

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of: )  
)  
TEXAS UTILITIES GENERATING ) Docket Nos. 50-445  
COMPANY, et al. ) 50-446  
)  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )

APPLICANTS' STATEMENT OF MATERIAL  
FACTS NOT GENUINELY IN ISSUE

1. The Comanche Peak Steam Electric Station ("CPSES") Emergency Plan identifies all state authorities having responsibility for emergency planning. CPSES Emergency Plan § 1.3.2. See Affidavit of Richard A. Jones.
2. The CPSES Plan identifies all regional authorities responsible for emergency planning. CPSES Emergency Plan § 1.3.1. See Affidavit of Richard A. Jones.
3. Texas Utilities Generating Company ("TUGCO") has obtained Letters of Agreement from Hood General Hospital, Hood County Sheriff, Hood General Ambulance Service, Somervell County Sheriff, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, Radiation

Management Corporation, Texas Department of Health, Texas Department of Public Safety, U.S. Department of Energy, and Squaw Creek Park, Inc. regarding warning and evacuation of the public and conduct of operations in the event of an emergency at CPSES. CPSES Emergency Plan § 15.0, Appendix H. See Affidavit of Richard A. Jones.

4. Letters of Agreement obtained by TUGCO identify the principal officials responsible for warning and evacuation by title and agency. CPSES Emergency Plan § 15.0, Appendix H. See Affidavit of Richard A. Jones.
5. A Letter of Agreement with the Granbury Volunteer Fire Department is being renegotiated and will be included in the CPSES Emergency Plan when available. CPSES Emergency Plan § 15.0, Appendix H.
6. Sections 1.3.1.3, 1.3.1.4, and 10.0 of the CPSES Emergency Plan describe arrangements for medical support, including the services of physicians qualified to handle radiation emergencies and arrangements for transportation of injured or contaminated individuals beyond the site boundary. These arrangements are further

described in the Letters of Agreement between TUGCO and Hood General Hospital, Hood General Ambulance Service, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, and Radiation Management Corporation. CPSES Emergency Plan §15.0, Appendix H. Arrangements for handling of radiological patients are detailed in the Affidavit of Roger E. Linnemann, M.D.

7. The CPSES Emergency Plan adequately describes plans for testing of emergency plans by annual exercises and periodic drills. CPSES Emergency Plan § 12.0. See Affidavit of Bobby Lancaster.
  
8. The CPSES Emergency Plan provides for participation of state and local emergency authorities in emergency drills and exercises. CPSES Emergency Plan § 12.0. Participation of state and local authorities is described in Letters of Agreement with the responsible agencies. CPSES Emergency Plan § 15.0, Appendix H.

9. Arrangements for medical support include the immediate vicinity of the site and the City of Glen Rose. CPSES Emergency Plan § 1.3.1.4, § 15.0, Appendix H. See Affidavit of Roger E. Linnemann, M.D.
  
10. The City of Glen Rose-Somervell County Emergency Operations Plan, Fixed Nuclear Facility Response Plan, and Manual of Procedure for Incidents Involving the Comanche Peak Steam Electric Station provide for emergency planning in the City of Glen Rose. See Somervell County Emergency Operations Plan §§ III, IV, Annex F (Attached to Jones Affidavit as Attachment B).
  
11. The Dallas/Forth Worth Metroplex lies outside the ten-mile plume exposure pathway emergency planning zone ("EPZ"). CPSES Emergency Plan § 15.0, Appendix G. See Affidavit of Richard A. Jones.
  
12. Much of Tarrant County and a small portion of Dallas County lie within the fifty-mile Ingestion Exposure Pathway EPZ.

13. The State is responsible for emergency planning in the Ingestion Exposure Pathway EPZ. NUREG-0654, Rev. 1, II.J.11.
  
14. The Texas Emergency Management Plan provides for emergency planning in the Ingestion Exposure Pathway EPZ. Texas Emergency Management Plan, Annex L, Appendix 7, Tab 1, Sections II.A.5, II.2., II.D.1,.2, II.E.1, II.G. (Attached to Jones' Affidavit as Attachment C).