March 23, 1981

#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# Before the Atomic Safety and Licensing Board

In the Matter of		
LOUISIANA POWER & LIGHT COMPANY	Docket No	. 50-382
(Waterford Steam Electric Station, ) Unit 3)		

APPLICANT'S RESPONSES TO LOUISIANA CONSUMER'S LEAGUE INTERROGATORIES 11 THROUGH 14 11. To what extent does any existing or draft emergency plan for
Waterford III prepared by LP&L, the State of Louisiana, or any
other governmental body provide a means for the evacuation (used
here to mean one or more designated evacuation routes and a
method of transportation that can be used thereon) of persons
living near Waterford III in the event of an accident?

Refer to the Louisiana Peacetime Radiological Response Plan, Attachment 1, Enclosure 1, sections XIV and XV.

12. What is the maximum distance from Waterford III for which a means of evacuation is provided in any existing or draft evacuation plan in number 11 above?

Evacuation is planned within a radius of about 10 miles of Waterford 3.

Also refer to response 11.

13. Does any evacuation plan prepared by LP&L, State of Louisiana, or any other governmental body provide a method to transport persons who are aged, infirm, or who do not own an automobile in an evacuation necessary because of an accident at Waterford III?

If so, please explain.

Refer to response 11.

14. Has LP&L or any contractor thereof, the State of Louisiana, or any other governmental agency evaluated the impact of a gasoline shortage on the feasibility of evacuating persons living near Waterford III? If so, please identify the study by title and author and state the results thereof. In lieu thereof, you may provide a copy of the study.

Neither LP&L nor any of its contractors has preformed such an evaluation. We are unaware of any such evaluation by a governmental agency.

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AFFIDAVIT OF R. G. AZZARELLO

State of Louisiana )
) SS
Parish of Orleans )

R. G. Azzarello, being duly sworn according to law, deposes and says that he is a Utility Engineer with Louisiana Power & Light Company; that the information contained in Applicants' Responses to Louisiana Consumers' League Interrogatory Nos. 11, 12, 13 and 14 is true and correct to the best of his knowledge and belief.

R. G. Azzarello Utility Engineer

Sworn to the subscribed before

me this 24+ Hay of 14ARCH 1981

Notary Public

My Commission expires AT DEATH

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## CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Responses to Louisiana Consumer's League Interrogatories 11 Through 14, and transmittal letter, dated March 25, 1981, were served upon those persons on the attached Service List, by deposit in the United States mail, postage prepaid, this 25th day of March, 1981.

James B. Hamlin Counsel for Applicant

Dated: March 25, 1981

#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

### Before the Atomic Safety and Licensing Board

In the Matter of

LOUISIANA POWER & LIGHT COMPANY

(Waterford Steam Electric Steam,)

Unit 3)

### SERVICE LIST

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Atomic Safety and Licensing
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