

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL
(Shoreham Nuclear Power Station,)	(Emergency Planning -
Unit 1))	Phase I)

LILCO'S MOTION FOR SUMMARY DISPOSITION
OF THE TRAFFIC CONGESTION ISSUES,
EP 2(B) AND 5(B), AND THE AUGMENTATION OF
ONSITE STAFF ISSUES, EP 5(B) AND 7(B)

I. Introduction: Contentions and Legal Standards

LILCO hereby moves, pursuant to 10 C.F.R. § 2.749, for summary disposition of the Phase I emergency planning contentions having to do with traffic congestion, EP 2(B) and 5(B), and onsite augmentation, EP 5(B) and 7(B).^{1/} Attached to this motion are a "Statement of Material Facts as to Which There Is No Genuine Issue To Be Heard on Contentions EP 2(B), 5(B), and 7(B)" (Attachment 1) and affidavits by Messrs.

^{1/} The Board has said that motions for summary disposition should be filed at the same time as motions to strike testimony. See the transcript of November 2, 1982 at Tr. 12,581.

DiMascio, Lieberman, and Blauer supporting that statement (Attachments 2, 3, and 9).

The contentions and applicable legal standards are as follows:

EP 2(B): MEDICAL AND PUBLIC HEALTH SUPPORT
(SC, joined by NSC and SOC)

B. Furthermore, LILCO has failed to adequately demonstrate that ground transportation (Plan at 6-16) is adequate for conveyance of contaminated injured individuals to Central Suffolk Hospital under the congested traffic or radiological conditions that are likely to exist during a radiological emergency. Thus, LILCO has failed to satisfy 10 CFR. §50.47(b)(12), 10 CFR Part 50, Appendix E, Item IV.E.6, and NUREG 0654, Item II.L.4.

The legal standards for EP 2(B) are that "[a]rrangements are made for medical services for contaminated injured individuals" (10 C.F.R. § 50.47(b)(12)); that "[a]dequate provisions shall be made and described for emergency facilities and equipment, including . . . [a]rrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary" (10 C.F.R. Part 50, Appendix E, Item IV.E.6); and that "[e]ach organization shall arrange for transporting victims of radiological accidents to medical support facilities" (NUREG-0654, Rev. 1, Item II.L.4).

EP5: OFFSITE RESPONSE ORGANIZATION
AND ONSITE RESPONSE AUGMENTATION
(SC, joined by NSC and SOC)

Suffolk County contends that LILCO has failed to provide reasonable assurance that onsite assistance from offsite agencies will be forthcoming in the event of a radiological emergency at the Shoreham site (see, e.g., Plan at 5-8 and 6-15). LILCO has therefore not met the requirements of 10 CFR §§50.47(b)(1), (2), (3), (8), (12) and (15), 10 CFR Part 50, Appendix E, Item A, and NUREG 0654. In addition, LILCO has not demonstrated adequately that it will be able to augment its onsite emergency response staff in a timely manner (see Plan, Ch. 5). LILCO has also, therefore, failed to meet the requirements of 10 CFR §50.47(b)(1) and (2). Thus:

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B. LILCO has not adequately demonstrated the possible effects of traffic congestion during evacuation of the population upon the ability of offsite personnel and/or onsite augmenting personnel to respond promptly to the Shoreham site.

The standards and criteria cited in contention EP 5 are §§ 50.47(b)(1), (2), (3), (8), (12), and (15); Appendix E, Item II.A; and NUREG-0654. These regulations and guidelines (except NUREG-0654, which is too lengthy to include) are Attachment 4 to this motion.

EP 7: ONSITE RESPONSE ORGANIZATION
(SC, joined by NSC and SOC)

Suffolk County contends that LILCO has not satisfactorily delineated the responsibilities of LILCO response personnel, nor has it demonstrated adequately that it will be able to augment

its emergency response staff in a timely manner. Thus, LILCO's emergency response plan is not in compliance with 10 CFR §§50.47(b)(1)(2)(3) and (8), 10 CFR Part 50, Appendix E, Items A and C, and NUREG 0654, Items II.A, B, C and H for the following reasons:

- B. Table 5-1 does not clearly demonstrate LILCO's ability to augment its staff within 30 minutes of declaration of an emergency and is not in compliance with Table B-1 of NUREG 0654.

The guideline for EP 7(B) is Table B-1 in NUREG-0654 (Attachment 5 to this motion).

Summary disposition is governed by 10 CFR § 2.749. The standard that LILCO must meet is to show that there is no "genuine issue of fact" with respect to all or part of a contention. Summary disposition has been viewed with approval by the Appeal Board as "an efficacious means of avoiding unnecessary and possibly time-consuming hearings on demonstrably insubstantial issues," Wisconsin Electric Power Company (Point Beach Nuclear Plant, Unit 1), ALAB-696, 16 NRC ____ (Oct. 1, 1982) (slip op. at 32), citing Houston Lighting and Power Co. (Allens Creek Generating Station, Unit 1), ALAB-590, 11 NRC 542, 550 (1980).^{2/}

^{2/} See also the Statement of Policy on Conduct of Licensing Proceedings, CLI-81-8, 13 NRC 452, 457 (1981) ("[B]oards should encourage the parties to invoke the summary disposition procedure on issues where there is no genuine issue of material fact so that evidentiary hearing time is not unnecessarily devoted to such issues.")

The basis for this motion for summary disposition is that the material facts needed to decide these three contentions are relatively simple and, we believe, largely undisputed. The effect of other traffic on the emergency vehicles can indeed be a complicated subject involving computer models. LILCO's consultant KLD has such a model, and so has the County's consultant Mr. Kanen (see Direct Testimony of Andrew C. Kanen on Behalf of Suffolk County, Regarding Contentions EP 2B and EP 5B at 12, referring to computer simulations of traffic conditions).

But these details need not be litigated to resolve the Phase I issues, for the following reasons. First, most of the travel of emergency vehicles is toward the plant, while the evacuating public would move away; that is, emergency vehicles would be on one side of the road traveling toward the plant while evacuating vehicles would be on the other side moving away from the plant (the "counterflow" idea);^{3/} Second, most

^{3/} To be sure, the County's witness foresees two ways in which traffic toward the plant could be delayed. One is the slowdown of traffic toward the station caused by checkpoints at a perimeter; the other is the effect of people returning home before evacuating. In short, Mr. Kanen's testimony predicts congestion if (1) emergency vehicles travel to the site during a brief "window" of time after the working public has been notified and starts for home but before most people have reached home and turned around to evacuate or (2) emergency vehicles come from outside the evacuation area after police have set up a perimeter and traffic has started to back up. But even accepting these scenarios, the delay envisioned by Mr. Kanen is immaterial, as we show in sections III, V, and VI below.

of the emergency personnel (LILCO personnel and the police, certainly) would be notified and head for the plant well before evacuation of the public was underway. Third, even if the predicted congestion in the County's testimony is accepted without question, the delays it would cause are immaterial -- they do not cause LILCO to fall out of compliance with the NRC requirements.

This third point is the most important. There is simply no indication in the NRC regulations that traffic congestion that might slow down emergency vehicles renders an applicant's emergency planning arrangements unacceptable. The legal standards cited by the County are that arrangements (or "adequate", arrangements) have been made (10 C.F.R. § 50.47(b)(12); 10 C.F.R. Part 50, App. E, IV.E.6; NUREG-0654, Rev. 1, II.L.4), that responsibilities of local organizations have been assigned and established (10 C.F.R. § 50.47(b)(1)), that timely augmentation of response capabilities is available (10 C.F.R. § 50.47(b)(2)), that arrangements for effectively using assistance resources have been made (10 C.F.R. § 50.47(b)(3)), and that offsite organizations for coping with emergencies have been described (10 C.F.R. Part 50, App. E, II.A). LILCO has done these things. At some point, it is true, a showing of traffic congestion might be capable of demonstrating that the applicant's arrangements are not (for example) "adequate" (if

traffic congestion were shown to prevent vehicles from getting to a site altogether, for example), but the County's evidence is not of that sort. Even accepting the traffic congestion predicted by the County's witness as correct, the congestion is simply too short in duration or too late in getting started to make a material difference, as we shall point out in the sections of this motion that follow.

II. Ambulances going to the plant

For the Shoreham Station, ambulances are supplied by local volunteer fire departments. LILCO's agreement for ambulance service is with the Wading River Fire Department (1),4/ which is about a mile and a half from the Shoreham Station through a rural area (3,4). If Wading River could not respond, other volunteer fire departments party to the Mutual Aid Agreement are available (9). Ambulances traveling to the plant from Wading River (or any other fire department) would be traveling counter to the flow of evacuating traffic, which would be moving away from the plant (5). If no ambulance could get to the plant at all, an injured person could be put into a station vehicle and driven to the hospital by a LILCO employee (10).

4/ Numbers in parentheses refer to the numbered "material facts" in Attachment 1 to this motion.

III. Ambulances going from the plant to
Central Suffolk Hospital

LILCO's emergency plan calls for contaminated injured people to be taken from the site to Central Suffolk Hospital, about 10 miles southeast of Shoreham along a route about 12 miles long (11, 12, 14). The preferable route is eastbound along North Country Road and Sound Avenue to Roanoke Avenue, then south along Roanoke Avenue to the hospital (13). This route is not a major evacuation route (15).

Suffolk County's witness Mr. Kanen testifies that congestion would begin to have a significant impact on travel of emergency vehicles from the Shoreham Station to Central Suffolk Hospital approximately one to one-and-a-half hours after public notification and that the delay likely to be experienced by a single vehicle could range from 15 minutes to one hour of congestion time (Direct Testimony of Andrew C. Kanen on Behalf of Suffolk County, Regarding Contentions EP 2B and EP 5B at 14-15).

This testimony appears to say, then, that the trip to the hospital could take as long as one hour plus the ordinary travel time for the 12-mile trip. LILCO submits that there is no requirement that an applicant show that ambulances must be able to get to the designated hospital quicker than that; even if it is true that the delay would be one hour, LILCO still

would have complied with the regulations. Therefore, on the basis of the County's own testimony, LILCO believes it is entitled to summary disposition on this issue.^{5/}

IV. Fire trucks going to the plant

The same considerations that govern ambulances going to the plant (except for the use of onsite vehicles as a last resort) govern fire trucks, since both types of vehicles are supplied by the Wading River Fire Department a mile and a half from the plant or, barring that, by other fire departments party to the Mutual Aid Agreement (22).

V. Police cars going to the plant

LILCO procedure SP 69.009.01, "Notifications," requires that the Suffolk County EOC and the Suffolk County police headquarters be notified within 15 minutes of the declaration of an emergency (23),^{6/} well before the onset of any

^{5/} The County is apparently contending in contention EP 2(A)(1) that Central Suffolk Hospital is too close to the Shoreham Station and in EP 2(B) that it will take too long to get to that hospital. Choosing a hospital farther away would, of course, only aggravate any delay in getting to the hospital.

^{6/} Presumably police headquarters would radio mobile police units to respond to the site, and the mobile units closest to the site would be assigned to respond. But this is beyond LILCO's control, and we do not know whether the County will dispute it.

congestion. Also, these police units would be traveling toward the station, whereas evacuating traffic would be traveling away from the station (24). Finally, Suffolk County police could respond by helicopter or boat if necessary (25).

VI. Offsite LILCO personnel going to the plant

The issue in contention EP 7(B) is whether sufficient numbers of LILCO personnel can respond in sufficient time to meet the recommendations of Table B-1. Part of the evidence is simply the normal commuting times of LILCO employees, as reported by those employees and provided on Attachment 7(B)-9 to LILCO's written testimony (Attachment 6 to this motion) (26, 27). In order to make this evidence clearer, we have combined the commuting times with the Table B-1 recommendations on Attachment 7 to this motion.^{7/}

Attachment 7 shows unequivocally that LILCO meets its commitment^{8/} in section 5.2 of the onsite emergency plan

^{7/} The information about the "Rad Waste Operator" category was inadvertently left out of Attachment 7(B)-9. It is supplied, from LILCO records, in Attachment 7 to this motion. We have also added the distances the employees live from the plant where they were available; the distances show that some of the employees could walk to the site if they had to. Due to the press of time, neither the Rad Waste Operator travel times nor the distances are covered by the attached affidavits.

^{8/} Contention EP 7(B) refers specifically to the 30-minute column of Table B-1, and LILCO admittedly has not committed to meet that 30-minute recommendation at all times in the future.

(Attachment 2 to SNRC-764, letter of September 1, 1982, from LILCO's J. L. Smith to the NRC's Mr. Harold R. Denton):

The augmentation of the onshift personnel shall be accomplished as soon as possible upon notification, and, based upon the average, normal one-way commute time for these personnel, meets the objectives of NUREG-0654 Table B-1 for a 30 to 60 minute response

Suffolk County filed no testimony on contention EP 7(B) as such, but presumably the County contends that traffic congestion may delay the arrival of the onsite augmentation personnel. Assuming this is the County's position, it has two flaws.^{9/} First, the County's witness testifies that if offsite personnel had to travel to the site at any time subsequently to approximately 1 1/2 to 2 hours after public notification of an emergency, they would encounter substantial congestion (Direct Testimony of Andrew C. Kanen at 16). Since the offsite

(footnote continued)

LILCO's position is that its commitment to meet "the objectives of NUREG-0654 Table B-1 for a 30 to 60 minute response," plus the measures it has taken to facilitate a prompt response (listed in the attached affidavit of H. Mark Blauer), plus the present normal commuting times in Attachment 6, are sufficient to meet the objectives of Table B-1 and to comply with NRC regulations. This position, LILCO believes, is consistent with NRC Staff practice and with the "Recommended Requirements" of SECY 82-111 (Attachment 7(B)-8 to LILCO's written testimony).

^{9/} Also, the onsite augmentation personnel will be traveling toward the station, whereas evacuating traffic will be traveling away. This is not a complete answer to the County, however, because the County's witness predicts some traffic effects that may delay travel toward the plant, as noted above.

personnel would be informed before the public was notified, and since the offsite people can arrive at the site within one hour, even if the County's testimony is correct it does not demonstrate lack of compliance with Table B-1.

Second, LILCO believes that the times in Table B-1 are for normal conditions, not highly congested conditions such as the County says would occur during an evacuation. In LILCO's view this interpretation is supported by Attachment 7(B)-7 to LILCO's written testimony (Attachment 8 to this motion).

VII. Conclusion

The issue of what routes to use for evacuation of the public and how much traffic will result is a complex one involving analysis by computer models. But LILCO believes those models need not be litigated in Phase I of the emergency planning case.

Phase I issues can be handled much more simply by recognizing (1) that police and LILCO personnel would be called to the site well in advance of the public evacuation, (2) that fire trucks and ambulances are garaged close to the station and would travel counter to evacuating traffic to get to the station, and (3) that the route to the hospital from the station is not a major evacuation route and therefore is not likely to be congested with traffic. Finally, it is

appropriate to conclude that even if traffic delay of the duration predicted by the County's testimony occurs, it does not establish noncompliance with the requirements that LILCO make arrangements for ambulances, police, fire and onsite augmentation.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

By 
James N. Christman

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23219

DATED: November 9, 1982

CERTIFICATE OF SERVICE

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322 (OL)

I hereby certify that copies of LILCO's Motion for Summary Disposition of the Traffic Congestion Issues, EP 2(B) and 5(B), and the Augmentation of Onsite Staff Issues, EP 5(B) and 7(B), were served upon the following by first-class mail, postage prepaid, by Federal Express (as indicated by an asterisk), or by hand (as indicated by two asterisks), on November 9, 1982:

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DATED: November 9, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322 (OL)
)	(Emergency Planning -
Shoreham Nuclear Power Station,)	Phase II)
Unit 1))	

STATEMENT OF THE MATERIAL FACTS AS TO WHICH
THERE IS NO GENUINE ISSUE TO BE HEARD
ON CONTENTIONS EP 2(B), 5(B), AND 7(B)

AMBULANCES

I. From the fire station to the plant.

A. From Wading River to the plant

1. LILCO has an agreement with the Wading River Fire Department to provide ambulances.

2. The route from the Wading River Fire Department to the Shoreham Station is westward along North Country Road to the site.

3. The distance from the Wading River Fire Department to the site along the route described above is about 1 1/2 miles.

4. This 1 1/2 mile stretch of road is rural and the surrounding area sparsely populated.

5. Evacuating vehicles will move away from the plant, while ambulances from Wading River will go toward the plant.

B. From other fire departments to the plant

6. Other fire departments in the SNPS vicinity are the following:

- (1) Rocky Point Fire Department
- (2) Ridge Fire Department Substation
- (3) Jamesport Fire Department
- (4) Miller Place Fire Department
- (5) Manorville Fire Department
- (6) Riverhead Fire Department.

7. Two of these fire departments (nos. 1-2 above) are within five miles of the Shoreham Station; two of them (nos. 4 and 5) are 5 to 10 miles from the plant; one of them (no. 6) is outside the 10-mile EPZ.

8. The above fire departments are parties to the Mutual Aid Agreement with the Wading River Fire Department.

9. In the event the Wading River Fire Department is unable to supply an ambulance, the Mutual Aid Agreement calls for the other member departments to send ambulances.

10. As a last resort, LILCO vehicles are available at the Shoreham Station and could be used to transport contaminated injured personnel to the hospital.

II. From the plant to the hospital

11. The LILCO plan calls for contaminated injured people from the Shoreham Station to be transported to Central Suffolk Hospital.

12. Central Suffolk Hospital is located about 10 miles southeast of the Shoreham site.

13. The preferable route from Shoreham to Central Suffolk Hospital is eastbound along North Country Road and Sound Avenue to Roanoke Avenue, then south along Roanoke Avenue to the hospital.

14. The route described above is about 12 miles long.

15. The portion of Sound Avenue that would be used by ambulances is not an evacuation route and is unlikely to be heavily congested during an evacuation.

16. The distance from Sound Avenue to the hospital along Roanoke Avenue is about 3 miles.

17. Roanoke Avenue is unlikely to be congested.

18. An alternate route from the Shoreham Station to the hospital would be turning south onto Wading River Manorville Road and traveling to the Long Island Expressway, then east to Route N.Y. 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

19. Another route to the hospital is east on Route 25A to Route 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

20. The ambulances are equipped with two-way radios and can communicate with Suffolk County Medical Control for information regarding traffic congestion.

21. The Wading River Fire Department ambulance has responded to automobile accidents on local highways during highly congested conditions in summer peak traffic and has succeeded in conveying victims to the hospital in a timely manner (see the NRC Staff Supplemental Testimony of John Sears Regarding Onsite Emergency Planning (Phase I) at 13).

FIRE TRUCKS

22. The fire trucks would depart for the Shoreham Station from the same fire departments and same locations as the ambulances.

POLICE CARS

23. LILCO procedure SP 69.009.01, Rev. 0, "Notifications," requires that the Suffolk County Emergency Operations Center and Suffolk County police headquarters be notified by means of a "hotline" within 15 minutes of the declaration of an emergency.

24. Police units would travel toward the station, whereas evacuating vehicles would travel away from the station.

25. Suffolk County police could respond by helicopter or boat if necessary.

VEHICLES OF LILCO PERSONNEL AUGMENTING THE ONSITE STAFF

26. The LILCO employees who might be called to augment the onsite staff are listed in Attachment 6 accompanying this Statement.

27. Each of these individuals was asked to give his "normal one-way commuting time" from home to the Station, and he responded as indicated under column 4 in Attachment 6, "Normal commute time."

28. Procedure SP 69.009.01, Rev. 0, "Notifications," requires that emergency response personnel be notified immediately following notification of the Suffolk County EOC.

29. Once notified, LILCO offsite personnel are to respond immediately if required.

30. LILCO site augmentation personnel will be traveling toward the station, whereas evacuating vehicles will be traveling in the opposite direction.

MEASURES TAKEN BY LILCO TO FACILITATE ONSITE AUGMENTATION

31. LILCO has instituted a duty officer system; certain personnel who might be needed in an emergency are required, on a rotating basis, to be on call.

32. Senior management personnel (those 8 people indicated on Attachment 6 accompanying this affidavit) are assigned pagers ("beepers").

33. Those people designated to assume the Emergency Director role will have two-way radios installed in their cars, permitting direct communication with the Main Control Room.

34. Conference call capability has been provided so that a single phone call from the Control Room will connect several key personnel at once.

35. Automatic card dialer capability allows the communicators at the site to dial offsite personnel simply by inserting a card into the phone.

My name is Nicholas J. DiMascio. I am Assistant Health Physics Engineer at the Shoreham Nuclear Power Station, and in that capacity I am responsible for the development of many station radiation protection programs and activities. I have also been assigned the job of Onsite Emergency Planning Coordinator. My duties include the preparation of the onsite emergency plan and the site Emergency Plan Implementing Procedures for compliance with the guidance of NUREG-0654, Rev. 1. I am also a member of the Wading River Fire Department. I

live in Wading River, about 1 1/2 miles from the Shoreham Station.

The following facts are true and correct to the best of my knowledge and belief; they are numbered consistent with the "Statement of the Material Facts as to Which There Is No Genuine Issue To Be Heard on Contentions EP 2(B), 5(B), and 7(B)," dated November 9, 1982.

AMBULANCES

I. From the fire station to the plant.

A. From Wading River to the plant

1. LILCO has an agreement with the Wading River Fire Department to provide ambulances.

2. The route from the Wading River Fire Department to the Shoreham Station is westward along North Country Road to the site.

3. The distance from the Wading River Fire Department to the site along the route described above is about 1 1/2 miles.

4. This 1 1/2 mile stretch of road is rural and the surrounding area sparsely populated.

5. Evacuating vehicles will move away from the plant, while ambulances from Wading River will go toward the plant.

B. From other fire departments to the plant

6. Other fire departments in the SNPS vicinity are the following:

- (1) Rocky Point Fire Department
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8. The above fire departments are parties to the Mutual Aid Agreement with the Wading River Fire Department.

9. In the event the Wading River Fire Department is unable to supply an ambulance, the Mutual Aid Agreement calls for the other member departments to send ambulances.

10. As a last resort, LILCO vehicles are available at the Shoreham Station and could be used to transport contaminated injured personnel to the hospital.

II. From the plant to the hospital

11. The LILCO plan calls for contaminated injured people from the Shoreham Station to be transported to Central Suffolk Hospital.

12. Central Suffolk Hospital is located about 10 miles southeast of the Shoreham site.

13. The preferable route from Shoreham to Central Suffolk Hospital is eastbound along North Country Road and Sound Avenue to Roanoke Avenue, then south along Roanoke Avenue to the hospital.

14. The route described above is about 12 miles long.

16. The distance from Sound Avenue to the hospital along Roanoke Avenue is about 3 miles.

17. Roanoke Avenue is unlikely to be congested.

18. An alternate route from the Shoreham Station to the hospital would be turning south onto Wading River Manorville Road and traveling to the Long Island Expressway, then east to

Route N.Y. 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

19. Another route to the hospital is east on Route 25A to Route 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

20. The ambulances are equipped with two-way radios and can communicate with Suffolk County Medical Control for information regarding traffic congestion.

21. The Wading River Fire Department ambulance has responded to automobile accidents on local highways during highly congested conditions in summer peak traffic and has succeeded in conveying victims to the hospital in a timely manner (see the NRC Staff Supplemental Testimony of John Sears Regarding Onsite Emergency Planning (Phase I) at 13).

FIRE TRUCKS

22. The fire trucks would depart for the Shoreham Station from the same fire departments and same locations as the ambulances.

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23. LILCO procedure SP 69.009.01, Rev. 0, "Notifications," requires that the Suffolk County Emergency Operations Center and Suffolk County police headquarters be notified by means of a "hotline" within 15 minutes of the declaration of an emergency.

24. Police units would travel toward the station, whereas evacuating vehicles would travel away from the station.

25. Suffolk County police could respond by helicopter or boat if necessary.

VEHICLES OF LILCO PERSONNEL AUGMENTING THE ONSITE STAFF

26. The LILCO employees who might be called to augment the onsite staff are listed in Attachment 6 accompanying this Statement.

27. Each of these individuals was asked to give his "normal one-way commuting time" from home to the Station, and he responded as indicated under column 4 in Attachment 6, "Normal commute time."

28. Procedure SP 69.009.01, Rev. 0, "Notifications," requires that emergency response personnel be notified immediately following notification of the Suffolk County EOC.

29. Once notified, LILCO offsite personnel are to respond immediately if required.

Date

Name

Subscribed and sworn to before me on the ____ day of _____,
1982.

Notary Public

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL
(Shoreham Nuclear Power Station,)	(Emergency Planning -
Unit 1)	Phase I

AFFIDAVIT OF
EDWARD LIEBERMAN ON TRAFFIC CONGESTION

State of New York)
) to wit:
County of Suffolk)

My name is Edward Lieberman. My firm, KLD Associates, Inc., has been retained by LILCO to do evacuation traffic studies for the Shoreham emergency planning effort. From the surveys conducted in connection with this work, I am familiar with the roads that would be used in an evacuation.

The following facts are true and correct to the best of my knowledge and belief; they are numbered consistent with the "Statement of Facts as to Which There Is No Genuine Issue To Be Heard on Contentions EP 7(A), 5(B), and 7(B)," dated November 9, 1982.

AMBULANCES

I. From the fire station to the plant.

A. From Wading River to the plant

2. The route from the Wading River Fire Department to the Shoreham Station is westward along North Country Road to the site.

3. The distance from the Wading River Fire Department to the site along the route described above is about 1 1/2 miles.

4. This 1 1/2 mile stretch of road is rural and the surrounding area sparsely populated.

5. Evacuating vehicles will move away from the plant, while ambulances from Wading River will go toward the

II. From the plant to the hospital

12. Central Suffolk Hospital is located about 10 miles southeast of the Shoreham site.

13. The preferable route from Shoreham to Central Suffolk Hospital is eastbound along North Country Road and Sound Avenue to Roanoke Avenue, then south along Roanoke Avenue to the hospital.

14. The route described above is about 12 miles long.

15. The portion of Sound Avenue that would be used by ambulances is not an evacuation route and is unlikely to be heavily congested during an evacuation.

16. The distance from Sound Avenue to the hospital along Roanoke Avenue is about 3 miles.

17. Roanoke Avenue is unlikely to be congested.

18. An alternate route from the Shoreham Station to the hospital would be turning south onto Wading River Manorville Road and traveling to the Long Island Expressway, then east to Route N.Y. 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

19. Another route to the hospital is east on Route 25A to Route 25, then east to Roanoke Avenue, then North on Roanoke Avenue to the hospital.

POLICE CARS

24. Police units would travel toward the station, whereas evacuating vehicles would travel away from the station.

VEHICLES OF LILCO PERSONNEL AUGMENTING THE ONSITE STAFF

30. LILCO site augmentation personnel will be traveling toward the station, whereas evacuating vehicles will be traveling in the opposite direction.

Date

Name

Subscribed and sworn to before me on the ____ day of _____,
1982.

Notary Public

-6-

A9. [Di Mascio, Lieberman] 10 C.F.R. § 50.47(b)(1):

(b) The onsite and offsite emergency response plans for nuclear power reactors must meet the following standards [footnote omitted]:

(1) 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.

§ 50.47(b)(2):

(2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

§ 50.47(b)(3):

(3) Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

§ 50.47(b)(8):

(8) Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

§ 50.47(b)(12):

(12) Arrangements are made for medical services for contaminated injured individuals.

§ 50.47(b)(15):

(15) Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Appendix E, II.A:

As a minimum, the following items shall be described:

A. Onsite and offsite organizations for coping with emergencies and the means for notification, in the event of an emergency, of persons assigned to the emergency organizations.

Q10. Considering the possible effects of traffic congestion, in your judgment does the LILCO emergency plan fail to comply with any of these regulations?

A10. [Di Mascio, Lieberman] No.

Table B-1

MINIMUM STAFFING REQUIREMENTS FOR NRC LICENSEES
FOR NUCLEAR POWER PLANT EMERGENCIES (See B.5.)

Major Functional Area	Location	Major Tasks	Position Title or Expertise	On Shift*	Capability for 30 min	Additions 60 min
Plant Operations and Assessment of Operational Aspects			Shift Supervisor (SRO)	1	--	--
			Shift Foreman (SRO)	1	--	--
			Control Room Operators	2	--	--
			Auxiliary Operators	2	--	--
Emergency Direction and Control (Emergency Coordinator)***			Shift Technical Advisor, Shift Supervisor or designated facility manager	1**	--	--
Notification/Communication****		Notify licensee, State local and Federal personnel & maintain communication		1	1	2
Radiological Accident Assessment and Support of Operational Accident Assessment		Emergency Operations Facility (EOF) Director	Senior Manager	--	--	1
			Senior Health Physics (HP) Expertise		1	--
		Offsite Surveys		--	2	2
		Onsite (out-of-plant)		--	1	1
		In-plant surveys	HP Technicians	1	1	1
		Chemistry/Radio-chemistry	Rad/Chem Technicians	1	--	1
Plant System Engineering, Repair and Corrective Actions	Technical Support		Shift Technical Advisor	1	--	--
			Core/Thermal Hydraulics	--	1	--
			Electrical	--	1	1
			Mechanical	--	--	1
	Repair and Corrective Actions		Mechanical Maintenance/ Rad Waste Operator	1**	--	1
			Electrical Maintenance/ Instrument and Control	1**	1	1
			(I&C) Technician	--	1	--

Table B-1 (contd)

Major Functional Area	Major Tasks	Position Title or Expertise	On Shift*	Capability for 30 min	Additions 60 min
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first- aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2**	2	2
Firefighting	--	--	Fire Brigade per Technical Specifications	Local Support	
Rescue Operations and First-Aid	--	--	2**	Local Support	
Site Access Control and Personnel Accountability	Security, firefighting communications, personnel accountability	Security Personnel	All per Security plan		
		Total	10	11	15

Notes:

* For each unaffected nuclear unit in operation, maintain at least one shift foreman, one control room operator and one auxiliary operator except that units sharing a control room may share a shift foreman if all functions are covered.

** May be provided by shift personnel assigned other functions.

*** Overall direction of facility response to be assumed by EOF director when all centers are fully manned. Director of minute-to-minute facility operations remains with senior manager in technical support center or control room.

**** May be performed by engineering aide to shift supervisor.

Response Time Survey

1	2	3	4	5
<u>Major functional area</u>	<u>Position title or expertise</u>	<u>LILCO personnel to fill position</u>	<u>Normal commute time</u>	<u>Beeper</u>
Notifications/ Communications	N/A	Individual 1	20 min.	no
		Individual 2	20 min.	no
		Individual 3	30 min.	no
		Individual 4	40 min.	no
		Individual 5	45 min.	no
		Individual 6	75 min.	no
<hr/>				
Rad Accident Assessment and Support of Oper- ational Accident Assessment	Senior Mgr.	Individual 1	30 min.	yes
		Individual 2	30 min.	yes
		Individual 3	50 min.	yes
<hr/>				
	Senior Health Physics Expertise	Individual 1	18 min.	yes
		Individual 2	30 min.	yes
		Individual 3	5 min.	yes
<hr/>				
	HP Technicians	Individual 1	13 min.	no
		Individual 2	15 min.	no
		Individual 3	15 min.	no
		Individual 4	15 min.	no
		Individual 5	15 min.	no

1	2	3	4	5
<u>Major functional area</u>	<u>Position title or expertise</u>	<u>LILCO personnel to fill position</u>	<u>Normal commute time</u>	<u>Beeper</u>
		Individual 6	20 min.	no
		Individual 7	25 min.	no
		Individual 8	35 min.	no
		Individual 9	45 min.	no
	Rad Chem Technicians	Individual 1	15 min.	no
		Individual 2	10 min.	no
		Individual 3	20 min.	no
		Individual 4	30 min.	no
		Individual 5	40 min.	no
		Individual 6	45 min.	no
		Individual 7	45 min.	no
		Individual 8	45 min.	no
		Individual 9	60 min.	no
		Individual 10	60 min.	no
		Individual 11	60 min.	no
Plant System Engineering, Repair and Corrective Actions	Core/Thermal Hydraulics	Individual 1	25 min.	yes
		Individual 2	10 min.	no
		Individual 3	15 min.	no
	Electrical	Individual 1	5 min.	yes
		Individual 2	45 min.	no

1	2	3	4	5
<u>Major functional area</u>	<u>Position title or expertise</u>	<u>LILCO personnel to fill position</u>	<u>Normal commute time</u>	<u>Beeper</u>
	Mechanical	Individual 1 Individual 2	25 min. 8 min.	no no
	Electrical and Mechanical Maintenance	<u>Mechanics A₁</u> Individual 1 Individual 2 Individual 3 Individual 4 Individual 5 Individual 6 Individual 7 Individual 8 Individual 9 Individual 10 Individual 11 Individual 12 Individual 13 Individual 14 <u>Mechanics B₁</u> Individual 1 Individual 2 Individual 3 Individual 4 Individual 5	 20 min. 20 min. 20 min. 25 min. 30 min. 30 min. 38 min. 40 min. 40 min. 40 min. 40 min. 45 min. 66 min. 75 min. 4 min. 7 min. 10 min. 15 min. 20 min.	 no no no no no no no no no no no no no no no no no no no

1	2	3	4	5
<u>Major functional area</u>	<u>Position title or expertise</u>	<u>LILCO personnel to fill position</u>	<u>Normal commute time</u>	<u>Beeper</u>
		Individual 6	20 min.	no
		Individual 7	30 min.	no
<hr/>				
Instrumentation and Control		Individual 1	5 min.	no
		Individual 2	8 min.	no
		Individual 3	20 min.	no
		Individual 4	20 min.	no
		Individual 5	25 min.	no
		Individual 6	25 min.	no
		Individual 7	25-30 min.	no
		Individual 8	25-30 min.	no
		Individual 9	30 min.	no
		Individual 10	40 min.	no
		Individual 11	45 min.	no
		Individual 12	45-60 min.	no
		Individual 13	60 min.	no
		Individual 14	60 min.	no
		Individual 15	65 min.	no
		Individual 16	75 min.	no
		Individual 17	90 min.	no

Table B-1 Augmentation Guidelines Compared to
LILCO Personnel Normal Commuting Times

<u>"Functional Area" or "Major Tasks" or "Position Title or Expertise" from Table B-1 1/</u>	<u>Table B-1 On Shift Guideline 2/</u>	<u>Table B-1 30-minute Guideline</u>	<u>LILCO Capability 3/</u>	<u>Table B-1 60-minute Guideline</u>	<u>LILCO Capability</u>
1. Shift Supervisor	1	--		--	
2. Shift Foreman	1	--		--	
3. Control Room Operators	2	--		--	
4. Auxiliary Operators	2	--		--	
5. Shift Technical Advisor	1**	--		--	
6. Notification/ Communication	1	1	20 min.(15 mi.) 20 min.(6 mi.) 30 min.(18 mi.)	2	40 min.(25 mi.) 45 min.(20 mi.) 75 min.(45 mi.)
7. Senior Manager	--	--	30 min.b 30 min.b	1	50 min.b
8. Senior Health Physics (HP) Expertise		1	5 min. (1.5 mi.)b 18 min (7.5 mi.)b 30 min.(15.3 mi.)b	--	
9. Offsite Surveys	--	2	Performed by HP Technicians or Rad/Chem Technicians - same people as lines 11 and 12 below. One member of each 2- man survey team (the driver) may be a Mechanic - line 17 below.	2	HP Technicians, Rad/Chem Technicians, or 1 Mechanic per team - lines 11, 12, and 17 below.

"Functional Area" or "Major Tasks" or "Position Title or Expertise" from Table B-1 1/	Table B-1 On Shift Guideline 2/	Table B-1 30-minute Guideline	LILCO Capability 3/	Table B-1 60-minute Guideline	LILCO Capability
10. Onsite (out-of-plant)	--	1	Performed by HP Technicians or Rad/Chem Technicians - lines 11 and 12 below.	1	HP Technicians or Rad/Chem Technicians - lines 11 and 12 below.
11. HP Technicians	1	1	13 min. (8 mi.) 15 min. (4 mi.) 15 min. (7 mi.) 15 min. (7 mi.) 15 min. (5 mi.) 20 min. (10 mi.) 25 min. (15 mi.)	1	35 min. (25 mi.) 45 min. (40 mi.)
12. Rad/Chem Technicians	1	--	10 min. (5.1 mi.) 15 min. (2 mi.) 20 min. (5.5 mi.) 30 min. (13 mi.)	1	40 min. (25 mi.) 45 min. 45 min. (35 mi.) 45 min. (5 mi.) 60 min. 60 min. (40 mi.)
13. Technical Support: Shift Technical Supervisor	1	--		--	
14. Technical Support: Core/Thermal Hydraulics	--	1	10 min. (2.5 mi.) 15 min. (2.5 mi.) 25 min. (13 mi.)b		
15. Technical Support Electrical	--	--	5 min. (2 mi.)b	1	45 min.
16. Technical Support: Mechanical	--	--	8 min. (2 mi.) 25 min. (13 mi.)	1	

"Functional Area" or "Major Tasks" or "Position Title or Expertise" from Table B-1 1/	Table B-1 On Shift Guideline 2/	Table B-1 30-minute Guideline	LILCO Capability 3/	Table B-1 60-minute Guideline	LILCO Capability
17. Repair and Cor- rective Actions: Mechanical Main- tenance/Rad Waste Operator	1**	--	<u>Mechanics-A1</u> 20 min. (10 mi.) 20 min. (12 mi.) 20 min. (15 mi.) 25 min. (10 mi.) 30 min. (14 mi.) 30 min. (15 mi.)	1	<u>Mechanics-A1</u> 38 min. (20 mi.) 40 min. (20 mi.) 40 min. (20 mi.) 40 min. (21 mi.) 40 min. (18 mi.) 45 min. (30 mi.) 66 min. (25 mi.) 75 min. (45 mi.)
18. Repair and Cor- rective Actions: Rad Waste Oper- ator ^{4/}			<u>Mechanics-B1</u> 4 min. (1.8 mi.) 7 min. (5 mi.) 10 min. (10 mi.) 15 min. (5 mi.) 20 min. (10 mi.) 20 min. (15 mi.) 30 min. (9 mi.) 30 min. 30 min. 30 min. 30 min. 30 min. 30 min. 30 min.	1	45 min. 60 min. 45 min.
19. Electrical Maintenance/	1**	1	<u>Mechanics-A1</u> and -B1 - Same people as line 17 above.	1	Mechanics-A1 and -B1 - same people as line 17 above.

"Functional Area" or "Major Tasks" or "Position Title or Expertise" from Table B-1 1/	Table B-1 On Shift Guideline 2/	Table B-1 30-minute Guideline	LILCO Capability 3/	Table B-1 60-minute Guideline	LILCO Capability
20. Instrument and Control (I&C) Technician	--	1	5 min.(1.5 mi.) 8 min.(4 mi.) 20 min.(10 mi.) 20 min.(12 mi.) 25 min.(19 mi.) 25 min.(12 mi.) 25-30 min.(17 mi.) 25-30 min.(16 mi.) 30 min.(11 mi.)	--	40 min. (13 mi.) 45 min. (20 mi.) 45-60 min. (35 mi.) 60 min. (46 mi.) 60 min. (50 mi.) 65 min. (45 mi.) 75 min. (40 mi.) 90 min. (60 mi.)
21. Radiation Pro- tection: HP Technicians	2**	2	Same people as line 11 above	2	Same people as line 11 above
22. Firefighting	Fire Bri- gade per Technical Specifica- tions	Local Support			
23. Rescue Opera- tions and First Aid	2**	Local Support			
24. Site Access and Personnel Accountability	All per Security plan				
Total	10	11		15	

1/ For this table, the "Major Functional Area," "Major Tasks," and "Position Title or Expertise" columns from Table B-1 have been combined. Each of the Table B-1 lines that contains numbers of people has been separately numbered (1-24) here.

2/ The on shift complement is not at issue in EP 7(B), since the contention refers only to LILCO's ability to "augment" its staff. The "on shift" column of Table B-1 is included here only because if there is one HP Technician (for example) on shift, then the number of people available to augment is one less than shown in the "LILCO Capability" columns. LILCO's on shift organization is described in section 5.1.1 of Attachment 7(B)-4 to LILCO's written testimony on EP 7(B).

3/ Each listed travel time represents a different individual.

4/ The line 18 functional area is covered at Shoreham by Nuclear Assistant Station Operators. The travel times for these people were taken, not from a survey, but from station records used to pay employees for travel time. The employees themselves provided these travel times.

"Functional Area" or "Major Tasks" or "Position Title or Expertise" from Table B-1	1/	Table B-1 On Shift Guideline 2/	Table B-1 30-minute Guideline	LILCO Capability 3/	Table B-1 60-minute Guideline	LILCO Capability
------------------------------------------------------------------------------------------------	----	---------------------------------------	-------------------------------------	------------------------	-------------------------------------	---------------------

- ** May be provided by shift personnel assigned other functions.
- b Has a beeper (8 people in all).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ATTACHMENT 8

OCT 26 1981

Dr. Donald F. Knuth
President
KMC, Inc.
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Dear Dr. Knuth: *Don:*

This is in response to your letter dated October 5, 1981 regarding the capability for rapid augmentation of a nuclear power plant staff in the event of an emergency. We expect that each utility will expend its best efforts to meet the augmentation criteria of Table B-1 of NUREG-0654/FEMA-REP-1 with respect to additional skills, such as professional health physics expertise, which may not be present on shift and to assure that enough "hands" are available to perform the many tasks that would result from an emergency.

Therefore, consistent with our policy for Regulatory Guides, we regard the Table B-1 criteria as having the same level of authority as a Regulatory Guide. (Revision 2 to Regulatory Guide 1.101 is now in publication which incorporates NUREG-0654 by reference). Facilities whose staffing augmentation capabilities meet the Table B-1 criteria would be acceptable. Those facilities which do not meet these criteria will be reviewed on a case-by-case basis.

Failure to meet the criteria in a particular drill would clearly not call for a civil penalty as indicated in your letter. Repeated failure to meet the design objective (goal) would be cause for the NRC to request utility management attention to this problem.

The response times listed in Table B-1 are certainly not rigid inviolate requirements as suggested in your letter because weather conditions, for example, could influence arrival times. A treatment of this problem in a recent SER (for the Callaway plant) is enclosed which gives an indication of the staff approach to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill", is written above the typed name.

William J. Dircks
Executive Director for Operations

Enclosure:
Excerpt from Appendix F
of the Callaway SER

ENCLOSURE 1

EXCERPT FROM APPENDIX F OF THE CALLAWAY SER

DATED OCTOBER 1981

"The onsite (minimum) emergency organization for non-normal working hours, backshifts, and holidays is described in the Plan. Emergency assignments have been made, and the relationship between the emergency organization and the normal staff complement are described in the Plan. Positions and/or titles and qualifications of shift and plant personnel both onsite and offsite who are assigned major emergency functional duties are listed. Minimum shift manning and shift augmentation are in the Plan and guidance for timely shift augmentation is provided.

The minimum on-shift staffing levels discussed in the Plan meet the objectives of Table B-1 of NUREG-0654. The Plan describes the capability to augment the minimum on-shift staff after declaration of an emergency. This capability meets the design objectives of Table B-1 and is prioritized to provide capability within 30 to 45 minutes and 60 to 75 minutes.

The following minimum on-shift expertise will be maintained 24 hours per day: one Shift Supervisor (SRO), one Operating Supervisor (SRO), two Unit Reactor Operators, two Equipment Operators, two Assistant Equipment Operators, one Instrument-Control Tech., one Radiation-Chemistry Tech., and one Shift Technical Advisor. This makes a total of eleven persons on shift capability of performing all necessary major functions called for in Table B-1. A person on-shift will be qualified to conduct in-plant radiation surveys. This is maintained 24 hours per day.

Within 30 to 45 minutes, depending on road and weather conditions, the additional personnel will be available for communications, in-plant protective actions, radiological accident assessment and operational support, and plant system engineering and repair actions. Within 60 to 75 minutes, fifteen additional persons will be available to augment the above mentioned functional area.

Because shift augmentation does not conform to the staff guidelines of 30 to 60 minutes, the licensee has committed to an extensive duty officer system to strengthen their existing augmentation capability. Further, periodic unannounced drills will be conducted of the system to ensure the design objectives of Table B-1 can be achieved. Records will be maintained for inspection. The duty officer system will ensure sufficient management and supervisory personnel will be on call 24 hours per day with a reliable pager system or automatic telephone system. Prioritized shift augmentation procedures will be developed and tested. In addition to the above, a dedicated Emergency Duty Officer will be maintained 24 hours per day who can act as the EPOM.

The staff finds that adequate shift staffing and augmentation capabilities exist and will examine the duty officer system during the preoperational inspection".

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	Docket No. 50-322-OL
LONG ISLAND LIGHTING COMPANY)	
)	(Emergency Planning -
(Shoreham Nuclear Power Station,)	Phase I)
Unit 1))	

AFFIDAVIT OF
H. MARK BLAUER ON MEASURES TAKEN BY
LILCO TO FACILITATE PROMPT ONSITE AUGMENTATION

Commonwealth of Virginia)	
)	to wit:
City of Richmond)	

My name is H. Mark Blauer. I am Chairman of LILCO's Emergency Planning Task Force and Emergency Planning Coordinator. My duties include overall technical and administrative responsibility for the Emergency Planning Task Force. The Task Force is responsible for developing and maintaining the Shoreham Nuclear Power Station Emergency Plan; Emergency Training curriculum, manuals, and lesson plans; qualification and selection of emergency response personnel; Emergency Plan

procedures; onsite and offsite emergency support facilities; the Prompt Notification System; the interfacing with Federal (NRC, DOE, FEMA, Coast Guard), State (Department of Health, Disaster Preparedness Commission) and Local (Suffolk County, hospitals and fire departments) authorities as well as other nuclear industry support groups (INPO). Because of my performance of these duties I am familiar with the measures LILCO has adopted to ensure prompt augmentation of the Shoreham Station staff in the event of an emergency.

The following facts are true and correct to the best of my knowledge and belief; they are numbered consistent with the "Statement of Material Facts as to Which There Is No Genuine Issue To Be Heard on Contentions EP 2(B), 5(B), and 7(b)," dated November 9, 1982.

31. LILCO has instituted a duty officer system; certain personnel who might be needed in an emergency are required, on a rotating basis, to be on call.

32. Senior management personnel (those 8 people indicated on Attachment 6 accompanying this affidavit) are assigned pagers ("beepers").

33. Those people designed to assume the Emergency Director role will have two-way radios installed in their cars, permitting direct communication with the Main Control Room.

34. Conference call capability has been provided so that a single phone call from the Control Room will connect several key personnel at once.

35. Automatic card dialer capability allows the communicators at the site to dial offsite personnel simply by inserting a card into the phone.

11/9/82
Date

H. Jack Blane
Name

Subscribed and sworn to before me on the 1st day of November 1982.

Judith M. Jackson
Notary Public
Com. expires Jan. 29, 1984