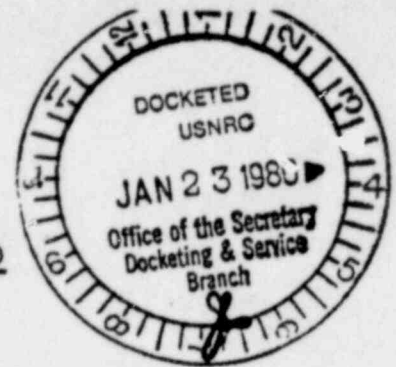


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of
METROPOLITAN EDISON COMPANY
(Three Mile Island
Nuclear Station, Unit One)

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Docket No. 50-289
(Restart)

INTERROGATORIES OF INTERVENOR ANGRY
TO COMMONWEALTH OF PENNSYLVANIA

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Intervenor Anti-Nuclear Group Representing York (ANGRY) hereby proffers pursuant to 10 C.F.R. §2.740(b) the following interrogatories to the Commonwealth of Pennsylvania. These interrogatories are deemed to be continuing, and shall be supplemented pursuant to 10 C.F.R. 2.740(e).

1. State whether or not Annex E of the Pennsylvania Disaster Operations Plan (DOP) has been submitted to the Nuclear Regulatory Commission for the purpose of receiving the latter's "concurrence" therein.
 - a. If not, when is such submission contemplated to occur?
 - b. If it has, was Appendix 8 thereof, the Bureau of Radiation Protection (BORP) Plan for Nuclear Power Generating Incidents, also submitted at the same time and for the same purpose?
 - c. If it has, were the Emergency Response Plans of Lancaster, York, Cumberland, Dauphin, and Lebanon Counties also submitted at the same time and for the same purpose?
 - d. On what date did these submissions occur?
 - e. Has such concurrence been granted or denied with respect to any of the aforementioned plans? Attach copies of all correspondence, memoranda or other documentation received or issued by the Commonwealth relating to compliance or non-compliance of any of the aforementioned plans with NRC concurrence standards and criteria.

2. According to DOP Section IX(A)(2)(c) the Pennsylvania Emergency Management Agency (PEMA) has the responsibility to "review and approve county RERP" (Radiological Emergency Response Plans).
 - a. Specify in detail the standards and criteria that PEMA employs in such review and approval procedure.
 - b. Has such approval been granted or denied with respect to the "TERP" of Dauphin, York, Lancaster, Cumberland, or Lebanon Counties? If so, when? Attach copies of all correspondence, memoranda or other documentation received or issued by the Commonwealth relating to compliance or non-compliance of

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any of the aforementioned plans with PEMA approval standards and criteria,

3. DOP Section VIII(G) states that the Governor "retains directional authority" over decision-making in the event of an "emergency nuclear incident." Yet the Governor is totally absent from the notification sequence set forth in DOP Appendix 3. Does Appendix 3 accurately reflect the role of the Governor in nuclear emergency decision-making? If not, please describe his place in the Appendix 3 notification sequence as precisely as possible.
4. What are the factual and analytical bases for the "assumption" that "the 10-mile evacuation distance includes an adequate safety margin which precludes the need for evacuation of institutions, facilities, or people beyond the 10-mile radius"? (DOP §IV(F))
5. What are the factual and analytical bases for the "assumption" that "adequate lead time will be available to implement the provisions of this plan"? (DOP §IV(E))
 - a. What is the minimum "lead time" that the Commonwealth considers to be "adequate" for DOP implementation?
 - b. How was the answer to interrogatory #5(A) derived?
6. Identify the emergency response capability of the 5 "risk counties" in terms of radial distance from the TMI site at the time of the March 28, 1979, accident. 1954 148
 - a. To what distance were such counties instructed to extend such capability in the period during and immediately following the accident?
 - b. What was the basis for the distance defining such extended capability that was chosen?
 - c. Will counties which have developed emergency response capabilities to a distance which exceeds that specified in DOP §IV(F) be required to maintain such capability?
 - d. What is the reason for the answer to interrogatory #6(c)?
7. Does the Commonwealth have plans to obtain, stockpile, and develop distribution methods for a thyroid blocking agent such as potassium iodide?
 - a. If yes, by what date will these steps be completed?
 - b. If no, give reason.
 - c. Is the availability of such a thyroid blocking agent in sufficient quantities necessary to effective emergency response capability?
 - d. What is the reason for the answer to interrogatory #7(c)?
8. The York County RERP states at p. IV-2 that 50 - 2 passenger ambulances will be supplied by "State C.D." to assist in evacuation of nursing homes.
 - a. Identify the Commonwealth agency that agreed to provide such service and attach a copy of letter, if any, confirming such agreement.
 - b. What arrangements are in effect for providing drivers for such vehicles in the case of a nuclear accident?

9. The York County RERP reflects at p. VII-1 the selection of two time frames, five and twenty-four hours in duration, upon which to base its emergency planning. Identify the assumptions and bases underlying the selection of these two time frames.
10. a. What is the basis for the conclusion that "we do not believe that the five-hour plan could be accomplished if schools were in session,"
- b. What contingency plan(s) exist for use in the event of a nuclear accident that occurs while schools are in session?
10. What ^{are} the factual and analytical bases underlying the assumption that "the majority of people within the evacuation area will elect to stay with friends and relatives within or outside York County"? (York Co. RERP, p. 2)
 - a. What would be the impact upon the plan's effectiveness if either more or fewer people behaved as stated in this assumption?
11. What is the time required for the evacuation of each of the seven "hospitals located within a 10 mile radius of TMI" as listed in Table 3 of the Licensee's Emergency Plan. Explain fully the reasons for the time given in each case.
12. What is the basis for belief in the effectiveness of the principal method of warning employed by the County RERP's, Civil Defense sirens?
 - a. What measures have been taken to insure that persons who are so warned have the knowledge necessary to enable them to receive further instructions?
 - b. What is the time required for such notification procedures to be completed?
 - c. Describe the special procedures, if any, that have been adopted for the notification of Old Order Amish. What is the time required for such special procedures to be carried out?
13. Explain how the decision will be made whether to order sheltering or evacuation during an atmospheric release of radioactive materials. Factors such as "time to release" or "time required for relocation" should be quantified, if possible.
14. What does the Commonwealth understand the terms "precautionary" and "selective" evacuation, respectively, to mean? What factors, quantified if possible, would lead to the choice of each as an appropriate protective action?
15. State whether or not an Atmospheric Release Advisory Capability System (ARAC) was placed in operation at Three Mile Island during the accident.
 - a. Who made the decision to install this system and what was the basis for such decision?
 - b. What are the advantages of ARAC over conventional methods of dose assessment and projection?
 - c. What is the opinion of the Commonwealth as to how the absence of the information analysis capability provided by ARAC affects the Licensee's ability to provide prompt and accurate dose assessment information to off-site authorities?
16. How much time would be necessary to evacuate all persons within a 10-mile radius of TMI. Include the estimated time for notification, for preparation, and for actual transit time.

- a. Identify all assumptions used in arriving at such estimates, such as road capacities and traffic volume over given egress routes.
- b. How would such estimates be affected by each of the following conditions:
- (1) Inclement weather, (3) Traffic accidents.
- (2) Rush-hour traffic congestion.

17. What action has the Commonwealth taken, if any, to comply with the following recommendation of the President's Commission^{ON} the Accident at Three Mile Island:

Planning should involve the identification of several different kinds of accidents with different possible radiation consequences. For each scenario, there should be clearly identified criteria for the appropriate responses at various distances...response plans should be keyed to various possible scenarios...(pp. 76, 77).

18. Identify all documents and studies relied upon by the Commonwealth in answering the foregoing interrogatories.

Respectfully submitted,

Anti-Nuclear Group Representing York

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DATE: January 19, 1980