



April 4, 1980

United States of America  
Nuclear Regulatory Commission  
before the Atomic Safety and Licensing Board

8005140073

in the Matter of Metropolitan Edison Company, Three Mile Island  
Unit 1, Docket 50-289

AMOLD INTERROGATORIES OF COMMONWEALTH OF PENNSYLVANIA -- Fourth Set

These interrogatories regarding the Department of Agriculture Plan for Nuclear Power Generating Station Incidents are filed pursuant to 10 CFR 2.740b which requires that the interrogatories be answered separately and fully in writing and under oath or affirmation. The plan was received March 19, 1980 and response in the form of these interrogatories is being made within the thirty day period allowed for documents.

Our principle concerns relate to

1. Timeliness of information flow to the farm operator. This concern relates to minimization of the time required on the part of the facility operator and government agencies (re NUREG (610) to determine that protective action may be needed and minimization of the time required to alert farmers.

2. Definition of appropriate protective actions that can ideally be taken by farmers.

3. Definition of the extent to which farmers can be expected to actively take protective action.

4. Restraints which are unique to farmers which will preclude assurance that their own health and safety as well as the safety of their property and farm products can be achieved.

In this light, please answer the following:

Regarding Section III - Responsibility of Facility Operators et al.

1. In the judgement of the Department of Agriculture, what safeguards are required to assure prompt notification of farm families of the possible need for taking protective action? By the very

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nature of the farm operation, farmers need more time than the general public.

2. What will be the mechanism of communicating initial warning and follow-up information to

a. farmers in general,

b. the Amish (most of whom have no telephones or radios)?

3. Can you be sure that phone lines will be open when needed?

Regarding Section IV - Accident Assessment and Dose Projection

4. Same as 1.

5. Do you hold that adequate radiation measurement capability is in place to assure adequately accurate projection of plume movement, content and dose to define

a. What protective action is needed by farmers?

b. Which farmers need take this action?

6. Following Interrogatory 5, what additional measurement capability is needed, in the judgement of the Department of Agriculture?

7. Based on herd list described on page 13, provide estimate of market value of the herds within a 10 mile radius of TMI.

Regarding Section V - Protective Action Options

8. With regard to V-A-1, answer Interrogatory 1.

9. Will potassium iodide be provided for livestock?

10. With regard to V-A-4, please explain why farm operators "may be tempted" to consider evacuation unfeasible and elect to stay to a larger extent than the general population.

11. Would you agree that the agricultural community is, therefore, anticipated by the Commonwealth to be subjected to greater risk to its health and safety than the population at large?

13. Have you determined if state or federal funding for compensation in event of loss of livestock and other property would significantly

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reduce the farmers' "temptation" to stay?

14. Regarding page 17, second paragraph, will phone lines be available?

15. Regarding V-B-1, why would movement of livestock be disruptive?

We would certainly contend that the small percentage increase in vehicular traffic attendant with cattle evacuation would have negligible impact on an overall evacuation plan. Except in the path of the plume all evacuation will be radially outward from TMI.

16. What concerns other than "disruption" lead the Commonwealth to conclude that evacuation of livestock is "impractical"?

17. What alternatives other than "across the board" evacuation does the Commonwealth consider practical?

18. Why are evacuation sites not provided for livestock (V-B-1a, last paragraph), when they are provided for the general population (staging areas at Dutch Wonderland, Park City, for example)?

19. With regard to V-B-2, advance planning for sheltering of livestock is suggested as an action for individual farmers. How will this be implemented? Who will pay?

Regarding Section VI - Food Protection

20. With regard to VI-A, what probability do you assign to the likelihood that any given milk shipment will not be contaminated with radioactive material as a function of "the nature of the incident" (paragraph 3)?

21. Relative to VI-B, do you plan to place dosimeters in every milk-house? If not, why not?

22. Relative to VI-B through G, although there is considerable information concerning objectives ("what" will be done), there is essentially no discussions of implementation ("how" it will be done). Will this information be a part of the plan? If so, when? If not, why not?

Regarding VII - Resources

23. To what extent will proposed organizational elements retain personnel in the event of

- a. site emergency,
- b. general emergency?

24. If Harrisburg is evacuated, where will control functions be located?

Regarding Annex B

25. Relative to General Procedures, does the Commonwealth plan to provide funding to individual farm operators to assist them to make provisions for sheltering? Can the individual farm operator be expected to make such expenditures "out of pocket"?

26. Relative to Space and Ventilation, obviously, ventilation is essential in any animal shelters, however, of what use is one 150 cfm fan when one dairy cow needs 300 cfm?

27. Does the Commonwealth believe filters are essential for adequate prolonged sheltering? If so, who will pay for them?

28. Relative to Feed and Water, explain how 1. (Plan for an emergency water supply), can be implemented in terms of time, space, accessibility to cows?

29. Apply Interrogatory 28 to advisory in 2. (Relative to Feed and Water, "Obtain drinking water from another source, if possible, until water is known to be safe.")

30. After a period of "heavy contamination", how will the farmer safely get to the (sheltered) barn to tend his cattle?

31. What incidence of mastitis is expected if lactating dairy cattle are left untended for

- a. 12 hours
- b. 24 hours

- c. 48 hours
- d. 72 hours
- e. one week?

32. Leaving dairy cattle unattended for over 48 hours would constitute cruelty to animals. Can this kind of cruelty be planned under current legal penalties?

33. Relative to Emergency Power, who will pay for it?

34. Relative to Emergency Power, how long can it be expected to operate unattended?

In General,

35. What will be the full cost of preparing an agricultural plan?

36. What will be the annual charges associated with readiness?

37. What would be the cost of evacuation of livestock in the event of a general emergency?

38. In the judgement of the Department of Agriculture, would methods other than nuclear generation of power be more compatible <sup>than nuclear</sup> with agricultural pursuits in Pennsylvania?

Respectfully submitted,

*Norman O. Aamodt (Mint)*

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