

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER AND LIGHT COMPANY AND)
NORTH CAROLINA EASTERN MUNICIPAL) Docket Nos. 50-400 OL
POWER AGENCY) 50-401 OL
)
(Shearon Harris Nuclear Power Plant,)
Units 1 and 2))

AFFIDAVIT OF THOMAS I. HAWKINS IN SUPPORT OF
NRC STAFF/FEMA'S RESPONSE TO APPLICANTS' MOTIONS
DISPOSITION OF EDDLEMAN CONTENTIONS EPX-2 AND EPX-8

County of Fulton)
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 State of North Carolina.

I have held this position since December 1981, and have been employed by FEMA since July 1978. A current statement of my professional qualifications is attached. 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 Contention EPX-2.

2. Contention EPX-2 contends:

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EPX-2. Communications deficiencies revealed in the exercise could have severe bad effects in a real emergency, including lack of effective communications and radiation monitoring results, lack of contact with field and ground units, etc. Specifically, the emergency inter-system mutual aid frequency was so overloaded the state's communications evaluator stated it was "proved that there could be absolutely no communications with ground units on this frequency due to constant misuse." Other examples: The Highway Patrol evaluator found "communication inadequacies; equipment ... is not yet capable of adequately handling the impact of so many units responding to an emergency of this type."; Harnett County had "insufficient telephones"; "[extra radio traffic overloaded personnel on duty" in Chatham County; "excessive delays" in Emergency Medical Services Office received messages from SERT (State Emergency Response Team); communications from the mobile radiation lab had to be relayed to base station at times, which "always introduces the possibility of delayed and/or incorrect information" according to the State Radiation Protection Section evaluator.

3. FEMA staff response asserts that:

The only communications deficiency identified by FEMA during the Harris exercise was the lack of sufficient telephones in the Harnett County EOC. However, the FEMA-identified deficiency in Harnett County's communications system was not of sufficient magnitude to seriously affect the capability of the emergency response organization to protect the health and safety of the public in the event of a radiological emergency.

Moreover, the Director of the North Carolina Division of Emergency Management, in his response to FEMA's letter requesting a schedule of corrective actions for deficiencies identified in the Plant Harris exercise, stated that total communications needs are being evaluated in Harnett County and that the installation of additional telephone circuits and instruments will be accomplished to meet those needs. The Director stated that these corrective actions are projected to be completed prior to full power licensing of the Harris plant.

The establishment of the Harnett County EOC in the County Office Building, with the concomitant improvement of the communications system proposed, will correct the communications deficiency identified in the FEMA Plant Harris exercise report.

4. Contention EPX-8 contends:

EPX-8. Emergency Broadcast System use was incomplete and effectively managed (FEMA, 2.3.1. (2), page 13; see p.12 discussion). Inadequacies include procedures for activation and use of the EBS (before the State assumes control); inadequate coverage of the emergency area and emergency response area, incomplete messages and instructions to the public. (Ref FEMA report received 8/30/85 Board Notification 85-078) Numerous problems with EBS activation mentioned on pp. 17-18 of the same report also need to be identified and rectified. All these problems must be resolved to ensure timely and effective notice to the public about nuclear/radiation emergencies so that the public can be protected in such emergencies.

5. FEMA staff response asserts that:

FEMA identified several inadequacies concerning use of the EBS system including inadequate coverage of the emergency area and emergency response area. This inadequacy, described on page 12 of the FEMA exercise report, does not refer to a geographical area or sector, but refers to a lack of continuing use of EBS to provide instruction to the public, according to the Federal evaluator who observed the Media Center facility and its activities.

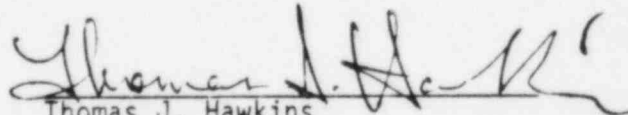
The inadequacies regarding EBS identified in the Harris exercise report were not of sufficient magnitude to seriously affect the capability of the emergency response organization to protect the health and safety of the public in the event of a radiological emergency.

(Memorandum, May to Krimm, subject: Interim Findings Report, Plant Harris, North Carolina, dated June 18, 1985.)

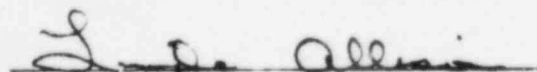
However, FEMA staff and the exercise report recommended that resolution of the identified problems associated with EBS be accomplished through the following actions: (1) installation of a dedicated telephone network, (2) improvement of EBS procedures, and (3) training.

The Meyers to Woodard letter, dated November 26, 1985, and the "Affidavit of Alvin H. Joyner on Eddleman EPX-8" clearly indicate that all identified problems associated with EBS will be resolved prior to full power licensing of Plant Harris.

FEMA staff considers the corrective actions outlined in the two above-referenced documents to be fully adequate.


Thomas J. Hawkins

Subscribed and sworn to before me
this 30th day of January, 1986


Notary Public

My Commission expires: Nov 12 1989
Notary Public, Georgia, State at Large

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.

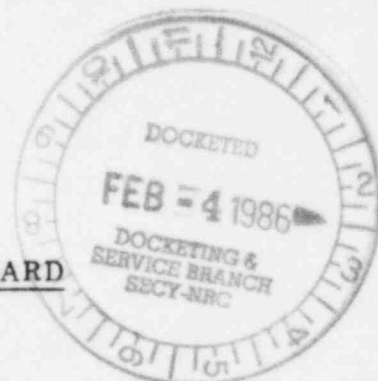
From April 1964 to January 1977 I was employed as Planning Director of Clayton County, Georgia.

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

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AGENCY)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF/FEMA RESPONSE TO APPLICANTS' MOTIONS FOR SUMMARY DISPOSITION OF EDDLEMAN CONTENTIONS EPX-2 AND EPX-8" in the above-captioned proceeding have been served on the following by deposit in the United States mail first class, or (*) through deposit in the Nuclear Regulatory Commission's internal mail system, this 3rd day of February, 1986:

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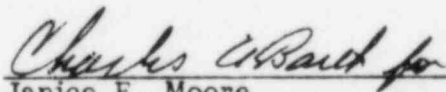
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