

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island, Unit 1))

Docket No. 50-289
(Restart)

INTERVENOR STEVEN C. SHOLLY SECOND SET
OF INTERROGATORIES TO LICENSEE
WITH DOCUMENT REQUESTS

Steven C. Sholly, Intervenor, hereby files the following interrogatories and document requests with Licensee pursuant to 10 FR 2.740 and 10 CFR 2.741. Interrogatories are to be answered fully, in writing, and under oath by any officers or employees of the Licensee who have personal knowledge thereof. The answer to each interrogatory should contain the name(s) and identification of the person(s) supplying the answer.

Interrogatories and document requests are arranged according to the Contention numbers as accepted by the Board. Contention numbers appear first, followed by the interrogatory or document request number within the particular contention. For example, 13-001 refers to the first interrogatory or document request for Contention #13.

Interrogatories and document requests are considered to be continuing and are to be supplemented as required by applicable parts of 10 CFR 2.

08-013--From among the persons who contributed to the Licensee's Emergency Plan, either by writing the plan or by providing supporting analyses or input, identify by name, title, position, and organization, those persons with expertise in the following areas:

- (a) Demography
- (b) Land use planning and analysis
- (c) Analysis of transportation capabilities, including traffic volume analysis and the impact of adverse weather conditions on traffic flow
- (d) Evacuation planning
- (e) Meteorology, especially diffusion characteristics

For each person so identified, list degrees and where they were received, publications relevant to the area of expertise, and memberships in professional societies and certifications related to the area of expertise.

08-014--According to NUREG-0396 at page 18, major radiation releases from nuclear power plants can begin within as little as 30 minutes after the start of the initiating event. Specify how this fact is reconciled with the assumptions in county emergency plans on which Licensee relies to provide necessary protection of public health and safety in terms of the lead times which are required

by each such plan in order for protective actions to be implemented on a timely basis within the Plume Exposure EPZ. Discuss each county plan separately in responding to this interrogatory.

08-015--Provide a map of suitable scale which delineates clearly the geographic extent of the Licensee's proposed Ingestion Exposure EPZ. This map must show all counties which fall within this EPA as well as the locations of towns and cities within the EPZ as proposed by Licensee.

08-016--Provide copies of the most recent letters of agreement and understanding with all county and state governments which fall within the proposed Ingestion Exposure EPZ. For each instance where no such letter exists, explain the reason and provide documents which show evidence of contact between Licensee and the government agencies with regards to the Ingestion Exposure EPZ. Where neither a letter of agreement or understanding or documents which show evidence of such contact exist, explain why and provide a schedule for making such contacts and obtaining letters of agreement and understanding with regard to emergency planning within the Ingestion Exposure EPZ.

08-017--NUREG-0396 at page 16 states that although the radius for an EPZ implies a circular area, the actual shape of an EPZ for a particular site is dependent on the characteristics of that site. In this light, provide the factual basis for the proposed circular EPZ's for both Plume and Ingestion Exposure Pathways, specifying how local conditions of demography, land use, access routes, topography, and local jurisdictional boundaries combine to result in circular EPZ's for Plume and Ingestion Exposure of 10 and 50 miles radius respectively. Provide documents which support the size and shape of the proposed EPZ's.

08-018--NUREG-0396 at page 17 states that all milk processing plants within the Ingestion Exposure EPZ should be included in emergency response plans regardless of their location. Provide documentation which confirms that Licensee has in fact contacted each such milk processing plant and that letters of agreement and understanding have been executed with each such milk processing plant. For each such milk processing plant, provide the address, name of the facility, and the name and title of the person at each such facility who has been contacted regarding emergency response planning.

08-019--NUREG-0396 at page I-4 concludes that discussion of a spectrum of accidents in Classes 1 through 8 is too limited in scope to be useful in emergency planning. Identify each statement in Licensee's Emergency Plan which takes into account any accident beyond the design basis of TMI-1. Specify how Licensee's Emergency Plan takes into account accidents beyond the design basis for TMI-1, particularly with reference to assumptions utilized in determining the time available for identification of an accident, assessment of the seriousness of the accident, notification of off-site authorities, implementation of protective actions, and confirmation of the completion of the protective actions.

08-020--NUREG-0396 at page I-6 states that Class 9 accidents cover a full spectrum of releases of radioactivity which range from those accidents which are on the same order as the DBA-LOCA type of release to those accidents which release significant fractions of the available radioactive materials in the reactor to the atmosphere. The lower range of the spectrum of Class 9 accidents is described to include accidents in which a core "melt-through" of the containment would occur. Given the fact that NUREG-0396 at page I-4 states that discussion of a spectrum of accidents in Classes 1 through 8 is too

limited in scope to be useful in emergency planning, produce documents which show how Class 9 accidents and their releases of radioactivity, including the core "melt-through", have been taken into consideration in the preparation of the Licensee's Emergency Plan and the Emergency Plan Implementing Document. Where such documents do not exist, discuss with specificity how Licensee's Emergency Plan has taken into account these accidents.

08-021--On page 2-6 of the Emergency Plan (Amendment 6, November 1979), it is stated:

"The engineering design of the TMI Nuclear Station ensures that the consequences of major malfunctions will be mitigated by the engineering safety systems."

If Licensee believes this to be a true statement, then Licensee is requested to explain how a Class 9 accident occurred at Unit 2 of the TMI Nuclear Station. If Licensee no longer believes this statement, indicate so and explain, in the light of the fact that, "Total emergency preparedness requires plans for the emergency response of both systems and people," (Emergency Plan, Amendment 6, November 1979, pages 2-5 and 2-6), how the fact that engineered safety systems cannot be relied upon to mitigate the consequences of major equipment

malfunctions impacts on the Emergency Plan and its ability to provide for the protection of the public health and safety in the event of an accident at the TMI Nuclear Station.

08-022--At page 4-2 of Licensee's Emergency Plan (amendment 6, November 1979) it is stated:

"The classification system is designed to permit rapid evaluation of plant conditions against emergency action levels so as to promptly recognize and declare emergencies (within 10 minutes of event)."

In the light of the fact that over 2½ hours elapsed between the start of the Unit 2 accident and the declaration of a Site Emergency, discuss with specificity how plant operating procedures and the Emergency Plan have been modified to ensure that emergencies will be declared within 10 minutes of the initiating event. Discuss also the training given to reactor operators and shift supervisors which assures that this 10-minute emergency declaration commitment will be met.

08-023--At page 2-7 of the Restart Report (Amendment 6, November 1979), it is stated that the State Plans and the TMI Emergency Plan were developed in close coordination. Provide documentation which verifies that this is true. Provide names of State personnel and representatives who worked with Licensee in developing and coordinating

the State Plans and the TMI Emergency Plan.

08-024--Specify any and all assumptions upon which the TMI Emergency Plan is based. Discuss each such assumption and explain why it is appropriate and what it's basis is in fact.

08-025--Provide time estimates, including upper and lower bounds, of the time required to perform each of the following major steps in an emergency response:

- a. Recognition of condition which fulfills one of the emergency event classes;
- b. Assessment of the seriousness of this condition;
- c. Initiation and completion of all required notifications;
- d. Implementation of necessary emergency response;
- e. Confirmation that emergency response (protective action) has been completed.

08-026--Provide a description of the means to be used by Licensee to notify the general public, including transients, of an emergency condition at the TMI site. Include documents which depict the existence of agreements with local media, Civil Defense, educational, and other groups which will be depended upon to provide the emergency notifications.

08-027--For each and every contractor who may be called upon to provide support services during an emergency at the TMI site (such services would include, but not be limited to, supplemental radiation monitoring and increased security), describe the nature and scope of the support services to be provided and the qualifications of each organization to provide such services.

08-028--For each and every government body on which Licensee's Emergency Plan depends for implementation of protective actions, provide details of the specific response capabilities of each such body, including the expertise of available personnel, the time frame within which their assistance would be available, and other resources which each body would be expected to provide in the event of an emergency.

08-029--Provide documents which show what radiation exposure guidelines will be followed by medical, firefighting, and decontamination services personnel and how these guidelines will be implemented in the event of an emergency.

08-030--Provide documentation which shows that all outside agencies which are depended upon by Licensee for medical and firefighting services are aware of the guidelines addressed in Interrogatory 08-029 and that

these organizations are cognizant of these guidelines and understand their implications with regard to providing the required services.

08-031--Provide documentation which shows that hospital and medical personnel who are relied upon by Licensee to provide emergency services are qualified to accomodate radiological emergencies, especially injured persons who may also be radioactively contaminated.

08-032--For each agency or organization with which Licensee has a letter of agreement and understanding, provide documents which specify what assistance is to be rendered and list mutually acceptable criteria for the implementation of these types of assistance.

08-033--Detail each responsibility of the Shift Supervisor under conditions of a Site Emergency and a General Emergency. Describe, for each Shift Supervisor, any and all training received which qualifies them to make judgments regarding protective actions (i.e., health physics training, medical degree with specialization in radiation protection, etc.).

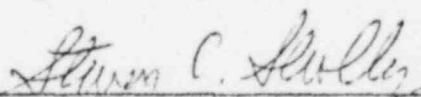
- 16-001--Identify those portions of Licensee's Security Plan which discuss how security forces will maintain positive control over access to Type I and Type II vital areas under conditions of Site Emergency and General Emergency.
- 16-002--Identify those portions of Licensee's Security Plan which discuss any and all special precautions which are being taken or will be taken at Unit 2 due to its increased vulnerability to sabotage as discussed in Pre- and Post-Accident Security Status at Three Mile Island By Donald G. Rose, Los Alamos Scientific Laboratory, and Three Mile Island Sabotage Analysis By Eddie R. Claiborne, Richard L. Cubitt, Roy A. Haarman, and John L. Rand, Los Alamos Scientific Laboratory, both of which are in the National Archives with documents authored by the Kemeny Commission.
- 16-003--Identify those portions of Licensee's Security Plan which discuss how applicants for security force positions as guards or watchmen are investigated to determine their mental and physical fitness for such positions. Included in this Interrogatory are those investigations performed to determine the accuracy of statements made on job applications. This Interrogatory includes both employees of Licensee as well as security forces provided by outside contractors, including Gregg Security.

16-004--Identify those portions of Licensee's Security Plan which discuss the specific qualifications which guards and watchmen must meet, including those candidates for supervisory positions.

16-005--Identify any and all documents or portions of documents in any way related to security at Unit 1 or Unit 2 at TMI, or both, which are non-proprietary in nature and can be released publicly without violating NRC regulations.

16-006--Will Licensee maintain separate security forces for Unit 1 and Unit 2? If so, how will this separation be assured? If not, why not?

Respectfully submitted,



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3238

DATED: 5 February 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

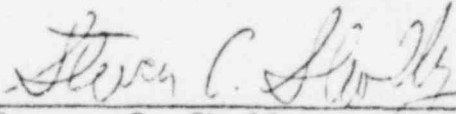
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(Three Mile Island, Unit 1))

Docket No. 50-289
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CERTIFICATE OF SERVICE

I hereby certify that a single copy of INTERVENOR STEVEN C. SHOLLY SECOND SET OF INTERROGATORIES TO LICENSEE WITH DOCUMENT REQUESTS was served upon the Licensee by hand delivery to the Three Mile Island Observation Center, addressed to the attention of Mr. John Wilson, on this 5th day of February 1980, for service to the other parties of this proceeding under the provisions of Licensee for such service.



Steven C. Sholly

DATED: 5 February 1980

RELATED CORRESPONDENCE

RECEIVED
LSNRC
FEB 3 1980
Office of the Secretary
Docketing & Service
Branch

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

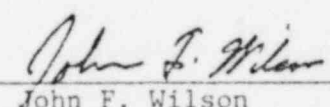
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(Three Mile Island Nuclear)
Station, Unit No. 1))

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CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor Steven C. Sholly Responses to Licensee's First Set of Interrogatories dated January 31, 1980 and Intervenor Steven C. Sholly Second Set of Interrogatories to Licensee with Document Requests dated February 5, 1980, which were hand delivered to Licensee at Three Mile Island Observation Center, Middletown, Pennsylvania, on February 5, 1980 were served upon those persons on the attached Service List by deposit in the United States mail, postage paid, this 6th day of February, 1980.



John F. Wilson

Dated: February 6, 1980

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Station, Unit No. 1)

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