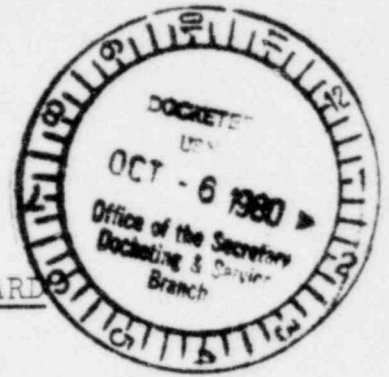


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of  
HOUSTON LIGHTING & POWER COMPANY  
(Allens Creek Nuclear Generating  
Station, Unit 1)



Docket No. 50-466

September 5, 1980

INTERVENOR SCHUESSLER'S FIRST SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO NRC STAFF

Persuant to Sections 2.740b and 2.741 of the Commission's Rules of Practice, Intervenor Schuessler propounds this first set of Interrogatories and Requests for Documents to Houston Lighting and Power Company (Applicant).

Interrogatories

1. Assuming accidents like those used in WASH 740 should occur at ACNGS, with winds blowing from (a) Northwest, (b) West and (c) Southwest, please answer the following questions as they would relate specifically to:
  - 1) Area within 10-mile radius
  - 2) Area within 50-mile radius
  - 3) Tomball
  - 4) Houston
  - 5) Harris County
  - 6) Sugarland
  - 7) Stafford
  - 8) Richmond
  - 9) Rosenberg
  - 10) Angleton
- a. How many short-term deaths would probably occur?

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- b. How many serious injuries would probably occur? What medical facilities and personnel will be available for care and treatment of injured? What special training is planned or anticipated for such personnel? What specialized equipment and supplies will be available for treatment of injuries expected from such an accident? Identify individuals and agencies responsible for care and treatment of injured. Describe their qualifications and training.
- c. How many people would probably require evacuation or shelter? What arrangements have been made, or are planned, to provide for their needs, such as transportation, safe food and water, sanitary facilities and medical care? Identify individuals and agencies responsible for these needs. Describe their qualifications and training.
- d. What arrangements have been made, or are planned for removal and handling of dead, including possibly radioactive bodies? What burial or funeral arrangements are planned, with wishes of families in mind? Identify individuals and agencies responsible for dealing with these problems. Describe policies they will work under.
- e. What would be the amount of property damage estimated at projected 1980, 1985, 1990, and year 2000 prices?
- f. What methods are planned for alerting public to emergency? What are estimates of time required? What are estimates of effectiveness of efforts? What individuals and agencies are responsible for carrying out this task?
- g. What methods are planned for directing, informing, and otherwise communicating with the public? How effective are these efforts expected to be? Identify individuals and agencies who will be responsible for this task. From what point(s) will they operate, and from what sources will they receive information to be given the public?
- h. Please identify individuals or agencies who will be responsible for determining if and when evacuation is necessary. On what criteria will such decisions be based? What information, from what source will be used?

i. Should evacuation be deemed necessary:

- (1) Describe the types of vehicles considered, their availability, reliability and capacities. What problems have been anticipated in this regard and how will they be resolved?
- (2) What mode of transportation will be available for evacuation of elderly and handicapped living in residences, schools, hospitals, jails and prisons, rest and convalescent homes, homes for aged, and other such centers? What studies have been done to assess the magnitude of this problem? Please produce data.
- (3) Describe plans and arrangements made, or to be made, for providing for evacuees. Where will they go? What shelter will be provided? Will they be removed to other urban areas, or are tent-city type facilities to be provided? If the latter, what arrangements have been made for sites and equipment? If the former, name urban areas, facilities and persons or agencies with whom arrangements have, or will be made.
- (4) What estimates have been made as to minimums and maximums of necessary length of evacuation period?
- (5) What estimates have been made as to timely safe return to evacuated areas?
- (6) Identify planned evacuation routes. What studies have been made to determine suitability and adequacy of these routes? Are they, and will they be, accessible? Are they to be made one-way routes? If so, will they prevent or hamper counter flow of emergency traffic? Are they free of possible flooding in storm conditions? Considering worst likely weather and traffic conditions, what is estimated to be time required for evacuation of given population groups? Provide estimated carrying capacities of proposed evacuation routes under a variety of possible conditions, including but not limited to, direction, time, weather, etc.

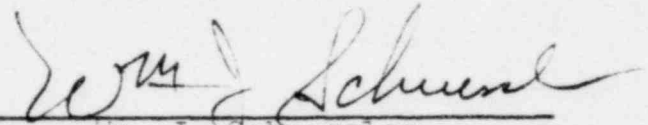
- (7) Identify individuals and agencies responsible for the planning, directing, and otherwise implementing evacuation plans. Please produce copies of arrangements and agreements made with them.
2. Do emergency evacuation and safety problems and considerations at ACNGS differ from those at the South Texas nuclear facility? If so, explain how. How does safety and emergency evacuation planning differ for these two projects. Provide data.
  3. Section of PSAR dealing with demographics has been substantially amended. Please produce copies of original PSAR pages which have been replaced in this section, including pages 2.1.3 through 2.1-9 and 2.1-24 through 2.1-29. Are similar amendments, based on current new data, planned?
  4. Please furnish copies of all data, documents, communications and preliminary or final drafts which are part of, or relate to preparation of your up-coming second final supplement to the Final Environmental Statement.
  5. Have any population density and population distribution studies been made by you, or are such studies planned, which are based on preliminary data from the 1980 U.S. Census which may confirm or dispute PSAR estimates and projections based on 1970 U.S. Census? If so, please produce all resulting data and findings.
  6. Identify all sites which were considered for this project before Allens Creek was selected. Produce copies of all data, documents and communications related to comparative judgements in regard to safety and emergency planning, which were made for the site selection.
  7. How did Allens Creek compare with other sites considered, in regard to safety and emergency planning? Please produce all data resulting from such studies.
  8. Identify by name and title all individuals who were involved in the process of selecting this site. Produce copies of all communications, studies, notes, transcripts, documents which bear directly, or indirectly, on the making of this decision.

9. Identify all expert witnesses you plan to present in these proceedings.

CERTIFICATE OF SERVICE

I hereby certify that one original and three copies of the foregoing were deposited in the U.S. Mail, addressed to the NRC Docketing and Service office for service on the parties, on September 5, 1980.

See attached list,

  
Wm. J. Schuessler

cc: J. Gregory Copeland, Esq.  
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