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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  
ANTI-NUCLEAR GROUP REPRESENTING YORK  
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. Included as an appendix to Licensee's Emergency Plan is the revised Commonwealth of Pennsylvania Disaster Operations Plan, Annex E, Fixed Nuclear Facility Incidents. The State Plan has been revised to satisfy the criteria of NUREG-0654/FEMA-REP-1.

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

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

2. Included as appendices to Licensee's Emergency Plan are the revised radiological response plans for the counties of Dauphin, York, Lancaster, Cumberland and Lebanon. These plans have been revised to satisfy the criteria of NUREG-0654/FEMA-REP-1.

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

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

3. 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. II (F)(1) are valid?

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

(c) If you still believe that permanent offsite monitoring devices which can be remotely read onsite 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.

(d) In light of these changes, do you still maintain that the concerns set forth in proposed revised

Contention No. II(F)(2) are valid?

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

(f) Do you have any reason to believe that the MIDAS assessment system does not have capabilities similar to the ARAC system? If so, explain. If you are unsure as to the capabilities of the MIDAS system, identify and describe those capabilities of the ARAC system which you contend must be part of the MIDAS system to provide for adequate radiological assessment.

4. Appendix D to Licensee's Emergency Plan now includes the current version of the emergency response plan of the Pennsylvania Department of Agriculture, which is Appendix 7 to the State Plan. Section V and Annex B of the emergency plan of the Agriculture Department include a discussion of protective action options for livestock.

(a) In light of this change, do you still maintain that the concerns set forth in Contention No. III(A)(B) are valid?

(b) If so, explain the basis of your conclusion, including in your explanation a listing of any types of property which you believe are not adequately covered by the revised plans of Licensee, the Commonwealth, and Dauphin, York, Lancaster, Cumberland and Lebanon counties.

5. Appendix C of the Emergency Plan includes a revised and updated set of letters of agreement.

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

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

(c) For each letter of agreement which you still maintain is "perfunctory", describe the shortcomings of that letter and what changes you believe will be necessary for an adequate letter of agreement.

6. Section 4.5.1.3 has been revised to reference new Table 8, which specifies the minimum staffing of the emergency onsite organization (including numbers of people with health physics training).

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

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

(c) Do you contend that the minimum staffing requirements set forth in Table B-1 of NUREG-0654 are insufficient? If so, explain.

7. Section 4.5.1.3.1 (p. 5-7) has been revised to include a list of 13 information items which the Emergency Director is to ensure are transmitted to the proper offsite authorities.

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

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

8. Section 4.8.1.2 has been revised to provide for the conduct, at least once every 12 months (± 3 months), of a major drill appropriate to a Site or General Emergency, including mobilization of on and offsite emergency response personnel and resources and communications with state and county agencies. Revised Section 4.8.1.2 further provides, at page 8-6, for the participation of federal agencies and organizations in drills and exercises. The updated state plan includes a new Appendix 14, which provides that communications with federal emergency response organizations will be tested annually. In addition, the Commonwealth of Pennsylvania recently completed a major 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 proposed revised Contention No. III(A)(H) are valid?

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

9. The revised York County Protective Action Plan includes a new Annex B, "Notification". In accordance with the notification system described in new Annex B of the revised Emergency Plan, notification to York and Lancaster Counties is given pursuant to this path:

- (a) Licensee to Dauphin;
- (b) Licensee to PEMA;
- (c) PEMA to BOPR;
- (d) PEMA to Dauphin; and
- (e) PEMA to York, Lancaster, Cumberland and Lebanon Counties.

In light of these changes, do you still maintain that:

- (a) the concerns set forth in Contention No. III(A) (I) are valid?
- (b) If so, explain the basis of your conclusion.

10. With respect to proposed revised Contention No. III(B) (D), answer the following questions:

- (a) Do you contend that NUREG-0654 concludes that a release of radioactive iodine may occur in less than one hour from onset of an accident? If so, identify that part of NUREG-0654 relied upon for this contention.
- (b) Identify the evidence upon which you rely indicating that the administration of a thyroid blocking agent to the public is either necessary or desirable.

11. The BRP Plan (Appendix 8 to the State Plan) includes an expanded discussion of protective action guides (§ V), identification of protective action areas (§ VII), and protective action options (§ VIII). In addition, Licensee's Emergency Plan has been revised to indicate the 13 information items it will transmit to BRP (§ 4.5.1.3.1 at p. 5-7).

(a) In light of these changes, do you still maintain that the concerns set forth in Contention No. III (B) (E) (1) & (2) are valid?

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

12. If you are adopting Mr. Sholly's proposed Contention No. 8(C) (a), describe what you perceive to be the significance of not including the entire City of Harrisburg within the plume exposure EPZ. In responding to this interrogatory, your discussion should include, but not necessarily be limited to, consideration of the following matters:

(a) Ability of those outside the EPZ to receive information about the Emergency Plan;

(b) Ability of those outside the EPZ to receive early warning of a possible emergency condition at TMI;

(c) Ability of those outside the EPZ to receive notice of a decision to take protective measures (i.e., sheltering or evacuation);

(d) Ability of those outside the EPZ to take shelter; and

(e) Ability of those outside the EPZ to evacuate the area.

13. If you are adopting Mr. Sholly's proposed Contention No. 8(C) (b), describe what you perceive to be the significance of not including the City of York and surrounding urbanized area within the plume exposure EPZ. In responding to this interrogatory, your

discussion should include, but not necessarily be limited to, consideration of the following matters:

(a) Ability of those outside the EPZ to receive information about the Emergency Plan;

(b) Ability of those outside the EPZ to receive early warning of a possible emergency condition at TMI;

(c) Ability of those outside the EPZ to receive notice of a decision to take protective measures (i.e., sheltering or evacuation);

(d) Ability of those outside the EPZ to take shelter; and

(e) Ability of those outside the EPZ to evacuate the area.

14. If you are adopting Mr. Sholly's proposed Contention No. 8(C)(c), describe what you perceive to be the significance of not including the entire geographic extent of all township, city, borough, town or village jurisdictions crossed by the 10-mile EPZ within the plume exposure EPZ. In responding to this interrogatory, your discussion should include, but not necessarily be limited to, consideration of the following matters:

(a) Ability of those outside the EPZ to receive information about the Emergency Plan;

(b) Ability of those outside the EPZ to receive early warning of a possible emergency condition at TMI;

(c) Ability of those outside the EPZ to receive notice of a decision to take protective measures (i.e., sheltering or evacuation);

(d) Ability of those outside the EPZ to take shelter; and

(e) Ability of those outside the EPZ to evacuate the area.

15. Are you adopting proposed Contention No. 8(C), as set forth by Mr. Sholly? If so, answer the following questions:

(a) With respect to proposed Contention No. 8(C), do you contend that the preplanning done within the 10-mile EPZ is inadequate to provide a basis for emergency actions outside the 10-mile zone, if such actions are deemed necessary? If so, explain the basis of that conclusion.

(b) With respect to proposed Contention No. 8(C), do you contend that the preplanning done by the counties in connection with their 20-mile evacuation plans is inadequate to resolve your concerns? If so, explain the basis of that conclusion.

16. If you are adopting proposed Contention No. 8(C) as set forth by Mr. Sholly, state whether you have any reason to believe that:

(a) The proposed access and egress routes for an evacuation are inadequate to carry the planned numbers of vehicles.

(b) There will be a "conflict" in use of access and egress routes in the event of a general evacuation.

If so, explain separately for parts (a) and (b) above the basis of that conclusion.

17. With respect to your proposed Contention No. 8(C)(d):

(a) Identify the basis of your claim that "[n]umerous members" of Old Order Amish reside within close proximity of the plume exposure EPZ.

(b) Define the geographic extent (e.g., location) of the Old Order Amish community referred to in this contention and state the number of Old Order Amish which you contend reside within that area.

(c) Explain why the 20-mile evacuation plan set forth in the emergency response plan for Lancaster County is inadequate to resolve your concerns.

18. With respect to proposed new Contention No. III(A)(K), answer the following questions:

(a) Do you contend that the guidance provided in the Standard Review Plan is applicable to the restart of TMI-1? If so, explain the basis of that contention.

(b) Do you contend that on page 6-7 Licensee states that accident assessment will take one-half hour? If so, identify the language in the Emergency Plan you rely upon for that contention.

(c) Do you contend that on page 6-7 Licensee commits to monitor on the west shore of the Susquehanna River within one-half hour? If so, identify the language in the Emergency Plan you rely upon for that contention.

(d) Clarify the reference to § 13.3(II)(3) of the Standard Review Plan, since there is no such subsection.

19. With respect to proposed new Contention No. III(A)(L), answer the following questions:

(a) Do you contend that where no governmental subdivision plans are provided, the county plans are inadequate to provide emergency response guidance on a county-wide basis? If so, identify each inadequacy you perceive and state the basis for that inadequacy.

(b) Are you aware that an emergency response plan from the Borough of Mechanicsburg is included as part of Annex Q to the Cumberland County Plan? Did you consider the existence of such a plan in drafting this contention?

20. With respect to proposed Contention III(B)(H)(3), identify specifically all places where the Commonwealth allegedly demonstrates that it "does not comprehend the distinction between 'core melt' and 'melt-through' accidents." Discuss in detail the significance of the Commonwealth's alleged failure to comprehend the distinction.

21. With respect to proposed Contention III(B)(H)(4), identify specifically the material in EPA 520/1-78-001B which you contend the Commonwealth should consider, and discuss fully the significance of that material to the state emergency response plan.

22. With respect to proposed Contention III(B)(I), identify all evidence on which you rely to demonstrate that the "persons responsible for implementing emergency response plans at all levels of the response network within the plume EPZ" have not successfully completed the training required by NUREG-0654, Criterion O-4, and provided for in Appendix 10 of the State Plan.

23. Appendix D to Licensee's Emergency Plan now includes the current version of the emergency response plan of the Pennsylvania Department of Agriculture, as Appendix 7 to the State Plan. Section V.A of the emergency plan of the Agriculture Department includes a discussion of sheltering as a protective action option for farmers who "consider an evacuation unfeasible and elect to seek or use sheltering for themselves."

(a) In light of this information, do you still maintain that the concerns set forth in Contention No. III(B)(J) are valid?

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

(c) If you contend that there are self-protective action "choices" for farm personnel, other than sheltering and evacuation, which are not adequately described in the Agriculture Department plan, explain those "choices".

24. With respect to proposed new Contention No. III(B)(K), answer the following questions:

(a) Identify the source of the proposed Commonwealth plan for hiring and training a nuclear engineer to be dispatched to the TMI-1 control room.

(b) Has this proposal been endorsed by the Governor? By PEMA?

(c) Explain the basis for your claim that this proposal must be implemented prior to TMI-1 restart.

25. The revised York County Protective Action Plan includes a new Annex N, "Radiological Monitoring and Decontamination".

(a) In light of this material, do you still maintain that the concerns set forth in proposed Contention No. III(C)(7) are valid?

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

26. With respect to proposed Contention No. III(C)(8), identify the concern underlying the proposed contention and discuss the practical significance of the Commonwealth's assignment of the responsibility for arranging for emergency wrecker and fuel services to risk counties, and York County's delegation of that responsibility to the National Guard.

27. With respect to proposed Contention No. III(C)(9), identify specifically the basis in NUREG-0654 on which you rely to support your assertion that the 24-hour operability requirement of Criterion F-1(a) is applicable to county-local government communications links (rather than to state-county communications links).

28. Discuss in detail your understanding of the purpose of the written agreements described in NUREG-0654, Criterion A-3, which you rely upon in proposed Contention III(C)(10).

29. With respect to proposed Contention III(C)(10), identify by specific reference to the emergency response plan all delegations not specifically listed in the proposed contention which you assert should be "documented by written agreements" but are not.

30. With respect to proposed Contention III(C)(10), identify all information on which you rely to demonstrate that, in the absence of written agreements, the persons and organizations referred to in the contention:

(a) Will not know the roles they are to play in the event of an emergency;

(b) Will not have the ability to perform their assigned roles in the event of an emergency; and

(c) Will not respond to York County's requests for assistance.

Your answer should include a separate response to each of (a), (b), and (c) above for each of the persons and organizations referred to in the contention.

31. Explain in detail all provisions, in the revised state and York County emergency response plan, for thyroid blocking agent distribution which you contend are not coordinated, including specific references to the particular provisions of the revised state and York County plans on which you rely.

32. With respect to proposed Contention No. III(C)(13), explain fully the concerns expressed in the last two sentences of the proposed contention. Your explanation should address, but should not be limited to, a discussion of the following points:

(a) The persons whom you understand will enter the risk area to perform "essential functions" on farms, as explained in Annex K to the York County plan;

(b) The specific items of information you contend should be gathered from farmers and compiled prior to restart of TMI-1;

(c) The reason why each specific item of information listed in response to (b) above is needed;

(d) The advantages of gathering such specific items of information prior to restart, in the absence of a need to activate the agricultural "Information Center"; and

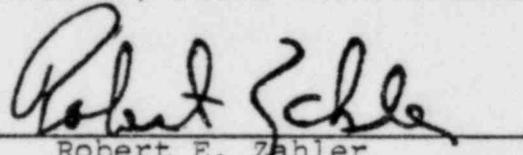
(e) The advantages of disseminating information concerning the program prior to restart.

33. With respect to proposed Contention No. III(C)(13), identify all information on which you rely to support your assertion that the York County Fairgrounds is "an inappropriate location for the agricultural 'Information Center'." Include in your response a discussion of the significance of the fairgrounds' asserted location within a 20-mile radius of TMI-1, and the basis for your assertion that a total evacuation within the 20-mile radius may be required.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: \_\_\_\_\_



Robert E. Zahler  
Delissa A. Ridgway

Dated: July 30, 1980