

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 JAN 30 11:07

In the Matter of)
DUKE POWER COMPANY, et al.)
(Catawba Nuclear Station)
Units 1 and 2))

Docket Nos. 50-413
50-414

CESG AND PALMETTO ALLIANCE INTERROGATORIES TO DUKE
AND NRC STAFF RE EMERGENCY PLANNING CONTENTIONS,
FIRST ROUND

Pursuant to NRC regulations and the Board's order of October 3, 1984, p. 7, as amended by agreement of the parties, to Feb. 6, 1984, subject to approval by the Board, CESG and Palmetto submit herein their first round of interrogatories to Applicant and NRC staff in re each emergency planning contention: 1, 3, 6, 7, 8, 9, 11, 14, 15, and 16. The party for whom the request is intended will be identified.

Contention 1

1-1. Has the reading level for the brochure attached to DPC's filing of Jan. 20, 1984 been assessed?

If so, provide the result. If not presently available provide when it is. DPC

1-2 In a brochure informing about emergency response what was the basis for including material on low level, routine dosage levels and omitting material on Event V and SST1 potential exposure levels; of taking up space describing how a nuclear plant operates; of providing the station layout (p. 3); of providing a glossary of nuclear terms; of placing the relevant emergency response information in the second half of the brochure rather than the first? DPC

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- 1-3 What is the basis for updating emergency information once a year? Is it based on studies of the time a certain fraction of the population recalls information thus transmitted? If so, what are the figures for older people who are known to have shorter retention spans for recent information? DPC, NRC
- 1-4 What is the basis for the choice of the particular sentence used advocating reading the brochure, beginning "We hope you will take time . . ."? DPC
- 1-5 What is the basis for omitting any instructions or suggestions as to placing the brochure in a prominent, readily accessible place so that in the event of an emergency it will be readily to hand? DPC
- 1-6 What is the basis for placing possible override of brochure instructions in the "Dear Neighbor" letter? DPC
- 1-7 In the sentence, p. 4, "Very small amounts of radiation comes [sic] from the generation of nuclear power," what is the meaning of the word "comes"? DPC
- 1-8 What is the basis for not defining health effects in terms of early fatalities, early injuries, and latent cancers, the language used by NRC staff? p.4 DPC
- 1-9 Why isn't the subject instructed to breath through a damp cloth, p. 4? DPC
- 1-10 What is the basis for omitting the minimum dosage levels associated with early injuries, with early fatalities, p. 6? DPC
- 1-11 On p. 8 reference is made to "sirens in the 10-mile area around the station . . ." How does this reconcile to Glover's affidavit of Nov. 2, 1983 which puts the area of the EPZ at "332 square miles" (p. 2)? DPC

- 1-12 Has the brochure been critiqued by any organizations primarily devoted to safety and/or emergency response? If so, provide the critiques. DPC
- 1-13 Has the NRC staff critiqued this brochure? If so, provide critique. NRC
- 1-14 What is the effectiveness of breathing through a damp cloth for removing airborne radioactive volatiles and particulates? Express quantitatively for probable types of fabric. How dependent is the efficiency of removal on concentration in the atmosphere? DPC, NRC
- 1-15 "A steady, three-minute signal would sound." p. 8 Just once? DPC, NRC
- 1-16 Are not the numbered instructions on pp. 4 and 9 which are similar in part, different in part, likely to be a source of confusion in a panic situation? DPC, NRC
- 1-17 Would not a Table of Contents on the first page be a benefit to the brochure user? DPC, NRC
- 1-18 On p. 9, ¶1, would it not be an improvement to give emphasis to "your zone"? DPC, NRC
- 1-19 On p. 9 in the block "You Might Be Told To Stay Indoors", is it not inappropriate to introduce long term information in regard to the monitoring of milk and food supplies? How can they be monitored in the home? DPC, NRC
- 1-20 On p. 10, item 1 "If You Are Ordered To Evacuate", is it not true that if the property were at the point of high particulate fallout that one could be away from home from that time forward? DPC, NRC
- 1-21 If 1-20 is answered in the negative, please provide the actual evidence that highly contaminated soil can be

effectively decontaminated. DPC, NRC

- 1-22 What is the basis for omitting, p. 10, the prime reason for registering, namely being measured for radioactive contamination, and being decontaminated as required? DPC
- 1-23 What level of importance does NRC assign to seeking total registration toward the end of detecting and remedying radioactive contamination? NRC
- 1-24 In defining nuclear terms, what is the basis for not defining "plume", "plume pathway" and "ingestion pathway"? DPC

Contention 3

- 3-1 What is the estimated total population in the EPZ as of the projected date of operation at more than 5% power, or the projected date of first commercial operation? DPC
- 3-2 What is the maximum number of people who will be notified to evacuate, worst case accident, worst case meteorology? DPC, NRC
- 3-3 For the 38 identified shelters, what is the present number of cots? Of mattresses? Of blankets? Of sheets? Of pillows? DPC
- 3-4 What is the present actual stock of foodstuff and beverages by specific kind and by amount? Where is it stored? What did it cost? DPC
- 3-5 What specific arrangements have been made to provide an uncontaminated water supply? How large is it. In the alternative, has an arrangement been made to decontaminate water? If so, what is it? What is its capacity per day? What energy source will it require? DPC

- 3-6 What is the longest stay planned for at the shelters?
What is the longest stay entering into FEMA/NRC planning?
What is the number of people assumed in the long stay
situations? DPC, NRC
- 3-7 What is the worst case rate for evacuees to return to
their homes? DPC, NRC
- 3-8 What is the worst case number of evacuees to require
crisis relocation? DPC, NRC
- 3-9 What is the worst case number of evacuees who will be
permanently displaced, i.e. unable to return to their
homes because of impermissible radiation levels? DPC, NRC
- 3-10 Have Applicant and government authorities assumed a most
likely emergency? If so, what is it? What number of
people will require emergency services? For how long? DPC, NRC
- 3-11 For the worst case what proportion of evacuees are assumed
to use the provided shelter; what portion to make other
arrangements? DPC, NRC
- 3-12 How many personnel are assigned to administer the shelter
operation? Have they been designated? What training
have they received or will they receive? What are the job
requirements? DPC
- 3-13 In processing evacuees, how many persons in a reception
team? Provide job descriptions such as clerk, radiation
measurement technician; decontamination technician,
cook, janitor, etc. DPC
- 3-14 What is the planning basis rate for registering, examining
for contamination, decontaminating if necessary, assigning
to quarters? DPC

- 3-15 What is considered as adequate decontamination equipment?
DPC, NRC
- 3-16 Provide the recommended decontamination procedure, including criteria for effectiveness and range of times required to achieve. DPC, NRC
- 3-17 Is each of the 38 shelters equipped with adequate decontamination equipment meeting the standards of 3-15? How many can simultaneously be decontaminated at each site? Are specially trained nurses or para-medicals required to perform decontamination? DPC, NRC
- 3-18 How many towels are in place for decontamination use at each facility? What other supplies are required for decontamination? In what amounts are these present at the 38 shelters. What is the worst case hot water requirement for decontaminating? What is the capability of each shelter? DPC, NRC in regard to per person supply needs.
- 3-19 What disposition will be made at each shelter of contaminated a) clothing, b) water, c) other (specify) materials? DPC, NRC
- 3-20 How will the cost of sheltering activities in the 38 shelters be met? The costs of registered, uncontaminated or decontaminated people who stay elsewhere? DPC, NRC
- 3-21 Will reimbursement be provided under the Price-Anderson Act for expenditures related to evacuation and away-from-home sheltering? How long will it take to pay such claims? DPC, NRC
- 3-22 Of the 38 shelters is it true that five are within 15 miles of Casawba and another 4 within 20 miles? Both the Sandia Report, NUREG/CR-2239 and the testimony of Jaques Read indicate that under severe accident conditions there can be early fatalities and injuries out to 20 miles.

What planning provisions have been made for threatened shelters? DPC, NRC

- 3-23 In the worst case accident, what is the peak number of automobiles expected at each shelter? What are the corresponding parking capabilities? If existing space is not adequate provide specifics for handling each overflow. DPC
- 3-24 Have any studies been made which would show the degree to which the content of the North Carolina public education program has been learned by those exposed to it? In a representative sampling, what part of the general public has been exposed to it? What part of the Catawba EPZ dwellers? What part of the McGuire EPZ dwellers? DPC
- 3-25 Have there been any emergency cleanup exercises in North Carolina? In South Carolina? If so, what was the nature of the exercise--in detail? What was the outcome? By whom was it evaluated? DPC, NRC
- 3-26 Wayne Broome has provided an inventory of radiological instruments. Provide the types of radiation separately measured by each instrument, the instrument ranges, frequency or energy level characterization, provisions for calibration for each type of instrument listed: CDV-138, -700, -715, -742, and -750. Indicate which instruments operate in real time. DPC.
- 3-27 What means are provided in emergency planning for the reuniting of family members separated during evacuation? DPC, NRC
- 3-28 In the FEIS at p. 5-39 it is stated in connection with the consequence/probability data that "early evacuation of the

plume exposure pathway was ensured." What does this mean in regard to operations during an emergency? What does it translate to in terms of the assumptions made in the CRAC calculation including specifics such as demography, weather, evacuation rate as miles per hour normal to plume pathway, and numbers of persons over the range of dosages? NRC

Contention 6

- 6-1 Is there legal authority to compel the examination of persons for radiological contamination? DPC
- 6-2 If a major release occurs under stagnant conditions, with random wind movement and a high probability of plume fallout in each zone, will a general (total) evacuation of the EPZ be declared?
- 6-3 In the event of a total evacuation will not all exit routes be used? DPC
- 6-4 Under the conditions foregoing, how many police will be available per route, assuming police will measure contamination, to insure that no persons bypass decontamination? DPC
- 6-5 Is there legal authority to compel registration and decontamination? DPC, NRC
- 6-6 Reception centers are in part not located on the roads leading out of the EPZ, for example #1 at UNCC. How can it be assured that all vehicles leaving the EPZ go to an appropriate reception center given the fact that there will be other traffic? DPC
- 6-7 How will vehicle contamination be dealt with? Will contaminated vehicles be permitted to leave the EPZ? Will vehicles

- be^{de}/contaminated at some or all of the reception centers? DPC
- 6-8 What vehicle decontamination equipment is in place? At what rate can this equipment process cars? If it is a commercial car wash, how will payment be made? Will the contaminated effluent be treated to remove the contamination or will it be sewerred? DPC, NRC

Contention 7

- 7-1 What are the criteria for an adequate shelter? NRC
- 7-2 Can residences be upgraded to approach meeting these criteria? If so, in what respects must changes be made? NRC
- 7-3 Do the brochure instructions, p. 9, items 2 and 3, effectuate adequate shelter for the types of residence in the EPZ? DPC, NRC
- 7-4 Would adequate sheltering be more nearly realized by provisions to be made in advance such as dust respirators and some minimal supply of canned foodstuffs and beverages? For a severe release what dosage reduction would be expected from these means? DPC, NRC
- 7-5 Has government any authority to require the upgrading of shelter capability for the residents of the EPZ? If there is such an upgrading can the associated expense be passed on to the Applicant? DPC, NRC
- 7-6 Have Applicant or local authorities advised EPZ residents as to how to achieve adequate shelter? DPC
- 7-7 Have EPZ residents been clearly and in sufficient detail advised as to what constitutes inadequate shelter? What structures are less effective than a closed automobile? DPC, NRC

- 7-8 What does FEMA/NRC consider a fully effective list of the actions to be taken by a person in the EPZ hearing the warning siren? Provide detail in regard to preparing and/or choosing shelter. NRC
- 7-9 For what spectrum of releases do FEMA/NRC see sheltering as being more beneficial than evacuating? NRC
- 7-10 For what periods of time may sheltering last? NRC
- 7-11 What advice can be given EPZ residents in regard to continuing sheltering if there is a communications breakdown. For example if the resident's line powered radio or TV breaks down or is not supplied with power? DPC, NRC
- 7-12 Has any advice been given as to the use of plastic suits to lessen particulate contamination either in-dwelling, dwelling-to-car, in-car? As to particle impermeable headgear? DPC
- 7-13 Are residents given any simple monitoring devices or will they be advised to obtain same? DPC, NRC
- 7-14 Would film badges placed in a dwelling, to be worn during potential exposure, be an aid in assessing the exposure of persons? Are they now required? Will they be provided? DPC, NRC
- 7-15 Is there a requirement prominently to display sheltering instructions? Does the NRC favor such a requirement? DPC, NRC
- 7-16 Does the NRC regard the place-damp-cloth-over-nose-and-mouth instruction as being adequately clear indication that inhalation is to be filtered? Have any reading specialists been called on to critique this instruction? DPC, NRC

- 7-17 What advice is given to those having only an open vehicle?
DPC, NRC
- 7-18 How many dwellings are in the EPZ? How many meet the criteria for adequate shelters, 7-1? For a worst case release, how many additional early deaths and injuries are calculatable to result from substandard shelters?. DPC, NRC

Contention 8

- 8-1 Has a response been received to the May 10, 1983 letter from R. M. Glover to R. Phillips regarding an annual review of emergency action levels? DPC
- 8-2 A review of Mecklenburg and York County emergency plans shows different administrative mechanisms in regard to siren notification. There does not appear to be any formal coordination. Is there? DPC
- 8-3 Similarly to 8-2, there does not appear to be coordination in regard to radio and TV emergency advisories to the public. It appears that people in the EPZ could receive conflicting information. Is there an established mechanism to avoid this? DPC
- 8-4 To whom have copies of the York and Mecklenburg emergency plans been distributed--by areas, not names? What is the total number of these copies for each county? Have the persons who have received these copies and have functional responsibilities in an emergency been thoroughly examined in regard to their knowledge of content? If so, what were the results? DPC
- 8-5 The York discussion of decontamination is more detailed than the Mecklenburg. Are such discussions required to meet a common standard? If so, what is it? DPC, NRC

- 8-6 Does any relevant emergency document discuss long term displacement and relocation? If so, please provide in relevant part. DPC, NRC
- 8-7 Are available radiological instruments to be characterized and an inventory provided? North Carolina and Mecklenburg County do; York County does not. DPC
- 8-8 Please provide Tab A to Appendix 9 to Annex Q in the York document. It is referenced, p. Q-75, but not provided.
- 8-9 Intervenor has not been provided with several items noted for later delivery in the N.C. plan, Annex I, and in the York plan. Please provide. DPC
- 8-10 Decontamination of property, livestock, buidings is called for in the Mecklenburg plan at p. 38. Is any information provided as to how? DPC, NRC
- 8-11 In an SST1 event are the decontamination services of the dispatchable Catawba station Radiation and Control unit likely to be oversubscribed? DPC
- 8-12 Does the Mecklenburg plan erroneously state the distance from the Catawba plant to Memorial Hospital, p. 40? What is the distance? DPC
- 8-13 Considering the exclusion, p. 5 of Part 3, item 4, where is the EMO team to monitor and what is it to monitor? DPC
- 8-14 How is Agricultural Extension to "support" mass feeding, Part 3, N.C. plan, p.6? DPC
- 8-15 Do Mecklenburg County police "assist" in monitoring, Part 3 p, 6, or do they monitor? DPC
- 8-16 What provision is made for the supplies the fire department will use in decontaminating, Part 3, p. 6? DPC
- 8-17 The Emergency Management Office of Mecklenburg County is

given several responsibilities during an emergency.

How many are on the EMO staff? What are their job titles?

Is the office of Director filled? DPC

- 8-18 The Red Cross is given primary responsibility for mass feeding, Part 3, p. 15. What food supplies will be maintained for this use? Or what alternative provisions will be made? Respond in the context of the worst case. DPC
- 8-19 How many persons are there altogether in the York and Mecklenburg volunteer fire departments? DPC
- 8-20 The Emergency Management Office is a link in the notification chain. Is it open continuously? DPC
- 8-21 Part 3, p. 24 of the M.C. plan identifies zones A-0 through A-10. The brochure identifies zones A-0 through A-3, eleven versus four. Reconcile the discrepancy. DPC
- 8-22 What is the time separation between the two warning cycles? It is not provided. DPC
- 8-23 Who are the three RDO's and where are they employed? Do they have beepers for being continuously on call? DPC
- 8-24 What "teams" are being referred to, Part 3, p. 27, 6. b? DPC
- 8-25 Is it realistic to expect that "all rumors" will become known to emergency workers? Part 3, p. 27. DPC
- 8-26 Who is the PSI officer for McGuire? Is there one for Catawba? Same person? DPC
- 8-27 For the several schools in the EPZ, are school buses with capacity for all students parked at each school during the school day? If not, what is the school population? What is the immediately available bus capacity? DPC
- 8-28 Wherein is vested the authority to call up public transportation

buses? Is there legal authority to order drivers into an
ErZ under conditions of potential high radiation dosage?
If so, please cite. DPC, NRC

8-29 How many Red Cross employees are available to work at mass
feeding? How many volunteers? Has the Red Cross
management committed to this role? If so but what
vehicle, contract, verbal agreement? DPC

8-30 How many Social Svices employees are there? Will all of
these be available to operate shelters? Are sufficient
social services employees available to assure around the
clock manning? DPC

8-31 How many persons is EMO committed to provide for the
monitoring program? DPC

8-32 In Part 3, p. 36, there is no indication under Protective
Response Options that an evacuation may be ordered? Is
this decision reserved to SERT? DPC, NRC

8-33 What scenarios would call for an evacuation order before
SERT was able to function--7 to 9 hours from inception?
DPC, NRC

8-34 What persons and equipment does EMO have for decontamination,
cf. Part 3, p. 34, (2)? DPC

8-35 How does this (8-34) coordinate with the fire department's
role, p. 37, 5., and that of the Catawba station unit,
id. 7? DPC

8-36 There is at present no director of the EMO. Who would
perform this role in the event of an emergency at McGuire,
or Catawba under similar circumstances? DPC

8-37 A number of types of drill are required, Part 3, p. 49.
Why is none required for either personnel or property

decontamination? DPC, NRC

8-38 How many persons has the EMO trained for radiological monitoring for McGuire? Will it train additional persons for Catawba? If so, how many? DPC

8-39 Describe in detail the training program given by the EMO for radiation monitoring? How many class hours? What evaluation, passing a test, or what? DPC

8-40 In the N. C. plan 29 divisions of state government are listed and 159 responsibilities are assigned. Part 1, pp. 12-24. An accident at Catawba will be a nonroutine event. What are the precedents to indicate that coordination of this complex a situation will be effective in a rapidly developing accident sequence, meaning one in which the maximum opportunity for mitigation hazard takes place in the first 12 hours? DPC, NRC

8-41 Will not the continuous sounding of sirens on boats, Part 1, p. 3-2, cause confusion to those on land who have presumably been informed about a 3 minute sounding? DPC

8-42 In what phone directories is McGuire emergency information give? In what directories will Catawba information be given? None is in the Charlotte phone book. DPC

8-43 Does the state have the legal authority to impound contaminated vehicles? DPC

8-44 Please provide EPA 520/1-78-001B, a factor in protective action consideration. NRC

8-45 What agency will deal with losses experienced as the result of embargoing meat, dairy products, grains, etc.? DPC, NRC

8-46 Is there legal authority to order workers to expose themselves to more than 25 R? Regarding the 75 R upper limit, will not

radiation sickness be likely at levels above 25 R? Is it assumed that workers would voluntarily and informed of the probable consequences expose themselves to levels greater than 75 R? DPC, NRC

8-47 Memorial Hospital has 10 "radiation beds". What accidental release would most likely result in this number of people requiring such treatment? DPC, NRC

8-48 Coordinating instructions are given in Part 1, p. 93. Part a. deals with background information for the public. Have surveys been made which show how many people in the locality of Catawba have been exposed to this information? Has the extent to which the information was retained by these people been measured? If so, what were the findings, DPC

8-49 How many state and local emergency responders will receive the NRC course, Part 1, p. 97, in 1984? What are plans for beyond 1984? DPC

Contention 9

9-1 In regard to the variety of circumstances which may operate to keep persons from hearing a siren, has a competent survey been made of awareness of siren tests at McGuire? If so what were the conditions during the test and the time of the test(s)? What were the findings? DPC

9-2 Regarding 9-1, if such a study was made, was was the breakdown on reasons given for not hearing? DPC

9-3 Has Carowinds provided an emergency response plan? If so, what is it? DPC

9-4 Has PTL provided an emergency response plan for Heritage Village? If so, what is it? DPC

Contention 11

- 11-1 Does DPC contest CESC's meteorological testimony? If so, in what respects? DPC
- 11-2 Does NRC contest CESC's meteorological testimony? If so, in what respects? NRC
- 11-3 Is there any substantial, i.e. empirical evidence, from which one can derive the number of "volunteers" who would evacuate Charlotte given radio and TV announcement of a general emergency at the Catawba plant? If so, how many would be expected to leave and in what number of vehicles? DPC, NRC
- 11-4 What fraction of the population of Charlotte are aware of NRC and Sandia Laboratory findings that early deaths could result as far as 20-25 miles from the point of release in a major accident? DPC, NRC
- 11-5 The Metromark study was made with subjects from the Oconee, McGuire, and Catawba EPZ's. Please provide for the light it will shed on the probable attitudes of those living in the vicinity of an operating plant, those living in the vicinity of a prospective operating plant, as it will bear on people in southwest Charlotte. DPC
- 11-6 What are the farthest points from Catawba of the city limits of Rock Hill, York, and Clover to the nearest 0.1 mile? DPC
- 11-7 In terms of NUREG-0654 requirements, what siren reach radii are appropriate in the area of Southwest Charlotte described in the example of the revised contention? DPC, NRC
- 11-8 Who will respond and cooperate better in a nuclear emergency, very thoroughly informed people or essentially

- uninformed people? DPC, NRC
- 11-9 What is the cost of a single siren as used in the Catawba EPZ? In southwest Charlotte, what is the estimated installed cost of the 46 siren system Duke has mentioned? Of a 5 siren system? DPC
- 11-10 Has Duke investigated a block telephone system which would selectively deliver appropriate emergency information to appropriately chosen zones in southwest Charlotte? DPC
- 11-11 Has Duke considered alternative EPZ areas within Charlotte city limits? If so provide the documentation. DPC
- 11-12 Has the NRC staff considered the appropriateness of including some or all of Charlotte in the EPZ? If so, provide these considerations. NRC
- 11-13 Referring to Tr. 11,321, do the 19,000 early fatalities mentioned involve one sector only? If so, provide the corresponding early fatalities and early illnesses in the remaining sectors and the early illnesses in the subject sector. How far from Catawba do fatalities reach in each sector? Early illnesses? NRC
- 11-14 The FEIS, p. F-4, also refers to 24,000 fatalities. What are the differences for arriving at that number and for arriving at 19,000? What was Dr. Read's reason for not mentioning the 24,000 number?

Contention 14

- 14-1 In its evacuation time study what worst case snowfall did Voorhees consider? What effect did it have on the rate of traffic flow? Did Voorhees determine the fraction of autos in the EPZ equipped with snow tires, with chains? Were iced-over roads considered? DPC

- 14-2 Did Voorhees consider the effect of a 100 year flood on traffic movement? If so, what did it find? DPC
- 14-3 Did Voorhees consider the effect of fog on traffic movement, particularly as the cooling towers contribute to fogging downwind from a plant? If so what effect did they discern? DPC
- 14-4 Did Voorhees consider the startability of cars under extreme cold weather conditions? If so, what were the conditions? The findings? DPC
- 14-5 What incidence of traffic flow interruptions by accidents were assumed by Voorhees? What effect did it have on traffic flow and evacuation time? DPC
- 14-6 What consideration give to the effect of voluntary evacuation of Charlotteans? What effect did it have? DPC
- 14-7 What are maximum I-77 traffic densities both northbound and southbound at the EPZ boundaries both near Charlotte and near Rock Hill? What consideration were these given by Voorhees? DPC
- 14-8 Does the authority exist to send student bus drivers into the EPZ during an emergency? DPC, NRC
- 14-9 Same as 8-27 DPC
- 14-10 Same as 8-28 DPC
- 14-11 What is the basis for the apparent assumptions as to work patterns and living habits of persons in the EPZ? Is it based on an actual study of this population? DPC
- 14-12 What are the assumptions made for Voorhees' "worst case" conditions re weather, time of day, day of week, season, and nature of accident? DPC
- 14-13 What allowance did Voorhees make for panic and irresponsible

driving as a consequence? DPC

- 14-14 What allowance did Voorhees make for evacuation traffic from Carowinds onto I-77 north and south, US 21, and SC 51? DPC
- 14-15 Re 14-14, for Heritage? DPC
- 14-16 What effect on evacuation time will attempts to exclude travel on certain roads due to proximity to the plume exposure pathway have? DPC

Contention 15

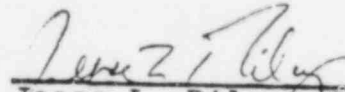
- 15-1 What is the workday incidence of homes in the EPZ which are without an automobile? DPC
- 15-2 How many people are in homes without workday transportation? DPC
- 15-3 What training has been given bus drivers in the several EPZ political areas in regard to operating under emergency evacuation conditions? DPC
- 15-4 How many qualified adult backup drivers have been selected for school buses? What capacity will the buses they drive have? How many children are in school in the EPZ during a normal schoolday? DPC
- 15-5 How many day care facilities are there in the EPZ. Normally how many children are present? What specific means are there to evacuate these children? DPC
- 15-6 How many hospitals are in the EPZ? What is the normal population of these hospitals? What specific provisions have been made to evacuate patients, indicating source and proximity of buses, ambulances, and other suitable vehicles, and driver availability? DPC

- 15-7 Has a survey been made of the EPZ residents to determine how many intend to remain regardless of warnings? DPC
- 15-8 If so, 15-7, what is the estimated total of those who will be unable or unwilling to evacuate? DPC

Contention 18

- 18-1 What is the capacity of the EPZ phone systems for simultaneous connections? How many phones are there in these systems? What is the maximum rate of making connections, i.e. of putting through calls? What is the breakdown of services, single party, two party, four party, etc.? What are the capabilities of operators breaking in on connections? How many operators, by time of day, are employed in the subject systems? DPC

Respectfully submitted,


Jesse L. Riley, for CESA
and Palmetto Alliance

January 26, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
DUKE POWER COMPANY, et al.)
(Catawba Nuclear Station)
Units 1 and 2))

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AFFIRMATION OF SERVICE

I hereby affirm that copies of "CESG AND PALMETTO ALLIANCE INTERROGATORIES TO DUKE AND NRC STAFF RE EMERGENCY PLANNING CONTENTIONS, FIRST ROUND" in the above captioned matter were served on the following by deposit in the United State mail this 26th day of January, 1984, with the exception of the copy to Ron Shearin which was hand-delivered on this date.

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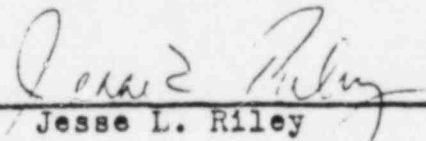
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