

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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 THOMAS I. HAWKINS IN SUPPORT
OF APPLICANTS' MOTION FOR SUMMARY DISPOSITION
OF CONTENTION EPJ-5

County of Fulton)
) ss.
State of Georgia)

Thomas I. Hawkins, being duly sworn, deposes and says:

1. My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. Included among my responsibilities is the radiological emergency planning liaison function between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within those States.

I have held this position since December 1981. I have been employed by FEMA since July 1978. A current statement of my

8503040334 850227
PDR ADDCK 05000400
G PDR

professional qualifications is attached hereto. My business address is 1371 Peachtree Street, NE - Suite 736 - Atlanta, Georgia, 30309. I have personal knowledge of the matters discussed herein and believe them to be true and correct. I make this affidavit in response to Contention EPJ-5.

2. Contention EPJ-5 contends:

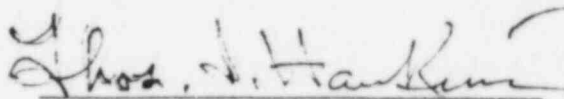
Section E 4b of State Procedures (p. 47) is deficient because there is no listing or mechanism of identifying homebound non-ambulatory people. Most ambulances and rescue squad vehicles are not adequately equipped to meet State standards for transporting hospitalized patients. A sufficient number of vehicles equipped adequately to transport the non-ambulatory from hospitals and homes will not be available.

FEMA guidance provides that "means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement" be included in the plans to implement protective measures for the plume exposure pathway (NUREG-0654, J.10.d.). The Harris ERP states, in Section IV, E.4.b., that the mobility-impaired will be identified through the use of the special needs response card contained in the brochure mailed annually and the CP&L listing of system customers on life support equipment and that the mobility-impaired will be "provided specialized transportation as required."

NUREG 0654, criterion G.1.d., provides that information on the special needs of the handicapped be included in the information to the public regarding how they will be notified and what their actions should be in an emergency. The Plant Harris Public Information brochure will contain this information.

FEMA guidance does not require investigation into the "number of vehicles equipped adequately to transport the non-ambulatory from hospitals and homes." However, FEMA staff has reviewed the affidavit of Jesse T. Pugh in support of the Applicants' Motion, and based upon the information provided in the affidavit, it appears that there are sufficient adequately equipped vehicles to transport the non-ambulatory populace.

FEMA staff and RAC also state that they have found no deficiencies in the Plant Harris ERP concerning the subject matter of Contention EPJ-5.


Thomas I. Hawkins

Sworn to and subscribed before me
this 25th day of February, 1985.


NOTARY PUBLIC FOR STATE OF GEORGIA

My Commission Expires:

Notary Public, Georgia, State at Large
My Commission Expires Nov. 12, 1985

Thomas I. Hawkins

Professional Qualifications

My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. I am assigned to the Radiological Emergency Planning liaison position between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological emergency plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within these States.

I have held the position of Emergency Management Program Specialist (or its equivalent) since December 1981. I have been employed by FEMA since July 1978.

From April 1964 to January 1977 I was employed as Planning Director of Clayton County, Georgia.

My formal education is as follows:

- AB Degree, Emory University, Atlanta, GA, 1958
- Master of City Planning Degree, Georgia Tech., Atlanta, GA, 1963
- Completed Radiological Emergency Response Course at the U.S. Department of Energy's Nevada Test Site, April 1982
- Completed Radiological Defense Officer and Radiological Defense Instructor Course, Georgia Emergency Management Agency, Atlanta, GA, March 1982
- Completed Basic Management Seminar for Emergency Management Personnel, Valdosta State College, Thomasville, GA, Winter Quarter, 1980
- Completed Radiological Emergency Planning Seminar, National Emergency Training Center, Emmitsburg, Maryland, October 1982
- Completed Radiological Accident Assessment Course, National Emergency Training Center, Emmitsburg, Maryland, August 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

CAROLINA POWER AND LIGHT COMPANY AND)
NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)

Docket Nos. 50-400 OL
50-401 OL

(Shearon Harris Nuclear Power Plant,)
Units 1 and 2))

I hereby certify that copies of "NRC STAFF/FEMA RESPONSE IN SUPPORT OF APPLICANTS' POSITION FOR SUMMARY DISPOSITION OF EMERGENCY PLANNING JOINT CONTENTION" in the above-captioned proceeding have been served on the following deposit in the United States mail, first class, or deposit in the Nuclear Regulatory Commission's internal mail system (*), this 27th day of February, 1985:

James L. Kelley, Chairman*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Richard D. Wilson, M.D.
729 Hunter Street
Apex, NC 27502

Mr. Glenn O. Bright*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Travis Payne, Esq.
723 W. Johnson Street
P.O. Box 12643
Raleigh, NC 27605

Dr. James H. Carpenter*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Linda Little
Governor's Waste Management Building
513 Albermarle Building
325 North Salisbury Street
Raleigh, NC 27611

Daniel F. Read
CHANGE
P.O. Box 2151
Raleigh, NC 27602

John Runkle, Esq. Executive Coordinator
Conservation Counsel of North Carolina
307 Granville Rd.
Chapel Hill, NC 27514

Steven Rochlis
Regional Counsel
FEMA
1371 Peachtree Street, N.E.
Atlanta, GA 30309

Spence W. Perry, Esq.
Associate General Counsel
Office of General Counsel
FEMA
500 C Street, SW Rm 840
Washington, DC 20472

Atomic Safety and Licensing Appeal
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert P. Gruber
Executive Director
Public Staff - NCUC
P.O. Box 991
Raleigh, NC 27602

Wells Eddleman
718-A Iredell Street
Durham, NC 27701

Richard E. Jones, Esq.
Associate General Counsel
Carolina Power & Light Company
P.O. Box 1551
Raleigh, NC 27602

Bradley W. Jones, Esq.
Regional Counsel, USNRC, Region II
101 Marietta St., N.W. Suite 2900
Atlanta, GA 30323

George Trowbridge, Esq.
Thomas A. Baxter, Esq.
John H. O'Neill, Jr., Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Atomic Safety and Licensing Board
Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Harry Foreman, Alternate
Administrative Judge
P.O. Box 395 Mayo
University of Minnesota
Minneapolis, MN 55455

Marjorie U. Rothschild
Marjorie U. Rothschild
Counsel for NRC Staff