

June 17, 1986

Ms. Jennifer Miller
Route 1, Box 191-B
Durham, North Carolina 27705

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Dear Ms. Miller:

I am pleased to respond to your letter of May 22, 1986, to Mr. Denton in which you expressed certain concerns about the Shearon Harris nuclear power plant. Specifically, you state that you heard "that CP&L may receive an exemption from having to develop a full, standard evacuation plan," and requested that the NRC deny Carolina Power and Light (CP&L) Company's exemption request. You also suggested that the NRC staff should expand the evacuation plan area to 50 or more miles radius of the plant.

Regarding your first concern for the conduct of an additional exercise prior to exceeding 5% power, by letter dated June 10, 1986, CP&L stated that they are now in the process of consulting with involved off-site response organizations on the scheduling of exercises for the Shearon Harris Plant. Furthermore, CP&L requested that the NRC staff hold in abeyance active review of the exemption request and the request for a hearing until the consulting process has been completed. At that point, CP&L will then provide additional information to the NRC staff for review. Consequently, the NRC staff will not act on this matter until the above cited additional information has been provided. However, I can assure you that no action will be taken by the staff that would jeopardize the health and safety of the public.

With respect to your comment on increasing the Plume Exposure Pathway Emergency Planning Zone (Plume EPZ) from a radius of 10 miles to 50 miles around the plant, commercial nuclear power plants in the U.S., based upon requirements of the NRC, have two concentric emergency planning zones (EPZs). EPZs are defined as the areas for which planning is needed to assure that prompt and effective actions can be taken to protect the public in the event of an accident. The choice of the size of the Emergency Planning Zones represents a judgment on the extent of detailed planning which must be performed to assure an adequate response. In a particular emergency, protective actions might well be restricted to a small part of the planning zones. On the other hand, for the worst possible accidents, protective actions might need to be taken outside the planning zones.

The first zone, called the Plume Exposure Pathway EPZ, is an area of about 10 miles in radius from the center of the plant. The major protective actions planned for this EPZ, evacuation and sheltering, would be employed to reduce fatalities and injuries from exposure to the radioactive plume from the most severe of the core-melt accidents and to limit unnecessary radiation exposures to the public from less severe accidents at nuclear power plants. The second zone, called the Ingestion Pathway EPZ, is an area of about 50 miles in radius from the center of the plant. The major protective actions planned for this

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Ms. Miller

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zone, putting livestock on stored feed and controlling food and water, would be employed to reduce exposure to the public from ingestion of contaminated food and water. The ingestion exposure pathway EPZ of 50 miles was selected because federal protective action guidelines would generally not be exceeded beyond 50 miles for a wide spectrum of hypothetical accidents.

The response measures established within the 10-mile and 50-mile EPZs can and will be expanded if the conditions of a particular accident warrant it. Also, although an EPZ is generally circular, the actual shape is determined based on local factors such as demography, topography, access routes, and governmental jurisdictional boundaries at a particular site. Smaller EPZs have been established for gas-cooled power reactors and smaller water-cooled power reactors.

The principal technical documents that describe the process of defining the size of the EPZs and the planning and protective measures to be taken within them are NUREG-0396, EPA 520/1-78-016, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light-Water Nuclear Power Plants," December 1978 and NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980. The principal technical study upon which the sizes of the emergency planning zones were based is NUREG-75/014, "Reactor Safety Study: An Assessment of Accident Risks in U.S. Commercial Nuclear Power Plants," October 1975, WASH-1400.

I hope that the above discussion is responsive to your concerns.

Sincerely,

/s/

Bart C. Buckley, Senior Project Manager
PWR Project Directorate No. 2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

*PREVIOUS CONCURRENCE SEE DATE

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DMiller
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