

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'86 MAR -5 P12:03

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

OFFICE OF TECHNICAL  
DOCKETING & SERVICE  
BRANCH

AFFIDAVIT OF FEMA EMERGENCY MANAGEMENT PROGRAM  
SPECIALIST CHERYL L. STOVALL IN SUPPORT OF AP-  
PLICANTS' MOTION FOR SUMMARY DISPOSITION OF  
EP-7 (EMERGENCY PLANNING IN SOUTH CAROLINA)

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 contention EP-7.

EP-7 contends:

Applicants claim that the Department of Energy (Savannah River Plant Operations Office, Aiken, South Carolina) will provide radiological assistance (advise and emergency action essential for the control of immediate hazards to health and safety) in the event of an emergency at Vogtle. It fails to address the possibility that an emergency situation (for example, an earthquake) which threatens the safe operation of Vogtle might also endanger operations at Savannah River Plant. In this event, not only would Department of Energy Offices be prevented from providing aid to Vogtle, other federal, state and local assistance resources would be divided between the two sites. Applicants do not address the impacts of simultaneous evacuation from both plants, or overload of medical facilities and emergency vehicles in the event of injury to persons by the operation of both plants. Nor do Applicants adequately discuss coordination of activities of Georgia and South Carolina's agencies.

I have also reviewed the Board's Memorandum and Order of October 1, 1985 (Ruling on Applicants' Motion of September 5, 1985 for Reconsideration and Clarification) in which the Board states:

We find that the litigible issue extant in EP-7 is Applicants' alleged failure to provide an emergency response plan for the VEGP which encompasses that part of the plume EPZ within South Carolina.

3. In addition, I have reviewed the following documents in preparation for this affidavit:

- a) Applicants' Motion for Summary Disposition of Joint Intervenors' Contention EP-7 (Emergency Planning in South Carolina).

- b) Applicants' Statement of Material Facts As To Which No Genuine Issue Exists To Be Heard Regarding Contention EP-7. (Emergency Planning in South Carolina).
- c) Affidavit of Jean M. Diluzio on Contention EP-7.

4. The plume EPZ for VEGP in South Carolina includes parts of three counties. Most of the area in South Carolina is within the bounds of the Savannah River Plant, owned by the Department of Energy. The remaining area out to the 10-mile radius in Aiken, Allendale, and Barnwell Counties is identified as part of the plume EPZ for VEGP.

5. The Natural and Technological Hazards Division, Federal Emergency Management Agency, Region IV received the following plans on February 7, 1986 from the South Carolina Emergency Management Agency:

- a) VEGP Site Specific Radiological Emergency Response Plan - Part 7, South Carolina Operational Radiological Emergency Response Plan (SCORERP).
- b) Fixed Nuclear Facility Radiological Emergency Response Plan - Annex Q, Part 2, to the Aiken County Emergency Operations Plan.
- c) Fixed Nuclear Facility Radiological Emergency Response Plan - Annex Q, Part 2, to the Allendale County Emergency Operations Plan.
- d) Fixed Nuclear Facility Radiological Emergency Response Plan - Annex Q, Part 2, to the Barnwell County Emergency Operations Plan.

In the same Office on February 20, 1986, the following plan was received from the Department of Energy, Savannah River Operations Office:

Vogtle Electric Generating Plant, Response  
Guide, SR 402.1, U.S. Department of Energy,  
Savannah River Operations Office.

6. Based on the submission of the plans mentioned in paragraph five of this affidavit and the review of documents identified in paragraphs two and three, I conclude that no material issue of fact remains.

Cheryl L. Stovall  
CHERYL L. STOVALL

Sworn to and subscribed before me this 27<sup>th</sup> day of February,  
1986.

Linda Allen  
Notary Public for State of Georgia

My Commission Expires: Notary Public (Georgia State Seal) My Commission Expires Nov. 12, 1989

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF RESPONSE TO 'APPLICANTS' MOTION FOR SUMMARY DISPOSITION OF JOINT INTERVENORS' CONTENTION EP-7 (EMERGENCY PLANNING IN SOUTH CAROLINA)" 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 3rd day of March, 1986.

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