

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY, ET AL.

(Perry Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-440
50-441

APPLICANTS' DIRECT TESTIMONY
OF SCOTT T. McCANDLESS
ON ISSUE NO. 1 - CONTENTION A

1. I am a co-founder, principal, and Vice President of HMM Associates, Inc. My business address is 336 Baker Avenue, Concord, Massachusetts 01742. My responsibilities at HMM Associates include the management and supervision of evacuation time estimate studies. I have served as Principal-in-Charge of the evacuation time estimate study prepared by HMM Associates for the Perry Nuclear Power Plant plume exposure pathway Emergency Planning Zone ("EPZ"). That study is entitled "Evacuation Time Estimates For Areas Near The Perry Nuclear Power Plant" ("the ETE").

2. The portion of Contention A which was not summarily disposed of states:

Evacuation time estimates have not been
reviewed by state or local organizations.

As confirmed by the Licensing Board's March 13, 1985 Memorandum and Order, the motion for summary disposition on Contention A

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was granted "except as to the issue of obtaining published comments from state and local officials...."

3. Offsite emergency planning/response officials have played an important role in the development of the ETE for the Perry EPZ. Indeed, their participation in the process is acknowledged on page 2-2 of the ETE:

Officials from the Ashtabula, Lake and Geauga County Disaster Services Agencies and Sheriff's Departments have participated in the compilation and selection of these preparation and mobilization times.

Further, page 2-2 of the ETE notes, in relevant part:

Vehicle occupancy rates for the various population segments were based upon * * * discussions with county emergency preparedness officials
* * *.

Thus, the participation of these officials went far beyond a mere "review" of the ETE, and -- in fact -- even beyond the determination of preparation and mobilization times and vehicle occupancy rates (expressly acknowledged in the ETE).

4. Before beginning work on the Perry ETE, on October 3 and 4, 1983, HMM personnel met individually with representatives of each of the three counties (including the DSA Directors for Geauga, Ashtabula, and Lake Counties), to present the basic methodology of the ETE and to discuss the general input data and assumptions for the computer simulation model to be used in developing the ETE. The model output (i.e., evacuation time estimates, average travel speeds, queue lengths, etc.) was also described. In addition, the

time/weather condition scenarios to be modeled were discussed. All meeting participants were in agreement with the information presented, and future meetings with the officials were scheduled for their review of the validity of the area-specific input data and assumptions for the Perry EPZ.

5. On October 17 and 18, 1983, HMM personnel again met with the officials (including the DSA Directors) of the three counties, to review the area-specific data and assumptions for use in the ETE. The data and assumptions discussed included matters such as evacuation area boundaries, evacuation routes, and adverse weather conditions to be modeled. All those in attendance at the meetings concurred in the results to date, as well as the proposed plans and procedures for continued work on the ETE.

6. On March 9, 1984, copies of the March 1984 draft of the ETE were provided to the DSA Directors of each of the three counties, and to the Ohio Disaster Services Agency in Columbus, for review and comment. The agencies' comments have been reflected in the February 1985 revision of the ETE, which is included in Revision 4 of the Perry Emergency Plan as Appendix D. The comments were submitted to the NRC with the submission of Revision 4 of the Perry Emergency Plan. Therefore, it is clear that the ETE has been reviewed by state and local organizations and that comments of these officials have been included with the submittal of the ETE to the NRC.