

427

October 8, 1984

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'84 OCT 11 AM 1:30

In the Matter of)
 Carolina Power & Light Company)
 And North Carolina Eastern Municipal)
 Power Agency)
 (Shearon Harris Nuclear Power Plant))

Docket No. 50-400 OL

OFFICE OF SECRETARY
DOCKETING & SERVICES

CONSERVATION COUNCIL'S INTERROGATORIES AND
 REQUEST FOR PRODUCTION OF DOCUMENTS TO
APPLICANTS ON EMERGENCY PLANNING CONTENTIONS (FIRST SET)

Per the Board's Memorandum and Order, dated August 3, 1984, the last day for filing discovery requests on emergency planning contentions is October 8, 1984. The last day to respond to these requests is to be October 31, 1984, with the deadline for motions for summary disposition to be December 21, 1984. The Conservation Council is the lead intervenor on EPJ 3.

INTERROGATORIES ON EPJ 3 (VOLUNTEER WORKER CONFLICT)

3-1 For each of the responses below, state who made the response, their position, and business address.

3-2 For each of the responses below, supply all basis for the response, including all material they relied on in responding (cite each fully).

3-3 What witnesses do Applicants expect to present in the hearing on this contention? For each, include name, address, position, and summary of their testimony.

3-4 What is the total number of volunteer workers--including volunteer police, rescue, fire departments, and teachers--expected to be utilized during an alert?

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3-5 For each of the workers enumerated in the response to Interrogatory 3-4 above, please answer the following:

- a) what is his/her current position? (ex. volunteer fireman, etc.)
- b) what role is he/she expected to play during an alert?
- c) how will he/she be alerted as to the emergency?
- d) how long will it take him/her to arrive at his/her position during the alert after he/she is notified?
- e) how long is he/she expected to be at that position?
- f) what duties will he/she be expected to fill during the alert?
- g) in what manner will he/she be permitted to communicate with his/her family while at his/her position?
- h) is he/she expected to relieve any other workers (paid or volunteer)?
- i) how will he/she be allowed any time off for food or necessities while on duty?

3-6 What training will each of the workers enumerated in the response to Interrogatory 3-4 above receive in the following areas:

- a) the duties he/she is expected to perform during an alert?
- b) the hazards of radiation?
- c) the proper use of monitoring devices?
- d) the proper use of protective gear?
- e) how to communicate to others under his/her supervision what is happening during the alert?

3-7 For any training described in the response to Interrogatory 3-6 above, please answer the following:

- a) who will conduct the training?
- b) how often will the training be conducted?
- c) will any of this training be certified?

d) how will the persons doing the training ascertain whether all of the
both
volunteer workers needing training have been/trained and trained properly?

3-8 Please provide a brief summary of the training described in the response to Interrogatory 3-6 above.

3-9 Have the Applicants contacted all organizations and agencies which are expected to supply volunteers during an alert?

3-10 Which agencies and organizations have been contacted?

3-11 For each agency listed above in the response to Interrogatory 3-10, please answer the following:

a) who made the contact?

b) which personnel of the agency or organization was contacted?

c) when were these contacts made?

d) what was discussed during each contact?

e) have memoranda of understanding (MOUs) or any other such documents been signed with any of the contacted agencies?

3-12 Have Applicants or any person under their direction studied the potential
in volunteer workers
role conflicts/which might occur around the Shearon Harris site during an emergency?

3-13 Are Applicants aware of any studies made of role conflict around any other nuclear plant during an emergency?

3-14 Are Applicants aware of any studies made of role conflict during any other emergencies, i.e. not related to nuclear plant evacuation?

3-15 Have Applicants or any person under their direction studied the locations of the families of volunteer workers enumerated to the response to Interrogatory 3-4 above?

3-16 If the response to Interrogatories 3-12 through 3-15 above is affirmative, please provide a copy of that study or studies.

3-17 Do the contracts of teachers who are expected to respond to an alert contain explicit provisions relating to such alerts?

3-18 If the response to Interrogatory 3-17 above is affirmative, what provisions are in the teacher contracts?

3-19 How many students will each teacher be expected to supervise?

3-20 How many teachers and students will be on each bus?

3-21 How many teachers and students will be in each shelter?

3-22 How many of the volunteer workers expected to respond to an alert will in fact respond? Please explain the response.

3-23 What steps have been taken to identify those volunteer workers which might not respond to an alert?

3-24 For which organizations (volunteer and non-volunteer), have the Applicants paid attention to the composition which would avoid conflict between organizational and family responsibilities?

3-25 For each organization identified in the response to Interrogatory 3-24, what was done?

REQUEST FOR PRODUCTION OF DOCUMENTS

For each document referred to above, will Applicants make it available to Counsel for the Conservation Council at a mutually agreed upon location?

Respectfully submitted,



John Runkle
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This is the 8th day of October, 1984.

CERTIFICATE OF SERVICE

I hereby certify that copies of the Conservation Council's Interrogatories and Request for Production of Documents to Applicants on Emergency Planning Contentions (First Set) were served upon the following persons by deposit in the U.S. Mail, postage prepaid, or by hand delivery to the following:

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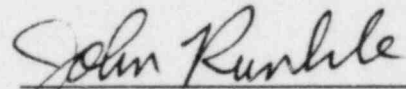
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This is the 8th day of October,
1984.