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UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

29 June 1984

'84 JUL -2 P3:47

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

OFFICE OF THE
 SECRETARY
 BRANCH

In the Matter of

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

Docket 50-400 OL

ASLBP No. 82-468-01
 OL

Wells Eddleman's Response to Board Order Requiring
 Additional Specification of Contention #215

On pp 24, 265, and 30-31 of the Board's June 14, 1984 Order, items which may be litigated under Contention 215 (conservatisms that may render evacuation time estimates unrealistic) are discussed. The Order requires a listing of conservatisms in such estimates, which I think should be litigated, to be filed today. Here goes:

1. The assumption of evacuation from home. For certain times of day, this assumption is unrealistic for many persons who will not be at home, but be at work, school, shopping, doctor's office, etc. This could also result in double counting of evacuees for persons who both live and work within the EPZ (6/14/84 Order at 31).
2. The assumption of one vehicle per household (Evac. Time Estimates, e.g. at 3-2/3-3). Households with 2 vehicles may evacuate in both vehicles rather than linking up.
3. The apparent assumption that those households without vehicles will automatically evacuate with neighbors (or can) at the rate of one vehicle per household.
4. The assumption in all of the evacuation scenarios that (see Estimates at 1-3, 1-4) at least one person is at home at all residences. The number of persons at school, the lakes, etc. varies according to more realistic criteria and these should too.

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O.L.

CERTIFICATE OF SERVICE

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I hereby certify that copies of WE Response on Contention 215,
~~WE Response to Summary Disposition on~~
Eddleman 11, and of separate Interrogatories to NRC Staff/FEMA
~~and to Applicants/NC State/ No County officials re emergency plans~~

HAVE been served this 29 day of June 1984, by deposit in
the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with
an asterisk, for whom service was accomplished by _____

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