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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
LOUISIANA POWER & LIGHT	)	
COMPANY	)	Docket No. 50-382
	)	
(Waterford Steam Electric	)	
Station, Unit 3)	)	

TESTIMONY OF JOHN M. LUCAS ON  
RADIOLOGICAL EMERGENCY RESPONSE PLANS

Q. Please state your name and address.

A. My name is John M. Lucas. My address is 519  
Pine St., Norco, La. 70079, St. Charles Parish.

Q. Where are you employed and what is your position  
there?

A. I am employed by St. Charles Parish as Director  
of the Department of Emergency Preparedness.

Q. In this capacity, are you responsible for  
implementing evacuation procedures in your parish?

A. Yes. The Emergency Preparedness Director,  
acting as Chief of Staff for the Parish President, is responsi-  
ble for directing and coordinating protective response to an  
accident at Waterford 3.

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Q. What has been your training and experience in civil defense and emergency preparedness?

A. I have had five years of full time employment in the position of Director. I am a four-phase graduate of FEMA's Staff College, including completion of two graduate courses. I have completed the Radiological Emergency Response Operations training course at the Mercury, Nevada Testing Site, the Advanced Radiological Training and Damage Assessment courses at the Emergency Management Institute, a Hazardous Materials Seminar conducted by the U.S. Department of Transportation, a fireman's training course at LSU, and six simulated exercises by the Parish Emergency Operations Center (EOC) and Regional Training Specialists. I have also handled a total of fifteen incidents that necessitated evacuation.

Q. Have you had occasion to direct or otherwise participate in evacuations within the parish?

A. Yes, on numerous occasions.

Q. Would you briefly summarize the nature and frequency of such evacuations?

A. Because of the large number of petro-chemical industries and oil refineries that are concentrated in St. Charles Parish, four railroads, five highways, and the Mississippi River, we have had many emergencies involving the emission of toxic materials. Last year alone, we recorded ninety-nine minor and major emissions, three of which

necessitated evacuation. As a result, the St. Charles Department of Emergency Preparedness is highly qualified and experienced in the handling of major emergency situations, including evacuation.

Q. Are you familiar with the State radiological emergency preparedness plan, which includes the emergency plans for St. Charles Parish and St. John the Baptist Parish?

A. Yes.

Q. What was your role in the development of the St. Charles Enclosure of the State emergency preparedness plan?

A. I have been involved in three years of constant endeavor with LP&L, LNED, LOEP, and the Civil Defense Director of St. John the Baptist Parish. The initial effort was improved with the addition of Energy Consultants, Inc., as advisors and consultants to our offsite planning efforts and training for the last year.

Q. In the event of a serious radiological accident at the Waterford 3 site, would you be able to evacuate the areas of your parish which are within the ten-mile Emergency Planning Zone, as contemplated by the Plan?

A. Yes. We have spent years of effort developing a plan which is realistic and workable for St. Charles Parish.

Q. Please briefly describe the public education program for periodically informing residents of evacuation procedures to be followed in the event of a serious radiological accident at the Waterford 3 site.

A. We have been engaged in a very enlightening public relations and information program, with at least two speaking engagements to parish groups recorded every month. This is in addition to at least one major article submitted and published in the official parish journal each month.

Q. Please briefly describe the programs for providing residents with evacuation instructions at the time an evacuation is ordered.

A. A brochure is being printed with evacuation instructions, and this will be distributed annually to all parish residents within the ten-mile EPZ. Cable TV and local radio stations (WCKW-FM 92 and WKQT-AM 1010) will also be used, at the time of an evacuation, to provide residents with evacuation instructions.

Q. Please describe the evacuation warning system to be activated in the event of a serious radiological accident at the Waterford 3 site, including the fixed siren system.

A. The fixed siren system will consist of twenty-one units in St. Charles Parish, each located by determination of a consultant's study and recommendation. These siren units will be tested regularly. The capability of the system is enhanced by being able to activate sirens selectively according to factors such as the severity of the accident and prevailing weather conditions. In addition, alert teams staffed by Parish and State personnel may be dispatched,

as conditions indicate, to provide supplemental notification to any specific sections of the Parish which may not have received adequate siren notification.

We will also notify the hospital and nursing home, and hunting and fishing camps in the wetlands, by tone-alert receivers.

Q. Does the public notification system have the capability to alert and notify the population within the EPZ within 15 minutes?

A. Yes, from the time of the decision to notify the population.

Q. Does the public notification system provide direct coverage of essentially 100% of the population within 5 miles of the site?

A. Yes. The siren system has been designed to cover virtually all of the population area within the EPZ in St. Charles Parish.

Q. What special arrangements will be made to notify persons such as hunters and fishermen in the wetlands, who may not have been alerted by the fixed siren system?

A. As I mentioned earlier, tone-alert receivers will be used to provide notification to fishing and hunting camps in the wetlands. Helicopters and boats, with loud-speakers, will also be used for wetlands notification, as necessary.

Q. In your opinion, will the residents of your parish within the EPZ receive adequate public information and emergency notification for evacuation in the event of a serious radiological accident at the Waterford 3 site?

A. Yes.

Q. Are you familiar with the Evacuation Time Estimate Study provided by Louisiana Power & Light Company?

A. Yes, it has been submitted to me, reviewed, and has been accepted by both St. John the Baptist Parish and St. Charles Parish after review.

Q. Do you agree that the assumptions, evacuation scenarios, and evacuation time estimates in that study are realistic for your parish?

A. After a realistic study, yes.

Q. Who makes the decision to commence evacuation, and how is that decision made?

A. As Director of the Department of Emergency Preparedness, I receive all information and recommendations concerning an accident from LP&L and from State agencies. I provide this information and these recommendations to the Parish President, and upon receiving the authority, in writing, from the chief executive, I make the decision to commence evacuation.

Q. Have provisions been made in the Emergency Plans to adequately provide you with the information necessary to

enable Parish officials to make the decision to commence evacuation?

A. Positively.

Q. Do you believe that it is necessary to actually evacuate people during the exercises of the Emergency Plans to adequately test the Plans?

A. No, because of the inconvenience to a vast number of people, agencies, and institutions, and the real possibility of some residents getting injured during an evacuation exercise. The important thing is to test our mobilization, communications, and readiness to begin the movement of people. That is what the exercises will do.

Q. Will there be adequate provisions for evacuating persons who are without vehicles?

A. Yes, pick-up points have been identified and will be listed in the brochure. Buses will be dispatched to the pick-up points, to evacuate these persons to reception centers outside the EPZ.

Q. Will there be adequate provisions for evacuating school children?

A. Yes. We have a School Services Officer and a Transportation Officer on staff, plus the emergency plans for the schools districts have been updated. Additional buses and relocation centers will be provided, as needed by support Parishes.