

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
Louis J. Carter, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

12 MAY 27 AM 1:39

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In the Matter of)	Docket Nos.
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point, Unit No. 2))	50-247 SP 50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3))	May 24, 1982

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LICENSEES' RESPONSES TO WESPAC
INTERROGATORIES

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PRELIMINARY STATEMENT

Consolidated Edison Company of New York, Inc., ("Con Edison"), licensee of Indian Point Station, Unit No. 2, and Power Authority of the State of New York (the "Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), submit these responses to WESPAC Interrogatories for Power Authority, State of New York and WESPAC Interrogatories for Consolidated Edison.* The following are general comments or objections applicable to multiple interrogatories.

A. Emergency planning responsibilities

WESPAC interrogatories in many instances reflect a fundamental misapprehension as to the various responsibilities for radiological emergency planning both generically and at Indian Point in particular. Although the Commission ultimately maintains licensing jurisdiction over nuclear power plants, the licensees' responsibility for and jurisdiction over emergency planning terminates at the site

*Although WESPAC has submitted individual sets of interrogatories to the two licensees, the licensees have not discerned any material differences which preclude these joint responses.

boundary. Pursuant to State law and consistent with federal regulations, the State of New York maintains primary responsibility for off-site radiological emergency planning (see N.Y. Executive Law, Art. 2-B). Radiological emergency response plans and procedures ("RERP's" or "plans") for the four counties surrounding Indian Point are annexed to the State plan.

Accordingly, most of the interrogatories relating to off-site emergency planning were misdirected to the licensees. The information sought, if available, would be more appropriately obtained from the governmental authorities responsible for off-site emergency response.

Nevertheless, much of the information sought may be found in the off-site emergency plans themselves, with which the licensees are familiar. Accordingly, where information is known on such a basis, we have attempted in an effort to expedite discovery to respond to the interrogatories concerning those plans, primarily by reference to portions of the plans.*

* This approach is analogous to the general principle of responding to interrogatories, which permits reference to documents as an answer where the answer may be derived or ascertained from such documents. See, e.g., Fed. R. Civ. P. 33(c), which states:

(footnote continued)

We continue to note, however, that the off-site authorities
are more appropriate sources for this type of information.

Document production

In many instances, WESPAC has served interrogatories which are, in effect, requests for production of documents. We note that while 10 CFR §2.740b requires responses to interrogatories within 14 days, 10 CFR §2.741 allows 30 days

(footnote continued)

Option to Produce Business Records. Where the answer to an interrogatory may be derived or ascertained from the business records of the party upon whom the interrogatory has been served or from an examination, audit or inspection of such business records, including a compilation, abstract or summary thereof, and the burden of deriving or ascertaining the answer is substantially the same for the party serving the interrogatory as for the party served, it is a sufficient answer to such interrogatory to specify the records from which the answer may be derived or ascertained and to afford to the party serving the interrogatory reasonable opportunity to examine, audit or inspect such records and to make copies, compilations, abstracts or summaries. A specification shall be in sufficient detail to permit the interrogating party to locate and to identify, as readily as can the party served, the records from which the answer may be ascertained.

for responses to document requests.* Accordingly, the licensees do not intend to produce documents or make objections, except as otherwise specified, at this time. We are prepared, while reserving any claims of privilege or other objections to such production, to consider a future time and location for the production of documents, in accordance with 10 CFR Part 2 and the convenience of the parties. In fact, since the licensees believe that documents WESPAC requests may also be encompassed by other intervenors' document requests, it may be in the interest of all parties to coordinate such requests.

* Of course, where the due date for document production lies beyond the Board's May 31, 1982 date for close of discovery under Commission Questions 3 and 4, the May 31 date should control.

RESPONSES TO INTERROGATORIES

1(a). INTERROGATORY:

What is the "Four-County Nuclear Safety Committee" (FCNSC) whose name and address is on the brochure (the "brochure") entitled "Indian Point, emergency planning, and you.[sic]?"

RESPONSE:

The Four-County Nuclear Safety Committee consists of the County Executives of Westchester, Orange and Putnam Counties, and the Chairman of the Rockland County legislature, the four counties' Civil Defense Directors, and the four counties' Health Commissioners.

1(b) INTERROGATORY:

Supply copies of any records, contracts, or financial transactions between [licensees] and this FCNSC.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

1(c). INTERROGATORY:

Who paid for the printing and mailing of the booklets, for telephones, and for the staff work involved in the operation of this committee?

RESPONSE:

Licensees paid the printing and mailing costs for the emergency planning brochure. Additional costs of the committee were paid from governmental funds.*

1(d). INTERROGATORY:

Does the FCNSC have any direct relationship with any governmental bodies, or is it strictly a creature of Con Ed and PASNY? If so, describe the relationship.

RESPONSE:

As set forth in response to Interrogatory 1(a), above, the FCNSC is a committee of governmental representatives, and has no organizational relationship with the licensees.

2. INTERROGATORY:

Supply copies of any contractual arrangements between [licensees] or the FCNSC and Parsons, Brinkerhoff, [sic] Quade, and Douglas relating to emergency planning for Indian Point. How much money was paid by PASNY to these consultants, and what were they asked to do? How much of these obligations have been completed, and how much remains?

* Licensees, both voluntarily and pursuant to State Law (see N.Y. Exec. Law, Art. 2-E), have contributed funds to governmental bodies for radiological emergency planning purposes. Funds contributed by the Power Authority include the salary of the FCNSC project coordinator since 1980. Certain wages for part-time FCNSC employees have been paid by the licensees.

RESPONSE:

See pp. 3-4, above, regarding responses to document requests.

To date, licensees have paid approximately \$1 million to Parsons Brinckerhoff Quade and Douglas to support their efforts in assessing and planning the possible evacuation of the public in the vicinity of Indian Point. The plans have been developed. The State of New York has assumed responsibility for improving and maintaining the plans. Parsons Brinckerhoff has provided some assistance to the State in organizing its program.

3. INTERROGATORY:

Supply copies of any contractual arrangements between [licensees] or the FCNSC and EDS Nuclear relating to emergency planning for Indian Point. How much money was paid by Con Edison to these consultants, and what were they asked to do? How much of these obligations have been completed, and how much remains?

RESPONSE:

See pp. 3-4, above, regarding responses to document requests.

Licensees paid approximately \$1 million to EDS Nuclear to enable it to support the efforts of the four counties and the State in preparing radiological emergency response plans. EDS Nuclear's obligations have been completed.

4. INTERROGATORY:

Supply copies of records, reports and correspondence between [licensees] or the two above-named consultants ("Consultants") and FEMA, the NRC staff, the N.Y. State Health Department, Westchester County, and/or other governmental bodies relating to the efficacy, practicality and/or deficiencies in the emergency plans.

RESPONSE:

See pp. 3-4, above, regarding requests for production of documents.

5(a). INTERROGATORY:

[Do licensees] consider the New York State Radiological Emergency Plan for Indian Point (and its subsidiary County Plans) ("the Plan") to be in satisfactory state of preparedness and implementability?

RESPONSE:

Yes.

5(b). INTERROGATORY:

If [licensees consider] the plans to be unsatisfactory or incomplete, specify the respects in which such is the case, and any remedies the [licensees intend] to implement.

RESPONSE:

Not applicable.

6(a). INTERROGATORY:

Supply copies and records of any correspondence, reports or telephone conversations had by [licensees], [their] two consultants, and/or the FCNSC pertaining to Indian Point emergency planning with:

- (i) The New York State Department of Corrections or the Ossining Correctional Facility.
- (ii) The U.S. Veterans Administration or the Franklin D. Roosevelt Memorial Veterans Administration Hospital in Montrose.
- (iii) The City of Peekskill [sic] or the Peekskill Community Hospital.
- (iv) Asthmatic Children's Home in Ossining.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

6(b). INTERROGATORY:

What plans exist for the protection and evacuation of inmates and employees of Ossining Correctional Facility? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for continued staff support of inmates who are "sheltered" in that facility?

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

6(c). INTERROGATORY:

What plans exist for the protection and evacuation of patients and employees of the FDR VA Hospital? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are drug-dependent, have psychiatric problems, or are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of an evacuated "hospital?" What plans are there for continued staff support of patients who are sheltered in that facility?

RESPONSE:

Plans for the protection and evacuation of patients and employees of the FDR VA Hospital are contained in Appendix A, Attachment 5, and the Special Facilities Procedure of the Westchester RERP. Those employees required for assistance in evacuating patients will travel with the patients; other employees would self-evacuate by car or could evacuate by buses to be provided for transit-dependent persons in the plume EPZ.

Parsons Brinckerhoff has ascertained that a determination as to whether to evacuate the facility would be made by the VA Regional Director or the FDR VA Medical Center's administrator. The VA Central Office (Washington, D.C.) policy prefers sheltering and avoiding evacuation where possible. However, in order to provide all emergency

response options for the facility, it was included in the evacuation portion of the RERP's Special Facilities Procedures.

Plans for the transport and care of patients who are drug-dependent, have psychiatric problems, or are physically dependent on special equipment for their survival are covered in Appendix A, Attachment 5, Section III. H.2, and the Special Facilities Procedures of the Westchester RERP. Care of the patients is under the authority of the Medical Center's administrator and the VA Central Office in Washington, D.C.

The VA Medical Center has internal medical response plans which delineate staff responsibilities and an internal "cascade" communications system. It also is connected to all other VA facilities and the VA Central Office via a "cascade" telephone system and support network.

At the direction of the FDR VA Medical Center's administration, two facilities in the VA System, the Castle Point and Bronx VA facilities, have been designated as host facilities for evacuated patients.

Licensees do not have further knowledge of the FDR VA Medical Center's plans for continued staff support.

6(d). INTERROGATORY:

What plans exist for the protection and evacuation of patients and employees of Peekskill Community Hospital? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of an evacuated "hospital?" What plans are there for continued staff support of patients who are sheltered in that facility?

RESPONSE:

Plans for the protection and evacuation of patients and employees of Peekskill Community Hospital are contained in Appendix A, Attachment 5, Section III. H.2, and the Special Facilities Procedures of the Westchester RERP. Those employees required for assistance in evacuating patients would travel with the patients; other employees would self-evacuate by car or would evacuate by buses to be provided for transit-dependent persons in the plume EPZ.

Parsons Brinckerhoff ascertained that most of the patients at Peekskill Community Hospital could be evacuated. It would be at the discretion of the Hospital's administrator to shelter rather than evacuate specific patients.

Plans for the transport and care of patients physically dependent on special equipment are covered in

Appendix A, Attachment 5, Section III.H.2, and the Special Facilities Procedures of the Westchester RERP. Information obtained from the facility indicates that portable equipment and necessary medications are available at the facility and could be transported with the patients.

The provisions for extended housing of patients, to the extent known to the licensees, are contained in the Westchester RERP, Special Facilities, Attachment 1, Table 1.

Licensees do not have further knowledge of Peekskill Community Hospital's plans for continued staff support.

6(e). INTERROGATORY:

What plans exist for the protection and evacuation of patients and employees of the Asthmatic Children's Home? What assumptions have been made about the advisability of not evacuating the facility? What plans are there for the transport and care of patients who are physically dependent on special equipment for their survival? Where will the patients be kept if they must be evacuated from the hospital for an extended period? What plans are there for continued staff support of patients who are sheltered in that facility?

RESPONSE:

Plans for the protection and evacuation of patients and employees of the Asthmatic Children's Home are contained in Appendix A, Attachment 5, and the Special Facilities

Procedure, Attachment 1, Section A and Table 1 of the Westchester RERP. Those employees required for assistance in evacuating patients would travel with the patients; other employees would self-evacuate by car or could evacuate by buses to be provided for transit-dependent persons in the plume EP2.

Parsons Brinckerhoff has ascertained that evacuation would be possible as all patients are ambulatory, adequate staff is always available to prepare and travel with patients, and there are sufficient facility-owned vehicles to evacuate the patients.

Medication must be available to the patients at all times; no other equipment and/or special supplies would be required.

The provisions for extended housing of patients, to the extent known to the licensees, are contained in the Westchester RERP, Special Facilities, Attachment 1, Table 1.

Licensees do not have further knowledge of the Asthmatic Children's Home's plans for continued staff support.

7(a). INTERROGATORY:

What assumptions have been made with regard to the number of persons in special facilities (hospitals, nursing homes, jails, special schools, schools, day care centers, etc.) who are transit-dependent? Please list each such facility, giving the following information:

(i) The name, address, and telephone number of the person(s) at the facility who are responsible for carrying out its role under the emergency plan.

(ii) The number of transit dependent people at the facility, and the specifics of their individual needs (wheelchairs, kneeling ambulances, buses, etc.).

(iii) The number of people at the facility who cannot be moved.

(iv) Copies of any contracts, agreements, reports, memoranda, or telephone conversations between PASNY, the Consultants, the FCNSC, and the facility.

(v) Any contracts or arrangements with public or private bus companies or other transportation carriers regarding their role in evacuating the facility, including numbers of buses, special buses, ambulances, and drivers required and the notification and time commitment for the drivers.

RESPONSE:

(i) Available information on the names, addresses, and phone numbers of special facilities in the Westchester County portion of the EPZ are contained in the Westchester County RERP in the following sections:

a. Schools Procedure, Attachment 1, Table 1 - "Schools Located in EPZ," for schools, nursery schools, and day care centers.

b. Special Facilities Procedure, Attachment 1, Table 1 - "Special Facilities in EPZ," for hospitals and nursing homes.

c. Appendix H - "Listing of Special Facilities in Westchester County," for colleges, group homes, convents and monasteries, resident and day camps, parks, and correctional facilities/police lockups.

Designation of a person(s) at each special facility who will be responsible for carrying out its role under the emergency plan is at the discretion of each special facility's administration.

(ii) The number of transit-dependent people at each special facility in the Westchester County portion of the EPZ and the specifics of their individual needs are contained in the Westchester County RERP in the following sections: (Unless it is otherwise noted in these sections, persons are ambulatory and could be evacuated by bus.)

a. Schools Procedure, Attachment 1, Table 1 - "Schools Located in EPZ," for schools, nursery schools, day care centers. The number of transit-dependent people at each such facility was assumed to be the enrollment figure minus the number of high school students who regularly drive to school.

b. Special Facilities Procedure, Attachment 1, Table 1 - "Special Facilities in EPZ," for hospitals and nursing homes. The total average number of patients/residents (ambulatory, wheelchair, stretcher) at each facility was assumed to be transit-dependent.

c. Residents at colleges, group homes, convents and monasteries were assumed to be part of the general population for evacuation purposes.

As part of the general population, these special facilities can request further assistance (e.g., ambulance transport) through the public information pamphlet's mail-back postcard for any residents who could not be evacuated by bus.

Based on information provided by resident camps on the number of facility-owned vehicles which could reasonably be expected to be readily available, additional vehicles were preassigned, if necessary, to supplement the existing vehicle capacities. Day camp visitors were assumed to be evacuated by the vehicles used to transport

them to the camp. Therefore, no people at day camps were assumed to be transit-dependent. Resident and day camps can also request either additional vehicles or special assistance, if necessary, through the public information pamphlet's mail-back postcard.

Visitors to Westchester parks were assumed to evacuate by the vehicles used to transport them to the park; therefore, no park visitors were assumed to be transit-dependent.

Detainees at police lockups were not assumed to be transit-dependent as their evacuation would be managed by the police.

For information concerning the Ossining Correctional Facility, see response to WESPAC Interrogatory 6(b), above.

(iii) Based on information provided by the special facilities, there are very few people in special facilities who cannot be moved during an evacuation. (See response to interrogatory #6(d), above.)

(iv)-(v) See pp. 3-4, above, concerning responses to document requests.

8(a). INTERROGATORY:

Supply a map of the EPZ and surrounding area on the east side of the Hudson River which shows the locations of all evacuation routes, reception centers, and congregate care centers, and which shows the bus routes set forth on Page 13 of the various editions of the "brochure." If one such map does not exist, a series would be satisfactory if it shows each entire bus route.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

8(b). INTERROGATORY:

Supply or list of any contracts or agreements with bus, ambulance, or public or private companies to provide this transportat. . For each company, provide the following information (if not included in the agreement):

(i) How many vehicles are to be provided?
For how long?

(ii) How many drivers are to be provided?
For how long?

(iii) How many special (kneeling, wheelchair, ambulance, etc.) vehicles are to be provided? What assumptions are made about their reliability?

(iv) How are the drivers and the vehicles to be notified when they are needed to participate in an emergency?

(v) What assumptions are made about the time required for vehicle and driver to become available to participate in an evacuation?

(vi) What is to be done with passengers who are already on a bus when it is needed?

RESPONSE:

(i)-(ii) In Westchester County, the number of vehicles to be provided by each company is indicated in Table 1 (entitled "Bus Company Assignments") in Attachment 1 of the Transportation Procedure. At least one driver will be necessary for each vehicle. Vehicles and drivers will be required for the duration of the egress phase of the evacuation. Estimates of the evacuation travel times are provided in Tables A-4 through A-7, in Appendix A of the County RERP.

(iii) Kneeling vehicles were not a consideration. Wheelchair requirements were met with facility-owned vehicles, the other available wheelchair-capable school vans, and, in some cases, by transporting the passenger in a van in a seat secured by a lap belt, with the wheelchair transported separately in the same van. It was assumed that no more than 50% of the available ambulances would be used for evacuation purposes.

(iv) Drivers are generally notified by their employers when they are needed to participate in an emergency.

(v) The time required for a vehicle and driver to become available to participate in an evacuation depends on

the time of day and day of week when the emergency is declared. This time is considered part of the mobilization time, which precedes the evacuation travel times presented in the RERP.

(vi) Buses in service that will be needed for an evacuation will continue to the end of their route. Passengers will be permitted to disembark at their preferred bus stops up to the point where the route terminates.

See pp. 3-4, above, concerning responses to document requests.

8(c). INTERROGATORY:

For each bus route, supply the following information:

- (i) How many people are expected to be carried?
- (ii) How many buses, and at what time intervals, are expected to cover the route?
- (iii) Which company is responsible for the route?
- (iv) How many trips is each bus expected to make, and how much time is allowed between trips?

RESPONSE:

This information can be found for Westchester County in Appendix A, Attachment 3 of the Westchester RERP. The number of buses, the responsible bus company, and the number of

trips are included in Attachment 1 of the Transportation Procedure in Table 1 (Bus Company Assignments) and Table 4 (General Population Bus Routes).

9(a). INTERROGATORY:

With respect to the statement on the inside cover of the "brochure" regarding residents who "may need special attention because of transportation problems or physical impairments:"

Describe the plans for giving special attention to all categories of persons who have the need thereof because of transportation problems or physical impairments.

RESPONSE:

See licensees' response to UCS/NYPIRG Interrogatory 25.

9(b). INTERROGATORY:

Describe all studies or surveys which seek to identify the persons and problems referred to in (a), and attach copies thereof.

RESPONSE:

During the development of the evacuation plans, efforts were made to identify the elderly and disabled who would require special transportation assistance during an evacuation. County and local agencies whose targeted populations and clien-

tele are the elderly and disabled were contacted. In most cases, available information was either incomplete or out-of-date. In other cases, the necessary information was either unavailable in a usable form or withheld to protect individual privacy.

The special needs response cards were enclosed with the emergency planning brochure for the purpose of identifying special problems and enabling offsite governmental authorities to take appropriate measures.

See pp. 3-4, above, concerning responses to document requests.

9(c). INTERROGATORY:

How many Business Reply Cards from the "brochure" were returned in each of the transportation or accommodation categories indicated on the card? How many such people called the phone numbers in the "brochure?"

RESPONSE:

Licensees do not have knowledge regarding the number of returned cards; cards were returned directly to the FCNSC.

The Power Authority has received seven telephone calls at the number identified in the brochure regarding requests for further information or special assistance. Licensees do not know the number of telephone calls made to the other listed numbers.

9(d). INTERROGATORY:

[Do licensees] have any other information about people with special requirements for emergency assistance? If so what?

RESPONSE:

No.

9(e). INTERROGATORY:

Identify the place where the information referred to in (9c) and (9d) is presently located, together with the name and address of the custodian thereof.

RESPONSE:

Licensees believe that the information referred to in Interrogatory 9(c) with respect to special needs cards is maintained by the Four County Nuclear Safety Committee, P.O. Box 701, White Plains, New York 10602, or other off-site governmental authorities.

9(f). INTERROGATORY:

Set forth all steps taken to address the needs of each person or to arrange for special attention thereto.

RESPONSE:

Such responsibilities are being undertaken by

the appropriate off-site governmental authorities. (See pp. 1-3, above, regarding responsibilities for off-site emergency planning.)

9(g). INTERROGATORY:

What steps [are licensees] taking to locate people with special emergency assistance requirements who did not return the reply card?

RESPONSE:

The licensees are not themselves taking such steps. (See pp. 1-3, above, regarding responsibilities for off-site emergency planning.)

9(h). INTERROGATORY:

Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:

- (i) Wheelchair disabled
- (ii) Confined to bed
- (iii) Sight-impaired
- (iv) Psychologically or emotionally unable to react to their role in the emergency plan.
- (v) Dependent on life-support equipment.

RESPONSE:

Licensees do not have such information. (See pp. 1-3, above, regarding responsibilities for off-site emergency planning.)

10(a). INTERROGATORY:

With respect to persons who are hearing-impaired or have one of the other conditions enumerated in 10(i) and thus will not hear or understand the sirens or the radio announcements which are integrals [sic] part of the notification system:

Describe the plans for notifying such groups and individual persons of their role in the Plan.

RESPONSE:

The hearing-impaired have been asked to make their needs known to the FCNSC by returning the response card attached to the emergency plan brochure. Licensees believe that the counties and State are developing plans to alert such people.

There are a number of radio stations in the area that broadcast in Spanish or other languages other than English. See licensees' response to UCS/NYPIRG Interrogatory 27.

People emotionally or psychologically unable to comprehend their role in an emergency should be aided by those who normally care for them. The community has also been asked to alert local authorities of the need for assistance by such people through return to the FCNSC of the response cards attached to the brochure.

People unable to hear sirens may be alerted by radio, television, other people, or the general shift in activities and activity-levels in the community in the event of an emergency during which the sirens are sounded.

10(b). INTERROGATORY:

Describe the methods for notifying them, during an emergency, of the responses they are to take, and of the fact that an emergency exists.

RESPONSE:

See response to Interrogatory 10(a), above.

10(c). INTERROGATORY:

Provide copies of all studies or surveys which seek to identify such persons and problems.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

10(d). INTERROGATORY:

How many Business Reply Cards from the "brochure" were returned for people with notification problems? How many such people called the phone numbers in the "brochure?"

RESPONSE:

See response to Interrogatory 9(c), above.

10(e). INTERROGATORY:

[Do licensees] have any other information about people with special requirements for notification? If so, what?

RESPONSE:

No.

10(f). INTERROGATORY:

Identify the place where the information referred to in (10d) and (10e) is presently located, together with the name and address of the custodian thereof.

RESPONSE:

See response to Interrogatory 9(e), above.

10(g). INTERROGATORY:

Set forth all steps taken to address the needs of each person or to arrange for special attention thereto.

RESPONSE:

See response to Interrogatory 9(f), above.

10(h). INTERROGATORY:

What steps [are licensees] taking to locate people with special notification requirements who did not return the reply card?

RESPONSE:

See response to Interrogatory 20, below.

10(i). INTERROGATORY:

Supply census or other information indicating how many such people there are within the EPZ for each of the following categories:

- (i) Hearing-impaired
- (ii) Spanish-speaking
- (iii) Other non-English speaking
- (iv) Emotionally or psychologically unable to comprehend their role under the emergency plans.
- (v) Without radios (outdoors, in parks, or otherwise unable to tune in the Emergency Broadcast System).
- (vi) Unable to hear sirens (because sirens are not loud enough, people are indoors, other noises interfere, sirens malfunction).

RESPONSE:

Licensees do not have such information. (See pp. 1-3, above, regarding responsibilities for off-site emergency planning.)

10(j). INTERROGATORY:

What steps are being taken to ensure timely notification of each of the types of persons listed in 10(i) above?

RESPONSE:

See response to Interrogatory 10(a), above.

11. INTERROGATORY:

What backup provisions exist to support telephone system malfunction during a Site Emergency with regard to the following aspects of the Plan:

(a) Notifying State and County officials of developing conditions at Indian Point?

(b) Notifying school principals of their responsibilities?

(c) Notifying bus companies, special facilities, and others who would normally be notified by telephone?

RESPONSE:

Information regarding the above is available in the following documents:

Indian Point 2 site plan, Section 7.2 and Procedure 1002; Indian Point 3 site plan, Section 7.2 and Procedure 1030; State RERP Part III, Section I, Procedure B; county RERP's, Appendix E.

12. INTERROGATORY:

Supply copies of any memoranda, contracts, or correspondence between PASNY, the FCNSC, or the consultants and any schools, other facilities, or agencies (including the American Red Cross) which will be used as or to support reception or congregate care centers, including the following information:

- (i) The name, address, and telephone number of the person(s) at the facility who are responsible for carrying out its role under the emergency plan.
- (ii) The number people who will be received or cared for at the facility, and the time (notification, duration) which the facility will be used for.
- (iii) The number of staff people from the facility who will be involved in the plan, the training they have been or will be given (including any written materials used in that training), and the time they will be expected to work (notification and duration).
- (iv) Copies of any contracts, agreements, reports, memoranda, or telephone conversations between PASNY, the consultants, the FCNSC, and the facility.
- (v) For Congregate Care centers, the provisions for housing and feeding people at the facility for a period of more than one or two days.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

13(a). INTERROGATORY:

Supply copies of any memoranda, reports, or telephone conversations with the New York Telephone Company relative to its capacity to handle communications during an emergency, as relates to page 6 of the "brochure" which says "Avoid using the telephone, so lines will not be overloaded."

RESPONSE:

See pp. 3-4, above, concerning production of documents.

13(b). INTERROGATORY:

How many calls can the telephone system handle at one time?

RESPONSE:

The licensees do not have such information.

13(c). INTERROGATORY:

Are there provisions for increasing this capacity during an emergency?

RESPONSE:

The New York Telephone Company's normal operating procedures provide for routine removal from service of specified equipment for preventive maintenance. The company's emergency procedures, to the extent known to the licensees, include the non-removal of such equipment or returning it to service during an emergency for a significant increase in capacity.

13(d). INTERROGATORY:

How will the telephone system be kept operational during an emergency? For example, how will repairs be made to lines which are downed due to automobile accidents; how will substations without electric power be supported, etc.?

RESPONSE:

The licensees do not have this information.

14. INTERROGATORY:

How will radiological screening be done?

- (a) When, where, and by whom?
- (b) What procedures will be followed?
- (c) How many people can be handled, and in what time span?
- (d) What training and equipment are available for this process?

RESPONSE:

The information requested can be found in the site, State and county plans as follows:

Indian Point 2 site plan sections 6.4.3, 7.4 and Procedures IP-1011, 1008, 1009, 1015, and 1017; Indian Point 3 site plan sections 6.5.4, 7.4.2, and Procedures IP-1025, 1060, 1063, 1065, 1079; State plan Part I, section III-57, Part III section I, Procedure G Attachment 3; county plan sections II.B.5, III.E, Procedure 6 Attachment 1 Table 2, Procedure 3 sections 4.5, 5.4, 6.4 (Rockland section 6.5).

15. INTERROGATORY:

What provisions are there for updating the Emergency Plan and keeping its information accurate and current with regard to:

- (i) Changes in school enrollment?
- (ii) Personnel and staff changes at schools?
- (iii) Personnel changes at special facilities?
- (iv) Personnel changes at reception and congregate care centers?
- (v) Transportation (road) network changes, both temporary and long-term?
- (vi) Personnel and resource changes at bus companies?
- (vii) People with special requirements who move into the EPZ or stay in transient facilities (e.g. motels, hospitals) and do not know of their roles ?

RESPONSE:

See response to UCS/NYPIRG Interrogatory 41.

16(a). INTERROGATORY:

How many automobiles are projected for each road planned for use during an evacuation, and what is the basis for such projections?

RESPONSE:

See response to UCS/NYPIRG Interrogatory 65.

16(b). INTERROGATORY:

How many people are expected to be carried in each automobile?

RESPONSE:

For the resident general population, the 1970 Census data on household size was used as the auto occupancy factor for households with at least one car. This data varied by traffic zone, and is annexed hereto as Exhibit A.

For trips originating from places of employment, from hotels/motels, and from parks, information on the number of people expected to be carried in each automobile is contained in the draft document, "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone," Section II.C.

16(c). INTERROGATORY:

How many cars per hour, both average and peak, are expected to be moving over each evacuation route from each ERPA subdivision (zone)?

RESPONSE:

In the draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone," Appendix D (Roadway Link Characteristics) contains the outbound evacuation capacity in PCE's per hour of the links comprising the primary evacuation routes in the Indian Point EPZ. These evacuation capacities are presented under normal and adverse weather conditions.

17. INTERROGATORY:

Supply copies of all reports, memoranda, correspondence, agreements, or telephone conversations with governmental agencies (including quasi-public transportation authorities) with responsibility over road traffic, including:

- (i) The name, address, agency, and telephone number of the person supplying [sic] the information, and the date of the contact.
- (ii) The capacities supplied for each road or intersection discussed, and the bases for these estimates, including weather,
- (iii) Any attempts to obtain traffic capacity information which have been unsuccessful.
- (iv) Personnel allocations for controlling traffic distribution during an emergency.

RESPONSE:

See pp. 3-4, above, concerning responses to document requests.

18. INTERROGATORY:

How does the Plan address itself to:

- (i) The effects of traffic accidents on traffic flow?
- (ii) Traffic control at exits from principal evacuation routes?
- (iii) The need for refueling (gas) for cars and buses during an evacuation?
- (iv) The effect of intersections, traffic signals, malfunctioning traffic signals, and other factors which impeded [sic] the normal flow of traffic?
- (v) Adverse weather conditions?
- (vi) Road closings due to construction, accidents, etc.
- (vii) Additional traffic on evacuation routes outside the EPZ as others self-evacuate along major roads?

RESPONSE:

(i) The RERP addresses the effects of traffic accidents on traffic flow in several ways. First, it does not assume that all lanes of a road would be used for outbound flow. This operational strategy would minimize the possibility of a total blockage of a route to an accident and allow emergency vehicles to get to the accident site. If an accident did occur, traffic could be diverted around that point in the opposing travel lanes.

Second, backup evacuation routes were determined for portions of the EPZ likely to become extremely congested, where the effects of an accident would be of the greatest magnitude.

Third, the RERP identifies key locations for the staging of tow trucks for the efficient dispatch of vehicles to accident sites.

Fourth, the RERP provides for traffic control and surveillance techniques and locations to reduce the likelihood of and, if necessary, to identify and mitigate automobile accidents.

Fifth, the RERP provides evacuation travel time estimates as a range of values. One of the determinants of which end of the range to use is the presence or lack of unexpected long-term capacity restrictions such as major accidents.

(ii) Traffic control at exits from principal evacuation routes is covered in the Law Enforcement and Fire and Rescue Procedures in the County RERP's.

(iii) The plan provides for tow trucks to be stationed at critical locations. These tow trucks can also provide limited quantities of emergency fuel to disabled vehicles.

(iv) The Law Enforcement and Fire and Rescue procedures in the RERP call for traffic control at many inter-sections (both signalized and unsignalized) throughout the evacuation network. In th Westchester County RERP these locations are specified in the Law Enforcement and Fire and Rescue procedures in the following tables:

- o "Signal Locations Requiring Traffic Control"
- o "Optional Signal Location for Traffic Control"
- o "Traffic Control Points to Prohibit EPZ Ingress"
- o "Traffic Control Points to Prohibit Ingress to ERPA's"
- o "Evacuation Route Access Points"
- o "Traffic Control Points Outside the EPZ"

The activities occurring at these traffic control locations are explained in the various tables.

(v) The RERP addresses adverse weather conditions in two basic ways. First, it provides procedures in appropriate sections (e.g., Public Works) calling for the clearing of evacuation routes of impediments to travel such as snow. Second, the RERP provides evacuation travel time estimates under adverse weather conditions so that decision makers will be aware of the time to implement the evacuation protection response option under these conditions.

(vi) The RERP specifies backup routes to be utilized in the event that critical portions of primary evacuation routes are unavailable due to construction, accidents, etc. These routes are included in the Law Enforcement, Fire and Rescue, and Public Works procedures. The RERP also calls for planned roadway construction or maintenance along evacuation routes to be reported to the County EOC on an on-going basis.

(vii) See response to UCS/NYPIRG Interrogatory 73.

19. INTERROGATORY:

What assumptions were made about traffic-carrying capacities of roadways and intersections in optimum conditions? In each of the abnormal conditions mentioned in (18) above?

RESPONSE:

The method and assumptions made to calculate traffic-carrying evacuation capacities under both normal and adverse weather conditions are described in the draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone," in Section III.A.1. (Evacuation Capacity Analysis) and Appendix E (Methodology to Calculate Evacuation Capacities). Remaining assumptions and procedures are described in licensees' response to Interrogatory 18, above.

20. INTERROGATORY:

What mailing list was used for distribution of the "brochures?" What provision is made for ensuring that the following categories of people are cognizant of their responsibilities under the Plan:

- (i) People who live in the area but are not on the mailing list?
- (ii) Visitors to the area (in hotels, parks, etc.)?
- (iii) Individuals who spend a significant part of their time in the EPZ (such as those who work there), but live elsewhere?
- (iv) Students who live in the EPZ but go to school outside it?
- (v) Students who live outside the EPZ but go to school within it?
- (vi) Children at day care centers and nursery schools who fall within categories (iv) and (v) above?

RESPONSE:

The mailing lists used for distribution of the emergency plan brochures were the customer lists of the electric utilities servicing the plume EPZ.

(i) New York State Disaster Preparedness Commission issued a press release prior to the initial mailing of the brochures, news from which was published in local newspapers advising people who did not receive brochures or needed additional ones to request them. These and other requests have resulted in additional distributions by the FCNSC.

Hand deliveries have been made to residents of apartment complexes who are not individual customers of electric utilities.

Follow-up mailings have been made to occupants of addresses from which brochures were returned apparently because the name of the addressee was incorrect.

Seasonal re-mailing is planned for addressees who are apparently present in the area only as summer residents from whose addresses brochures were returned.

(ii) Posters are being prepared for display in places of public assembly, including hotels and parks. Information is also being prepared for placement in local telephone directory yellow pages.

(iii) Brochures were mailed to all businesses and institutions (see response to (i) above). Posters and yellow-page notices, as well as local press coverage, should alert individuals who are regularly in the area (see response to (ii) above); they may also request brochures.

(iv) Families of students who live in the area should have received brochures.

(v) Schools within the EPZ should have received brochures and, in addition, have been contacted by the licensees and/or State government about emergency planning.

(vi) See responses to (iv) and (v) above.

21. INTERROGATORY:

What provisions are made for parents of young children (who are to be picked up at day care centers or nursery schools) who have one or more of the following problems:

- (i) They work outside the EPZ?
- (ii) They are a teacher, bus driver, traffic control officer, or other person with a designated role under the emergency plan?

- (iii) For whatever reason, they don't pick up their child within a long period of time?

RESPONSE:

Licensees object to this interrogatory on the grounds that it is:

- (a) too vague for response; and
- (b) overbroad.

22. INTERROGATORY:

Does the Plan anticipate restrictions in traffic flow within the EPZ beyond those which will be caused by high density? Will traffic be prevented or discouraged from entering the EPZ or driving in directions opposite to the flow of evacuating vehicles? Will lanes or intersections be closed, and will lanes or roads have their normal directions of traffic flow changed?

RESPONSE:

The Westchester County RERP procedures are sufficiently flexible to respond to different situations and circumstances that may arise at the time of an evacuation. In addition, restrictions in traffic flow in the plume EPZ due to roadway geometry have been accounted for in the capacity calculations, and are reflected in the evacuation time estimates.

Traffic will be prevented or discouraged from entering the plume EPZ at locations specified in the table entitled "Traffic Control Points to Prohibit EPZ Ingress," which can be found in the Law Enforcement, Fire and Rescue, and Public Works procedures of the Westchester County RERP. Traffic control officers will monitor traffic flow to facilitate the outbound flow of vehicles from the EPZ.

It is not anticipated that lanes will be closed, except for inbound lanes at EPZ and ERPA ingress control points. Normal direction of traffic flow will not be changed.

23. INTERROGATORY:

How much money has PASNY spent on emergency planning and preparedness in each of the past five years? How much do you expect to spend per year between now and when Indian Point III is decommissioned?

RESPONSE:

The Power Authority alone has spent approximately \$4.3 million for emergency planning at Indian Point in the past three years. The Power Authority does not have statistics available for 1977 and 1978.

Exhibit to licensees' response to WESPAC 16(b)

<u>Traffic Zone</u>	<u>General Population Auto Trips Passengers/Vehicle</u>	<u>Traffic Zone</u>	<u>General Population Auto Trips Passengers/Vehicle</u>
1A	3.20	14A	3.64
1B	3.20	14B	3.83
2A	3.40	15A	3.63
2B	3.39	15B	3.65
2C	3.39	16A	3.20
2D	3.39	17A	3.21
2E	3.39	17B	3.27
2F	3.40	18A	3.20
3A	3.39	18B	3.20
4A	3.39	18C	3.21
4B	2.31	19A	3.50
5A	3.21	19B	3.50
5B	3.39	19C	3.80
5C	3.39	20A	3.48
5D	3.60	20B	3.50
6A	0	21A	3.69
6B	3.39	22A	3.34
6C	3.39	22B	3.34
6D	3.39	22C	3.34
6E	3.41	22D	3.34
7A	3.47	22E	3.34
7B	0	22F	3.39
8A	3.39	23A	3.20
8B	3.39	24A	3.34
8C	2.69	25A	3.35
8D	3.43	25B	3.46
8E	3.39	25C	0
9A	3.39	26A	3.34
9B	3.41	26B	3.34
10A	3.95	27A	3.50
10B	3.95	27B	3.50
11A	3.94	27C	3.55
11B	3.95	28A	0
11C	3.95	28B	0
11D	3.95	28C	3.23
12A	3.95	29A	3.51
12B	3.95	30A	3.53
12C	3.96	30B	3.50
13A	3.95	30C	3.50
13B	3.95	30D	3.50
13C	3.95	30E	0
13D	4.00	30F	0
13E	3.91	31A	2.26

<u>Traffic Zone</u>	<u>General Population Auto Trips Passengers/Vehicle</u>
31B	3.22
31C	3.22
32A	3.38
32B	3.75
32C	3.74
33A	3.74
33B	3.74
33C	3.74
33D	3.76
34A	3.76
34B	3.74
34C	3.74
34D	3.74
34E	3.74
35A	3.74
35B	3.74
35C	3.74
35D	3.74
35E	3.50

<u>Traffic Zone</u>	<u>General Population Auto Trips Passengers/Vehicle</u>
35F	0
36A	3.22
36B	3.17
36C	3.33
37A	3.91
37B	4.00
37C	4.00
37D	4.00
38A	3.43
39A	0
40A	0
41A	0
42A	0
43A	0
44A	0
45A	0
46A	0
47A	0

As to Answers:

CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.

By *Richard P. Remshaw*
Richard P. Remshaw
Project Manager - Indian Point Hearings

POWER AUTHORITY OF THE STATE OF NEW YORK

By *Herschel Specter*
Herschel Specter
Project Manager - Indian Point Hearings

As to Objections:

CONSOLIDATED EDISON COMPANY OF NEW YORK INC.

By *Brent L. Brandenburg*
Brent L. Brandenburg
Assistant General Counsel

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By *David H. Pikus*
David H. Pikus

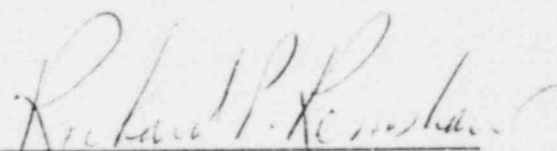
Attorneys for Power Authority of
the State of New York

VERIFICATION

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

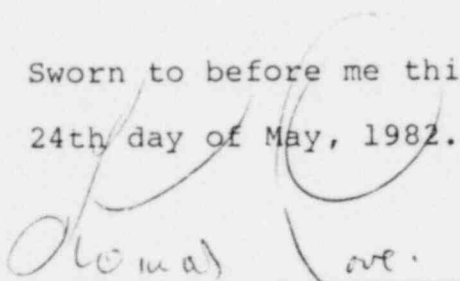
RICHARD P. REMSHAW, being duly sworn, deposes and
says:

That he is the Project Manager - Indian Point Hearings
for Consolidated Edison Company of New York, Inc., licensee
of Indian Point Nuclear Generating Station, Unit No. 2; that
he is authorized to make this verification on behalf of said
corporation; and that the foregoing answers to interrogatories
were prepared under his direction and supervision and are true
and correct to the best of his knowledge, information and
belief.



RICHARD P. REMSHAW

Sworn to before me this
24th day of May, 1982.



Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1983

VERIFICATION

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

HERSCHEL SPECTER, being duly sworn, deposes and
says:

That he is the Manager, Indian Point 3 Hearings,
Technical Support for Power Authority of the State of New
York, licensee of Indian Point 3 Nuclear Power Plant; that
he is authorized to make this verification on behalf of said
Authority; and that the foregoing answers to interrogatories
were prepared under his direction and supervision and are
true and correct to the best of his knowledge, information
and belief.

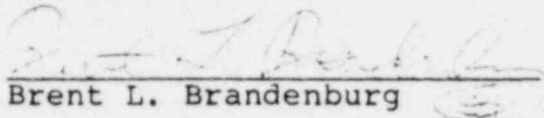

HERSCHEL SPECTER

Sworn to before me this
24th day of May, 1982.

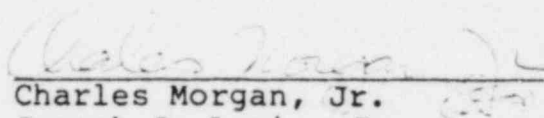

Notary Public

DAVID H. PIKUS
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Respectfully submitted,


Brent L. Brandenburg

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Dated: May 24, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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

In the Matter of)
) Docket Nos.
)
CONSOLIDATED EDISON COMPANY OF NEW YORK,) 50-247 SP
INC. (Indian Point, Unit No. 2)) 50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK)
(Indian Point, Unit No. 3)) May 24, 1982
)

CERTIFICATE OF SERVICE

I hereby certify that copies of LICENSEES' RESPONSES TO WESPAC INTERROGATORIES in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 24th day of May, 1982.

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