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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 )  
MUNICIPAL POWER AGENCY )

(Shearon Harris Nuclear Power Plant) )

Docket No. 50-400 OL

AFFIDAVIT OF RUSSELL CAPPS ON EDDLEMAN EPX-8

COUNTY OF WAKE )

STATE OF NORTH CAROLINA )

ss:

RUSSELL CAPPS, being duly sworn, deposes and says:

1. I am the Director of the Wake County Emergency Management Agency. In this capacity, I am responsible for all coordination of the emergency planning undertaken by Wake County and for the response of Wake County agencies and resources to emergency conditions within the county requiring multiagency actions. I have been active in the field of emergency planning and response for many years. A current statement of my professional qualifications and experience is attached hereto. My business address is 366 Fayetteville Street Mall, Raleigh, North Carolina. I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in response to Eddleman Contention EPX-8.

2. An exercise of the North Carolina Emergency Response Plan ("ERP") In Support of the Shearon Harris Nuclear Power Plant was held on May 17 and 18, 1985.

This was the first full-scale exercise of the off-site response capability for the Harris Plant. Wake County was a participant in that exercise, and I was charged with the overall coordination and supervision of the activities of the Wake County agencies involved. Specifically, I directed the operations of the Wake County Emergency Operations Center ("EOC") throughout the course of the exercise.

3. The ERP provides for Emergency Broadcast System ("EBS") activation either by the State or -- if activation is warranted before the State assumes control of the emergency response -- by the counties within the plume exposure pathway Emergency Planning Zone ("EPZ"). In the latter case, Wake County (the lead county) is responsible for EBS activation, in coordination with the other counties of the EPZ and the North Carolina Division of Emergency Management ("DEM").

4. On Friday, May 17, 1985 (relatively early in the exercise and prior to State assumption of control of emergency response), the scenario for the exercise postulated plant conditions warranting EBS activation by Wake County. This involved the preparation of an EBS message and the coordination of system activation with Chatham, Lee and Harnett Counties, and DEM. During the exercise, certain difficulties were encountered in these processes.

5. For purposes of the exercise, an EBS message had been prepared for actual broadcast by WQDR during the exercise. This message was used for each EBS activation throughout the exercise, to inform the public that an exercise was in progress, and that there was no cause for concern. Nevertheless, it was also expected that preparation of an EBS message would be simulated by Wake County EOC staff as part of the exercise. The purpose of the simulated message was to afford the EOC staff an opportunity to practice EBS message preparation; the simulated message was not for actual broadcast. Due to confusion about who had responsibility for preparation of the simulated message

during the exercise, no simulated EBS message was prepared. Similarly, there was no simulation of "follow-up" EBS messages by Wake County during the exercise. (In a real emergency, such messages are used to apprise the public of changes in the status of the emergency following the initial EBS activation.)

6. Problems also arose during the exercise with the first efforts to activate the EBS process. During the exercise, the State EOC and the four county EOCs were linked by a standard telephone conference call system (using speakerphones) which was utilized to coordinate the response to the simulated emergency, and particularly to coordinate EBS activation. This conference call was established early in the emergency exercise, through the state telephone operator. For purposes of EBS activation, this system was to assure that (1) the fixed siren system was simultaneously activated by the four county EOCs (2) the EBS message to be broadcast was agreed upon by all four counties, and (3) the lead EBS Common Program Control Station (WQDR-FM in Raleigh) was fully aware of the precise timing of the activation of the fixed sirens so that the timing of the broadcast of the EBS messages could be coordinated. The EBS activation on Friday, May 17, was to be accomplished by adding WQDR and the Wake County Sheriff's Department Dispatcher (who activates the fixed siren system for Wake County) to the ongoing telephone conference call. I mistakenly believed that the conference call had to be terminated and re-established to add the two additional parties. (Shortly after terminating the call, I learned that the two parties could have been added without terminating the call.) When I attempted to re-establish the conference call, I discovered that some of the telephone numbers in the procedures were incorrect, so that some calls had to be placed again. In addition, upon redialing, I received "busy signals", on some of the lines. These problems resulted in a delay of approximately three or four minutes in EBS activation.

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7. Once these initial mistakes and difficulties with the conference call system were corrected, the EBS activation process proceeded very smoothly and quickly. The prerecorded message intended for broadcast was on the air within three minutes (which is well within our performance objective for the system) and numerous radio stations, in addition to the lead program control station (WQDR-FM), carried the broadcast. Given the large number of stations participating in the exercise broadcast, we would have obtained excellent results in reaching the residents of the EPZ via the EBS, had the exercise been a real emergency. Furthermore, had I originally known of the capability to add parties to the ongoing conference call, most of these difficulties would not have occurred. This is so because all parties would have remained on the line, precluding the problems experienced on re-dialing with incorrect numbers and "busy signals."

8. In addition, in recognition of the difficulties experienced with the conference call and EBS procedures, Wake County (in coordination with DEM) is undertaking a thorough review and revision of its EBS procedures. I will be cooperating with DEM and the other counties of the EPZ in a complete review and revision to the EBS activation and message processing procedures. Major objectives of this review will be to streamline the procedures and to clarify the responsibilities of the EOC personnel to assure that important steps are not overlooked. While this process to correct the procedures is not complete, certain features will be addressed. In particular, the procedures are being clarified to assure that the responsibility for message preparation in an actual emergency is well defined. The procedures will specify that the messages will be prepared using the prescribed messages provided in the ERP, if appropriate, or a specially prepared message, if required. The procedures are also being clarified to assure that "follow-up" EBS messages would be prepared in an actual emergency and to identify the EOC staff responsible for this activity. The procedures will further specify that, at appropriate

intervals, the designated EOC or information center staff, is to obtain any information needed for a followup EBS message and to prepare it. Such a message may simply confirm the present status of the emergency and instructions given previously to the public or it may include new information and instructions. When the message is completed, it will be reviewed with the other counties and, if agreed upon, broadcast by the EBS.

9. The procedures also will be revised to reflect reliance on new equipment. With the support of Applicants, DEM has initiated steps to accomplish the replacement of the conferencing system used during the exercise. The new conferencing capability will be based on use of a reserved, restricted telephone system dedicated to this purpose at the time of an emergency, and on modifications of the procedures for conferencing and EBS activation to accommodate the new system as well as to streamline the process. The State of North Carolina currently maintains a state-wide telephone network that is restricted for its own use. The network is based on commercial telephone lines, some of which are restricted to uses defined as "essential" (e.g., emergency services). These lines are completely unavailable to the public. The system also bypasses the toll offices of AT&T, making the system invulnerable to the adverse effects of heavy utilization of the commercial telephone network, including busy circuits. The system is under the complete physical and administrative control of the State, and its use is carefully controlled through extremely limited distribution of the access code number. If needed for an emergency, the State system provides conference call capability that can be immediately cleared of all traffic. (This differs from commercial conference calling capability which cannot be immediately cleared.) It is immediately available (on a 24-hour per day basis) from any State telephone within the 733 exchange, to any individual with the proper access code number. Any other

commercial telephone can be interconnected to the system for conferencing. The present system allows the individual initiating the call to add up to 12 conferencing parties without the assistance of a telephone operator, and without breaking any ongoing conference call. Improvements in the system now underway will soon provide the capability to add up to 30 parties to the conference network without operator assistance (and, again, without breaking any ongoing conference call). Under emergency conditions, the system is dedicated to the conference call established for the response; access by other state agency personnel to the system is prohibited. To facilitate use of this restricted network in the event of an emergency at Harris, Applicants are providing new telephones and lines on the State's 733 exchange and related equipment to each of the four county EOCs ( and to the siren activation points, if desired by the counties) to the State EOC and warning point, and to the Emergency Operations Facility ("EOF"). A separate, reserved line will be provided to the lead EBS program control station, so they can receive the call to initiate the broadcast. (The station does not initiate calls, so the 733 exchange is not needed here.) These new telephones will have "unlisted" numbers (not available except in the EOCs' procedures) and will be completely dedicated to the conferencing function between EOCs, including EBS activation with its requirements for consultation and coordination. In the event of an emergency at Harris, the conferencing network can be established either by the State or by Wake County. Once established (immediately upon notification of an emergency), the network will be kept open on a continuous basis for the duration of the emergency; however, if for some reason the network were broken, it could be re-established immediately without operator assistance and irrespective of the level of public use of the commercial telephone system.

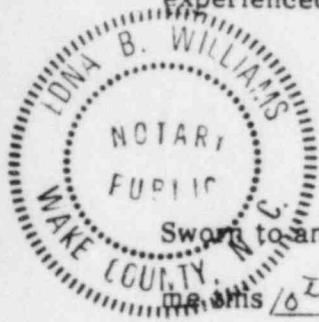


10. Finally, the procedures will be reviewed to assure the accuracy of all information included there (e.g., the telephone numbers). The phone numbers in the procedures will be reverified frequently, probably on a monthly basis, by Wake County. Review and revision of the procedures, and installation of all equipment, will be completed prior to full power licensing of Harris.

11. Recognizing that many -- if not most -- of the problems with EBS activation in the exercise are attributable to inexperience with the procedures, additional training and practice will be provided on conferencing and EBS activation procedures. Prior to full power licensing of the plant, we will conduct a training program, including "table-top" exercises, with the cooperation of DEM and the other counties. All relevant personnel will participate in the table-top exercise, actually using all telephones on the network. I now plan to involve each of the county emergency coordinators, their designated alternates, the Wake County PIO, WQDR personnel, and appropriate DEM staff in this training. In addition, during the table-top exercise, Wake County will simulate preparation of one or more EBS messages and the relay of the message to the lead program control station will be exercised. I will assure that, in each of the communications drills specified by the ERP, the new network will be activated by the EOCs and the capability of the personnel to operate the network thereby tested. If during this, or any activation, personnel experience difficulty in system operation, message preparation or message relay to the radio station, corrections and/or retraining will be done and at least one table-top exercise for this purpose will be held again.

12. In conclusion, the difficulties and delays encountered in EBS activation during the exercise have been analyzed, and the basis for those problems is understood. The May 17-18, 1985 exercise was the first exercise of the procedures and the EBS activation process for the Shearon Harris Nuclear Power Plant, and some such difficulties are to be

expected under these circumstances. The exercise was extremely helpful in pointing out areas for improvement. Corrective actions have been identified, and are being implemented. All will be completed prior to full power licensing of the plant. I am confident that these corrective actions will prevent the recurrence of the problems experienced during the exercise of May 17-18, 1985.



Russell Capps  
RUSSELL CAPPS

Sworn to and subscribed before  
me this 10<sup>th</sup> day January, 1986.

Edna B. Williams  
Notary Public

My commission expires: June 7, 1988