

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-5
) (EP Exercise)
)

AFFIDAVIT OF ROBERT S. WILKERSON

1. My name is Robert S. Wilkerson. I currently serve as the Chief of the Technological Hazards Division, State and Local Programs & Support Directorate, of the Federal Emergency Management Agency.
2. I have personally reviewed the October 3, 1986, PREHEARING CONFERENCE ORDER (Ruling on Contentions and Establishing Discovery Schedule) and believe that it would fundamentally change the ongoing exercise planning and exercise process for off site safety considerations at commercial nuclear power generating sites throughout the country. This process, since 1979, has been thoroughly integrated into both the initial and continuing license process for such plants.
3. Contentions on exercise design, scenario development, scope, and conduct to the extent that they deviate from the exercise results on the day of the

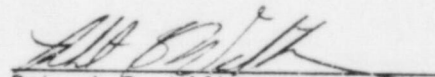
exercise are not relevant to the protection of health and safety around the plant. Only the designed event, the exercise and its results, provide insight into the adequacy of the emergency preparedness plan and process. Deviations from scenario design or exercise conduct, even if demonstrated, do not in and of themselves render exercise results meaningless. In most exercises, free play and unplanned interaction among players provides a critical realism to the simulation of what is at best an unpredictable environment. It is the application and modification of procedures in a "real" environment that the evaluation process hopes to capture.

4. FEMA does not use the term "Fundamental Flaw" in its regulations or guidance concerning off site emergency preparedness. FEMA does use the terms "Deficiency" and "Area Requiring Corrective Actions" for exercises and uses the term "Inadequacy" for plans. The Nuclear Regulatory Commission is fully aware and has concurred in the methodology and terminology used in our evaluation and review process. They have in fact accepted the process in both initial licensing actions and even more numerous actions for operating plants since the involvement of FEMA. The purpose of the exercise program is to test features of the plan that FEMA, in its discretion, and with NRC staff concurrence, determines are the most relevant to evaluation of the emergency preparedness process. This does not mean that every element of every plan must be tested in every exercise. Rather, over a continuous cycle, beginning with the qualifying exercise, various exercise objectives are reflected in scenarios that realistically tax policy implementation and personnel carrying it out in an emergency. Inherent in the exercise cycle is the FEMA goal of evaluating reasonable assurance. Reasonable assurance is the totality of trained individuals, systems and policy that can interact as opposed to statistical

assurance that particular components are available. This process evaluation stresses flexible emergency response because of the inherent unpredictability of emergencies.

5. The October 3, 1986 Order reflects substantive misunderstanding of the exercise evaluation process and fails to reflect the past acceptance by the Nuclear Regulatory Commission of the current framework. This exercise litigation is for the sole purpose of documenting the exercise involving a simulated possible emergency at Shoreham and responses to it. FEMA did not issue a finding concerning the exercise but did issue an exercise assessment that reflects the official FEMA action on the exercise.

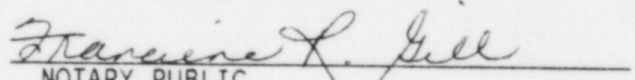
6. I hereby declare under penalty of perjury that the foregoing is true and correct.


Robert S. Wilkerson

District of Columbia

City of Washington

Subscribed and sworn to before me this 27th day of October, 1986.


NOTARY PUBLIC

My Commission expires 3/14, 1987

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE

Docket No. 50-322-005-NCH
(EP Exercise)

CERTIFICATE OF SERVICE

I hereby certify that copies of "FEDERAL EMERGENCY MANAGEMENT AGENCY'S MOTION TO RECONSIDER ATOMIC SAFETY AND LICENSING BOARD PREHEARING CONFERENCE ORDER DATED OCTOBER 3, 1986, AND MEMORANDUM AND SUPPORTING AFFIDAVIT IN SUPPORT OF THAT MOTION" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by a double asterisk by messenger, this 27th day of October, 1986:

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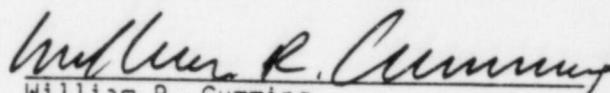
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