

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

75 FEB 25 P1:35

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of

THE CLEVELAND ELECTRIC  
ILLUMINATING CO. PA. 1

Docket Nos. 40-40  
60-441

(Ferry Nuclear Power Plant,  
Units 1 and 2)

AFIDAVIT OF  
WILLIAM A. BROTHMAN  
ON COMPECTION

COUNTY of LAKES }  
State of Ohio }

William A. Brothman, being duly sworn, deposes and says:

1. I am currently self-employed as a Farmer in Madison, Ohio. My business address is 2157 Bennett Road, Madison, Ohio 43057. I have also worked as a part-time and full-time substitute teacher in the Madison Local Schools and as a commercial snow plower in the Madison area. The Northeastern Ohio weather has affected my occupations as much as anyone in the area could be affected. A current state out of my education and occupational experience is attached hereto.

2. FBI seems to take for granted that roads throughout Madison Township can be kept open for an evacuation in case of a nuclear accident at the Ferry Plant. As a resident of Madison, I have seen snow storms here so severe that roads had to be closed unless they could be opened up with front end

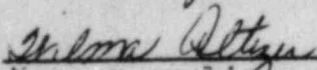
loader equipment. This operation would take most of a day once the storm winds let up. These severe winter storms can also render many roads in the township useless, making it impossible for area residents to even get out of their driveways.

3. When I was employed in the Madison Local Schools in 1977, there was a day when we couldn't leave Madison High School at the normal time because of the weather. A winter storm blew in and visibility became impossible. The "white out" condition occurred, forcing the bus drivers to pull off the road for safety reasons. At the school, we were informed over the P.A. system to stay in the building and not to try to go outside. Some parents arrived to pick up their children through the door. I left school that day at about 3:30 PM, just as the cafeteria was serving dinner to the many people still stranded at the high school. I was lucky to make it home in my truck. Even now, I question my judgment as to that day. Later that evening, the final students were brought home by volunteers in four wheel drive vehicles.

4. In summary, my occupations have certainly made me observe weather conditions very closely. I have seen this community paralyzed by various winter storms when home evacuation is impossible in the event of a nuclear disaster at Perry.

  
WILMA A. ALTIZER

Subscribed and sworn to before me this 18 day  
of February, 1989

  
Notary Public  
My Commission Expires: February 18, 1991  
WILMA ALTIZER

Notary Public, State of Ohio  
My Commission Expires June 19, 1991  
(Recorded in Lake County)

Name: William A. Wotznan, Wotznan Farms, Madison, Ohio

Education:

- High School Graduate, Madison Senior High School, 1970
- Bachelor of Liberal Studies, Milldale College,  
Michigan; History Major, Secondary Education  
Certificate, 1974
- Social Studies comprehensive courses completed at  
Garfield Senior College, Winter, 1977

Occupational Experience:

- Substitute teacher, Madison Local Schools 1975-1977
- Permanent Substitute, Madison High School  
October 1976 - June 1977
- Commercial Snow Plow, 1971-1981 Madison Area
- Wotznan Farms (vegetables) 1976-present