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)

DOCKETED
USNRC
FEB 27 1980
Office of the Secretary
Docketing & Service
Branch

INTERVENOR STEVEN C. SHOLLY FIRST SET OF INTERROGATORIES TO DAUPHIN COUNTY

Pursuant to 10 CFR 2.740, Intervenor Steven C. Sholly hereby files the following interrogatories with Dauphin County, a participant in this proceeding under 10 CFR 2.715. Interrogatories are limited to Sholly Contention #8, relating to Emergency Planning and Preparedness.

Interrogatories are to be answered fully, in writing, and under oath by any officers of the County who have direct personal knowledge of the facts sought by these interrogatories. The answer to each interrogatory is to contain the names and identifications of the persons supplying the answers. All documents relied upon in providing an answer to an interrogatory are to be referenced according to title, authors, source of the documents, and page numbers utilized in supplying the answer. These interrogatories are to be supplemented as required by NRC regulations.

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08-001--The Dauphin County Office of Emergency Preparedness "Action And Response Plan For Emergency Personnel And Citizens, April 1976," (hereafter referred to as the Dauphin County Plan) is appended to the Licensee's Emergency Plan. As such, Licensee is functionally dependent upon Dauphin County to ensure that the public health and safety is adequately protected in the event of an emergency at TMI. Discuss the extent to which officials from the Licensee have participated in the preparation of the Dauphin County Plan. Be as specific as possible regarding when such assistance occurred and the form which the assistance took.

08-002--Discuss the extent to which the Dauphin County Plan has been coordiated with other county plans and the Commonwealth of Pennsylvania Disaster Plan, Annex E, to ensure that evacuation routes are not planned to be utilized by more than one county, and that there is not duplication in the planned use of host reception areas.

08-003--Identify the assumptions upon which the Dauphin County Plan is based, specifically those assumptions relating to the time available in the event of an

emergency at TMI to implement the Dauphin County Plan. Where Licensee has provided specific time estimates for lead times to implement the Plan, provide these time estimates and specify the persons supplying the estimates and when they were supplied to the County.

08-004--The Dauphin County Plan estimates the number of persons in Dauphin County within 10 miles of the TMI site as 127,000. NRC documents (specifically, "Beyond Defense In Depth") cite the total population within 10 miles of TMI as being less than 120,000 (Beyond Defense In Depth is NUREG-0553). What is the source of the 127,000 figure presented in the Dauphin County Plan?

08-005--The Dauphin County Plan contains numerous emergency plans for individual political subdivisions (i.e., the Conewago Township Emergency Plan, the Derry Township Evacuation Plan, etc.). To what extent has Dauphin County investigated to see whether these individual municipality emergency plans conflict with one another? If any such conflicts have been identified, describe each such conflict.

08-006--According to newpaper accounts, a full-time staff person from PEMA has been assigned to Dauphin County to work on

a revision to the Dauphin County Plan. Identify the PEMA staff person assigned to Dauphin County. Was this assignment requested by Dauphin County? If so, when was the request made?

08-007--Has the Licensee ever requested Dauphin County to prepare an emergency plan covering possible events at TMI? If so, state when such a request was made and by whom.

08-008--The Dauphin County Plan appears to address only evacuation as a means of protecting the public health and safety in the event of an accident at TMI. To what extent will the revised Dauphin County Plan address other potential protective actions which may be necessary?

Respectfully submitted,

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DATED: 25 February 1980

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CERTIFICATE OF SERVICE

I hereby certify that single copies of INTERVENOR STEVEN C. SHOLLY FIRST SET OF INTERROGATORIES TO DAUPHIN COUNTY were served upon the persons on this service list by deposit in the United States Mail, postage prepaid, on this 25th of February 1980.

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