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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

'81 DEC 17 P2:04 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of CINCINNATI GAS AND ELECTRIC CO., et al. (Wm. H. Zimmer Nuclear Power Station, Unit 1)

Docket No. 50-358

To: David K. Martin
Assistant Attorney General
209 St. Clair St.
Frankfort, Kentucky 40601

CITY OF MENTOR INTERROGATORIES TO COMMONWEALTH OF KENTUCKY

Intervenor City of Mentor (Mentor) hereby requires the Commonwealth of Kentucky (hereinafter referred to as Commonwealth), pursuant to 10 C.F.R. \$2.740 (b), and In the Matter of Gulf States Utility Company (River Bend Station, Units 1 and 2), ALAB-444, 6 NRC 760, 768 (1977) [as to an "interested" state admitted to the proceedings pursuant to 10 C.F.R. \$2.715(c), "[0]nce" let in, however, an 'interested' state must observe the procedural requirements applicable to other participants"], to answer separately and fully, in writing, and under oath or affirmation, the following interrogatories on or before December 31, 1981.

DEFINITIONS

- 1. For the following interrogatories, if an answer to an interrogatory would differ according to what type of accident is envisioned, then answer each interrogatory for each of the following classes of accidents:
 - a. general emergency
 - b. site area emergency
 - c. alert
 - d. notice of unusual event
- 2. If an answer to an interrogatory would vary according to how much notification time on-site personnel of the Zimmer Power Station would have

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of an impending accident then answer each such interrogatory for the following time intervals, for each of the four classifications of accidents cited in Definition 2:

- a. 1 hour notification
- b. 30 minute notification

INTERROGATORIES

- 1. State whether or not the Commonwealth has Standard Operating Procedures for Emergency Operations Centers. If so, attach a copy of such procedures.

 If not, attach those parts of the procedures in draft or final form, which are written, and give the anticipated dare of completion for those parts not written.
- l.a. List all state and county officials who do have or will have a copy of the above Standard Operating Procedures and state where such copies of these procedures will be physically located.
 - 2. State whether or not the Commonwealth has Notification

Standard Operating Procedures. If so, attach a copy. If not, attach those parts of the procedures in draft or final form which are written and give the anticipated date of completion for those parts not written. 2.a. List all state and county officials who do have or will have a copy of the above Notification Standard Operating Procedures and state where such copies of these procedures will be physically located. 3. State whether or not the Commonwealthhas a written completed list of those to be called in an emergency (disaster alert roster), with alternates pursuant to Notification Standard Operating Procedures. If so, attach a copy. If not, state the anticipated date of completion of such a list. 3.a. State whether or not the Commonwealthhas a Duty Officer Scandard Operating Procedure. If so, attach a copy of such procedure. If not, attach those parts of the procedure in draft or final form which is written and give the anticipated date of completion for those parts not written. 3.b. List all state and county officials who do have or will have a copy of the above Duty Officer Standard Operating Procedure. State where such copies of this procedure will be physically located. 4. State what materials and equipment would be needed in order to implement Notification Standard Operating Procedures for Campbell, Bracken, and Pendleton Counties; respectively. 5. With regard to the counties listed in Interrogatory four, state which items listed in answer to Interrogatory four each of

the counties does not currently have and the purpose each item would serve in the event that Notification Standard Operating Standards were employed. 6. State whether or not the Commonwealth has completed written School Standard Operating Procedures. If so, attach a copy. If not, attach those parts of the procedures in draft or final form which are written and give the anticipated date of completion for those parts not written. 6.a. List all state and county officials who do have or will have a copy of the above School Standard Operating Procedures and state where such copies of these procedures will be physically located. 7. State what equipment would be necessary to implement Standard Operating Procedures for schools in Campbell, Bracken, and Pendleton Counties, respectively. In answer to this interrogatory distinguish between what equipment would be needed by the State and what equipment would be needed by each county. 8. List which of the above items the State and each of the counties does not have and the intended purpose for each item in the event that standard operating procedures for schools were employed in Campbell, Bracken, and Pendleton Counties, respectively. 8.a. State the number of personnel each of the three counties would need to implement the standard operating procedure for schools and state what duty each would be assigned. 8.b. State which of the above erronnel would be volunteers. 9. State whether or not the monwealth has written completed standard operating procedures for activation of the Emergency Broadcast System. If so, attach a copy. If not, attach those parts of the procedures either in draft form or final form which are w.itten and give the anticiapted date of completion.

9.a. List all state and county officials who do have or will have a copy of the above Standard Operating Procedures for activation of the Emergency Broadcast System and state where such copies of these procedures will be physically located. 10. State whether or not the Commonwealth has standard operating procedures for accident assessment. If so, attach a copy. If not attach those parts of the procedures which are written either in draft or final form and state the anticiapted date of completion for those parts not written. 10.a. State whether or not the Commonwealthhas a damage assessment form for use by the Radiation Control Board personnel. If so, attach a copy. If not, attach those parts of the damage assessment form which have been written, either in draft or final form and state the anticipated completion date for those parts not written. 10b. State whether or not the Commonwealth has standard operating procedures for maintaining individual exposure records. If so, attach a copy. If not, attach those parts which are written, whether in draft or final form and state the anticipated date of completion for those parts not written. 11. State what equipment would be necessary in order for the Radiation Control Branch to do an adequate job of accident assessment including off-site dose projection and the collection of field radiological data in the event of a general emergency. 12. State which of the above listed items the Commonwealth does not have and the purpose each item would serve in the event that an accident occurred.

State the number of personnel needed to carry out accident assessment standard operating procedures and their respective duties. 14. How many people who are qualified to perform the above listed duties are employed by the Radiation Control Branch presently? 15. Assuming that more personnel are needed than what are presently employed, and that volunteers will be needed for monitoring and decontamination efforts, give a list of such volunteers and what training they have received. 16. State whether or not the Commonwealth has standard operating procedures for Personnel Decontamination, and if so, attach a copy; if not, attach those parts of the procedures in draft or final form which are written, and give the anticipated date of completion for those parts not written. 17. State whether or not the Commonwealth has written completed standard operating procedures for Radiological Monitoring. If so, attach a copy. If not, attach those parts which are written, whether in draft or final form, and state the anticipated date of completion for those parts of the procedures not written. 17.a. State what equipment would be necessary in order for the Radiation Control Branch to do an adequate job of Radiological Monitoring for each classification of accident. 17.b. State which of the above listed items the Commonwealthdoes not have and the purpose each item would serve in the event that an accident occurred. 18. State whether or not the Commonwealth has written completed standard operating procedures for Decontamination of Equipment. If so, attach a copy. If not, attach those parts which are

written, whether in draft or final form, and state the anticipated date of completion for those parts of the procedures not written.

18.a. State what equipment would be necessary in order to implement the standard operating procedures for Decontamination of Equipment.

18.b. State which of the above listed items the Commonwealth

18.b. State which of the above listed items the Commonwealth does not have and the purpose each item would serve in the event that an accident occured.

- 19. State whether or not the Commonwealthhas written completed standard operating procedures for Ingestion Pathway Protective Actions Recommendations. If so, attach a copy along with tables 305-4 and 305-5. If not, attach those parts which are written whether in draft or final form and state the anticipated date of completion for those parts of the procedures not yet written. Tables referred to are from the Kentucky State Plan.
- 19.a. State what equipment would be necessary in order to implement the standard operating procedures for Ingestion Pathway Protective Actions Recommendations.
- 19.b. State which of the above listed items the Commonwealth does not have and the purpose each item would serve in the event that an accident occurred.
- 20. State whether or not the <u>Commonwealth</u> has written completed standard operating procedures for the use and distribution of Potassium Iodide. If so, attach a copy. If not, attach those parts which are written whether in draft or final form and state the anticipated date of completion for those parts of the procedures not written.

21. Other than the standard operating procedures already inquired of in the above interrogatories, does the Commonwealth have any other completed written standard operating procedures, including Radiation Control Branch standard operating procedures numbers 301 and 302. If so, attach a copy. Numbers are from the Kentucky State Plan. If the answer to the above interrogatory is no, does the Commonwealth have any uncompleted standard operating procedures. If so, attach a copy of those parts which are written, whether in draft or final form, and state the anticipated date of completion of those parts unwritten. 23. State whether standard operating procedures will be developed for use by agricultural service coordinators to aid farmers with, and inform farmers of the following problems: the manner and means by which poultry and livestock alternate feed source (feed kept under cover) will be obtained, maintained and supervised; the availability and distribution of uncontaminated feeds for poultry and livestock; the means and manner by which livestock shall be sheltered; the proper means of cleaning, storing and preservation of poultry and livestock feeds; methods and directions for decontaminating livestock and poultry and their respective feed; and if such standard operating procedures already exist, attach a copy. 24. State the water source for each municipality within the 50 mile Ingestion Pathway Emergency Planning Zone in Kentucky. 25. State the utility company or individuals who supply water to each of the municipalities within the 50 mile Ingestion Pathway Emergency Planning Zone. 25.a. State whether or not standard operating procedures will be devised to insure the protection of public health and

safety in the event of contamination of drinking water sources. If

such standard operating procedures exist, attach a copy.

26. State whether or not the following plans are completed and if so attach a copy. If not, attach those parts of the following plans which have been completed either in draft or final form and state the anticipated completion date for those parts not written .: a. Northern Kentucky District Health Plan for a radiological emergency. b. a plan for the distribution and control of the tone alert radio system. c. Any and all plans for coordination efforts between the Commonwealth of Kentucky, Campbell, Bracken, and Pendleton Counties, and the Zimmer Power Station public information officers. 27. State the number of the following items which the Commonwealth presently has : a. anti-contamination suits b. CDV-700 Survey meters with batteries and headphones c. gas masks. d. signs reading: CAUTION RADIATION AREA e. Campbell County highway maps with monitoring locations marked. f. Bracken County maps with monitoring locations marked g. Pendleton County maps with monitoring locations marked. h. lensatic compasses. i. thermo-luminescent dosimeters i. self reading pocket dosimeters. 28. State the numbers of each of the items listed in interrogatory 27 which would be required to implement the Kentucky Emergency Radiological Plan for a general emergency. 28.a. List all county (Campbell, Bracken, and Pendleton) and Kentucky state officials who would be provided with pagers.

28.b. List all drills and exercises that have been staged in Kentucky to date. 29. During the November, 1981 exercises and/or drills held in Campbell County were any standard operating procedures which are written, implemented? If so, which ones? 30. List all organizations which participated in the drills referred to in interrogatory 29. 30.a. State whether or not Federal Emergency Management Agency (FEMA) observers were present at the exercises and/or drills referred to in interrogatory 29. If so, attach a copy of any written observations made by FEMA observers. 31. State whether or not the Commonwealth and/or Campbell County had observers present at the Campbell County November, 1981 drills and/or exercises. If so, attach copies of any written observations made by those observers. 32. If the Commonwealth or Campbell County had observers present at the Campbell County November, 1981 drills and/or exercises state what criteria they used in making evaluations of each exercise and/or drill. 32.a. Which state agency shall have primary responsibility for providing observers for all future exercises or drills. 33. Have any tests been conducted concerning the prompt notification system for Campbell County? If so, which part of the system has been tested, and how has it been tested? 34. Have any tests been conducted concerning the prompt notification system for Bracken County? If so, which part of the system has been tested, and how was it tested? 35. Have any tests been conducted concerning the prompt notification system for Pendleton County? If so, which part of the

system has been tested, and how was it tested? 36. State the number of people who reside within five miles of the Zimmer Power Station in Campbell County? 37. State the number of people who work, but do not live within five miles of the Zimmer Power Station in Campbell County? 37.a. How many tone alert radios will be distributed to residents of Campbell County, and when will the distribution occur, and in what manner will it occur? 38. State the number of people who reside within five miles of the Zimmer Power Station in Bracken County. 38.a. How many tone alert radios will be provided to the residents of Bracken County, when will the distribution occur, and how will it occur? 39. State the number of people who work, but do not live within five miles of the Zimmer Nuclear Power Station in Bracken County. 40. State the number of people who reside within five miles of the Zimmer Nuclear Power Station in Pendleton County. 41. How many tone alert radios will be distributed to the residents of Pendleton County, when will the distribution occur, and how will it occur? 42. State the number of people in Campbell County who reside within five miles of the Zimmer Station but who are not within fifteen minutes of the Zimmer station by car. List and explain the set of assumptions used in order to arrive at this figure. 43. State the number of people who work, but do not reside within five miles of the Zimmer Station and who are not within fifteen minutes of the station by car while at work in Campbell County.

44. Provide the information called for by interrogatory 42 with respect to Bracken County. 45. Provide the information called for by interrogatory 43 with respect to Bracken County. 46. Provide the information called for by interrogatory 42 with respect to Pendleton County. 47. Provide the information called for by interrogatory 43 with respect to Pendleton County. 48. State the number of people who reside within the plume exposure emergency planning zone in Kentucky . 49. State the number of people who work but do not reside within the plume exposure emergency planning zone in Kentucky 50. How many households are not within the range of a siren within five miles of the Zimmer Station in: a. Campbell County. b. Bracken County. c. Pendleton County. 51. How many deaf individuals live or work within five miles of the Zimmer Station in: a. Campbell County? b. Bracken County? c. Pendleton County? 52. How many deaf individuals live or work within ten miles of the Zimmer Station in: a. Campbell County? b. Bracken County? c. Pendleton County? 53. How many blind people live or work within five miles of the Zimmer Station in:

- a. Campbe' County?
- b. Bracken County?
- c. Pendleton County?
- 54. How many blind people live or work within ten miles of the Zimmer Station in:
 - a. Campbell County?
 - b. Bracken County?
 - c. Pendleton County?
- 55. State what the power source is for each of the sirens to be used as part of the prompt notification system in Campbell, Bracken, and Pendleton Counties. If an electrical power source is to be used for any siren, state the name of the utility which will provide the electricity.
- 56. State whether or not any of the sirens referred to in interrogatory 55 will be equipped with an alternate power source. If so, identify the power source for each siren. Describe any maintance plan to be used for each alternate power source.
- 57. State whether or not the in-home radios will be equipped with an alternate power source. If the answer is in the affirmative, state what the alternate power source will be. Describe any maintenance plan to be used for these alternate power sources.
 - 58. What parts of Campbell County are serviced by Kentucky utilities?
- 59. What parts of Campbell County are serviced by Owen Rural Electric Co-operative?
- 60. What parts of Campbell County are serviced by Union Light Heat and Power?
 - 61. Inadvertantly deleted.

- For the following utilities, state the dates, times of day or night and duration of any electrical power outages experienced by residents of Campbell, Bracken and Pendleton Counties, respectively, who are within the 10 mile emergency planning zone, within the last year.
 - a) Union Light Heat and Power

planning zone. If so, attach a copy.

- b) Owen Rural Electric Cooperative
- c) Kentucky Utilities
- d) any additional utility listed in the answer to interrogatory number 56

 63) State whether or not the Commonwealth has an alternate plan for prompt notification in the event that there is a power outage in one or more areas within the 10 mile emergency
- 64) Identify the agency, company, entity or person who has (have) the primary responsibility for maintenance of the sirens.
- 65) Identify the water source for each muncipality within the 50 mile Ingestion Pathway emergency planning zone in Kentucky.
- 66) State whether or not plans have been formulated to isolate contaminated water from the water sources identified in the answer to interrogatory number 65. If so, attach a copy.
- 67) State whether or not plans have been formulated regarding the storage of contaminated water from the water sources identified in the answer to interrogatory number 65. If so, attach a copy.
- 68) State whether or not plans have been formulated regarding the rationing of uncontaminated water for each of the counties within the 50 mile Ingestion Pathway Emergency Planning Zone in Kentucky. If so, attach a copy.
- 69) Siste whether or not plans have been formalated regarding the transportation of uncontaminated drinking water. If so, attach a copy.

- 70) State the number of motile sirens which have been acquired by the for use at Kincaid Lake Park.
- 71) State the number of mobile sirens which have been acquired by the for use at A. J. Jolly Park.
- 72) Identify the landing site for a helicopter in Falmouth, Kentucky to be used for the purposes for the landing of Federal Radiological Monitoring Agency Personnel.
- 73) State whether or not the Commonwealth has plans to test the prompt notification system under differing atmospheric conditions. If so, list the various atmospheric conditions the plan calls for.
- 74) List the number of training events by topic, that the Commonwealth has conducted to date and identify which personnel or organizations were involved.
- 75) State the number of voice channel microwaves that have been installed in Kentucky and state their locations.
- 76) State the number of tests which have been conducted of the communications equipment to be used in the event of a radiological emergency and state the dates that such tests were conducted. This question refers to communication equipment located in Kentucky.
- 77) List the number of volunteers that the Kentucky Radiological Emergency Plan would require in order to implement every detail of that plan in the event of a general emergency and state the specific duties asked of each volunteer.

78. State whether or not the Commonwealth has a tape or transcript of any or all of the public meetings held regarding the Kentucky,

Campbell, Bracken or Pendleton County Radiological Emergency Plans including the public meeting held in the evening in September of 1981 at the Alexandria Courthouse in Campbell County. If so, attach a copy of the tape or transcript.

- 79. State whether or not the Commonwealth has a tape or transcript of the public meeting held in New Richmond, Ohio on or about November 19, 1981 at 4:30p.m. at which Kentucky officials were present. If so, attach a copy.
- 80. List the items, materials and equipment that the Commonwealth of Kentucky has requested from the Applicant in order to implement the Kentucky Radiological Emergency Plan.
- 81. List the items, materials and equipment that the Commonwealth of Kentucky has obtained that are contained in the answer to interrogatory number 80.
- 82. I ist the items, materials and equipment from the following list that the Commonwealth of Kentucky does have.
 - a. a telemetry system capable of transmitting by means of radio signal the following data: a) wind direction; b)wind speed; c) differential temperature; d) Pasquill stability class; e) primary containment high range radiation level; f) primary containment post accident radiation level; g) secondary containment radiation level; H) standby gas treatment stack radiation level; i) main plant vent stack radiation level; j) service water discharge radiation level; k) fifteen station ring monitor radiation levels.
 - b. microwave multiplex equipment and related telephone terminal

equipment.

Respectfully submitted,

Deborah Faber Webb
Counsel for the City of Mentor