

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) Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant))

AFFIDAVIT OF THOMAS I. HAWKINS IN SUPPORT
OF APPLICANTS' MOTION FOR SUMMARY DISPOSITION
OF WILSON CONTENTION 12(b)(3) AND EPJ-2

County of Fulton)
) ss.
State of Georgia)

Thomas I. Hawkins, being duly sworn, deposes and says:

1. My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. Included among my responsibilities is the radiological emergency planning liaison function between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within those States.

I have held this position since December 1981. I have been employed by FEMA since July 1978. A current statement of my

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professional qualifications is attached hereto. My business address is 1371 Peachtree Street, NE - Suite 736 - Atlanta, Georgia, 30309. I have personal knowledge of the matters discussed herein and believe them to be true and correct. I make this affidavit in response to Wilson Contention 12 (b)(3) and EPJ-2.

2. Wilson Contention 12(b)(3) states:

The evacuation time study itself is deficient because: The 240 family (sic) without transportation is too low -- there are more without cars and many whose only car would be out of the EPZ at work. Many have cars that are not in working order.

Wilson Contention EPJ-2 states:

Section IV.E.4.e. of the State Plan (at 47) is deficient because it provides no estimate of the number of people without transportation (Applicants' estimate of 240 families in evacuation time study (p. 3-2) seems far too low), no suggestion as to how people without transportation would get to pickup points, and no criteria for determining when and where they would be "established as required."

In response to Wilson Contention 12(b)(3): FEMA staff and the RAC have no basis for questioning the validity of the ETE Study data or assumption made in that study.

In response to Wilson Contention EPJ-2: FEMA guidance does not require estimates of the number of households without transportation, details of how this population segment will get to pickup points, or criteria for determining when and where pickup points will be established, to be included in the plan document itself. This information concerning detailed plans for the transit-dependent population is better placed in Standard Operating Procedures.

Thomas I. Hawkins

Professional Qualifications

My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. I am assigned to the Radiological Emergency Planning liaison position between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological emergency plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within these States.

I have held the position of Emergency Management Program Specialist (or its equivalent) since December 1981. I have been employed by FEMA since July 1978.

From April 1964 to January 1977 I was employed as Planning Director of Clayton County, Georgia.

My formal education is as follows:

- AB Degree, Emory University, Atlanta, GA, 1958
- Master of City Planning Degree, Georgia Tech., Atlanta, GA, 1963
- Completed Radiological Emergency Response Course at the U.S. Department of Energy's Nevada Test Site, April 1982
- Completed Radiological Defense Officer and Radiological Defense Instructor Course, Georgia Emergency Management Agency, Atlanta, GA, March 1982
- Completed Basic Management Seminar for Emergency Management Personnel, Valdosta State College, Thomasville, GA, Winter Quarter, 1980
- Completed Radiological Emergency Planning Seminar, National Emergency Training Center, Emmitsburg, Maryland, October 1982
- Completed Radiological Accident Assessment Course, National Emergency Training Center, Emmitsburg, Maryland, August 1984

Atomic Safety and Licensing Appeal
Board Panel*
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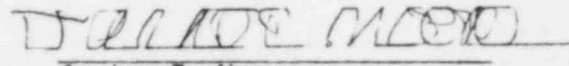
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