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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
THE CLEVELAND ELECTRIC) Docket Nos. 50-440
ILLUMINATING COMPANY) 50-441
)
(Perry Nuclear Power Plant,)
Units 1 and 2))

AFFIDAVIT OF
GARY WINTERS
ON CONTENTION B

County of Dauphin)
) ss.
Commonwealth of Pennsylvania)

GARY WINTERS, being duly sworn, deposes and says:

1. I am presently a Project Coordinator and Emergency Planning Specialist for the Emergency Management Services Department of Energy Consultants. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. My responsibilities include coordination of offsite resource inventory and assessment efforts involving Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant. Project activities have included the interview of response agency/facility administrators for resource information, preparation of county resource documents and analysis of

offsite resource capability to respond to an accident at the Perry Plant. A current statement of my professional qualifications and experience 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 Applicant's Motion For Summary Disposition of Contention B.

2. The purpose of this affidavit is to explain the consideration of potential evacuation route impediments (such as snow and disabled vehicles) in offsite plans for the Perry plume exposure pathway Emergency Planning Zone ("EPZ") as well as the ability of the counties in the EPZ to handle extreme conditions of inclement weather. As indicated in the plans and procedures, resources such as tow trucks and snowplows are utilized to keep evacuation routes clear. See, e.g., Lake County Plan,^{1/} § J-08; Ashtabula County Plan,^{2/} § J.4.2; Geauga County, Ohio Radiological Emergency Response Plan Standard Operating Procedure.

3. The jurisdictions within the EPZ are particularly well prepared to handle snow. Because the agencies charged with responsibility for snow removal within the EPZ are equipped and staffed to keep the roads passable in a normal

^{1/} Lake County Emergency Response Plan for the Perry Nuclear Power Plant, (Rev. 3, October 1984).

^{2/} Ashtabula County Radiological Emergency Preparedness Plan (May 10, 1984).

"snowbelt" snowfall, normal snow conditions require no special consideration in emergency planning for the Perry EPZ.

4. Of the 22 road departments within the EPZ, most could keep roads passable with no assistance even during a blizzard. During an emergency, the county governments have the authority to coordinate the response of the various political subdivisions within a county. Lake County Plan, § A-08; Ashtabula County Plan, § B.5; Geauga County Plan,^{3/} § B-4. Municipal road departments are included in the group of local departments subject to county-level coordination. The County Engineers are charged with maintaining roads within the EPZ in usable condition, and will coordinate impediment removal efforts. Lake County Plan, § J-08; Ashtabula County Plan, Appendix 6; Geauga County Plan, Appendix 4. Thus, in the unlikely event of an emergency at Perry during a blizzard, the resources of all road departments throughout Lake, Ashtabula, and Geauga Counties would be made available to augment the resources of any road departments within the EPZ which might need assistance in keeping roads passable.^{4/} With the

^{3/} Geauga County Radiological Emergency Response Plan (including Change No. 2 dated July 1984).

^{4/} Indeed, under particularly inclement weather conditions (i.e., snow accompanied by high winds), only the downwind sector of the plume EPZ is likely to be affected by an emergency at Perry. Therefore, should evacuation be indicated in such conditions, the snow removal resources of the three counties could be concentrated on the sector of the EPZ to be evacuated.

assistance of these road departments from outside the EPZ, the few road departments within the EPZ which may need assistance will have sufficient snow removal resources to keep the roads clear in a blizzard.

5. A partial survey^{5/} of road departments within the three counties revealed an impressive inventory of snow removal equipment. The 23 road departments surveyed in Lake County have a combined total of 139 large trucks with snow plows, 117 salt/cinder spreaders, 32 front-end loaders, and 13 graders. The 12 road departments surveyed in Ashtabula County have a combined total of 88 large trucks with snow plows, 58 salt/cinder spreaders, 22 front-end loaders, and 15 graders. The 11 road departments surveyed in Geauga County have a combined total of 64 large trucks with snow plows, 58 salt/cinder spreaders, 16 front-end loaders, and 11 graders. Additional snow removal equipment is available locally, from the other road departments within the three counties.

6. Still more snow removal equipment (if needed) would be provided from Ohio Department of Transportation resources outside the three counties, upon the request of one of the three County Engineers. State Plan,^{6/} §§ II.A.4.b(5)(d),

^{5/} The survey did not canvass all road departments within the three counties -- only those serving municipalities with a response role specified in the county plans. Therefore, additional snow removal equipment (beyond that identified in the survey) is locally available to the counties.

^{6/} State of Ohio Plan For Response to Radiological Emergencies at Licensed Nuclear Facilities (1984 ed.).

II.A.4.b(5)(e)3, V.2.e(4).

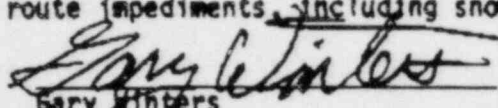
7. Sunflower's further argument that the Perry facility should be required to go to low power or no power operation during extreme conditions of inclement weather is also inconsistent with the snow removal capabilities within the three counties and the frequency of major snowstorms in this area. According to Miller & Weaver, Research Bulletin 1044: Snow in Ohio (Ohio Agricultural Research and Development Center, 1971), based on 29 years of data, the frequency of snow fall in excess of eight inches for the locations within the plume EPZ is 0.92 mean days per season (Painesville) and 0.85 mean days per season (Geneva). The frequency of snow fall in excess of twelve inches is 0.21 mean days per season (Painesville) and 0.20 mean days per season (Geneva). The frequency of snow falls in excess of 12 inches together with high winds is undoubtedly even less frequent.

8. Interviews with the County and State road departments indicate that with snowfalls of eight inches or less, the roads can be kept passable with existing resources. The road departments also indicated that under "worst case" weather conditions (i.e., 12 or more inches of snow in 12 hours with high winds), all evacuation routes could be kept open without resources from outside the three counties by marshalling the available resources within the counties in the EPZ area. This does not consider resources from outside the three counties


which would be available through the Ohio Department of Transportation.

9. This information demonstrates that even extreme conditions of inclement weather would not make evacuation impossible for any substantial periods of time. Although there have been instances (for example the "Blizzard of '78") when some roads in the area near the plant remained snowed in for a few days, in these few cases there was no attempt to marshal available resources to clear a particular area. Our review of the available resources and interviews with County and State road departments indicate that even in the "Blizzard of '78," all evacuation routes could have been kept open by focusing the available resources on these routes.

In summary, the offsite emergency plans for Perry reflect adequate consideration of potential evacuation route impediments, including snow.


Gary Winters

Subscribed and sworn to before
day of February, 1985.



My Commission Expires:

JENNIE M. DANIELS, NOTARY PUBLIC
HARRISBURG, DAUPHIN COUNTY
MY COMMISSION EXPIRES DEC. 12, 1988
Member, Pennsylvania Association of Notaries



ENERGY CONSULTANTS

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Resume Current 01-11-85

GARY A. WINTERS

Education

1975

Bachelor of Science - Law Enforcement
Pennsylvania State University
University Park, Pennsylvania

Experience

9-81 to Present

Energy Consultants
Harrisburg, Pennsylvania

Planner/Trainer, Emergency Management Services. Responsible for provision of direct consultant services to assist state and local governments and industry in emergency management planning, procedure preparation and program accreditation/licensing. Recent project assignment has included coordinating and performing a detailed audit of the offsite emergency preparedness program in support of the Perry Nuclear Power Plant Atomic Safety and Licensing Board hearings. Assignment as project coordinator involved responsibility for development of audit criteria; plan/procedure review; documentation of program weaknesses; and resource verification. Prior project assignments have included:

- Development of four county radiological emergency response plans in support of the Callaway Plant;
- Development of local emergency response agency implementing procedures in support of the Waterford 3 Steam Electric Station; and
- Revision of a county radiological emergency response plan in support of the Beaver Valley Power Station.

Gary A. Winters
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4-76 to 9-81

Dauphin County
Harrisburg, Pennsylvania

Juvenile Court Probation Officer. Managed caseloads, investigated cases of delinquency, prepared legal documents, and testified in court hearings; coordinated the delivery of human services to delinquent youth among various public and private institutions. Advanced to Assistant Supervisor of Predispositional Services.

9-67 to 10-70

U.S. Army
12th U.S. Army Security Agency Field Station
Chitose, Japan

Non-Morse Intercept Operator for the U.S. Army Security Agency. Advanced to search operator, Specialist 5, quality controller, and shift leader. Received a "top secret" security clearance.