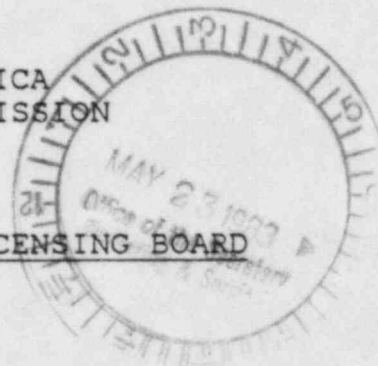


May 20, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
UNION ELECTRIC COMPANY) Docket No. STN 50-483 OL
(Callaway Plant, Unit 1))

APPLICANT'S MOTION FOR SUMMARY DISPOSITION
OF REED CONTENTION 1
(STAFFING - SHERIFF'S OFFICE)

Pursuant to 10 C.F.R. § 2.749, Union Electric Company ("Applicant") moves the Atomic Safety and Licensing Board for summary disposition of Contention 1 advanced by intervenor John G. Reed. As shown below, summary disposition is appropriate because there is no genuine issue of material fact to be heard with respect to Contention 1. Accordingly, Applicant is entitled to a decision in its favor on Contention 1 as a matter of law.

This Motion is supported by Applicant's Statement of Material Facts On Reed Contention 1 As To Which There is No Genuine Issue to be Heard (Staffing-Sheriff's Office),

Applicant's Memorandum of Law in Support of Motions For Summary Disposition on Emergency Planning Issues ("Memorandum of Law"), the Callaway County/Fulton Radiological Emergency Response Plan ("Callaway/Fulton Plan"), the Montgomery County Radiological Emergency Response Plan ("Montgomery Plan"), the Gasconade County Radiological Emergency Response Plan ("Gasconade Plan"), the Osage County Radiological Emergency Response Plan ("Osage Plan"), the Affidavit of Walter M. Clark on Reed Contention 1 (Staffing-Sheriff's Office) ("Clark-1"), the Affidavit of Gerald W. Stanfill on Reed Contention 1 (Staffing-Sheriff's Office) ("Stanfill-1"), and the Affidavit of Gerald W. Stanfill on Reed Contention 2 (Staffing-Clerk's Office) ("Stanfill-2"), all filed simultaneously herewith, as well as the pleadings and other papers filed by the parties in the proceeding.

I. Procedural Background

Because of its length, Reed Contention 1 is appended to this Motion as Attachment 1. Reed Contention 1 was admitted to the proceeding without objection by Applicant or the NRC Staff. Board Memorandum and Order dated December 7, 1982.

In summary, Contention 1 reviews the duties assigned to law enforcement in the four county plan and standard operating procedures which have now been superceded by separate plans for each of the four counties in the Callaway Plant plume exposure emergency planning zone ("EPZ"). See Clark-1, ¶ 4. After assigning to each of these duties the number of personnel he

believes are necessary, Mr. Reed concludes that there are insufficient personnel in each of the four EPZ counties to perform assigned law enforcement functions. See Attachment 1.

II. Governing Legal Standards

The basis for evaluating the number of personnel available to fulfill the law enforcement functions assigned in the county radiological emergency response plans is the general regulatory requirement that local emergency plans must be "capable of being implemented." 10 C.F.R. § 50.47(a)(2). This requirement is repeatedly reflected in various evaluation criteria of NUREG-0654/FEMA-REP-1 (Rev. 1), Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (Nov. 1980) ("NUREG-0654"). See, e.g., NUREG-0654, Section II.J.9 ("Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria . . ."). The responsibility for making the determination whether the local plans are capable of being implemented rests with the Federal Emergency Management Agency ("FEMA"). 10 C.F.R. § 50.47(a)(2).

III. Argument

The standards governing summary disposition motions in an NRC proceeding are set forth in Applicant's Memorandum of Law. In summary, where, as here, a properly supported motion for summary disposition is made, the party opposing the motion must come forward with substantial facts establishing that a genuine issue of fact remains to be heard. In the absence of such a showing, the movant is entitled to a decision in its favor on that contention as a matter of law. 10 C.F.R. § 2.749(b).

Applying the foregoing standard to Contention 1, it is clear that there is no basis for the concern expressed by Mr. Reed in Contention 1 that an insufficient number of law enforcement personnel would be available in the EPZ counties in the event of a radiological emergency. Accordingly, there is no genuine issue of fact remaining to be heard by the Board.

The ability to adequately staff law enforcement functions in Callaway County/Fulton is explained by Mr. Walter Clark in his affidavit on Contention 1. Mr. Clark is the Emergency Management Director ("EMD") for Callaway County and the City of Fulton, Missouri. Clark-1, ¶ 1. Not only does Mr. Clark have a working knowledge of the Callaway/Fulton Plan, but he has been involved in the field of emergency response for 25 years. Id., Exhibit "A". In reaching the conclusions set forth in his affidavit, Mr. Clark consulted with the Callaway County Sheriff and the Fulton Chief of Police. Id., ¶ 6.

A summary of the number of law enforcement personnel required to be available in the other three EPZ counties of Gasconade, Osage and Montgomery is provided by Gerald W. Stanfill in his affidavit on Contention 1. Mr. Stanfill is the Radiological Emergency Planner with the Missouri State Emergency Management Agency ("SEMA"). Stanfill-1, ¶ 1. Mr. Stanfill has been personally involved in the development of the off-site (local and state) plans for the Callaway Plant. During the course of his work, he has had the opportunity to meet on numerous occasions with the emergency management directors, the sheriffs and other local government officials for the four counties -- Callaway, Montgomery, Gasconade and Osage -- located in the Callaway Plant EPZ. In particular, Mr. Stanfill has been actively involved in the preparation of the county plans.

A. Background & Assessment Assumptions

The Callaway Plant is located in Callaway County. Clark-1, ¶ 2 and Exhibit B (map of EPZ). Callaway County, including the City of Fulton with a population of approximately 11,000 (on the outer edge of EPZ boundary), has a population of approximately 15,300 living within the EPZ. This number reflects the rural nature of the community, as further evidenced by the much smaller populations of 200, 860 and 500 within the EPZ in the counties of Gasconade, Osage and Montgomery. Stanfill-2, ¶ 4; Clark-1, ¶ 5.

While Callaway County has the benefit of the availability of law enforcement personnel from the City of Fulton's police department, the fact remains that in the event of a radiological emergency at the Callaway Plant, the demands that would be placed upon the sheriff and police departments of Callaway County and the City of Fulton can be expected to be greater than the demands placed upon the sheriff's offices of the other counties in the EPZ. Clark-1, ¶ 5.

As Mr. Clark explains, three unstated and unexplained assumptions underlie Mr. Reed's Contention 1 analysis of sheriff manning needs which are contrary to accepted emergency planning practices. These assumptions are: (1) that an eight hour shift would be used for emergency workers during a radiological emergency at the Callaway Plant; (2) that all normal law enforcement functions would continue during a radiological emergency at the Callaway Plant; and (3) that only regularly employed law enforcement personnel would be available to fulfill emergency functions assigned to the sheriff's office in the Callaway/Fulton Plan. In Mr. Clark's opinion, all three of these assumptions are unreasonable. Id., ¶ 7.

In the 25 years Mr. Clark has spent working in the field of emergency preparedness, the common and accepted practice is for emergency workers, including individuals performing law enforcement functions, to work a twelve hour, not an eight hour, shift (at a minimum) during emergencies of all kinds. In

his opinion, individuals can perform satisfactorily on a twelve hour shift. In fact, rotating three shifts of personnel can create unnecessary confusion and lack of continuity in performing jobs under what are often complex and rapidly changing circumstances. Id., ¶ 8.

In Mr. Clark's opinion, it is also unreasonable and inconsistent with actual emergency operations to assume that regular law enforcement personnel are required to be available during an emergency to perform all of their normal, routine functions. Priorities change during an emergency. Routine law enforcement activities, such as traffic ticketing, become unimportant and can even hinder necessary emergency activities, e.g., evacuation. Thus, it would be totally counterproductive to prevent regular law enforcement personnel from engaging in needed emergency activities during an emergency at the Callaway Plant just "in case" it might be decided to perform a routine function. The availability of law enforcement personnel adequately covers this contingency, along with the emergency-related needs for law enforcement which arise in the event of a radiological emergency. Id., ¶ 9.

With respect to Mr. Reed's third assumption that only regularly employed law enforcement personnel would be available to fulfill emergency functions assigned to sheriffs' offices, the agreement of the State Highway Patrol and National Guard to supplement local law enforcement, as discussed below, negates this assumption. See Clark-1, ¶ 10.

Taking into consideration the reasonable assumptions, described above, that can be made about staffing law enforcement functions in the four counties in the EPZ, the issue remains whether a sufficient number of people have been identified to ensure that, with respect to law enforcement, the county plans are capable of being implemented. It should be recognized that the assessment which follows assumes the need to evacuate the entire EPZ at one time -- a preliminary conservative assumption.

B. Identification of Supplies and Demands

The Callaway County sheriff's office consists of 19 full-time employees (a sheriff, 7 sheriff's deputies, 4 radio dispatchers, 3 clerical personnel and 4 jailers who are deputies). There also are 3 part-time radio dispatchers and 4 part-time jailers. The Sheriff's Reserve organization consists of 30 active members. The City of Fulton police department consists of 29 full-time employees (the Chief of Police, 22 policemen, 4 radio dispatchers and 2 clerical personnel). Id., ¶ 11.

At the present time, the Sheriff is assisted by 8 regular sheriff's personnel in Montgomery County, of which 4 individuals are radio dispatchers and 4 are law enforcement officers. There are also 3 clerical staff. In addition, Montgomery County has a voluntary sheriff's auxiliary organization with a membership of approximately 20. Stanfill-1, ¶ 3.

In Gasconade County, the Sheriff is assisted by 13 sheriff's personnel, of which 6 individuals are radio dispatchers and 7 are law enforcement officers. There are also 3 clerical staff. Id., ¶ 4.

Finally, in Osage County the Sheriff is assisted by 7 sheriff's personnel, of which 4 individuals are radio dispatchers and 3 are law enforcement officers. There are also 4 clerical staff. Id., ¶ 5.

In addition to the local resources available to fulfill emergency law enforcement functions in the event of a radiological emergency at the Callaway Plant, the Missouri State Highway Patrol and the Missouri State National Guard have committed to respond and satisfy needed county law enforcement functions in the event of a radiological emergency at the Callaway Plant. Clark-1, ¶ 10 and attached Exhibits "C" and "D" (letters of agreement); Stanfill-1, ¶ 11 and attached Exhibits "B" and "C". The Highway Patrol will have 8 individuals available within one hour and 16 individuals available within two hours from the time of notification. The National Guard has committed and previously demonstrated the ability in other kinds of emergencies to provide 120 trained guardsmen within a four to six hour period after notification. A Missouri National Guard Military Police unit is located in Fulton. Another MP unit is located in Columbia. There are other Guard units in Jefferson City. Clark-1, ¶ 10.

In Contention 1, Mr. Reed identifies the following functions which require law enforcement personnel: (i) dispatching; (ii) relaying messages; (iii) EOC security; (iv) manning vehicle impound lots; and (v) manning traffic control points. Clark-1, ¶ 12; see Attachment 1. The four-county emergency plan on which Reed Contention 1 is based has been replaced with separate plans for each of the four counties in the EPZ. The affidavits of Messrs. Clark and Stanfill take into consideration Mr. Reed's contention, but also have been adapted to the functions now assigned to law enforcement in the EPZ counties. Clark-1, ¶ 4; Stanfill-1, ¶ 2.

C. Assessment for Callaway/Fulton

Mr. Clark agrees with Mr. Reed that, in the event of a radiological emergency at the Callaway Plant, for Callaway County and the City of Fulton on each shift there would be a need for two individuals to receive and transmit law enforcement messages using the dispatch system (including receipt and verification of messages from the plant; requesting assistance from other law enforcement agencies; conducting notification of response agencies and special facilities; and informing emergency response organizations of the location of access and traffic control points); one individual to hand carry messages between the dispatcher and the sheriff or other authorized individual; one individual to provide security for the

emergency operations center ("EOC"); and a law enforcement officer to man each of the vehicle impound lots, which will be no more than four in the County. Clark-1, ¶ 12; Attachment 1 (Reed Contention 1.A(3), (4), (5) and (7)). In addition, there would be a need for one member of law enforcement to man each of the 41 access and/or traffic control points. Clark-1, ¶ 12. This individual would be appropriately assisted by a non-law enforcement person, e.g., from among the 55 volunteer firemen available in the County/City. Id. In Mr. Clark's opinion, in addition to the individuals assisting the officers at the traffic/access control points, the two radio dispatchers need not be law enforcement personnel, although they would be required to know how to work the radiocommunications equipment. Also, the communications messenger need not be a member of law enforcement or otherwise technically trained (beyond the instructions routinely provided to messengers) to carry out his assigned responsibilities. Thus, in Callaway County/Fulton, 46 positions per shift would have to be filled by law enforcement personnel (41 at access/traffic control points, 1 at the EOC and a maximum of 4 at impound lots). Id.

Furthermore, Mr. Clark agrees with Mr. Reed's view that activating the warning system, which will be initiated from the EOC Communications Center, does not create a need for any additional personnel. Id., ¶ 13. Mr. Clark would add that similarly, the function of notifying the Presiding Judge/Mayor

of any emergency condition at the Callaway Plant would not require any additional personnel, as this function could be performed easily by the individual manning the 24-hour Emergency Communications Center. Id.

Mr. Clark also notes that the Sheriff and Chief of Police will personally coordinate the activities of their respective law enforcement personnel and will coordinate any necessary impediment removal activities, through the dispatchers, which may be taking place in their respective jurisdictions. They will also initially identify the access and traffic control points which need to be activated, given the particular pathway of the plume. Id., ¶ 14.

After an evacuation, the 41 law enforcement personnel no longer needed to man traffic control points will provide security within the EPZ by patrolling the area. In the course of their patrol, these individuals will be able to locate stranded motorists and protect property. Id., ¶ 15.1/

As previously stated, Callaway County and the City of Fulton have available to them 29 full-time law enforcement personnel (excluding the Sheriff, the Chief of Police and the

1/ In response to Applicant's interrogatory seeking to determine how, in his assessment, Mr. Reed had accounted for the time required to fulfill functions, and the potential for personnel to proceed to fulfill more than one assignment because of the passage of time, Mr. Reed responded, "The timing of functions is not relevant to determining that task functions must be accomplished." John G. Reed's Responses to Applicant's Revised Interrogatories, November 12, 1982, at 2.

jailers), 8 full-time radio dispatchers and 5 full-time laymen (clerical personnel) from the sheriff's office and the police department. In addition, there are 30 members of the Sheriff's reserve. Thus, there would be no shortfall of personnel on the first shift, and a shortfall of 60 individuals (33 law enforcement personnel and 27 laymen for traffic and access control) on the second shift. Id., ¶ 16. This deduction is made clear in the law enforcement manning chart attached to Mr. Clark's affidavit on Contention 1. See Clark-1 at ¶ 16 and Exhibit "E".

If one were to factor in Mr. Reed's highly conservative 10% reserve requirement for each shift, a total of 99 rather than 90 individuals would be required each shift in Callaway County and the City of Fulton. See Clark-1, Exhibit "B". This calculation takes into account Mr. Reed's concern about failing to take personnel shortages into account. See John G. Reed's Responses to Applicant's Revised Interrogatories, November 12, 1982, at 2. Conservatively assuming the entire shortfall consisted of law enforcement personnel, not messengers, dispatchers or laymen for traffic/access control points, 9 additional law enforcement personnel would be needed each shift. There would still be no manning shortages on the first shift because of the availability of the Sheriff's reserve. On the second shift, again assuming a 10% reserve for that shift, there would be a shortfall of 78 members of law enforcement.

(Nine members of the Sheriff's reserve personnel previously available for the second shift would now be working on the first shift, plus nine more members of law enforcement would be the "reserve" for the second shift.) Clark-1, ¶ 17.

After one hour, 8 State Highway Patrolmen would become available to perform law enforcement functions in the EPZ. In two hours, 8 more State patrolmen would arrive in the area. Within four to six hours after their notification, 120 National Guardsmen would be available to perform necessary law enforcement functions. Clark-1, ¶ 18.

Based on the assessment described above, Mr. Clark is satisfied that there is an adequate supply of individuals available with law enforcement training who are committed to providing emergency law enforcement services in Callaway County and the City of Fulton in the event of a radiological emergency at the Callaway Plant. Id., ¶ 19. Mr. Clark also notes in his affidavit that while he is confident that adequate law enforcement personnel are available, the full scale exercise required by NRC to be conducted prior to the plant's exceeding 5% power will serve to identify any personnel shortfalls and enable local and State governments to take any additional steps necessary to ensure that sufficient law enforcement personnel are available. Id., ¶ 20.

D. Assessment for Osage, Gasconade and Montgomery

Mr. Stanfill has assessed law enforcement staffing levels for the other three counties in the EPZ. This analysis recognizes that,

(a) the traffic access/control implementing procedure for Montgomery County will specify the need for a maximum of five traffic/access control points in the Montgomery County portion of the EPZ.

(b) the traffic access/control implementing procedure for Gasconade County will specify a possible need for one traffic/access control point in the Gasconade County portion of the EPZ; and

(c) the traffic access/control implementing procedure for Osage County will specify the need for a maximum of five traffic/access control points in the Osage County portion of the EPZ. Stanfill-1, ¶¶ 6-8.

Taking into account the current plans for the EPZ counties, and assuming Mr. Reed's law enforcement functional assignments essentially are correct, Mr. Stanfill calculates that Montgomery County could need 7 law enforcement officers (5 for traffic control, 1 for the security of the EOC, and 1 at an impound lot), as well as 2 radio dispatchers and 1 messenger per shift. Consequently, there would be a shortfall of 3 law enforcement personnel, but no shortfall of radio dispatchers or

laymen (messengers) for the first shift. Members of the Sheriff's reserve within the county can fulfill this shortfall, as well as provide law enforcement assistance on the second shift. Additional assistance from the State Highway Patrol and National Guard can be obtained if necessary. No additional dispatchers or messengers would be necessary. (Here, Mr. Stanfill has not relied upon the Sheriff as a member of law enforcement available to perform one of the law enforcement functions described above because the Sheriff would be coordinating the activities of his men, as well as maintaining contact with law enforcement personnel in the other EPZ counties.) Stanfill-1, ¶ 9.

Similarly, in Gasconade County, there could be a need for 3 law enforcement officers (1 for traffic control, 1 for the security of the EOC, and 1 at an impound lot), as well as 1 radio dispatcher and 1 messenger per shift. Consequently, there would be no shortfall of law enforcement personnel, radio dispatchers or laymen (messengers) for either shift. Id., ¶ 10.

In Osage County, there could be a need for 7 law enforcement officers (5 for traffic control, 1 for the security of the EOC, and 1 at an impound lot), as well as 2 radio dispatchers and 1 messenger per shift. Consequently, there could be a shortfall of 4 law enforcement personnel, but no shortfall of radio dispatchers or laymen (messengers) for the first shift.

The State Highway Patrol can provide 8 state patrolmen in the area within one hour of notification. See Stanfill-1, attached Exhibit "B" (letter of agreement). This resource should provide the needed manpower for the first shift. On the second shift, the National Guard will provide law enforcement assistance. See Stanfill-1, attached Exhibit "C" (letter of agreement). No additional dispatchers or messengers would be needed. Id., ¶ 11.

Finally, while a layman would be needed to assist the law enforcement officer at each of the traffic/access control points, these personnel will be available from the Sheriff's Auxiliary in Montgomery County (14), the Morrison Volunteer Fire Department in Gasconade County (18), and the Chamois Volunteer Fire Department in Osage County (24). Since there are only an absolute maximum of five traffic/access control points in Osage County, the available resources described above will provide a sufficient pool of manpower. Id., ¶ 12.

Mr. Stanfill therefore concludes that, based on the number of law enforcement and fire department personnel available in the counties of Montgomery, Gasconade and Osage, he is satisfied that there are a sufficient number of personnel available to perform law enforcement-related functions in the event of a radiological emergency at the Callaway Plant. Id., ¶ 13.

E. Assessment Conclusion

Combining the number of law enforcement personnel needed for the four counties in the EPZ, it is clear that the absolute maximum total manpower needed from the State Highway Patrol and the National Guard for law enforcement is 4 individuals on the first shift, and 67 on the second shift. Even if one were to factor in a 10% reserve requirement, the 16 Highway Patrolmen and 120 National Guardsmen provide more than an adequate pool of manpower to fulfill this need. Furthermore, this assessment assumes that the EPZ will be evacuated in its entirety at one time.

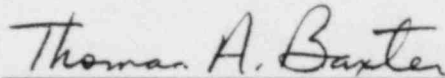
In summary, the issue of law enforcement staffing has been analyzed in detail by Mr. Walter M. Clark, the Callaway County/Fulton EMD who has first hand knowledge of the Callaway/Fulton Plan and of the resources available to the County/City in the event of a radiological emergency, and by Mr. Gerald W. Stanfill, the SEMA Radiological Emergency Planner who has a similar familiarity with the plans for and resources available to the other three EPZ counties. Based on this detailed review, there is no basis for concern that there would be insufficient personnel available in the EPZ counties to perform the law enforcement duties assigned in the county plans.

IV. Conclusion

A sufficient number of personnel will be available in the four EPZ counties to perform the law enforcement functions assigned in the county plans. Reed Contention 1 therefore has been fully satisfied. Accordingly, there is no genuine issue to be heard with respect to Contention 1 and Applicant's motion for summary disposition should be granted.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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CONTENTIONS

#1. STAFFING - SHERIFF'S OFFICE

County Sheriff's Offices have insufficient personnel to perform duties assigned in the proposed Off-site Plan and SOPs:

A. Montgomery Sheriff's Office has 4 deputies and 4 radio dispatch operators, for a total of 9 persons (paid, full-time). The proposed Montgomery SOP requires the Sheriff to provide law enforcement, activate the warning system, provide and maintain communications with emergency response personnel, provide security for the EOC, receive notifications from the Callaway Plant, notify officials of emergency conditions at the plant, notify other officials of emergency classifications or the Presiding Judge's instructions, provide traffic control, establish and maintain traffic control points, provide security to evacuated areas, request assistance from other law agencies via the State EMA, and notify other emergency agencies of the traffic control points (see Montgomery County SOP, page 3). For the following reasons, the manning requirements for the Montgomery County Sheriff's Office is 89 persons ($9+72+8=89$) if the responsibilities outlined in the proposed SOP are to be met. This includes a conservative reserve estimate of 10% (8 persons). This indicates a shortage of 80 personnel in this office.

(1) Provide law enforcement: This is the normal function for which this office is funded and staffed. All full-time employees are needed to support this function if

current standards of law enforcement are to be maintained. No comparative degree of effectiveness of this office with like organizations is inferred; whatever level of effectiveness is being maintained is sufficient to fulfill a requirement that such office is presently providing its maximum level of law enforcement in its area of responsibility.

(2) To activate the warning system incurs no major obligation to this office unless the activation switch is located outside the immediate administrative area (communications room). The switch can be activated by existing personnel, if colocated with radio equipment.

(3) To provide and maintain communications with emergency response personnel involves more than simply speaking to a distant operator and recording a brief note of the call in a traffic log (as is done under existing procedure in the Sheriff's Offices).

(a) All messages being received must be written down by the operator on a prescribed message form (see Montgomery SOP, Proc. 2, 5.7 Communications), hand carried to the County Clerks Office for logging (see SOP, Proc. 2, 5.7.2 & 5.7.3) and delivered to the addressee for action or information.

(b) The operator working the emergency response radio/telephone network must be immediately available to receive or transmit message traffic in order to assure timely action by response personnel in the field and officials in the EOC. This communications net will require a fulltime operator at each

radio transmitter/receiver or telephone and because of operational stress, time limits for shift schedules should be limited to 8 hours per individual. This necessitates a minimum of 3 receive/transmit operators for each communications network which has a terminal station in the Sheriff's Office.

(c) To hand-carry messages from the Sheriff's Office to the message center in the County Clerk's Office will require at least one person per shift. If this responsibility is assigned to the Sheriff, an additional 3 persons will be required for a 24 hour period.

(4) Provision of security for the EOC (SOP, Proc. 2, 5.9 Security) requires a person at a predetermined access control point in the Courthouse to perform the duties outlined in SOP 5.9.2 and 5.9.3. If more than one access point exists for entry into the EOC, a possibility exists that more than one security guard will be necessary. Assuming an 8 hour shift, 3 individuals are required to meet this SOP provision.

(5) Receipt of notifications from the Callaway Plant, if such are limited only to emergency incident classifications changes, can be performed by the normal radio dispatch operator; however if such notices are messages from the county on-site representative or include moderately large volumes of messages, another operator will be required to function on this "command net", performing duties similar to those identified in ((3, a & b)) above. This will necessitate 1 person per shift for a total of 3 per day.

(6) Personnel needed for notification of other officials of emergency conditions at the plant or the Presiding Judges instructions will be determined by the location of such officials at the time of said notification. Notice may be accomplished by use of existing communications nets. Only in the event of having to hand-carry messages will additional personnel be required and possible use of a vehicle, if great distances are involved. Neither personnel or vehicles is anticipated to perform this function; however neither plan nor SOP is clear as to what is actually intended.

(7) Personnel for traffic control, if such involves traffic flow in corridors outside of the EPZ perimeters, will depend upon the length of the control corridor and ingress/egress points along which vehicular travel is anticipated. No estimate of manning can be made at this time due to insufficient data in the proposed plan and SOP. If, however; traffic control is tied to the EPZ road-block/security functions and is limited to controlling contaminated traffic to an impound area along a route with no ingress/egress points between the road-block and the impound area, an additional ⁴/₇ men will be required for each impound area (1 radiological monitor and 2 law enforcement officers plus a driver and vehicle to transport occupants of contaminated vehicles to a decontamination center). The actual number of men may be increased if personnel manning the impound area become contaminated and must be replaced. For a 24 hour period, a total of 12 men

are required to operate 1 impound area. If more areas are to be established, the figure must be increased proportionately.

(8) Establishment and maintenance of roadblocks in Montgomery County is based upon 8 presited locations (SOP, pg. 11-5). Need for 2 persons per roadblock (1 radiation monitor and 1 law officer) creates a need for 16 men to man the roadblocks. Working 8 hour shifts, 48 men, a minimum of 8 vehicles (with radios and associated roadblock equipment (SOP, pg. 11-4) is needed. To supply support for roadblocks, the Sheriff will need to supply meals to roadblock teams, relief teams, transport of personnel arrested at roadblocks, administrative support (to include radiation exposure records) and transport of contaminated evacuees from vehicle impound areas.

(9) Security of evacuated areas is provided by roadblock personnel, unless roving patrols are anticipated (SOP, pg. 10-3, item 5.6.1). Such patrols will require 1 vehicle and 2 men (1 driver and 1 radiation monitor) with radio contact with EPZ roadblocks. No roving patrol needs are included in this estimate.

(10) The patrolling of affected areas to ensure all persons have evacuated or taken shelter (proposed Offsite Plan, 9.0 Protective Response, D. Evacuation/Sheltering Notification, page 9-2) will require an undetermined man-power pool and vehicles in excess of above estimates. Because of a lack of specificity in the referenced plan, it is not possible to determine needs, at this time.

3. The above manning is applicable to the counties of Gasconade, Osage and Callaway. The functions are the same, only the number of fulltime Sheriff's employees and the number of roadblocks differ:

- Gasconade County Sheriff's Office has 6 fulltime, paid employees: 2 deputies and 3 radio dispatch operators. Roadblocks number 2, requiring 12 men for a 24 hour period.

- Osage County Sheriff's Office has 8 fulltime, paid employees: 3 deputies and 4 radio dispatch operators. Roadblocks number 8, requiring 48 men for a 24 hour period.

- Callaway County Sheriff's Office has 12 fulltime, paid employees: 8 deputies and 3 radio dispatch operators. Roadblocks number 11, requiring 66 men for a 24 hour period.