

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

It 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 JOHN BAER  
ON ISSUE NO. 1 - CONTENTION 2

1. I am presently Project Manager for Emergency Management Services, Energy Consultants, Inc. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. In my position, I am project manager for off-site radiological emergency response planning being provided to Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant.

2. Contention 2 states that "the [emergency] plans do not provide decontamination protection for bus drivers during an emergency." Sunflower believes that bus drivers, in addition to the dosimeters they will have, should also be provided with protective gear such as respirators and goggles. See Sunflower Alliance's Particularized Objections to Proposed Emergency Plans in Support of Issue No. 1, dated August 20, 1984, p. 24.

3. There is no regulatory requirement and no regulatory guidance that calls for bus drivers to be provided with protective gear such as respirators and goggles. The NRC regulations require that there be means for controlling radiation exposures to emergency workers. 10 C.F.R. § 50.47(b)(11). Further guidance on this topic is contained in NUREG-0654, Criterion K.3, which describes provision for supplying dosimetry to emergency workers. Neither NRC regulations nor NUREG-0654 nor other guidance documents suggest that respiratory devices or goggles should be provided for emergency workers such as bus drivers.

4. The county emergency plans provide for the distribution of personnel dosimetry, both self-reading and permanent record types, and associated recordkeeping materials to those bus drivers who will be serving as emergency workers.

5. Bus drivers have access to dosimetry at assembly areas from which they will be deployed. Each bus driver will wear dosimetry equipment at all times. Training in the use of and associated recordkeeping of dosimetry has been, and will continue to be provided to bus drivers. This includes "reading" dosimeters regularly while performing emergency duties. Three hundred and eighty-seven of the 718 regular and substitute bus drivers have received this training. Further training sessions will take place during the summer and early fall of 1985, and periodically thereafter, both for those bus drivers who have already had dosimetry training, as well as those who have not yet been trained.

6. Standard Operating Procedures for each school district require that bus drivers, as well as other emergency workers, read their dosimeters and record their readings at least once an hour. If the bus driver's self-reading dosimeter indicates any radiation exposure, the procedures call for him to report to a monitoring and decontamination station (all of which are outside the plume exposure pathway EPZ) for monitoring and, if needed, decontamination. This monitoring would show any differing exposure levels to different parts of the body. Upon completion of a mission or shift, each bus driver is required to turn in his or her dosimetry to be checked and recorded. Dosimetry records are forwarded to the county EOC and retained.

7. In each school district emergency procedure there is a section that details radiological exposure control procedures for bus drivers. Information contained in this section includes:

- a. The distribution and use of dosimeters;
- b. Associated exposure control recordkeeping; and
- c. Availability of monitoring and decontamination services at specified worker decontamination stations.

8. There are several other factors that reduce the chance of bus drivers being exposed to any radiation hazard.

- a. emergency response plans have been written so that an evacuation can be completed before the release of significant radioactivity occurs.
- b. The nature of bus drivers' duties will have them spending less time inside the plume exposure pathway emergency planning zone than most other

emergency workers, i.e., bus drivers leave the risk area as soon as their buses are loaded.

- c. Every bus driver will have a radio in his bus which will ensure prompt receipt or transmission of pertinent information, including radiological information.
- d. State, Lake County and CEI radiological monitoring teams will be reading radiation levels and can provide radiological data through emergency management channels that can be relayed to bus drivers. Each of the three county plans provides for the dissemination of information originating with the state radiological monitoring teams. Lake Plan, Annex H, p. 100; Ashtabula Plan, Section H, p. 3; Geauga Plan, Section H, p. 3. The dissemination of radiological or other information is yet another way to protect bus drivers.

9. In light of the information and procedures in the emergency response plans relevant to the proper dosimetry, exposure control recordkeeping and monitoring services, bus drivers are well protected. There is no need for bus drivers to have goggles, protective clothing or respirators.