

orig. ①

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

DOCKETED
 USNRC

'84 JUL -2 P3:47

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright
 Dr. James H. Carpenter
 James L. Kelley, Chairman

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
 (Shearon Harris Nuclear Power Plant,
 Unit 1)

Docket 50-400 OL

ASLBP No. 82-L68-01
 OL

Wells Eddleman's Interrogatories to NRC Staff and FEMA
 (4th Set)

Wells Eddleman hereby requests the NRC Staff and FEMA to answer the following interrogatories before July 19, 1984 or such other date as counsel for the Staff, FEMA and I agree on. These interrogatories are submitted under 10 CFR 2.720(h)(11) and inquire into the studies, information, and knowledge of NRC staff with respect to my contentions on which discovery is now open. Since I cannot read the minds of the staff, and this information is not contained in documents which the staff has provided to me, I am unable to obtain this information by other means. Where the information is contained in a document I can obtain from NRC (Public Document Room, etc), I still need the identification of the document in order to obtain the information. The staff has resources and information which exceed what I have, and as a party, their position and information are necessary to making my case in this proceeding. These interrogatories are continuing in nature and should be supplemented when answers change.

GENERAL INTERROGATORIES (FIRST SET)

In all interrogatories herein, "you" or "Staff" means NRC Staff or FEMA, Eddleman contentions 30,

For each of contentions 57-C-3, 57-C-10, 57-C-13, 213, 215, 224 please provide the following information by answering each of these questions.

1. What is NRC Staff's ^[FEMA's or] reviewer's ^{of Affiant's} understanding of the subject matter of this contention?
2. Has ^{FEMA or} NRC Staff made any investigation into, (a) this contention (b) the subject matter of this contention (c) the allegation(s) in this contention (d) the basis of this contention (e) the information relied upon by intervenor(s) in support of this contention?
3. For all parts of your response to Interrogatory 2 above for which your answer is affirmative, please provide the following information: who made the analysis, inquiry, study or investigation; what was being considered in such analysis, inquiry, study or investigation ("AISI"); the content of the AISI, the results of the AISI, whether the AISI has been completed, whether a date for completing the AISI has been established if it is not complete, what that date is, all documents used in the AISI, all persons consulted

DS03

in the course of the AISI, all documents containing information discovered or analysis or study or information developed during or as a result of the AISI (identify each such document and state what information or results it contains), whether staff believes additional analysis is warranted, or further AISI needs or may need to be undertaken on this contention, and whether any persons participating in the AISI are to be called as witnesses for the Staff in this case, and what questions the staff AISI is intended to answer and what information it seeks to develop if it is not complete.

4. For all responses to parts of (2) above for which NRC staff's ^{OR FEMA'S} answer is other than affirmative, please state (a) whether NRC staff ^{OR FEMA} plans to perform any AISI on this contention, (b) whether anyone on NRC Staff has stated that AISI of any kind is warranted for this contention (even though it has not been made) (c) whether NRC Staff plans for AISI ^{OR FEMA'S} on this contention include a date for beginning or for ending such AISI, (d) those dates, for all affirmative answers to (c) above, (e) what AISI NRC staff will undertake on this contention (f) what AISI NRC staff desires to undertake on this contention (g) all reasons why no AISI is planned on this contention if none is planned (h) all reasons why no AISI has been done yet on this contention if none has been done (i) what the responsibilities of NRC staff ^{OR FEMA} with respect to this contention are.

5. Identify all documents the ^{FEMA OR NRC} Staff relied on in opposing the admission of this contention, and any specific facts not stated in the Staff's opposition to admission of such contention (already filed in this case) upon which Staff relied in making such opposition.

6. Identify all documents not identified in Staff's interrogatories to Wells Eddleman or to Joint Intervenors (to present -- a continuing interrogatory) upon which the Staff relied in making each such interrogatory.

7. Identify by name, personal or business address, ^{FEMA OR} NRC staff position or title (if any), and telephone number (if known) each person on NRC staff or consultant to NRC staff or known to NRC Staff or consulted by NRC staff in the staff's analysis of the subject matter of this contention prior to (a) its filing (b) its admission; state for each such person what analysis was performed by that person.

8. State all professional qualifications of each person identified in response to interrogatories 7. 3,4.

9. Provide any statements of the analysis made by persons identified in response to interrogatories 3,4, or 7~~x~~ above, and identify all documents containing such information or statements not previously identified.

10. Give the identifier number, date, source, and title of all documents identified in response to interrogatories above, which are available through NRC PDR (Public Document Room).

11. Will NRC Staff make available copies of documents identified in response to the above interrogatories to Wells Eddleman for inspection and copying, for documents not available through NRC's PDR?

12. Identify by name, ^{FEMA OR} NRC staff position if any, address and telephone number each person whom NRC staff intends to ~~use~~ use or call as a witness in this proceeding.

13. State fully the professional qualifications of each person identified in response to interrogatory 12 above.

14. Summarize the position (or planned testimony) with respect to each contention on which such person is expected to testify, for each person identified in response to interrogatory 12 above.

15. Has ^{FEMA or} NRC Staff, any witness identified in response to interrogatory 12, or anyone acting in behalf of the Staff or such a witness or at their direction, made any calculation or analysis (not identified in response to interrogatories 1 through 4 above) with respect to this contention?

16. If the answer to interrogatory 15 above is yes in any case, provide the name, business or personal address, telephone number and professional qualifications of each person who has made such calculation or analysis, stating for each what contention it relates to, what person (or Staff) it was made for or at the direction of, and identifying all documents containing such calculation or analysis and all documents used in making such calculation or analysis or relied upon in it or supplying information used in it.

17. Provide a summary of each AISI, calculation or analysis ~~made~~ for which the answer to interrogatory 15, or interrogatory 2 above, is yes.

18. Please give the accession number, date and originator of each document identified in response to interrogatory 16, which is available at the NRC PDR.

19. Will ^{FEMA or} NRC Staff make available to Wells Eddleman for inspection and copying all documents identified in response to interrogatory 16 above which are not available through the PDR?

20. Identify each person, including telephone number, address, and field of expertise and qualifications (complete) (if any) ~~in~~ who answered interrogatories with respect to this contention; if more than one person contributed to an answer, identify each such person, providing the information requested above in this interrogatory for each such person, and state what each such person's contribution to the answer was, for each answer.

21. Identify all documents which the ^{FEMA or} Staff proposes or intends to use as exhibits with respect to this contention during this proceeding, including exhibits of Staff witnesses (identifying the witness for each, if such a witness has been designated), and exhibits to be used during cross-examination of witnesses of any party (stating for each which witness it is to be used in cross-examination of), and identifying for each the particular pages or chapters to be used as exhibits.

22. Identify all documents which ^{FEMA or} NRC staff relied upon in answering interrogatories with respect to this contention, which have not been identified in response to interrogatories 1 through 21 above, stating for each which answer(s) re which contention(s) it was used for, and each specific fact and page number therein on which NRC staff relied or which NRC staff used in answering such interrogatory.

23. Please give the accession number, date, and originator of each document identified in response to interrogatories 21 or 22 above which is available through the NRC PDR.

24. Will ^{FEMA or} NRC Staff provide Wells Eddleman with copies of the documents identified in response to interrogatory 21 or 22 above which are not available at the PDR, for inspection and copying?

25. Identify any other information or source of information not identified in response to the the above interrogatories 1 thru 24 ^{on} which upon which any member of NRC staff relieved, or which any such member of staff used, in answering each interrogatory with respect to this contention, naming the contention and response in which each such source was used, and the location of the information used or relied on in such source (e.g. page number, section, chapter, etc).

26 (a) Does the Staff ^{or FEMA} now agree with the contention? (b) Does the Staff now agree with any part of the contention?

27. If answer to (b) above is affirmative, which part(s) and why?

SPECIFIC INTERROGATORIES. "You" means (to Staff/FEMA) NRC Staff or FEMA or any person answering these interrogatories for FEMA or NRC Staff. "You" means, to Applicants, Applicants or the State of NC or the NC Dept of Crime Control and Public Safety, or appropriate county or state emergency response planners or personnel, e.g. those supplying answers to these interrogatories or having knowledge of the matters inquired about.

57-C-3-1(a) Do you know of any provisions for nighttime notification of residents or transients (i) within the EPZ (ii) who are asleep (iii) who are in boats or houseboats or other craft on either (iii-a) Jordan Lake, or (iii-b) the Harris plant lake?

(b) What are these provisions? Please identify all documents containing such provisions and state which such documents are part of the emergency response plan (offsite) for Shearon Harris. If any such document is part of another emergency response plan, e.g. Harris on-site plan or other state or county emergency response plan or contingency plan, please identify that plan also, for each such document.

(c) What provisions, if any, are in the brochure to be sent to EPZ residents, concerning action to take if a nuclear accident occurs at night? (d) what provisions among these concern sheltering, turning off air conditioners or air-to-air heat exchangers, or closing windows? Please identify each such provision and which of the above items it relates to. (e) Do you know of any plans for telephone notification of (i) residents of the EPZ (ii) transients in motels, hotels or other lodging in the EPZ, for accidents at the Harris nuclear plant? If so, please identify each such plan and all documents concerning it. (f) Have you ever considered telephone notification of persons within the EPZ in the event of a nuclear accident? If so, please identify all documents concerning your consideration of this matter.

57-C-3-2(a) Are automatic telephone dialing systems available to (i) CP&L (ii) the State of NC (iii) Wake County (iv) Chatham County (v) Harnett County (vi) Lee County (vii) other authorities who would be involved in ordering sheltering in the event of a nuclear accident at Harris? (b) What are the capabilities of the automatic telephone dialing systems available to each such organization? Please include in your answer (i) number of numbers dialed per hour (ii) ability to dial a preprogrammed set of numbers (iii) ability to have input a set of numbers to dial (iv) ability to automatically dial back if the phone is hung up before a message is completed (v) length of message the system can deliver (vi) audio quality of message the system can deliver (vii) capacity OF Telephone lines (e.g. number of lines) the system requires, (viii) other technical requirements of the system, e.g. for power supply, actuation, reset if errors in dialing occur (ix) whether the system can function with a backup power supply if electrical power to it is lost, and whether such backup power supply is in fact provided for it. (c) Please detail the capabilities of any automatic telephone dialing system which you have (i) considered for use (ii) plan to buy (iii) know is available for purchase.

213-1(a) What is the specific responsibility of (i) CP&L (ii) the State of NC (iii) Wake County (iv) any other authority or agency you know of, for notifying boaters, swimmers or others on or in the Harris plant lake in the event of a nuclear accident at Harris? (b) Please list every means by which you will carry out such notification, and state which document(s) detail these means, your authority or ability to use them, and what personnel are required to operate these means (number of persons, where they work, who will notify them, how long they will take to begin operating the means of notification. (c) Please state how long each means of notification will take to notify all persons on or in the Harris lake, and for each means, what backup means of notification will be used if there is a failure of the first means. Please also describe the provisions for sheltering or evacuation which will be announced to persons on or in the Harris lake. (d) what means, if any, are provided for verifying that persons on the Harris lake have been notified of an accident at Harris? Who operates each such means? Who is responsible for each such means being used? Who will receive the reports of such verification? How will each such person receive each such report?

213-2(a) In what respects do provisions for notification of persons (i) on (ii) in (iii) on the shores of, the Harris plant lake, differ from provisions for notification of persons in or on corresponding parts or areas near Jordan lake? (This means for notification of an accident at the Harris plant.) (b) For each such difference in provisions, do you have any reason for the difference? If so, please state in what documents your reason, or reasoning, for having this difference in notification provisions for the Harris and Jordan lake areas, is. (c) Please explain any modifications to be made in notification provisions for the people in, on or around the Harris lake by (i) Wake County (ii) CP&L (iii) other emergency planners, including the State of NC.

57-C-10-1(a) What study, if any, have you made of sheltering effectiveness for shelters typical of those available within the Harris EPZ? (b) Please identify all documents in which you make such study, or any analysis of sheltering effectiveness for such shelters. (c) What study, if any, do you plan to make of sheltering effectiveness for shelters typical of those to be available near Harris? When will each such study be completed? Who is doing each such study? What are their qualifications to do it? Who will receive the results of each such study?

(d) Does any study referred to in your responses to (b) or (c) above establish sheltering effectiveness for (i) houses without basements (ii) brick houses without basements (iii) cinder block basements (iv) brick-walled basements (v) basements above ground level (vi) basements sunk partly below ground level (vii) motels or individual motel rooms (viii) restaurants (ix) public buildings (x) farm buildings (xi) storm cellars (xii) wooden houses (xiii) solar or passive solar houses (xiv) any structures, in terms of typical numbers of air changes per hour (xv) any structures, in terms of measured numbers of air changes per hour (xvi) any structures, by relying on typical characteristics of such structures? (e) Please identify all documents containing data on the sheltering effectiveness, or measurements of air changes, or characteristics of shelters, which you have used or will use in addressing the effectiveness of sheltering for typical structures around the Harris plant. (f) Please explain your method for assessing sheltering effectiveness for homes, etc., in the Harris EPZ.

57-C-10-2(a) Have you made any determination of sheltering effectiveness for any (i) school (ii) day care center (iii) church or other house of worship (iv) other structures ~~xxxx~~ open to the public or used by more than 10 persons (other than homes or apartments)? (b) Was your determination of sheltering effectiveness made (i) for a typical such structure (ii) for a specific structure (please identify) (iii) by any other method? (c) Please explain, identifying all documents used for data or assumptions, and identifying all calculations and methods used, how you determined the sheltering effectiveness for each type of structure inquired about in part (a) above.

57-C-10-3(a) Please identify all documents, methodologies, data, equations, calculations or other information you have used, or plan to use, in calculating or determining sheltering effectiveness for structures within the Harris EPZ. (b) Please identify all documents containing such information. (c) Please identify all documents you possess which describe methods of figuring, calculating, or assessing sheltering effectiveness. (d) Please state why you have adopted or used any methods, data or calculations of sheltering effectiveness which you have used with respect to structures near Harris or in its EPZ. (e) Please state and describe in as much detail as you know, what kinds of structures you consider "typical" of those ~~xxxx~~ available for sheltering in the Harris EPZ. Please identify all documents or information and all opinions you rely on in considering each type or structure typical. How many types of structures have you assessed sheltering effectiveness for within the Harris EPZ?

57-C-10-4(a) Do you possess any information on the (i) number (ii) types (iii) number of persons in (iv) times of day persons are in, structures in the Harris EPZ? (b) Did you consider

57-C-10-4(b) continued

medical or dental offices, stores, schools, farm buildings, theaters, public buildings, motels, day care centers, or other buildings in collecting data on types of shelter available in the Harris EPZ? (c) If so, what data do you have on each type of building inquired about in (b) above. ~~for~~

(d) For each type of building listed in (b) above that you have no data on or did not ~~xxx~~ consider, please tell why you (i) have no data on, or (ii) did not consider, that type of building.

(e) among the types of structures inquired about in this interrogatory 57-C-10-4, what structural characteristics, air-change characteristics or other characteristics do you think are appropriate to consider to determine sheltering effectiveness for each such type?

(f) Please identify all documents in which data, determinations or information concerning the matters inquired about in (a) thru (e) and all subparts, inclusive, above, are contained.

57-C-13-1(a) Have you made any determination of the best Protection Factor (PF) available in any (i) hospital (ii) nursing home within the Harris EPZ? (b) If so, how did you make that determination? Was an on-site survey conducted? How did you get your data about characteristics of the structure? Did you consider any data about air infiltration into the structure? Please identify all documents concerning each determination of PF you have made for any school or hospital within the Harris EPZ and how that PF was determined.

(c) Have the data used in your PF determination been checked by anyone? If so, by who and when? Please identify all documents concerning checking of such data. (d) How many people can fit into the area with the best PF in each (i) hospital (ii) nursing home, in the Harris EPZ? (e) What provisions for patient characteristics (e.g. ambulatory, non-ambulatory, need for special medical supplies, need for nursing access, sensitivity to heat, to cold, or to reduced oxygen and/or stuffy conditions in a closed area) were included in your determination or estimate of how many people will ~~fit~~ fit into the area of best PF in each specific (i) hospital (ii) nursing home, in the Harris EPZ?

(f) What is the maximum capacity of each (i) hospital (ii) nursing home within the Harris EPZ? (g) What food supplies would be available in the area of highest protection factor in each (i) hospital (ii) nursing home, within the Harris EPZ, in the event of a long-term sheltering being required? What water supplies would be available in the highest PF area within each such hospital or nursing home? (g) If all the people in the hospital or nursing home can't fit into the highest PF area, what is the PF of the next-highest PF area within such hospital or nursing home? How many people can this next-highest PF area hold? What regard of medical conditions or needs of persons to be sheltered in this area was taken in your determination or estimate of how many people would fit into this area?

57-c-13-2(a) Are there any means of increasing PF for hospital or nursing home areas within the Harris EPZ that you have (i) considered (ii) recommended to the operators or owners of those hospitals or nursing homes? (b) are there any care facilities within the Harris EPZ which care for adults but which you define as being neither a hospital nor a nursing home? Please identify each such facility and state why you believe it is not included within the term "hospital or nursing home."

30-1(a) Has any determination of the quantity of potassium iodide (KI) to be kept at any location (e.g. county health department) for use as a radioprotective drug in an emergency at the Harris plant been made? (b) How, if at all, does each such determination take into account the "shelf life" of the KI? (c) Who made each such determination? (d) How was each such determination made? (e) Please identify each document concerning each such determination, and also all documents containing information used in making each such determination. (f) Please state what information, from what specific source (page reference please) was used in making each such determination. (g) How many persons are to be provided with KI from each location during an emergency? Please state the numbers of emergency workers, the number of persons not mobile (e.g. in nursing homes), and numbers of other persons for whom KI is to be provided from each location where KI is stored & for use in a radiological emergency at Shearon Harris nuclear plant. (h) Are there any reserve supplies of KI available within the Harris EPZ for use in an emergency? If so, who determines where these reserve supplies are and how much is in each location? (i) what dose(s) are provided per person in the KI stored for use in a radiological emergency at Harris? If no KI is now stored for this purpose, what dose(s) are planned to be provided per person?

30-2(a) If quantities of KI for use during a radiological emergency at Harris have not been determined yet, when is such determination to be made? Please explain how each of the matters asked about in 30-1(b) through (i) above will be addressed in such determination. (b) Please state who is making the determination of KI quantities which is going to be made. (c) Please state who will make each such determination and whether each such determination will be included in the Harris emergency response plan. (d) Please identify all points in the Harris emergency response plans where specific quantities of KI or other radioprotective drugs are mentioned.

224-1(a) What analysis of the frequency of weather events, including fog, ice, snow, rain, heavy rain, hail or other adverse weather, have you made for the Harris EP&Z? (b) What information do you have on the frequency (both (i) typical, and (ii) maximum in any recorded data) of (aa) fog (bb) ice (cc) ~~xxx~~ snow (dd) rain (ee) "heavy rain" (ff) hail (gg) rain above 1 inch per hour (hh) rain above 3 inches per hour, in or around the Harris EPZ or in areas believed to be similar in meteorology to the Harris EPZ? Please identify all documents containing such information. (c) Do you have any other ~~x~~ information concerning frequency of adverse weather in the Harris EPZ or in areas of similar meteorology? If so, please identify all such other information and all documents containing it.

224-2(a) Please state what sensitivity analysis for frequency of adverse weather was included in the Harris evacuation time estimates. (b) If you reviewed the Harris evacuation time estimates, what analysis, if any, did you make of the sensitivity of such time estimates to the frequency of adverse weather? Please identify all documents concerning (i) your analysis of the Harris evacuation time estimates (ii) sensitivity of such estimates to adverse weather conditions (iii) sensitivity of evacuation time estimates to the frequency of adverse weather conditions. (c) Please state what further analysis of adverse weather frequency and its effect on Harris evacuation time estimates you plan to make, and when it will be done.

215-1(a) How do recreational populations at (i) Jordan Lake (ii) the Harris plant lake (iii) other recreation sites within the Harris EPZ, vary with (aa) time of day (bb) day of week (cc) season of year? Please provide what data you have on variation of recreational populations in each recreational area in the EPZ, including numbers of overnight users of each. ~~xxxxxxx~~ (b) What data provided in response to (a) is based on actual observation? (c) What basis do you have ~~x~~ for estimates of recreational populations near Harris at various times of the day, week and year, other than observation? How realistic is such basis in your view? Do you know methods to check the realism of such estimates? What are such methods? Are you doing any checking of the realism of such estimates? If so, how? Do you plan to check the realism of estimates of recreational populations in the Harris EPZ before the plant operates? Before the evacuation plan is tested?

(c) What data do you have on vehicle occupancy rates in the Harris EPZ (i) at any time or times (ii) in the early morning, e.g. 6-9 am (iii) in the early evening, e.g. 5-7 pm (iv) between ~~x~~ 11am and 1 pm or in that range (v) after 7pm but before midnight? ~~xx~~ (d) Do any of your data on vehicle occupancy rates in the Harris EPZ vary by day of week or season or date in the year? If so, how does each vary? (e) Please identify all documents concerning actual occupancy rates of vehicles in the Harris EPZ which you (i) possess (ii) know of. (f) Please identify all documents concerning recreational populations in the Harris EPZ or how these ~~x~~ populations vary at varying times. (g) Please identify all documents concerning estimation of (i) vehicle occupancy rates (ii) recreational populations, in the Harris EPZ, or ~~xx~~ basis for such estimates, or data used in such estimates.

215-2(a) Please state if you know what numbers or percentage of the Harris ~~x~~ EPZ population is at home (i) with transportation at home (ii) without transportation at home, at varying hours of the day or year or at any time(s) (please specify times for which you have such information. (b) Please state what investigation or analysis or data collection you (i) have made (ii) will make (iii) are making concerning numbers of persons in the Harris EPZ who are at home at any time or times of the day or year.

215-3(a) Do you know how many vehicles are available to each household within the Harris EPZ (i) as owned or rented vehicles (ii) at any time of the day, e.g. during work or school hours (iii) located at or near the home of each household, at any time or times of the day or year? (b) Please detail all data you have on the numbers of vehicles available to each household in the Harris EPZ at any specific times. (c) Please detail all data, information or documents as to the number of vehicles each household (or a typical household) in the Harris EPZ will use to evacuate in the event of a nuclear accident at Harris.

215-4(a) Have you made any study of how many persons would evacuate from a location other than their home(s) within the EPZ in the event of an accident at the Harris nuclear plant? (b) Have you studied where people would actually evacuate from under daytime or evening conditions from the Harris EPZ at any date or season of the year? (c) Please identify all documents concerning such study or studies.

215-5(a) Have you determined the distance from each (or any of the) non-car-owning household(s) in the Harris EPZ to each's nearest neighbor? (b) Have you determined how many non-car-owning households have telephones over which they might ask neighbors for rides in the event of an accident at Harris? (c) Do you know how many persons would evacuate from car-owning households near the non-car-owning households? (d) Do you know how many of such car-owning neighbors of non-car-owning households would have extra space to carry members of the households without transportation? (e) Why have the evacuation time estimates assumed that one car will be added per family of non-vehicle-owning evacuees in an accident at the Harris plant? (f) Have you made any analysis of the Harris evacuation time estimates' treatment of the number of vehicles evacuating as it is affected by the numbers of vehicles assumed or estimated to be evacuating persons without transportation? (g) Please identify all documents concerning any such analysis. (h) Please state whether persons without transportation includes those who do not have their own transportation readily available, or only those who do not own cars.

215-6(a) Please identify any information underlying the Harris evacuation time estimates, or any other information available to you, which concerns the number of vehicles per evacuating person or per family which would be required to evacuate the Harris EPZ under realistic conditions. (b) Please identify the realistic conditions and the documents containing all such information. (c) Have you compared the number of vehicles used in the evacuation time estimates to the number of vehicles ~~xxx~~ considered to be actually evacuating under realistic conditions for any evacuation condition or scenario? If so, state for which condition or scenario, and please identify the results of your comparison and all documents containing such results or information on which such results were based.

215-7(a) Have you performed, or do you know of, any reanalysis of the computer runs made for the Harris evacuation time estimates, incorporating any less conservative assumptions (or more realistic assumptions) concerning numbers of vehicles to be evacuated, population of recreation-area users to be evacuated, or other matters contained in Contention 215 as initially admitted or as revised? Please identify all documents containing such reanalysis, and state the evacuation times given by each such reanalysis.

215-8(a) Do you know of any data showing the actual traffic loadings on each road segment during evacuation from a Harris accident (i) as computed in any evacuation time estimate computer run (ii) as determined in any other computer run (iii) as determined in any other manner? (b) For each part of (a) above for which your answer is affirmative please identify all documents containing such data, and state what assumptions or data about population and vehicles evacuating, road conditions, or other variables were used in deriving such data or making such computer run.

215-9(a) Do you have any information as to the amount of time required for evacuating the Harris EPZ under conditions less conservative than those specified in the Harris evacuation time estimates? If so, what information do you possess or know of?

215-9 continued

(b) Please identify all assumptions that were made in deriving the time required (or effect on time required) to evacuate the Harris EPZ, for any information identified in response to (a) above. (c) Please identify all documents containing information about less conservative evacuation time estimates for the Harris EPZ you are aware of. (d) Who made estimates of Harris EPZ evacuation time, other than CP&L's contractor?

PRODUCTION OF DOCUMENTS

Wells Eddleman hereby requests the persons these interrogatories are addressed to, whether FEMA/NRC Staff, or CP&L and NC State and County government emergency response personnel or planners, to make available for inspection and copying the original or best copy of each document identified in response to any of the above interrogatories.

29 June 1984

Wells Eddleman
Wells Eddleman