

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

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In the Matter of)
)
THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)
)
(Perry Nuclear Power Plant,)
Units 1 and 2))

Docket Nos. 50-440
50-441

AFFIDAVIT OF
DANIEL D. HULBERT
ON CONTENTION B

County of Lake)
) ss
State of Ohio)

Daniel D. Hulbert, being duly sworn, deposes and says:

1. I am presently Emergency Planning Coordinator, Perry Plant Technical Department, The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry Ohio 44081. In my position, I am responsible for developing, maintaining, and evaluating the Perry Nuclear Power Plant (PNPP) Emergency Plan, including coordinating emergency preparedness among various PNPP departments and developing emergency planning documents and specifications of response requirements. These responsibilities include the plans and instructions governing evacuation of c-site personnel. A current statement of my professional and technical qualifications is attached hereto. I have personal knowledge of the matters stated herein and believe them to be true and

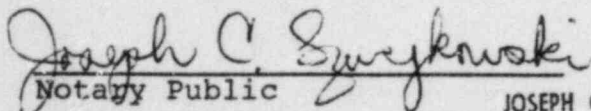
correct. I make this affidavit in support of Applicants' Motion for Summary Disposition of Contention B.

2. Contention B states in part that the evacuation of construction workers on-site has not been included in emergency plans. This part of Contention B is incorrect. The Perry Nuclear Power Plant Emergency Plan specifically provides that all personnel without emergency response functions will be evacuated at a Site Area or a General Emergency level event. PNPP Emergency Plan, § 6.4.1. Procedures implementing the PNPP Emergency Plan provide for evacuation of such personnel on a Site Area Emergency. Construction workers on-site do not have emergency response functions, and would therefore be evacuated in the event of such an emergency. The plan also describes the routes to be used by non-essential personnel to evacuate the site. PNPP Emergency Plan, Fig. 6-7, sheets A-C.

3. In summary, the Perry Emergency Plan specifically includes the evacuation of non-essential personnel, including construction workers.


DANIEL D. HULBERT

Subscribed and sworn
to before me this 29th day
of JANUARY, 1985.


Notary Public

JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio - Cuyahoga County
My Commission Expires: My Commission Expires July 14, 1986

Name: Daniel D. Hulbert, Emergency Planning Coordinator, Perry Plant
Technical Department

Formal Education and Training:

Electrician's Mate School, U. S. Navy, 1973-1974
Nuclear Power Training, U. S. Navy, 1974-1975
Engineering Laboratory Technician School, U. S. Navy, 1975
One-Week Basic BWR Systems (PDP), 1980
Fifteen-Week Davis-Besse Nuclear Power Station (Emergency Planning), 1980
Eight-Week Davis-Besse Nuclear Power Station (Evacuation Time Estimates),
1981
One-Week Electrical Fundamentals II, 1981
One-Week Planning for Nuclear Emergencies Course, Harvard School of Public
Health, 1982

Experience:

1979 - Present: The Cleveland Electric Illuminating Company

Joined CEI as an Engineering Technician and assigned to development of the PNPP Emergency Plan. Assisted in the preparation of the Davis-Besse Nuclear Power Station Emergency Plan, implementing procedures, and the Davis-Besse education time estimates. Participated in several Emergency Plan exercises at other Nuclear Power Plants as an official Exercise Observer. In 1982 promoted to present position of Emergency Planning Coordinator. Reports directly to the Technical Superintendent, Perry Plant Technical Department.

1973 - 1979: U. S. Navy

Electrician's Mate - Qualified as Engineering Laboratory Technician, Electrical Operator and Shutdown Reactor Operator on a S5W Class Submarine. Duties included operation and maintenance of electrical systems, chemistry controls for both primary and secondary plant, and routine and emergency health physics coverage. Assignments included one tour on an S5W Submarine and one tour assigned to the Radiological Controls Division of a Submarine Tender.