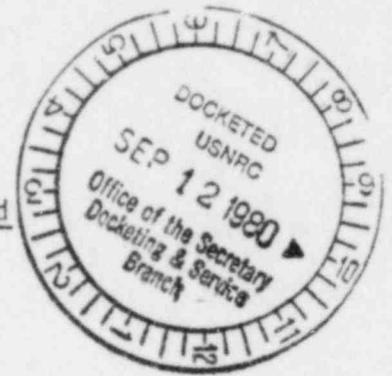


SHOLLY, 8/29/80

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



In the Matter of  
METROPOLITAN EDISON COMPANY, ET AL.  
(Three Mile Island Nuclear  
Station, Unit No. 1)

Docket No. 50-289  
(RESTART)

INTERVENOR STEVEN C. SHOLLY  
SUPPLEMENTAL RESPONSE TO  
LICENSEE'S INTERROGATORIES  
ON REVISED EMERGENCY PLAN

The following constitutes my supplemental response to interrogatories which were answered initially in a filing dated 8/4/80.

INTERROGATORY #2

Responses to previously outstanding discovery requests have not materially altered my prior response. The response to interrogatory #2 as filed 8/4/80 does not require supplementation as I had earlier presumed that it would.

INTERROGATORY #4

The emergency plans of the local counties do not constitute a sufficient basis to resolve the concerns of Contention 8(c). These plans contain unproven assumptions which, if incorrect, could have disastrous

8009180 169

G  
DS03  
50/1

consequences. These plans contain, in addition to problems identified in earlier filing, assumptions that presume sufficient lead time in the event of an accident requiring evacuation to fully implement the plan, including provisions for traffic control, prior to the evacuation announcement. This is an unproven assumption, and one which should not be relied upon in predicting the effectiveness of such emergency plans.

To select an example, the following specific defects in the Cumberland County Plan have been identified, the sum of which makes the plan unsuitable:

- a. The plans consider only short-term evacuation. No long-term evacuation plans are explained.
- b. The evacuation of New Cumberland to Newville while evacuating Mechanicsburg only to Carlisle, less than 5 miles more distant from TMI than Mechanicsburg, is an obvious defect. People from Mechanicsburg simply will not stop at Carlisle. To the extent that the plan relies on support services and facilities in Carlisle to support evacuees from Mechanicsburg, the plan is defective.
- c. Chains of command are not well-delineated. In the absence of key personnel, for whatever reason, appears to leave positions such as transportation open. The specific chains of command for each key position should be clearly explained.
- d. The plan fails to recognize significant seasonal

population changes.

- e. The "phased" evacuation presumes that other persons in lower priority areas will remain until they are called upon to leave. This assumption is unproven.
- f. A sudden evacuation may result in a far higher than 50% need for care at relocation centers in host areas.
- g. There are no references in the plan for care and/or transportation of prisoners (for example, at the State Correctional Facility at White Hill).
- h. It is unclear whether the EBS station (WHYL) has emergency power provisions.
- i. It is unclear that sufficient phone lines are available at the call-in location for persons without transportation. Such inadequate provision could cause panic.
- j. There are clearly insufficient provisions made for transportation; even where this is acknowledged in the plan, there is little specified as to how the required transportation will be acquired.

This does not constitute an exhaustive list of defects in the Cumberland County plan, nor does it reference the other four county plans. It is merely meant to exemplify why these plans are insufficient as a basis for emergency planning outside the circular 10-mile EPZ proposed by Licensee.

INTERROGATORY #9

The specific data requested by this interrogatory is unavailable as of this date. The data is being sought by counsel for ANGRY and myself. When we obtain the specific data, it will be provided in a supplemental response or in direct testimony.

INTERROGATORY #15

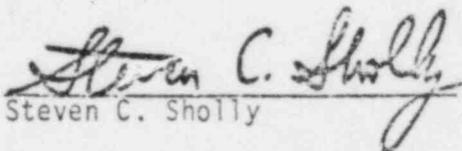
Despite assertions by Mr. Zahler to the contrary, I am not in possession nor have I received a copy of the Department of Agriculture emergency plan. The only reference in the State Plan at Appendix 7 is that the plan is "under separate cover." I have never received this plan; I have never seen it. I cannot therefore respond to this interrogatory with more specificity.

INTERROGATORY #21

See response to Interrogatory #15 above. I simply do not have and have not received this plan.

RESPECTFULLY SUBMITTED,

DATED: 29 August 1980

  
Steven C. Sholly

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of

METROPOLITAN EDISON COMPANY, ET AL.

(Three Mile Island Nuclear  
Station, Unit No. 1)

Docket No. 50-289  
(RESTART)

CERTIFICATE OF SERVICE

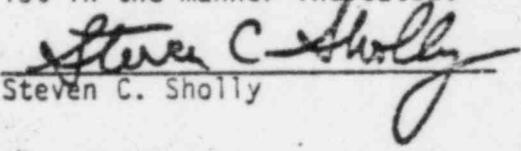
By my signature below, I hereby certify that a single copy of

INTERVENOR STEVEN C. SHOLLY SUPPLEMENTAL RESPONSE TO LICENSEE'S INTERROGATORIES  
ON REVISED EMERGENCY PLAN

was served upon the parties on this service list in the manner indicated.

SERVICE BY:

- A--1st class mail
- B--Express mail
- C--Hand delivered

  
Steven C. Sholly

Ivan W. Smith, Esq.  
Chairman, Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555  
ATTN: Docketing and Service  
Section

Dr. Walter H. Jordan  
Atomic Safety and Licensing  
Board Panel  
881 West Outer Drive  
Oak Ridge, TN 37830

Office of the Executive Legal  
Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Linda W. Little  
Atomic Safety and Licensing  
Board Panel  
5000 Hermitage Drive  
Raleigh, NC 27612

George F. Trowbridge, Esq.  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20006

Service by 1st class mail on 9/10/80