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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  
OF THE BOARD  
BRANCH

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 EDDLEMAN CONTENTION 57-C-10

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

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 Eddleman Contention 57-C-10.

2. Eddleman 57-C-10 contends:

The State Plan (PT I pp 45-46 and 50-53) provides no useful analysis or information on sheltering effectiveness; but without knowledge of sheltering effectiveness, the decision on that option versus evacuation will be illinformed and quite possibly wrong. The plan's discussion of protective actions is mostly a list of them and a little handwaving - it's hopelessly inadequate. The plan, for potential shelters typical of those in the SHNPP plume EPZ, does not comply with Evaluation Criterion J.10.m. of NUREG-0654, which calls for inclusion in the plan of "expected local protection afforded in residential units or other shelter for direct and inhalation exposure...."


FEMA guidelines do not call for inclusion in the plan of the actual protection factors (PF's) afforded in residential units. NUREG-0654, criterion J.10.m., calls for "The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units or other shelter for direct or inhalation exposure, as well as evacuation time estimates.."

(Emphasis added, footnote omitted.)

The required bases and expected local protection afforded by sheltering and evacuation time estimates are stated and considered in the plan at pages 40, 49, 50 and 51. FEMA staff and the RAC consider that the requirements of J.10.m. have been met.

In addition, FEMA staff understands that the North Carolina Division of Emergency Management has accepted the results of a housing survey commissioned by the Applicants and summarized in the Affidavit of Robert G. Black, Jr. in Support of Applicants' Motion for Summary Disposition of CCNC Contention 2 and Eddleman Contention 57-C-10. The Division of Emergency Management, FEMA staff understands from the Affidavit of Jesse T. Pugh, III, will amend the ERP to "reflect the results of the housing survey and to include an analysis of the level of protection from radiation releases afforded by typical residential structures in the Harris EPZ."

Although Mr. Pugh apparently believes the above-stated action to be necessary to comply with NUREG-0654, criterion J.10.m., FEMA and the RAC have never required this information concerning protection factors to be included in ERP's and believe that the plan, as presently written, complies with criterion J.10.m. of NUREG-0654.

  
Thomas I. Hawkins

Sworn to and subscribed before me  
this 1st 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