

October 8, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN) Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant))

AFFIDAVIT OF ROBERT G.
BLACK, JR. ON EDDLEMAN-144

County of Wake)
) ss.
State of North Carolina)

ROBERT G. BLACK, JR., being duly sworn, deposes and
says:

1. I am the Director - Emergency Preparedness for Ap-
plicant, Carolina Power & Light Company.

In my professional capacity, I have been personally in-
volved in the development of the onsite emergency plan and
procedures for the Harris plant for the past three and a
half years. Further, I have attended numerous industrial
symposiums, am active in related professional associations,
and have participated in numerous emergency exercises at op-
erating nuclear plants. A current statement of my profes-
sional qualifications and experience is attached hereto. My

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business address is Carolina Power & Light Company, P.O. Box 1551, Raleigh, North Carolina 27602. I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in response to Eddleman Contention 144.

2. The purpose of this affidavit is to demonstrate the compliance of Table 2.2-1 of revisior and 3 of the Harris onsite emergency plan with the Commission's emergency planning regulations and applicable guidance.

3. Eddleman Contention 144 asserts that CP&L's emergency personnel levels do not meet the requirements of Table 2 of NUREG-0737, Supplement 1. More specifically, Mr. Eddleman has asserted that "[t]he staffing levels shown in the FSAR are insufficient to meet the requirements [identified by footnote 1 to Table 2] for one damaged and one undamaged unit." At the time this contention was admitted, Applicants were constructing a sister unit to the Harris plant, to be designated Harris Unit 2. However, by letter dated December 21, 1983, Applicants have advised the Commission that plans for the construction of Harris Unit 2 have been canceled. See December 21, 1983 Letter, E. E. Utley, Carolina Power & Light Company, to Director, Office of Nuclear Reactor Regulation, NRC. Any concerns about the adequacy of overall plant staffing in the event of an emergency at one unit of a multi-unit plant are therefore no longer relevant.

4. Applicants' on-shift staffing and augmentation for emergencies for the remaining unit of the Harris plant were set forth in Tables 2.2-1 and 2.2-2 of revisions 0 and 1 of the onsite plan. The information in these tables was not in the same format as Table 2 of NUREG-0737, Supplement 1 (which, with the exception of a typographical error, is identical to Table B-1 of NUREG-0654).

5. In the "Safety Evaluation Report related to the operation of SHNPP Units 1 & 2," NUREG-1038 (November 1983). The NRC stated:

The On-shift emergency staff and the augmented Emergency staff appear to comply with guidelines of Table B-1 of the planning standard [i.e. NUREG-0654], but contain ambiguities that interfere with proper review of the plan * * * * Tables 2.2-1 and 2.2-2 should be revised to be more compatible with Table B-1 of NUREG-0654.

See NUREG-1038, § 13.3.2.2 ("On-site Emergency Organization") (emphasis supplied).

6. In Revision 2 of the onsite plan (February 1984), CP&L revised Table 2.2-1 and 2.2-2 (of revisions 0 and 1) to be substantially the same as the format of Table B-1, as requested by the NRC Staff, by incorporating both tables into a new Table 2.2-1. Table 2.2-1, "On-shift Staffing for Emergencies," is now nearly identical to Table B-1 of NUREG-0654 (Table 2 to Supplement 1 of NUREG-0737). The main difference is that

instead of listing augmentation times of exactly 30 minutes and 60 minutes for two categories of personnel to respond, CP&L lists times of 30-45 minutes and 60-75 minutes to allow for variations in time of arrival due to weather conditions. The December 17, 1982 letter transmitting NUREG-0737, Supplement 1 expressly contemplates such accommodations:

You should * * * note that
the staffing levels in table
2 * * * are only goals and
not strict requirements.

See December 17, 1982 Letter, Director, Division of Licensing, Office of Nuclear Reactor Regulation, to All Licensees of Operating Reactors, Applicants For Operating Licenses, and Holders of Construction Permits, Re: Supplement to NUREG-0737 -- Requirements For Emergency Response Capability (Generic Letter No. 82-33).

7. A second minor difference between the table included in NUREG-0654 and Supplement 1 to NUREG-0737, and the table now included in the Harris onsite plan is that, while the regulatory guidance lists generic titles for personnel, CP&L has substituted the specific position titles used at the Harris plant for personnel with the identified job function or expertise.

8. A typographical error was made in Table 2 of NUREG-0737, Supplement 1, when the table was transferred from NUREG-0654. Thus, although Table 2 erroneously suggests that three persons are required in the 30-minute column under the Major Task "Repair and Corrective Actions," Table B-1 of

NUREG-0654 correctly indicates that only two persons are needed with the position title or expertise in Electrical Maintenance/Instrument and Control (I&C) Technician. In Table 2.2-1 of the onsite plan, item 5 ("Plant Engineering, Repair and Corrective Actions"), CP&L lists two Electrical/I&C maintenance personnel in the 30-45 minute column. This satisfies the regulatory standard.

9. Under the Major Task "Repair and Corrective Actions," Table B-1 of NUREG-0654 provides for one person on shift with the position title or expertise of Mechanical Maintenance/Radwaste Operator. The table further indicates a requirement of one mechanical maintenance person and one radwaste operator at 60 minutes. CP&L's routine non-emergency on shift staffing includes a minimum of at least one mechanical maintenance person and at least one radwaste operator. Thus, the Table B-1 requirement for one radwaste operator onsite at 60 minutes will be met by normal on-shift staffing levels. In an emergency, CP&L would bring in, if not already onsite, additional mechanical maintenance personnel (rather than one maintenance person and one radwaste operator), as identified by Table 2.2-1 of the onsite plan, since the major emergency task would be repair. CP&L thus meets or exceeds the regulatory guidance in this area. CP&L has also committed to a minimum on shift complement of 10, which meets the provisions of Table B-1.

10. Fire brigade and security staffing are identified in Table 2.2-1 of the onsite plan by reference to other controlling documents, exactly as indicated in Table B-1 of NUREG-0654 (Table 2 of NUREG-0737, Supplement 1). The total number of personnel reflected in Table 2.2-1 for the emergency organization for on shift, 30-45 minutes, and 60-75 minutes meets or exceeds the provisions of Table B-1.

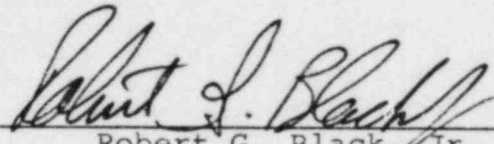
11. Since issuance of revision 2 of the onsite plan, the NRC Staff has issued Supplement No. 1 to NUREG-1038, "Safety Evaluation Report" (June 1984), addressing existing open items. Under Section 13.3.2.2: "On-site Emergency Organization," three open items were addressed. In relation to item 2, the NRC Staff stated:

The Applicant has revised Tables 2.2-1 and 2.2-2 to correspond with Table B-1 of NUREG-0654 so that they specify the minimum On-shift staffing available for emergencies and the capability for augmentation in 30 to 45 minutes with additional augmentation in 60 to 75 minutes. The variations in times of arrival are determined by weather conditions. The minimum staffing and augmentation of the emergency staff follow the guidelines of NUREG-0654 and Supplement 1 of NUREG-0737 and are adequate.

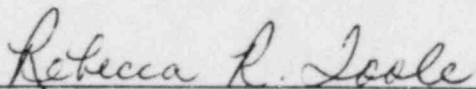
In relation to the three open items discussed in the section the NRC Staff concluded:

The staff finds the applicants response to the above three issues is satisfactory and the staff's concerns have been fully resolved.

12. In summary, I am confident that Table 2.2-1 of the Harris onsite emergency plan complies with Table 2 of NUREG-0737, Supplement 1 (Table B-1 of NUREG-0654). The NRC Staff concurs in this assessment.


Robert G. Black, Jr.

Sworn to and subscribed before me this 8th day of October, 1984.


Notary Public

My Commission expires: My Commission Expires 6-2-86

ROBERT G. BLACK, JR.
DIRECTOR - EMERGENCY PREPAREDNESS
CAROLINA POWER & LIGHT COMPANY

EDUCATION AND TRAINING:

B.S. Degree in Industrial Engineering
Georgia Institute of Technology (1965)

Attended various schools while in the U.S. Navy

Completed EIT

Registered Professional Engineer - February 1979

PROFESSIONAL SOCIETIES:

American Nuclear Society

Professional Engineers of North Carolina

EXPERIENCE:

June 1969 to June 1973 -
U.S. Navy Nuclear Program

September 1973 -
Senior Engineer
Environmental & Technical Services Section
Special Services Department
CP&L
Raleigh, N.C.

January 1976 to June 1976 -
Project Engineer
Licensing & Technological Services Section
Special Services Department
CP&L
Raleigh, N.C.

June 1976 to December 1979 -
Project Engineer
Nuclear Licensing Unit
Licensing & Siting Section
Technical Services Department
CP&L
Raleigh, N.C.

December 1979 to March 1981 -
Project Engineer
Nuclear Licensing Unit
Licensing & Permits Section
Technical Services Department
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Raleigh, N.C.

March 1981 to August 1983 -
Director
Emergency Preparedness
Technical Services Department
General Office
Raleigh, N.C.

August 1983 to Present -
Director
Emergency Preparedness
Operations Training and Technical
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