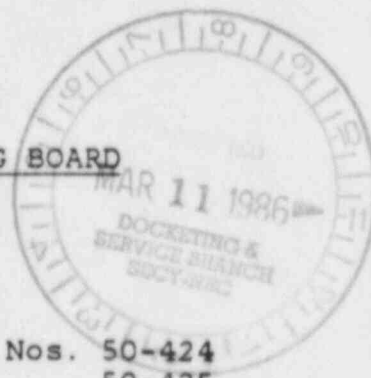


March 10, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GEORGIA POWER COMPANY, et al.)
)
(Vogtle Electric Generating Plant,)
Units 1 and 2)

Docket Nos. 50-424
50-425

AFFIDAVIT OF KEVIN P. TWINE
ON CONTENTION EP-2/EP-2(h)

COUNTY OF BERGEN)
)
STATE OF NEW JERSEY)

I, Kevin P. Twine, being duly sworn according to law, depose and say as follows:

1. My name is Kevin P. Twine. I am employed by Ebasco Services, Inc. as Manager, Resources Planning. Ebasco has been retained by Georgia Power Company to coordinate offsite emergency planning activities for the Vogtle Electric Generating Plant, including coordination with the Savannah River Plant ("SRP"). I am Project Manager for the Ebasco Vogtle Project. My business address in Atlanta is 145 Technology Park/Atlanta, Norcross, Georgia 33092. 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 Intervenors'

Contention EP-2/EP-2(h)," which concerns the provision of emergency public information for transients within the Vogtle plume exposure pathway Emergency Planning Zone ("EPZ"). I have personal knowledge of the matters set forth herein and believe them to be true and correct.

3. By definition, all persons in Savannah River Plant ("SRP")-controlled areas of the Plant Vogtle plume exposure EPZ are considered to be transients. These transients fall into seven categories:

- (1) Personnel working in fixed SRP facilities
- (2) Department of Energy ("DOE") or contractor personnel working outdoors within the Plant Vogtle EPZ
- (3) Forest Service personnel and contractors working within the Plant Vogtle EPZ
- (4) Hunters onsite during deer-hunting season
- (5) Hunters in the Crackerneck Section of the Sumter National Forest (National Forest land secured by the SRP)
- (6) Motorists transiting the SRP site on Route 125
- (7) Railroad personnel passing through the SRP site

The identification of these transient populations is the result of extensive, detailed consultation with SRP personnel. A comprehensive program has been designed to assure that these transients are provided with information needed for response to a

Vogtle emergency. This program will be fully implemented prior to fuel load at Vogtle.

4. All personnel working in fixed SRP facilities receive employee training, which includes instruction in emergency signals/announcements, rally points, and evacuation routes. The initial training is reinforced by protective action exercises involving all employees at each facility several times a year. DOE and DOE-contractor personnel working out-of-doors and away from fixed facilities in the EPZ receive, at a minimum, an orientation program outlining warning procedures and required responses to notification of an emergency. In addition, signs, flyers, and printed instructions (e.g., emergency procedures summarized on the back page of all SRP telephone books) are used to continually remind all employees of emergency procedures.

5. U.S. Forest Service personnel and timber contractors working within the SRP portion of the Plant Vogtle EPZ receive an orientation including information on means of emergency notification, emergency conditions, and protective actions prior to their entry to the work site.

6. Hunters using lands on the SRP portion of the EPZ are informed of emergency notification and evacuation procedures each day prior to the hunt by the SRP Hunt Coordinator. Access for hunters to the Crackerneck Section of the Sumter National Forest is also controlled by SRP, and is granted only to those

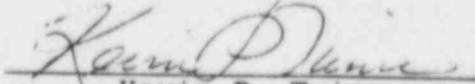
persons with both a South Carolina Game Management Permit and a special DOE permit. Access is restricted to specific hours, and all hunters must sign in and out on a log sheet maintained by Security Contractor personnel at the only entrance to the property. Each person entering the area receives an orientation card describing notification procedures and protective actions in case of a radiological emergency.

7. Motorists traveling on Route 125, which traverses the EPZ, must pass through security barricades operated continuously by SRP. All vehicles receive passes and are time-checked to verify that they have completed their passage in a normal period of time. Upon notification of an emergency at Plant Vogtle, the SRP Emergency Operating Center would notify the Security Contractor personnel at the barricades to close SRP to civilian traffic. Motorists on Route 125 within the SRP boundaries then would be intercepted by mobile patrols and directed away from hazardous areas if necessary. The stringent controls of SRP staff over the movement of motorists on Route 125, and their ability to provide personal notification and instructions to those motorists in the event of an emergency, obviate the need for specific pre-emergency public information measures directed at the motorists.

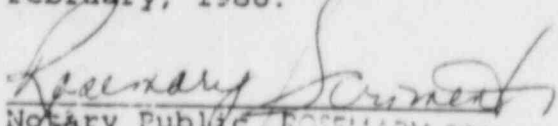
8. The Seaboard Coast Line (a freight railroad) also traverses the SRP portion of the EPZ. Prior to fuel load at Vogtle, and annually thereafter, Georgia Power Company will

provide the railroad with a supply of the South Carolina edition of the Vogtle emergency public information brochure, "Safety Information -- Plans To Help You During Emergencies," for distribution to all railroad employees who work within the EPZ.

9. Thus, adequate measures are being taken to assure that all transients on the SRP site will respond appropriately in the event of an emergency at Plant Vogtle.


Kevin P. Twine

Sworn to and subscribed
before me this 24th day of
February, 1986.


Notary Public (ROSEMARY E. [unclear])
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES SEPT. 30, 1990

My Commission expires:

Sept 30, 1990

2/86

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KEVIN P TWINE
Manager - Resources Planning

SUMMARY OF EXPERIENCE (Since 1967)

Total Experience - Eighteen years experience including supervision and direction of numerous projects involving demographic, land use, traffic/transportation and socioeconomic impact and environmental assessment analyses.

Professional Affiliations - American Society of Photogrammetry

Education - MRP, University of North Carolina, 1967 - Regional Planning
BA, Wesleyan University, 1965 - History

REPRESENTATIVE ENVIROSPHERE PROJECT EXPERIENCE (Since 1974)

Manager - Resources Planning

Responsibilities include management of EnviroSphere Staff involved in land use, traffic/transportation, socioeconomic, aesthetic, and archaeological disciplines; direction of research in these fields; management of projects relating to resources planning; management of EnviroSphere's Land Resources Analysis System (LRAS) for satellite imagery analysis and computerized geographic studies; expert testimony before regulatory bodies.

Projects include:

Georgia Power Co. Vogtle Electric Generating Plant. Project manager for offsite emergency preparedness planning program. Responsibilities included contract management; management of subcontractors; and management of tasks in plan and procedure preparation, alert and notification system, corporate and communications planning, exercise preparation, and preparation of documents for ASLB hearings. Areas for which plans were carried out included three counties in South Carolina, USDOE Savannah River Plant, and Burke County, Georgia.

Carolina Power & Light Co. Shearon Harris Nuclear Power Plant. Served as technical project manager for licensing support concerning off-site emergency and evacuation planning. Work involved extensive contacts with local and state government officials, utility officials, and legal counsel, as well as demographic analyses and planning for shelter and evacuation.

Holyoke Energy Recovery Company; Environmental Impact Report for Waste-to-Energy Facility in Holyoke, MA. Conducted analysis of the impact of increased truck traffic on urban roadway system; study included traffic counts, volume/capacity ratio calculations, optimization of truck routes, and mitigation recommendations.

KEVIN P TWINE

REPRESENTATIVE ENVIROSPHERE PROJECT EXPERIENCE (Continued)

TRC Environmental Consultants, Inc; Data Base for Air Quality Materials Damage Study. Gathered land use, demographic, and air quality data and incorporated it into a computerized data base for use in an air quality materials damage study. Data base was organized in two formats: 9,000 1-km square grid cells; and 1200 census tracts. Study area was Southern California Air Basin (Los Angeles area).

Kansas Gas and Electric Company (KG&E); Wolf Creek Nuclear Generating Station. Directed a 3 person field team in a four month comprehensive offsite emergency and evacuation planning effort for Coffey County, Kansas (location of Wolf Creek Nuclear Plant) and the State of Kansas. Functioned as part of KG&E staff. Prepared witnesses and developed testimony for hearings. Reviewed, revised and prepared offsite emergency plans and implementing procedures. Interfaced closely with county and state officials.

Louisiana Power & Light Company; Waterford 3 Nuclear Generating Station. Directed the preparation of Evacuation Time Estimate, 1980 and 1982; testified in defense of findings at hearings of Atomic Safety and Licensing Board, May, 1982; directed preparation of detailed analysis of large evacuation which took place in Waterford 3 vicinity as a result of an industrial accident on December 11, 1982.

Consolidated Edison Company of New York; Site Selection Study for Coal Burning Waste Disposal Facility. Directed preparation of demographic, land use, and aesthetic elements of site selection study; performed analysis of satellite imagery on LRAS for input to site selection procedure.

Pennsylvania Power & Light Company; Pumped Storage Site Selection Study. Directed land use, socioeconomic, aesthetic and archaeological studies and was responsible for assisting a Public Advisory Committee (PAC) in reaching a decision.

New York State Electric & Gas Corp.; Somerset Station Unit No. 1 Licensing. Directed aesthetic impact studies; estimates of construction worker mobilization; landscape architecture; recreational multiple use plan.

Public Power Corporation of Greece; First Nuclear Power Station. Site selection studies in southern two-thirds of Greece, including development and analysis of criteria concerning demographic, land use, socioeconomic and aesthetic factors.

Florida Power & Light Company; St. Lucie Unit 2 Nuclear Generating Station. Directed the preparation of demographic, land use, cultural and aesthetic analyses for the environmental report and safety analysis; testified at ACRS hearings, Oct. 1981.

KEVIN P TWINE

REPRESENTATIVE ENVIROSPHERE PROJECT EXPERIENCE (Continued)

Louisiana Power & Light Company; Waterford Unit 3 Nuclear Generating Station. Directed the preparation of a survey of construction and operational work forces to determine socioeconomic impacts; performed land use and demographic studies for environmental report and safety analysis.

Directed the gathering and presentation of detailed agricultural information within 50 miles of the St. Lucie 2 and Waterford 3 Nuclear Power Stations.

Directed land use and socioeconomic studies for four synthetic fuels plants in central and south-central areas of U.S.

Analyzed land use and industrial development implications of a major coal conversion project in New York metropolitan area.

Served as project manager for a review of decontamination and decommissioning methods for radioactive facilities at Oak Ridge National Laboratories; was project manager of an environmental report and engineering plan for removal of radioactive wastes from the site of the former Kellex laboratory in Jersey City, NJ.

Regional Planner (4 years)

Areas of responsibility included demographic modeling and projections; use of remote sensing techniques land use surveys and analyses; regional economic analysis; socioeconomic impact assessments for large projects; land use surveys and analyses; public services assessment; and community planning.

Projects included:

Developed demographic models for projecting population by annular sector within five and fifty miles of the Waterford Unit 3 Nuclear Generating Station for Louisiana Power & Light Company.

Developed mathematical models to project construction worker influxes and location patterns at major energy projects, enabling the assessment of socioeconomic impacts on a town-by-town basis, for the Lake Erie Generating Station, Dunkirk, New York; Niagara Mohawk Power Corporation. Defended these models at New York Public Service Commission hearings, November 1976 - March 1977.

Directed land use and socio-economic analyses for site-selection studies for large coal-fired generating facilities in British Columbia, Canada, and Washington State.

KEVIN P TWINE

REPRESENTATIVE ENVIROSPHERE PROJECT EXPERIENCE (Continued)

Directed the preparation of land use and socio-economic assessments for the Philippine Nuclear Power Plant Unit No. 1, Philippine National Power Corporation. Prepared the land use and socio-economic elements of the environmental report for the Killen Steam Electric Station, Adams County, Ohio, for the Dayton Power and Light Company.

PRIOR EXPERIENCE (8 years)

- The Fantus Company-Consultant (1 year)
- Florida Land Company-Land Planner (2 years)
- Planning Department, City of Portland, Maine-Community Development Coordinator (3 years)
- Gassner, Nathan, Browne - Architects/Planners; Project Manager (1 year)
- Memphis and Shelby County Planning Commission; Associate Planner (1 year)

PUBLICATIONS AND PAPERS

Twine, K P 1983. The Use of Landsat as a Cost-Effective Data Resource: Land Cover Analysis of Multiple Sites (a Case Study). National Conference on Energy Resource Management, San Francisco, CA, August.

Twine, K P 1982. Using Satellite Imagery and Geographic Information Systems. Presented at Seminar on Environmental Impact Assessment: Its Importance, Methods, and Applications, Santo Domingo, Dominican Republic, October.

Twine, K P 1982. Impact Assessment Methods: Sociocultural Studies. Presented at Seminar on Environmental Impact Assessment. Its Importance, Methods, and Applications, Santo Domingo, Dominican Republic, October.

Twine, K P, and P H Astor 1979. Geographic Information Systems In Right-Of-Way Management: The Status And Uses Of Current Computer Technology. Presented at the Second Symposium on Environmental Concerns in Rights-of-Way Management. Ann Arbor, Michigan, October.

Twine, K P 1978. How to pick your plant site. Parts I and II, discussing models for projecting socioeconomic impacts of construction workers at a large electric generating facility, in "The Management Report," Electrical World, August and September.