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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '84 OCT 16 AM 11:07

In the Matter of)
)
CAROLINA POWER AND LIGHT COMPANY AND)
NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)
)
(Shearon Harris Nuclear Power Plant,)
Units 1 and 2)

OFFICE OF SECRETARY
DOCKETING & SERVICE
SPRINGFIELD, VA

Docket Nos. 50-400 OL
50-401 OL

NRC STAFF AND FEMA RESPONSES TO INTERROGATORIES DATED
SEPTEMBER 19, 1984 PROPOUNDED BY RICHARD WILSON
ON CONTENTIONS EPJ-5 AND WILSON 11, 12b2 and 12b3

The NRC Staff provides responses to Interrogatories 1a and 1b and Thomas Urbanik II responds to Interrogatory 5 on behalf of the NRC Staff. FEMA's responses to the interrogatories are attached hereto.

INTERROGATORY

1. a) Did the Staff and FEMA support or oppose the admission of proposed Wilson Contentions 7a, 7d, 7f, 11, 12b2, 12b3?
- b) Please state the basis for your positions on each of these contentions and provide all references you used to support your positions.

ANSWER

1.a. The NRC Staff response to proposed Wilson contentions can be found in its April 27, 1984 filing, "NRC Staff Response to Emergency Planning Contentions of Intervenors Richard Wilson and Wells Eddleman" at pages 14, 15, 16, 20 and 21.

1.b. See answer to Interrogatory 1.a.

DS07

I hereby affirm subject to the penalty of perjury that I answered
interrogatories 1a and 1b on behalf of the NRC Staff and the answers
are true and correct to the best of my knowledge and belief.

Elaine I. Chan
Elaine I. Chan

INTERROGATORY

5. a) Is the "vehicle-owning population" as determined by U.S. Census data a reliable estimate of the number of households within the EPZ during a workday that would not have transportation?

b) If not, how should the estimate be done?

c) If so, why shouldn't vehicles driven to work outside the EPZ be subtracted from the total number available for evacuation?

ANSWER

The Census data does not indicate the number of households with cars that have individuals at home without a vehicle. Those individuals at home without a car for any reason would be handled in the same manner as anyone without a vehicle. The vehicle may return to the EPZ to pick up the person without a car, so it can not be excluded from the vehicle count.

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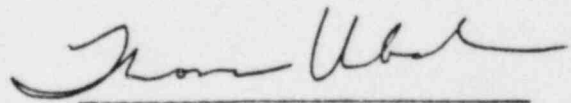
(Shearon Harris Nuclear Power Plant,)
Units 1 and 2))

Docket No. 50-400 OL
50-501 OL

AFFIDAVIT OF THOMAS URBANIK II

I, Thomas Urbanik II, hereby affirm as follows, subject to the penalty of perjury, that the answers are true and correct to my best knowledge and belief.

1. I am an Associate Research Engineer associated with the Texas Transportation Institute of the Texas A&M University System, College Station, Texas.
2. I hereby certify the answers given to Richard Wilson Interrogatory 5 to the NRC Staff and FEMA with regard to EPJ-5 and Wilson 11, 1262 and 1263 are true to the best of my knowledge.



Thomas Urbanik II

FEMA RESPONSES TO: RICHARD WILSON
INTERROGATORIES TO THE NRC STAFF AND FEMA
WITH REGARD TO EPJ-5 AND WILSON 11, 12b2, 12b3

INTERROGATORY

1. a) Did the Staff and FEMA support or oppose the admission of proposed Wilson Contentions 7a, 7d, 7f, 11, 12b2, 12b3?

b) Please state the basis for your positions on each of these contentions and provide all references you used to support your positions.

ANSWER

1.a. FEMA Staff neither supported nor opposed the admission of proposed Wilson Contentions since FEMA is not a party to the proceedings.
7a, 7d, 7f, 11, 12b2, 12b3.

1.b. N.A.

INTERROGATORY

2 a) Please state your positions on the admitted contentions Wilson 11, 12b2, 12b3, and EPJ-5.

b) If different from answers to 1 above, please state the basis and relevant references.

c) Please list the documents, including NRC decisions and cases, that you would present as exhibits at hearing in support of your positions.

ANSWER

2.a. Wilson 11: FEMA guidelines do not require criteria for entry into the 10-mile EPZ to be defined or listed in the plan. These criteria normally are contained in the responsible SOP's.

12b2: FEMA Staff has no basis for questioning the ETE Study data or assumptions.

12b3: FEMA Staff has no basis for questioning the ETE Study data or assumptions.

EPJ-5:

FEMA guidelines do not require listings of non-ambulatory people in the plan. FEMA does encourage state and local governments to compile such listings, and we understand the state and local governments involved with the Harris plant emergency planning are currently making these compilations.

FEMA Staff will be more knowledgeable about the number of vehicles available for transportation of non-ambulatory people after the proposed exercise is conducted.

2.b. N.A.

2.c. Unknown at this time.

INTERROGATORY

3. With respect to the FEMA Regional Assistance Committee's informal evaluation comments on the Off-Site Radiological Emergency Response Plans for the SHNPP done May 1984,

a) Please explain in detail the inconsistencies and unreasonableness referred to in the comment on NUREG item E6 (the relevance of this question to this contention is that if more emergency [sic] vehicles and time are required for notification, then fewer vehicles and less time will be available for evacuation and traffic control).

b) Please explain in detail what you believe to be the most accurate way for counties to identify the mobility-impaired to which you referred in NUREG item J10d. Please include your definition of "mobility-impaired", and the reasons that would cause a resident to be considered "mobility impaired"? Please include as examples any procedures adopted by other counties which achieve this goal in what you believe to be an optimal [sic] fashion.

ANSWER

3.a. It seemed to the RAC that excessive speeds would have to be attained by the Sheriff's Department's vehicles in between the quarter-mile stops and that it would be unreasonable to expect these speeds to be attained between each and every stop.

3.b. FEMA Guidance Memorandum Number 24, "Radiological Emergency Preparedness for Handicapped Persons" expands on the criteria of NUREG-0654 and includes the following information concerning the identification of the mobility-impaired:

1. Systematic identification of the mobility-impaired located in the EPZ is the first major step in radiological emergency preparedness for the handicapped.
2. All such information should be kept confidential in order not to compromise the privacy and security of the handicapped.
3. Data compiled should include names, locations, types of handicaps, and types of assistance required.
4. Sources of help in compiling the data include: Responses from mailings to EPZ residents; Welfare or social agencies which have lists of recipients of their services; religious, fraternal, sororal, and service organizations; voluntary and non-profit organizations; National organizations for groups of handicapped individuals; Fire Service organizations; families and friends of handicapped persons.

Mobility-impaired, or "the handicapped," as defined in Guidance Memorandum Number 24, includes those people with sensory impairments, movement impairments, and mental/emotional impairments.

An example of procedures adopted by another government which could achieve this goal in what we believe to be an optimal fashion in the state of Florida. Florida's publication "Radiological Emergency Preparedness for Handicapped Persons" has been prepared under the guidelines of FEMA's G.M. Number 24, mentioned above.

INTERROGATORY

4. With respect to entrance into the EPZ during the evacuation,
 - a) What groups are usually allowed to enter?
 - b. What groups do you believe should be allowed to enter?
 - c) Do you think that pre-arranged criteria should be established for entrance or that the personnel at each traffic control point should make the decisions?

ANSWER

- 4.a. Groups or individuals allowed to enter are not stated in the Harris plan.
- 4.b. Much depends on the precise situation existing at the time a decision must be made. In my opinion, definite criteria cannot be ascertained before conditions are known.
- 4.c. Some criteria should be pre-determined and written in SOP's; other criteria should be developed on an ad-hoc basis.

INTERROGATORY

6. Please identify each person who helped answer these interrogatories.

ANSWER

Thomas J. Hawkins, John C. Heard, FEMA, Region IV, Atlanta, Georgia.

AFFIDAVIT

The below subscribed person hereby affirms, subject to penalty of perjury, that he has answered the Interrogatories of Intervenor Richard Wilson as identified below. The answers are true and correct to the best of his knowledge and belief.


Thomas I. Hawkins 10/4/84

Dated at
Atlanta, Georgia
this 4th day of October, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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POWER AGENCY) 50-401 OL
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF AND FEMA RESPONSES TO INTERROGATORIES DATED SEPTEMBER 19, 1984 PROPOUNDED BY RICHARD WILSON ON CONTENTIONS EPJ-5 AND WILSON 11, 12b2 and 12b3" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system (*), this 9th day of October 1984.

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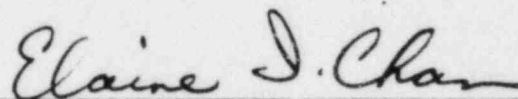
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