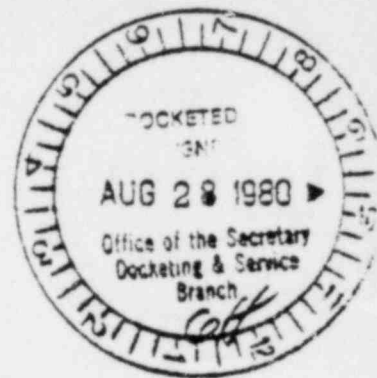


UNITED STATES NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

Metropolitan Edison, et al

(Three Mile Island Nuclear Station
Unit #1)

Docket # 50-289 (Re-start)

INTERVENOR NEWBERRY TOWNSHIP TMI STEERING COMMITTEE
ANSWERS TO LICENSEE'S INTERROGATORY ON REVISION 2 OF
OF LICENSEE'S EMERGENCY PLAN

1. (A) Yes.

(B) The answer to subparagraph B is contained in the answer to subparagraph C.

(C) The claim that population as it is set forth by the census figures is a concern to the intervenor, however, the real crux of the issue is that there are located throughout Newberry Township and surrounding townships and municipalities within the five and ten mile EPZ pockets of high density populations. It is imperative that any evacuation planned that is supposedly premised upon a low density population basis also recognized the problems presented by the pockets of high density population in a rural setting. The concern raised by this Contention is that the drafters of the New York County evacuation plan have not taken into consideration the true magnitude of the difficulties presented in the evacuation of the high density pocket population areas.

2. (A) Yes.

(B) Newberry Township, Goldsboro, and Fairview Township are still not included in the 911 emergency telephone area and it is still intervenor's position that the remaining twenty-four (24) trunk lines will still not be adequate to handle an overload such as that which was experienced in March of 1979.

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3. (A) Yes.

(B) The change in sentence structure of Annex C of the new York County Plan does not change the Annex's original content. Appendix 1 to Annex G of the new York County Plan does not change the original thought expressed by intervenor in Contentions 3(b) (5), (6) & (7).

(C) Intervenor expects to present testimony that fire department officials in Newberry Township, Goldsboro and York Haven Borough cannot rely upon volunteers to effect the plan as set forth in Appendix 1 to Annex G of the new York County Plan. Intervenors also expect to present testimony that local fire departments will not be able to effect Appendix 1 to Annex G because of the rural nature of Newberry Township and surrounding municipalities and the distances involved in that said area.

4. (A) Yes.

(B) Contention 3(b) (8) refers to the fact that the Hanover site is not in an "emergency ready" condition and Annex D still does not refer to the Hanover site as being "emergency ready", but instead states that the RACES organization will provide interim communications for emergency operations until full communications capability can be restored.

(C) None, assuming the radio equipment required to adequately and effectively direct an emergency evacuation can be transported and established in the reception centers.

5. (A) Yes.

(B) RACES is a volunteer organization which may not respond in the event of an emergency evacuation. There is no plan set forth as to who at RACES will be responsible for initiating the interim communications set up. Finally, there is no assurance that an open line communication will be sufficient to adequately handle the direction of a county wide evacuation.

6. See attached map; circled dot represents siren not in place in Newberry Township, Pennsylvania.
7. (A) Yes.
- (B) The basis for the intervenors position on this matter is set forth in its Contention. The addition of telephone numbers does not alleviate the issues presented by the Contention.
8. (A) Yes.
- (B) Intervenor's position is that Annex M to the new York County evacuation Plan and section IX A. 7 of the State Plan do not meet and resolve the issues set forth in intervenors contention 3(b) (12) & (20). The contentions are still held by the intervenors to be valid.
9. (A) Yes.
- (B) The changing of a Plan does not change the candid realities recognized in the original York County Plan that augmentation would be required because volunteer fireman would evacuate the families. Intervenor is still of the opinion that once a fireman's family has left the risk area either he will not return to the area, could not return to the area or would not allow his family to leave the area without his assistance, and thus would not remain on the job in the risk area. It is a gross assumption that volunteer firemen will remain in the risk area or that volunteers from outside the risk area will enter into the risk area. As far as the National Guard being summoned it is recognized that Annex G of the new York County Plan does not incorporate their use, and if this is the point of Licensee's Interrogatory that point is conceded, however, the previously stated points are still held to be valid by intervenors.

10. (A) Yes.

(B) The new York County Plan incorporates a transportation coordinator but does not alleviate any of the shortcomings and considerations set forth in intervenors Contention 3(b) (15) (17). Contention 3(b) (16) is alleviated assuming the transportation coordinator has the proper school phone numbers. Also there is a general assumption that the transportation coordinator has a Plan which he is going to effect, however, that Plan has not been submitted to date and is not included in the new York County Evacuation Plan.

11. (A) Yes.

(B) Wind factors have still not been taken into consideration with regard to the Contention raised by the intervenor.

(C) The portion of the York County Plan referred to in this Interrogatory only relates to route 83, Pennsylvania Turnpike, Route 15, and Pennsylvania route 382 and 177. The plan does not indicate the secondary rural access roads required to be traveled by a vast majority of the population to reach these sites, and it is still intervenors position that the secondary access roads are incapable of holding the traffic which would occur during an evacuation.

12. (A) No.

(B) Intervenors are of the opinion that the new York County Plan raises new issues which will be further explained in intervenor's new Contentions.

13. (A) No.

(B) No applicable.

14. (A) Yes.

(B) Appendix 5 does not address the issue of whether sirens are within a hearing distance of the total populus of Dauphin County and/or the power source issue raised in the Contention. Therefore, Plaintiff still believes

that its conclusion that this portion of the Dauphin County Plan is inadequate is still valid.

15. (A) Yes.

(B) Intervenor is still of the position that the staging area provisions are deficient and that there is no set person designated to operate a staff director at the staging areas, that there is an assumption that protective cover will be available when it is not provided for and that there is no police protection at these various sites. Therefore, intervenor is still of the opinion that the Contention is valid.

16. (A) Partially yes and partially no.

(B) The new Dauphin County Plan does resolve some of the concerns set forth in Contention 3(c) (7) as to triage and receiving points for patients, however, there does not appear to be any firm agreements regarding acceptance of patients. The Dauphin County Plan does not resolve the issue of sufficiency of ambulance service and that intervenors are still of the position that Contention 3(c) (6) is still valid as set forth.

17. (A) Partially yes and partially no.

(B) The support of the National Guard as provided in the Dauphin County Plan is dependent upon the Governor's calling to active duty guard members. If the National Guard is not called to active duty while an evacuation is ordered the concerns expressed in Contention (c) (6) are still valid.

(C) At this time intervenors are investigating various sources of information to support this Contention.

18. (A) Yes.

(B) Section 4.8.1.1.4 provides that at some later date the Licensee will provide instruction to local fire officials. The Plan does not however state with any specificity the exact expectations of Licensee vis-a-vis

local fire companies. Moreover, the letters of agreement do not specify what levels of involvement are expected of the fire companies but are merely blind commitments to provide estimated manpower and equipment. Section 4.5.3.1.6 and 4.8.1.1.3 provide for PEMA involvement but still there are no guarantees that local fire companies and police departments will be required to attend training seminars and programs.

(C) To begin there are no specifically assigned functions set forth in either the letters of agreement or the Licensee's Plan regarding the involvement of local fire companies and police departments. Moreover, the intervenor expects to present testimony as to the realities experienced by volunteer fire companies when emergency conditions existed in the past regarding the dependability of volunteers.

19. (A) No, unless the Plan still would allow a situation to exist wherein an initial or subsequent radiation release could not be accurately measured because radiation monitors provided in the Plan would have been incapacitated or not provided with gradients high or low enough to measure the release.

(B) Not applicable

20. (A) No.

(B) Not applicable

21. (A) No.

(B) Not applicable.

22. (A) Yes.

(B) The duty of the Shift Supervisor is to declare an emergency situation. The parameters that establish emergency situations are contained in the Emergency Plan Implementation Document which document is not attached as part of the Emergency Plan although it is appendixd to the Plan. Intervenor is still of the position that its Contention 3(d) (7) is still valid in that too much discretion is still placed with the Shift Supervisor

- concerning declaration of an emergency situation.
23. Section 4.5.3 is a restatement of PEMA duties and responsibilities. The plan still does not reflect coordination and as just one example of the total deficiency in this area it is noted that the Dauphin County Plan indicates initial notification by the Utility whereas the York County Plan indicates notification by PEMA. Intervenor is still of the opinion that Contention is valid.
24. (A) Yes.
- (B) Radiological instrumentation and communication systems are in place in Newberry Township. As concerns other townships, Plaintiff is not aware of the state of readiness concerning those two subjects. The Commonwealth of Pennsylvania has withdrawn supervision of the radiological reading program and the result has been that the program is no longer effective. As of the present tapes generated by the radiological monitoring instruments have not been collected by the Commonwealth of Pennsylvania resulting in that readings are not being made and that readings are not being interpreted and thus the program is of no value since it is not in use. Moreover, the tests carried out by the Commonwealth of Pennsylvania did not include full participation of the surrounding communities and counties. Specifically York County did not fully participate because the emergency drill took place on a week day. Without full participation of the counties it is submitted that there still exists a deficiency.
25. (A) The answer to Interrogatory 25 at this time is do not know. Intervenor expects to cover this area in its set of new Contentions which will be drafted and submitted to the Atomic Safety and Licensing

Board in early September. If the area is not covered by new Contentions,
a full answer will be given by Intervenor.

Respectfully submitted,

FOX, FARR & CUNNINGHAM

By: Jordan D. Cunningham
Jordan D. Cunningham
Attorney for Newberry Township
Steering Committee

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the within Answers to Interrogatories by First-Class Mail, postage prepaid to the following:

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