UNITED STATES OF AMERICA DURATED

ATOMIC SAFETY AND LICENSING APPEAL BOARD

Administrative Judges:

Thomas S. Moore, Chairman Dr. John H. Buck Stephen F. Eilperin

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In the Matter of

PENNSYLVANIA POWER & LIGHT COMPANY and ALLEGHENY ELECTRIC COOPERATIVE, INC.

(Susquehanna Steam Electric Station, Units 1 and 2) Docket Nos. 50-387 OL 50-388 OL

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ORDER

August 20, 1982

Attorneys for the parties identified below should be prepared to respond at the September 8, 1982 oral argument to the following questions:

Commonwealth of Pennsylvania

The Commonwealth's brief indicates that it has sufficient numbers of CD V-742 dosimeters to predistribute to emergency workers within the Susquehanna plume exposure pathway EP2.

- What is the number of emergency workers upon which this assessment is based?
- Does the Commonwealth plan to provide all emergency workers within the plume exposure pathway EPZ with CD V-742 dosimeters? If not, what workers or categories of emergency workers will receive CD V-742 dosimeters?

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Commonwealth of Pennsylvania

The Commonwealth's brief states that it lacks a sufficient number of CD V-730 dosimeters to predistribute to emergency workers within the Susquehanna plume exposure pathway EPZ. In addition, Commonwealth witness Belser testified in this proceeding that the Commonwealth will make a "partial" distribution of CD V-730 dosimeters.

- How many CD V-730 dosimeters does the Commonwealth have to predistribute to emergency workers?
- What additional number of CD V-730 dosimeters does the Commonwealth require for <u>complete</u> predistribution to emergency workers? What is the number of emergency workers upon which this assessment is based?
- Does the Commonwealth plan to provide all emergency workers within the EPZ with CD V-730 dosimeters? If not, what workers or categories of emergency workers will receive CD V-730 dosimeters?
- What is the estimated total cost of the needed CD V-730 dosimeters?
- Is this number of CD V-730 dosimeters readily available from manufacturers or other suppliers?
- What is the shortest time period necessary to procure this number of CD V-730 dosimeters?

The Commonwealth's brief states that it has no thermoluminescent dosimeters (TLDs) to predistribute to emergency workers within the Susquehanna plume exposure pathway EPZ.

- What number of TLDs does the Commonwealth require for complete predistribution to emergency workers?

- What is the number of emergency workers upon which this assessment is based?
- Does the Commonwealth plan to provide all emergency workers within the EPZ with TLDs? If not, what workers or categories of emergency workers will receive TLDs?
- What is the estimated total cost of the needed TLDs?
- Is this number of TLDs readily available from manufacturers or other suppliers?
- What is the shortest time period necessary to procure this number of TLDs?

NRC staff

The staff's brief (p. 11) states that "[o]nly that dosimetry without which there cannot be reasonable assurance that adequate means for controlling radiological exposures to emergency workers has been established is necessary dosimetry."

- Absent other compensatory actions, how many and what type of self-reading dosimeters must each emergency worker within the Susquehanna plume exposure pathway EPZ wear in order to provide reasonable assurance that adequate protective measures to control radiological exposure are being taken?
- In conjunction with "necessary" self-reading dosimeters, do emergency workers within the Susquehanna plume exposure pathway EPZ require TLDs in order to provide reasonable assurance that adequate protective measures to control radiological exposure are being taken?

- Has Regulatory Guide 8.4, "Direct-Reading and Indirect-Reading Pocket Dosimeters," p. 8.4-2 note 3 (February 26, 1973) been superseded? Does the guidance provided in note 3 still represent the staff's recommendation?
- In the staff's view, what status should NRC adjudicatory boards accord FEMA-REP-2, "Guidance on Offsite Emergency Radiation Measurement Systems, Phase 1 - Airborne Release "(September 1980)?
- What number and what type of self-reading dosimeters are actually available for predistribution for each emergency worker within the plume exposure pathway EPZ at (i) Peach Bottom; (ii) Beaver Valley; and (iii) Three Mile Island?

All parties

Assuming that each emergency worker in the Susquehanna plume exposure pathway EPZ must wear both a low and high range self-reading dosimeter in order to be provided reasonable assurance against undue radiological exposure, what basis, if any, exists for permitting the plant to operate above 5% power before adequate numbers of both types of self-reading dosimeters are available for distribution to emergency workers?

It is so ORDERED.

FOR THE APPEAL BOARD

C. Jean Shoemaker

Secretary to the Appeal Board