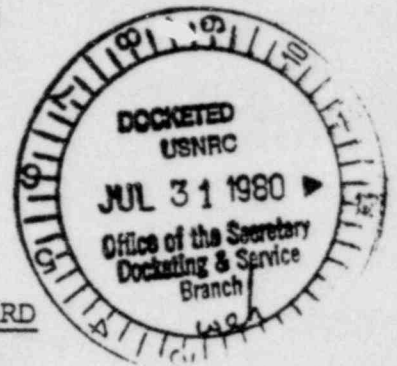


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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
NEWBERRY TOWNSHIP TMI STEERING COMMITTEE
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. Annex S of the updated York County Plan includes historical population data from 1900-1970, projected population data for 1980, 1990, 2000, 2010 and 2020, and 1980 population estimates for 5-, 10-, and 20- mile radii of TMI.

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(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(1) are valid.

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

(c) Given this information, explain what purpose would be served by including 1980 census totals.

2. Annex D of the updated York County Plan (§ VI.B.c) indicates that the EOC contains 79 emergency telephone trunk lines, 49 at which are on the 911 system and 6 others are for the standby rumor control center. Annex E (§§ V.E & J) identifies a rumor control telephone number and provides additional new information on the dissemination of public information.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(4) are valid?

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

3. Annex C of the updated York County Plan (§ IV) identifies the primary warning control system, as well backup and supplementary systems. Appendix I (Warning) to Annex G describes the means to be used by local fire companies to assist in the warning of York County residents.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention Nos. 3(b)(5), (6) & (7) are valid?

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

(c) Identify any evidence upon which you rely demonstrating that the system of fire company notification described in Annex G is inadequate.

4. Annex D of the updated York County Plan (§§ V.F) identifies the revised reception centers. Annex D (§ VI.A.4) describes the radio system designated as the County Sheriff Net.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(8) are valid?

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

(c) Identify any evidence upon which you rely demonstrating that the County Sheriff Department will not be able to use its radio network from the reception centers.

5. Annex D of the updated York County Plan (§ V.G) now identifies the RACES network as the means to provide interim communications should relocation of the EOC become necessary.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(9) are valid?

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

6. With respect to Contention No. 3(b)(10), do you still contend that the maps designated "York County Warning System" and "Fire Control Net" (located at the back of Annex C) are inaccurate? If so, identify which of the Newberry Township sirens you contend does not exist.

7. The table referred to in Contention No. 3(b)(1), formerly in Annex 10 relating to "Health-Medical," has been moved to Annex K relating to "Transportation." In addition, Annex K now includes information on the number of buses available and telephone numbers where school buses can be secured.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(11) are valid?

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

8. The updated York County Plan contains an entirely new section (Annex M) on the support to be provided by the Pennsylvania National Guard. In addition, Section IX.A.7 of the State Plan contains information on the support to be provided by the Department of Military Affairs.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention Nos. 3(b)(12) & (20) are valid?

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

9. The updated York County Plan contains a new Annex G on "Fire Services."

(a) In light of these changes, do you still maintain that the concerns set forth in Contention Nos. 3(b)(13) & (14) are valid?

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

10. The updated York County Plan contains a new Annex K on "Transportation."

(a) In light of these changes, do you still maintain that the concerns set forth in Contention Nos. 3(b)(15), (16) & (17) are valid?

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

11. The updated York County Plan contains a new Annex H on "Evacuation."

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(18) are valid?

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

(c) Identify any evidence upon which you rely demonstrating that the routes described in Annex H are "incapable of holding traffic which would occur during an evacuation."

12. The updated York County Plan contains a new Annex E, including revised draft news releases.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(b)(19) are valid?

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

13. The updated Dauphin County Plan includes a new Appendix 1 on "Organization and Responsibility." Appendix 4 includes a concept of operation in the event an evacuation is ordered. In addition, Appendix 2 includes a list of local emergency preparedness directors, and Appendix 3 includes a list of Dauphin County personnel to be contacted in the event of an emergency.

(a) In light of these changes, do you still maintain that these concerns set forth in Contention No. 3(c)(1) are valid?

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

14. The updated Dauphin County Plan includes a new Appendix 5 on "Alert Warning."

(a) In light of these changes, do you still maintain that these concerns set forth in Contention No. 3(c)(2) are valid?

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

15. The updated Dauphin County Plan includes a new Appendix 8 on "Transportation" and a new Appendix 12 on "School Policy." These appendices contain information on local pick-up points, staging information (including staff to be present at such sites), and school evacuation procedures.

(a) In light of these changes, do you still maintain that these concerns set forth in Contention Nos 3(c)(4) & (5) are valid?

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

16. The updated Dauphin County Plan includes a new Appendix 13 on "Medical/Health." This appendix indicates that ambulances are to be obtained from county resources and from PEMA (§§ IX & X). Attachments to the appendix also list acute care hospitals and long term care facilities, as well as relocation facilities.

(a) In light of these changes, do you still maintain that these concerns set forth in Contention No. 3(c)(6) & (7) are valid?

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

17. The updated Dauphin County Plan includes new appendices on "Police" (App. 9), "Military Support" (App. 10), and "Fire and Rescue" (App. 11). These appendices provide for the arrival of National Guard troops and the presence of fire and police personnel in the evacuated area if such presence is safe.

(a) In light of these changes, do you still maintain that these concerns set forth in Contention No. 3(c)(8) are valid?

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

(c) Identify the evidence upon which you rely demonstrating that this version of the Dauphin County Plan has not been distributed to emergency personnel.

18. Revision 2 of the Emergency Plan includes updated letters of agreement with the Middletown Fire Department, Rescue Hose Co. #3, Union Hose Co. #1, Londonderry Fire Co. #1, Bainbridge Fire Co., Borough of Middletown Policy Department, and the Pennsylvania State Police, who are all invited to attend Emergency Plan orientation and training courses conducted by Licensee, as explained in Sections 4.8.1.1.3 and 4.8.1.1.4. In addition, Section 4.5.3.1.6 includes a new paragraph on the assistance available from the Pennsylvania Department of Military Affairs.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(1) are valid?

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

(c) If you are of the view that firefighting and/or police authorities will fail to carry out their assigned functions notwithstanding the above-referenced letters of agreement, describe the basis for this conclusion and identify the evidence which you rely upon for that conclusion.

19. Revision 2 of the Emergency Plan includes a new Section 4.6.3.5 on radiological assessment and offsite monitoring. In addition, Section 4.7.6.1.7 has been revised to include cross-references to the Restart Report dealing with high-range effluent monitors.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(3) are valid?

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

20. 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. 3(d)(4) are valid?

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

21. Section 4.5.1.3.1 of the Emergency Plan indicates that immediately following declaration of an emergency the Shift Supervisor will assign members of the shift organization to carry out the various emergency actions. In order to further clarify the duties of the shift organization, a reference to a revised Table 8 has been added to this section. The revised Table 8 shows, for example, that the responsibility for making notifications will be carried out by a control room operator.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(5) are valid?

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

22. Revision 2 of the Emergency Plan includes a new Section 4.6.1 on emergency notification of offsite agencies. That section, together with Section 4.6.2.2.3, set forth the obligation to immediately notify the appropriate state, county and federal offsite agencies.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(7) are valid?

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

23. Included with Revision 2 of Licensee's Emergency Plan were updated versions of the state and five county plans. In addition, Section 4.5.3 has been greatly expanded to include a more detailed discussion of the state plan. Also, a new Figure 20, depicting the relationship between Licensee and state/local authorities, has been added. These revisions, together with Section 4.8.2, illustrate the coordination in planning among the Licensee, the state, and the five counties.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(9) are valid?

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

24. Sections 4.8.1.2.4 and 4.8.1.2.7 include revised commitments with respect to the testing of offsite communications and radiological monitoring. In addition, the Commonwealth of

Pennsylvania recently completed a drill of its response capability to a radiological emergency.

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(10) are valid?

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

(c) Identify where Revision 2 to the Emergency Plan assumes the placement of communications systems, radiological monitoring instrumentation and warning systems not yet in place.

25. Section 4.6.5.1.2 has been revised to include new information on the protective action options recommended by the BRP. This information is further explained in Appendix 8 to the State Plan. Moreover, the various county plans have been revised to include "take cover" and "selective evacuations" as possible protective action options (see, e.g., York County Plan, § VI.A.7).

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. 3(d)(11) are valid?

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

(c) Identify the evidence which you rely upon to demonstrate that the revised emergency plans of the Licensee, state and counties lack coordination.

Respectfully submitted,
SHAW, PITMAN, POTTS & TROWBRIDGE

By: 

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Delissa A. Ridgway

Dated: July 30, 1980