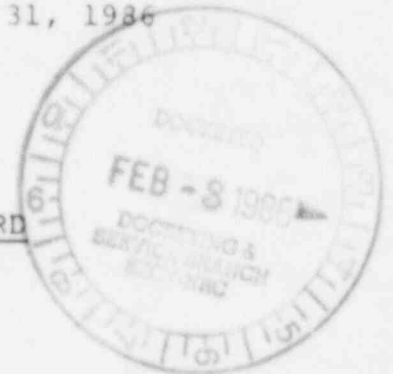


January 31, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2)

AFFIDAVIT OF RICHARD L. BRYANT
ON CONTENTION EP-1/EP-1(a)/EP-2(b)

COUNTY OF FULTON)
)
STATE OF GEORGIA)

I, Richard L. Bryant, being duly sworn according to law,
depose and say as follows:

1. My name is Richard L. Bryant. I am employed on a full-time basis as the Director of the Burke County Emergency Management Agency. My business address is Route 2, Box 51B, Waynesboro, Georgia 30830. A summary of my professional qualifications is attached to this affidavit as Exhibit A.

2. The purpose of this affidavit is to support "Applicants' Motion For Summary Disposition of Joint Intervenor's Contention EP-1/EP-1(a)/EP-2(b)," which concerns the 24-hour staffing of the Burke County Emergency Notification Network ("ENN") link. I have personal knowledge of the matters set forth herein and believe them to be true and correct.

3. The "Burke County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Vogtle Electric Generating Plant" ("Burke County Plan") identifies four means -- one primary and three back-up means -- by which Burke County could be notified of an emergency at Plant Vogtle. Burke County Plan, Attachment G.

4. The ENN -- a dedicated telephone network linking offsite emergency response officials with Plant Vogtle -- will be the primary means for notification to Burke County of an emergency at Plant Vogtle. As first back-up to the ENN, Burke County could be notified via commercial phone lines using the specified "24-hour" emergency number at the Burke County Emergency Operations Center ("EOC"). The second back-up means of notification would be the Burke County EMA radio network (39.98 MHz).

5. Beginning in early 1986, Burke County will utilize a consolidated dispatching system for its emergency response organizations. The consolidated dispatching system will be operated by a central dispatcher, located in the Burke County Emergency Management Agency's EOC. Burke County will staff the central dispatcher's position on a 24-hour-per-day basis. The ENN, the "24-hour" emergency number for the Burke County EOC, and the Burke County EMA radio network all will be located on the console staffed by the central dispatcher. Thus, each of these systems will be staffed on a 24-hour-per-day basis, and

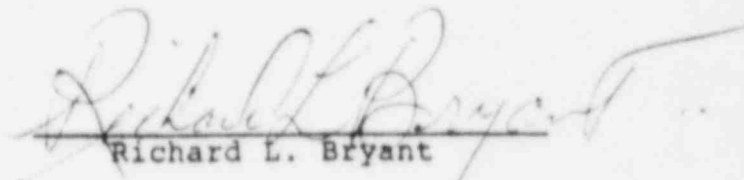
the use of any of them would place Plant Vogtle in direct contact with the central dispatcher in the Burke County EOC.

6. Finally, the third back-up means of notification to Burke County from Plant Vogtle is via commercial phone lines to the specified "24-hour" emergency number for the Burke County Sheriff's Department. (The Burke County Plan is being amended to correctly indicate that the Sheriff's 24-hour number is the third back-up, while the Burke County EMA radio network is the second back-up). That phone is located on the Sheriff's Dispatcher's console, which is staffed on a 24-hour-per-day basis. Pursuant to procedure, the Sheriff's Dispatcher would then advise the central dispatcher (in the EOC) of the notification from Plant Vogtle, sending a member of the Sheriff's staff (available on a 24-hour-per-day basis) to hand deliver the message if necessary.

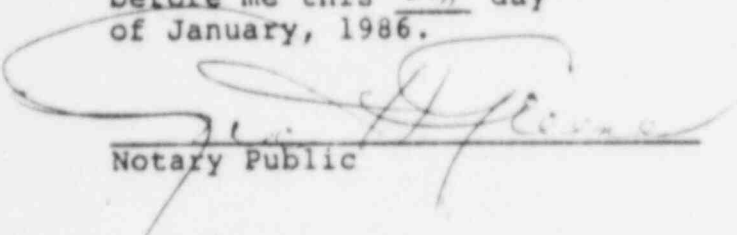
7. Upon notification of an emergency at Plant Vogtle (via any of the four identified means), the central dispatcher's procedure directs the central dispatcher to contact one of the following persons in succession: EMA Director, first Deputy EMA Director, second Deputy EMA Director, EMA Operations Officer, and EMA Training Officer. The EMA Director, or any of the designated alternates listed above who is contacted by the central dispatcher, has the authority to activate the Burke County Plan and to initiate an emergency response by Burke County. The line of succession (described above) --

which will be included in the next revision of the Burke County Plan -- was specifically developed to assure the 24-hour-per-day availability of an official with the authority to respond to an emergency at Plant Vogtle.

8. In summary, the Burke County ENN link and the three back-up means for notification to Burke County of an emergency at Vogtle all will be staffed on a 24-hour-per-day basis, and the procedure for initiation of Burke County emergency response will be the same regardless of the means used to notify Burke County of the Emergency.


Richard L. Bryant

Sworn to and subscribed
before me this 28 day
of January, 1986.


Notary Public

January, 1986

Exhibit A

RICHARD L. BRYANT

DIRECTOR, Burke County Emergency Management Agency

Since 1984, Mr. Bryant has served as the Director of the Burke County Emergency Management Agency (EMA), with headquarters located in Waynesboro, Georgia. Mr. Bryant is the first full-time director of the agency which, under his leadership, has experienced significant growth and expansion of its resources and capabilities.

As Director, Mr. Bryant has responsibility for fire, rescue, and ambulance services on a county-wide basis, as well as responsibility for planning and implementing the response to the full range of natural and technological disasters potentially affecting Burke County. He supervises a paid staff of approximately 30 people, as well as more than 50 volunteers.

He assumed the lead in obtaining funding for Burke County's recently constructed Emergency Operations Center (EOC), and -- with the cooperation of the local agencies involved in EOC development -- he managed the planning efforts involved in its design. These efforts included the development of the overall layout of the facility and its equipment.

Mr. Bryant has completed numerous professional development courses offered by the Federal Emergency Management Agency. These have included courses in emergency management planning and decision-making, personnel management, finance and budgeting, shelter management, and radiological procedures and methodologies. Mr. Bryant has also completed several courses with the Georgia Emergency Management Agency, including such topics as rescue, hazardous materials transportation accidents, and arson investigation.

PRIOR EXPERIENCE

For twenty-three years prior to assuming the Directorship of the Burke County Emergency Management Agency, Mr. Bryant was a Flight Engineer with the operations branch of the United States Air Force, specializing in planning and scheduling. He had responsibilities in emergency planning areas, including emergency response to conventional and nuclear warfare, and hazardous materials issues and problems. These responsibilities included leading emergency response teams for hazardous materials emergencies, as well as supervising programs for routine and emergency handling and disposal of radioactive materials. Mr. Bryant's duties also included tactical operations and contingency planning.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

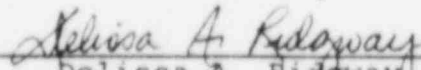
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Motion For Summary Disposition of Joint Intervenors' Contention EP-1/EP-1(a)/EP-2(b) (24-Hour Staffing of Burke County ENN Link)," "Applicants' Statement of Material Facts As To Which No Genuine Issue Exists To Be Heard Regarding Contention EP-1/EP-1(a)/EP-2(b) (24-Hour Staffing of Burke County ENN Link)," and "Affidavit of Richard L. Bryant On Contention EP-1/EP-1(a)/EP-2(b)" were served this 31st day of January, 1986, by deposit in the U.S. mail, first class, postage pre-paid, upon the parties listed on the attached Service List, except that those whose names are marked by asterisk were served by hand delivery this 31st day of January, 1986.


Delissa A. Ridgway

Dated: January 31, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket No. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2))

SERVICE LIST

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| * Morton B. Marqulies, Chairman Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | * Douglas C. Teper 1253 Lenox Circle Atlanta, GA 30306 |
| * Mr. Gustave A. Linenberger Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | * Laurie Fowler 218 Flora Avenue, N.E. Atlanta, GA 30307 |
| * Dr. Oscar H. Paris Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | * Tim Johnson Campaign for a Prosperous Georgia 1083 Austin Avenue, N.E. Atlanta, GA 30307 |
| * Bernard M. Bordenick, Esq. Office of Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | Docketing and Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555 |
| Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | Bradley Jones, Esquire Regional Counsel U.S. Nuclear Regulatory Commission Suite 3100 101 Marietta Street Atlanta, GA 30303 |
| Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | |
| * Steven M. Rochlis Regional Counsel Federal Emergency Management Agency 1371 Peachtree Street, N.E., #700 Atlanta, Georgia 30309 | * H. Joseph Flynn, Esquire Assistant General Counsel Federal Emergency Management Agency 500 C Street, S.W. Washington, D.C. 20472 |