

RELATED CORRESPONDENCE

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) )

Docket No. 50-289

INTERROGATORIES OF ANTI-NUCLEAR GROUP  
REPRESENTING YORK TO LICENSEE (SECOND SET)

Intervenor Anti-Nuclear Group Representing York (ANGRY) hereby propounds pursuant to 10 CFR §2.740b its second set of interrogatories to Metropolitan Edison Company. These interrogatories are deemed to be continuing, and shall be supplemented where appropriate in accordance with 10 CFR 2.740(e).

15. What determinations has the licensee made, if any, as to the existence in the environs surrounding TMI of conditions such as demography, topography, land characteristics, access routes, and local jurisdictional boundaries that warrant departure from a circular EPZ defined uniformly by a 10 mile radius from the plant?

a. Does the licensee agree or disagree with the following conclusion reached by the NRC/TMI Special Inquiry Group (Vol. 1, p. 133):

Therefore, at the very least, significant centers of population beyond 10 miles from the plant must be considered in the planning as well.

Explain fully the reasons for any disagreement. If there is agreement, explain with reference to specific sections of the licensee's emergency plan how this conclusion has been incorporated into emergency planning around TMI.

16. At present is there a notification system in place in the TMI EPZ capable of satisfying the "design objectives" of Appendix 3 to NUREG 0654? If yes, describe in detail the functioning of such system and give the bases for the licensee's belief that the standards of NUREG 0654 are satisfied.

a. What measures has the licensee taken for assuring that the means, financial or otherwise, exist for putting such a system into place?

17. Has the licensee engaged in discussions with Lancaster County with respect to the possibility of transmitting effluent and/or other radiation monitoring information directly to the County Emergency Operations Center? If yes, what has been the outcome of these discussions?

18. Describe fully the instrumentation the licensee intends to install in its off-site Emergency Operations Center in terms of the specific items of information (i.e.,

radiation monitoring; essential plant status parameters such as pressure and temperature) such instrumentation will be able to furnish.

19. State whether or not there has been any interruption in electrical service to any part of the area embraced by the 10-mile EPZ at any time since the initial criticality of TMI-1. For each such interruption specify date(s) of occurrence, duration, and area affected.
20. Add to interrogatory #2 the findings of the NRC/TMI Special Inquiry Group (Vol. 1, pp. 122-128) and of NUREG CR-1270.
21. What criteria does the licensee intend to use in making "protective action recommendations to State officials" (EP §4.6.4.1(2)). In particular, assuming an atmospheric release causing calculated offsite doses which equal or exceed EPA PAG levels, what factors will determine the recommendations of either sheltering or evacuation as an appropriate action? The factors listed should be quantified.
  - a. What is the time that will be required between the initial recognition of an emergency condition and the selection and transmittal to the State of a protective action recommendation? What role is assumed for the NRC in making this time estimate? How would a greater or lesser role than that assumed affect the estimate?

Respectfully submitted,

Anti-Nuclear Group Representing York

By: 

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