 1988.



Notary Public

My Commission expires:

BEVERLY A. CARUSO, NOTARY PUBLIC
STATE OF OHIO
MY COMMISSION EXPIRES FEB. 11, 1990

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensees' Answer To Concerned Citizens' Letter Regarding FEMA Memoranda on § 2.206 Petition" were served this 31st day of August, 1988, by deposit in the U.S. mail, first class, postage prepaid, to the following persons:

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Delissa A. Ridgway