

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKET

ATOMIC SAFETY AND LICENSING BOARD

'82 MAY -5 11:29

Before Administrative Judges:
Louis J. Carter, Chairman
Mr. Frederick J. Shon
Dr. Oscar H. Paris

emy

In the Matter of
Consolidated Edison Company of
New York (Indian Point Unit 2)
Power Authority of the State of
New York (Indian Point Unit 3)

Docket Numbers 50-247SP
50-286SP

May 3, 1982

WESPAC'S INTERROGATORIES FOR
THE NUCLEAR REGULATORY COMMISSION STAFF



On April 23, 1982 the Atomic Safety and Licensing Board issued a Memorandum and Order Formulating Contentions, Assigning Intervenors, and Setting a Schedule for the above-captioned proceeding. The Board ordered that formal discovery was to begin on April 26, and that all interrogatories on "matters under Commission Questions 3 and 4" be filed by May 3, although "discovery on matters to be heard later than the week of June 22 shall continue." (Board 4/23 order at 22, footnote 5). WESPAC received this order on the evening of April 28, two working days before the filing deadline.

WESPAC hereby requests that the NRC Staff answer each of the following interrogatories in accordance with the foregoing and in line with the Federal Rules of Civil Procedure as soon as possible, but in no event later than May 31, 1982. For questions where the Federal Emergency Management Agency (FEMA) has additional or better information, we request that Staff consult with FEMA to provide the fullest information possible.

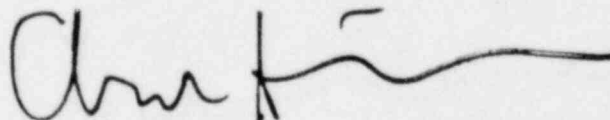
DS03
s
1/0

8205060388 820503
PDR ADOCK 05000247
PDR
G

1. Provide a reference index to all NUREG reports, Sections of CFR, and other NRC, FEMA, and other federal documents relating to Indian Point, generic emergency planning, and site-specific emergency planning. Indicate how these references may be read or obtained. Where possible, supply copies.
2. Supply copies of the August 1981 FEMA report on Indian Point emergency planning, of NUREG-0715, of the Staff review of onsite emergency planning (May, 1981), and of the 8/21/81 and 11/19/81 appraisals of onsite planning. Supply the fullest and most recent information on the FEMA review, including identified deficiencies, referred to in Staff's 12/31/81 filing ("NRC Staff Statement of Position with Respect to the Commission's Six Questions") in this proceeding, at the bottom of page 4.
3. With regard to the exercise conducted on March 3, 1982:
 - 3(a) To what degree did the Licensee (PASNY) have advance notice of the scenario and the parts of the emergency plan to be tested? Supply copies of all correspondence, memoranda, and telephone calls between the NRC or FEMA, and PASNY with regard to the drill prior to the exercise itself.
 - 3(b) Supply copies of drill scenarios that tested the off-site emergency plan.
 - 3(c) Supply copies of all reports and evaluations written by Staff, FEMA, or the New York State Health Department of the exercise.
 - 3(d) Identify any aspects of the Plan which were not satisfactorily tested by the exercise.
 - 3(e) Identify any aspects of the Plan which were tested and did not perform satisfactorily.
 - 3(f) What steps does Staff recommend be taken to remedy deficiencies identified in (d) and (e) above?
4. What do Staff and FEMA consider as reasonable goals for the time to evacuate the population in an emergency? Include numbers of people, distance to be moved, percentage completion, and percentage who will not be evacuated in a graphical or tabular presentation.
 - 4(a) What is the basis for these goals?

- 4(b) What accident scenarios are they intended to cover?
- 4(c) Does the Indian Point Plan meet these goals?
- 4(d) Did the March 3 exercise meet these goals?
5. What do Staff and FEMA consider as reasonable goals for notification of people that an emergency exists which would require evacuation? Include times and percentages notified in a graphical or tabular presentation.
- 5(a) What is the basis for these goals?
- 5(b) What accident scenarios are they intended to cover?
- 5(c) Does the Indian Point Plan meet these goals?
- 5(d) Did the March 3 exercise meet these goals?
6. Does Staff consider that the existing NRC Guidelines and Regulations, if met, provide the best possible protection for the health and safety of residents around Indian Point? If not, what improvements should be made to the regulations?
7. Does Staff believe that it is possible to meet the regulations for every conceivable nuclear plant site -- regardless of local circumstances?
- 7(a) Would it be possible for a site to exist which, even though it might not be licensed today, would be impossible to develop a workable emergency plan which met the regulations in practice, and not merely on paper?
- 7(b) Would it be possible for a site to meet the regulations on paper but not in practice?

Respectfully Submitted,



Charles A. Scheiner
Co-Chairperson

Westchester People's Action Coalition, Inc.
P.O. Box 488
White Plains, New York 10602
914/682-0488