

Lic 7/29/80



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

|                             |   |                   |
|-----------------------------|---|-------------------|
| In the Matter of            | ) |                   |
|                             | ) |                   |
| METROPOLITAN EDISON COMPANY | ) | Docket No. 50-289 |
|                             | ) | (Restart)         |
| (Three Mile Island Nuclear  | ) |                   |
| Station, Unit No. 1)        | ) |                   |

LICENSEE'S INTERROGATORIES TO INTERVENOR  
ENVIRONMENTAL COALITION ON NUCLEAR POWER  
ON REVISION 2 OF LICENSEE'S EMERGENCY PLAN

These interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that the interrogatories be answered separately and fully in writing and under oath or affirmation, and the Board's Memorandum and Order of July 15, 1980, authorizing discovery requests based upon new information in Revision 2 of Licensee's Emergency Plan. The schedule for responding to these interrogatories is set forth in the referenced Board Memorandum and Order.

1. Section 4.4.2 of the Emergency Plan has been revised to indicate that the state and five-county emergency plans now use the same emergency classification scheme as Licensee.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-4 are valid?

(b) If so, explain the basis of your conclusion.

8008040033

2. Revision 2 of the Emergency Plan includes a revised Emergency Public Information Plan as Appendix B. That plan calls for dissemination of information to the media in the event an alert is declared. In addition, Section IX.A.3 of the State Plan provides information on the means to be used by state officials in disseminating information to the public.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-7 are valid?

(b) If so, explain the basis of your conclusion.

3. Section 4.7.6.1.7 has been revised to cross reference those sections of the Restart Report which describe the range and capabilities of the high-range effluent monitors.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-11 are valid?

(b) If so, explain the basis of your conclusion.

4. A new Section 4.6.3.5 has been added to describe radiological assessment and offsite monitoring.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-13 are valid?

(b) If so, explain the basis of your conclusion.

(c) If you still believe that real time, offsite monitors are necessary, indicate the number needed, the

approximate placement of the monitors, and the information to be provided by the monitors that would not be available from a mobile, offsite radiological monitoring team.

5. Section 4.7.6.2.1 has been revised to reference a new Table 10, identifying the location of monitoring devices for the upgraded REMP.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention Nos. 2-20 and 2-30 are valid?

(b) If so, explain the basis of your conclusion.

6. Section IV of the State Plan has been revised to indicate that "[t]he amount of lead time may dictate the protective action to be implemented" (p. 6). In addition, the BRP Plan (Appendix 8 to the State Plan) contains information on protective action options.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-26 are valid?

(b) If so, explain the basis of your conclusion.

7. Section XIV.B.7 and Annex XIV.A of the BRP Plan (Appendix 8 to the State Plan) and Section X.I (p. 25) and Appendix Q of the Department of Health Plan (Appendix 9 to the State Plan)

contain information on radiation, radiation sickness, decontamination, and hospitals with special decontamination facilities.

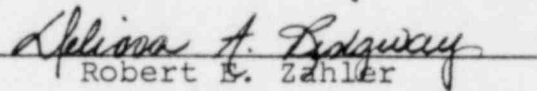
(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 2-28 are valid?

(b) If so, explain the basis of your conclusion.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:



Robert E. Zahler

Delissa A. Ridgway

Dated: July 29, 1980