

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:)

THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY,)
DUQUESNE LIGHT COMPANY,)
OHIO EDISON COMPANY,)
PENNSYLVANIA POWER COMPANY,)
AND THE TOLEDO EDISON COMPANY)

(Perry Nuclear Power Plant)

DOCKET NO. 50-440
50-441

OPERATING LICENSE HEARING

6/1/81

SPECIAL PREHEARING CONFERENCE BRIEF
OF INTERVENORS
THE LAKE COUNTY BOARD OF COMMISSIONERS
AND
LAKE COUNTY DISASTER SERVICES AGENCY



BASIS FOR INTERVENTION

The Lake County Board of Commissioners and the Lake County Disaster Services Agency as the representatives of the local "interested government" charged with providing for the health, safety, and welfare of its citizens were admitted to this proceeding as party participants pursuant to 10 C.F.R. § 2.715(c). Our principal concerns pertaining to the licensing of the Perry Nuclear Power Plant are listed below:

EMERGENCY RESPONSE PLAN

The Perry Nuclear Power Plant presents a unique hazard of major magnitude. The potential consequences of

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the accidental release of radioactive gasses, liquid and particulates may envelope large areas within the (10 mile) Emergency Planning Zone (78,634 citizens), and would also critically impact upon the remainder of Lake County (151,366 citizens).

One of our principal concerns which we ask the Nuclear Regulatory Commission to help us on is the adequacy of the Emergency Response Plan which C.E.I. submitted to Lake County on May 15, 1981.

We also ask the Nuclear Regulatory Commission not to permit the Perry Nuclear Power Plant to commence fuel loading until the local Emergency Response Plan and its concomitant Emergency Operating Center are in place and tested to our mutual satisfaction.

It is our desire that the Emergency Response Plan wherever possible, blend with other emergency planning procedures for nonnuclear emergencies presently in existence in Lake County.

RADIOLOGICAL MONITORING

In order for Lake County to protect the citizens who reside within the ten (10) miles radius of the Perry Nuclear Power Plant from all radiological releases, it is felt by the Petitioners that we need to independently verify all monitoring so that we can adequately provide our citizens with an emergency warning if any dangerous or unsafe releases of radiation from the Perry Nuclear Power Plant occur.

FINANCING

Existing Federal requirements as found in NUREG-0654, FEMA-REP-1, Rev. 1, NUREG-0755, NUREG/CP-0011, Federal Register, Tuesday, April 19, 1980, Part VIII Nuclear Regulatory Commission Emergency Planning, Final Regulations, dictate that Lake County must also develop its own Emergency Response Plan. Attached hereto as "Exhibit A", is a listing of the minimum resources and equipment needed by Lake County to implement its own Emergency Response Plan and Emergency Operation Center. To adequately Implement and Maintain our own plan and Emergency Operation Center is beyond the limited financial capabilities of Lake County. The direct financial cost as a result of the Perry Nuclear Power Plant impact on local governmental budgets will far outweigh any financial benefit derived from local property taxes paid as a result of the Perry Nuclear Power Plant being located in Lake County.

Respectfully submitted,

JOHN E. SHOOP
PROSECUTING ATTORNEY

Donald J. Ezzone
Assistant Prosecuting Attorney

EXHIBIT A

The following resources are required to implement the protective actions as developed from the N.R.C. and U.S.-E.P.A. emergency planning criteria.

1.0 ALERTING AND NOTIFICATION SYSTEM

The criteria for the subsystems that make-up the Alerting and Notification System are described in NUREG-0654, FEMA-REP-1 Rev.1:3-1 to 3-16.

Note: It is mandatory for C.E.I. to implement an Alerting and Notification System for the entire Emergency Planning Zone and to have it in place and approved by Local Government, the State and N.R.C., prior to the intended startup date of Perry Nuclear Power Plant.

The following listed subsystems are required to meet N.R.C. criteria for:

- (a) Alerting and mobilizing local response staff and resources.
- (b) Alerting and notifying the population of the required protective actions.
- (c) And to perform these tasks promptly (within 15 to 45 minutes) and effectively (in scale and with appropriate back-up.)



1.1 SYSTEM FOR ALERTING AND NOTIFICATION RESPONSE ORGANIZATIONS.

This is a secure-tone alert radio system (on dedicated frequency) for mobilization of local organizations, directly involved in implementation and coordination of the emergency response actions for protecting the population.

1.2 PRIMARY SYSTEM FOR ALERTING THE POPULATION IN THE EMERGENCY PLANNING ZONE.

Siren or Electronic Tone Alerting System (N.R.C. criteria NUREG-0651 Rev 1, Appendix 3-6 60 3-13.)

Units are required to be located throughout the 10 Miles EPZ. Lake County Disaster Services Agency to consider combining C.E.I. and matching Federal Programs, so as to include all of Lake County.

Note: Lake County- Emergency Planning Team recommends that this system must be countywide. It is improper, both morally and operationally, to exclude Emergency Notification to the remain populace of the County.

1.3 PUBLIC RADIO AND TELEVISION NOTIFICATION SYSTEM.

Notification details regarding protective actions must be broadcast over local Emergency Broadcast System. (NUREG-0654, Rev 1, Appendix 3-13 to 3-15.)

It will be necessary for Lake County to establish a Local Emergency Broadcast System with Local Common Program Control Stations.

It will be necessary to provide secure 2-way radio communication facilities with the Local Common Program Control Stations and Lake County Emergency Operation Center.

It will also necessary to have back-up electric power generating units at each of the selected Local Emergency Broadcast Stations.

1.4 BACK-UP ALERTING AND NOTIFICATION SYSTEM WITH THE 10 MILE EMERGENCY PLANNING ZONE.

It is necessary to have a back-up alerting and notification system for the people within the 10 mile EPZ. (NUREG criteria: NUREG-0654 appendix 3 Page 3-3 and (b) Page 3-16.)

Tone alert NOAA radio receivers (operating on home electric power with self contained battery) are one means for providing this function. This subsystem will require the following:

- (a) The issue of NOAA receivers to each home in the critical 5 mile zone .
- (b) Dedicated phone and 2-way radio linkage to the Cleveland Control point for the local NOAA * transmitters.
* National

1.5 PORTABLE HIGH-INTENSITY LOUDSPEAKER KITS.

Portable Loudspeaker Kits which may be used on aircraft, vehicles, or boats. These units are for Alerting and Notification of special or unusual concentrations of people- in Parks, Shopping Centers, Boating, etc, etc..... (NUREG-0654, Rev 1 Section 4d page 3-16.)

2.0 LAKE COUNTY-EMERGENCY OPERATIONS CENTER

It is necessary to provide a 24 Hour Duty Facility for alerting and mobilizing the local response staff required to impliment the Emergency Response Plan. The E.O.C. must have complete County-Wide Radio and Phone Communication Facilities to coordinate actions.

This facility must be capable of performing its mission regardless of the availability of non-availability of power and phone service within the local utility grids.

It must be capable of full level service within minutes of incident notification. It must be capable of performing its operational and technical functions on a "stand alone basis" the first 4 to 8 hours of an incident.

It must have support capability in the form of mobile information gathering unit(s). Field information will be vital in coordinating Protective Actions during the first 4 to 8 hours crisis period.

3.0 MOBILE MONITORING AND RECONNAISSANCE UNIT(S) AND PORTABLE INSTRUMENTATION

The Population density of Lake County and its neighboring counties

Lake County 240,000

Ashtabula 103,000

Geauga 76,474

Cuyahoga 1,500,000

makes it cost effective as well technically wise to require and to provide full technical capability of immediately implementary Accident Assessment functions as indicated by item 1 7.8,9,10 (page 57-8) NUREG-0654, Rev 1.

This requires appropriate state of the art, portable radiation instrumentation, sampling devices and semi-portable meteorological instrumentation.

This will require all-weather vehicle(s) (2 units), self-contained breathing air supplies and protective clothing for reconnaissance teams and communication equipment.

4.0 TRAINING

Training of the local emergency response cadre to include:

(a) Provide a health physicist or engineer to coordinate ongoing training programs and maintain a continuous liaison with the plant manager and key safety specialist at the Perry Nuclear Power Plant.

(b) Establish and maintain a program of public education as to emergency and protective actions.

This to be accomplished through local schools, church organizations, Boy Scouts, etc, etc.....

(c) Establish and maintain a training program for all local emergency response organizations.

5.0 OFF-SITE RADIATION DETECTION AND ALARMING SYSTEM.

The nuclear industry does not have a credibility record regarding prompt notification to local response authorities, pertaining incidents or impending incidents (with potential off-site consequences.)

It is the consensus of the Lake County Commissioners that the people must be protected by a off-site means for continuous monitoring and automatic alarming to detect radiation leakage from the Perry Nuclear Power Plant.

5.1 The Lake County-Emergency Planning Team recommends a system with 16 sampling/detection stations. These units to be appropriately sited in the inhabited sectors surrounding the Plant.

Each sampling/detection unit to transmit data continuously by telemetry to a central data storage and alarming micro-processor. This data/alarming unit to be located in the Lake County Emergency Operation Center. A remote

read-out unit would also be provided in the Perry Nuclear Power Plant Control Center and the Emergency Operations Centers in adjacent Counties.

- 5.2 The Lake County Emergency Planning Team also recommends and request that the N.R.C. staff give priority attention to the development and implementation of:
INCIDENT DETECTION AND IDENTIFICATION MICRO-PROCESSOR WITH
TELEMETRY TO THE LOCAL EMERGENCY OPERATION CENTER.

This unit to be located on-site and connected to the appropriate plant safety monitoring systems. The "Interpolation Message" to be designed to alert trained off-site personnel in the local Emergency Operation Center of plant situations which could lead to off-site consequences.

This is an early-warning system intended for alerting staff and allowing for emergency resource mobilization.

6.0 LAKE COUNTY-EVACUATION SCHOOL BUS RADIO SYSTEM

Evacuation of the population at risk is the primary Protective Action when specified radiation guidelines have been exceeded.

Officials of Lake County have examined a recent massive public evacuation. It was learned that public transportation buses played a key part.

The Emergency Planning Team has recommended that the school buses be equipped with 2-way radio system. This radio system is urgently required to make it possible to coordinate the buses from _____ School Systems to support the transportation needs of the evacuation plans.

7.0 PROTECTIVE CLOTHING AND RESPIRATORY UNITS FOR EMERGENCY WORKERS ASSIGNED TO DUTY WITHIN THE 10 MILE EMERGENCY PLANNING ZONE.

- (a) _____ Hundred dosimeters, indicating type.
- (b) _____ Hundred LTD type (Numbers unavailable at this time)
- (c) _____ protective clothing sets.
- (d) _____ filter-respirator sets.

- 8.0 Reserve supplies of Radiation Monitoring Units and Radio Sets (Hand Held Type) Police and Fire Frequencies.

9.0 SITE-SPECIFIC EMERGENCY SUPPORT FACILITIES.

It is assumed that the operators (C.E.I.) will negotiate some support to the first-in Fire Department (Perry Township) for Fire, Rescue and Ambulance Service for On-Site industrial Accidents and Firefighting. The enhanced capacity of countywide mutual aid fire service could be a factor in averting and incident with Off-Site consequences.

The Lake County Emergency Planning Team recommends the following Equipment to be based within Lake County. This equipment is for critical support for a major on-site fire and/or accident which requires mutual aid from Fire Departments throughout the county. The listing of accessories are included to indicate the concept or purpose of these site support facilities.

9.1 MOBILE-BREATHING AIR TRUCK

Equipped with the following:

- (a) High pressure air pump, filter, manifold, and bulk storage system.
- (b) Spare air tanks, matching County Fire Departments
- (c) _____ Spare Self-contained air packs. (Numbers unavailable at this time)
- (d) _____ Protective Suits.

9.2 HOSE AND CHEMICAL TRUCK.

Equipped with the following:

- (a) _____ ft. of 5" large Bore Hose.
- (b) _____ Remote Operated Portable Monitor-Nozzle Sets.
- (c) _____ Valve Manifold Sets.
- (d) _____ Slippery Water Sets. (Numbers unavailable at this time)
- (e) _____ gal. "Slippery Water Additive".
- (f) _____ Foam Applicators
- (g) _____ gal. Foam Agents
- (h) ¹ _____ Remote Operated, Mobile Monitor Unit.
- (i) _____ Explosive Kits for forcible entry through concrete walls.

9.3 MEDICAL TRIAGE VEHICLE

Equipped with the following:

- (a) _____ Contamination/Isolation Transport Litters for safe transport of victims contaminated with Radioactive Materials.
- (b) _____ Medical Supplies for on site treatment of Medical Trauma.
- (c) _____ Protective Clothing Kits for Medical/Rescue Personnel.
- (d) _____ Major Burn Kits. (Numbers unavailable at this time)

CERTIFICATE OF SERVICE

A copy of the foregoing Special Prehearing Conference Brief of Intervenor was forwarded by United States mail, postage prepaid, to the following on this 1st day of June, 1981:

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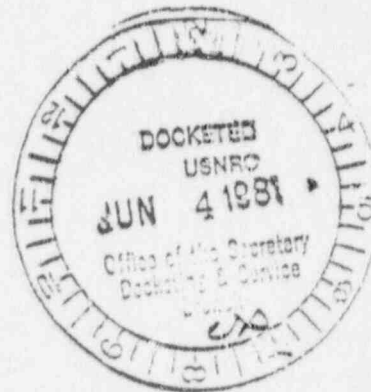
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