LOCAL PDE



UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	
POWER AUTHORITY OF THE) STATE OF NEW YORK)	Docket No. 50-549
(Greene County Nuclear Power) Plant)	

COLUMBIA COUNTY SURVIVAL COMMITTEE'S FURTHER RESPONSES TO NRC STAFF INTERROGATORIES

Pursuant to the December 15, 1978 Board Order Concerning Discovery, Columbia County Survival Committee further responds to the NRC Staff interrogatories as follows:

G-5. (a) The first full paragraph on p.2-9 of the SER is deficient because it fails to set forth with specificity the sources for its statements concerning non-military traffic, it fails to show necessary research was done such as eye witness observations and communications with appropriate FAA air traffic control centers and it fails to set forth the number of nearby overflights expected or the analysis which leads to the conclusion of that paragraph. According to the December 27, 1978 supplemented response of Staff to Interrogatory HS-4, over 100,000 aircraft per year fly over the site of the proposed GCNPP site.

(b) Section 15.5.1 of SER Supplement 1 is deficient because it does not state how large a population would be without a fresh water supply and for how long if, as assumed by the NRC Staff, the "public" will not be significantly exposed because the "public" will stop drinking water within 24 hours after a postulated accident.

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- (c) Section 13.3 of the SER is deficient because it fails to take into account the type of community in which the GCNPP is located and seems to be based upon assumptions that the community receives a high level of public services from full-time paid employees and contains a large sophisticated medically trained population. No specific identification is provided of the individuals and institutions upon whom reliance is so heavily placed by the NRC Staff.
- Sy-1. The accidents postulated in Section 15.5.1 of SER Supplement 1 and other accidents which would permit leakage of radioactive material outside the containment. CCSC does not know what these other accidents are but believes that there are other types of accidents with consequences that could include the potential for the release of significant amounts of radioactive material.
- S9-2. As set forth in Section 15.5.1 of SER Supplement 1 a number of reservoirs are near the proposed GCNPP site and, under the accident postulated therein, would receive deposits of radionuclodes which would require interdiction of the public use of reservoir water. CCSC figured this out by looking at a map, knowing that the wind blows sometimes from the proposed GCNPP site to the reservoir locations and by guessing that escaped radioactive materials could be carried the distances shown on the map to exist between the proposed GCNPP site and the reservoir locations. No other data, models or assumptions were used in making this common sense analysis.
- B-6-3. The PSAR is deficient in that it contains merely a "wish list" and not information with respect to agencies, individuals and institutions not within the control of the Applicant. The PSAR fails to contain (a) adequate information concerning the contacts, arrangements and identification required by Item B of Section II of Appendix E to 10 CFR 50; (b) specific identification of the emergency transportation and offsite treatment facilities required by Item D or any information tending to show that the agencies, individuals and institutions relied upon are ready, willing and able to participate; (c) explanation of the emergency treatment provisions required by Item E; or (d) a description of the training program for the "other persons" referred to in Item G, who these persons are, where and by whom they will be trained or who will pay for this. Given the site's access routes, surrounding population distributions, land use, fiscal condition of local government bodies, absence of full time paid police and fire protection, lack of public transportation, hostility of the local population, the PSAR fails to provide any assurance that the proposed emergency "plan",

such as it is, is compatible with the site location.

ROBERT J. KAFIN affirms that he is the attorney for COLUMBIA COUNTY SURVIVAL COMMITTEE, has prepared the foregoing based on his own knowledge and review of the appropriate files in his possession, and believes the foregoing to be true.

January 5, 1979

Robert J. Kafin

Attorney for COLUMBIA COUNTY

SURVIVAL COMMITTEE