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RELATED CORRESPONDENCE

August 9, 1984

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' EMERGENCY PLANNING INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO INTERVENOR CHANGE (FIRST SET)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Order (Ruling on Various Procedural Questions and Eddleman Contention 15AA)" of May 10, 1984, Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that Intervenor CHANGE answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below. Answers or objections to these interrogatories and responses or objections to the request for production of documents must be served no later than August 30, 1984.

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These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should CHANGE or any individual acting on its behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and CHANGE must produce immediately any additional documents it, or any individual acting on its behalf, obtains which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely.

Definitions. As used hereinafter, the following definitions shall apply:

"Applicants" is intended to encompass Carolina Power & Light Company, North Carolina Eastern Municipal Power Agency and their contractors for the Harris Plant.

"Offsite emergency plans" refers to the "North Carolina Emergency Response Plan In Support of The Shearon Harris Nuclear Power Plant," Parts 1-5.

"Document(s)" means all writings and records of every type in the possession, control or custody of CHANGE or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of CHANGE; a document shall be deemed to be within the "control" of CHANGE or any individual acting on its behalf if they have ownership, possession or custody of the document or copy thereof, or have the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof.

General Interrogatories

1(a). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged, and upon which you relied in formulating allegations, in each of your contentions which are the subject of this set of interrogatories.

(b). Identify those facts concerning which each such person has first-hand knowledge.

(c). State the specific allegation in each contention which you contend such facts support.

2(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which you relied in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

3(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness or a witness relating to any contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) regarding which each such person is expected to testify.

(c). State the subject matter as to which each such person is expected to testify.

4(a). Identify all documents in your possession, custody or control, including all relevant page citations, pertaining to the subject matter of, and upon which you relied in formulating allegations in each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each such document relates.

(c). State the specific allegation in each contention which you contend each document supports.

5(a). Identify all documents in your possession, custody or control, including all relevant page citations, upon which you relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

6(a). Identify any other source of information, not previously identified in response to Interrogatory 2 or 5, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

7(a). Identify all documents which you intend to offer as exhibits during this proceeding to support the contentions which are the subject of this set of interrogatories or which you intend to use during cross-examination of witnesses presented by Applicants and/or the NRC Staff and/or the Federal Emergency Management Agency ("FEMA") Staff on each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each document relates and the particular page citations applicable to each contention.

Interrogatories on CHANGE 17

17-1(a). Identify all NRC and FEMA rules, regulations, regulatory guides, publications, and endorsed national standards which you believe require provision for special notification (i.e., by means other than sirens) of the hearing-impaired population within the plume EPZ in the event of an emergency at a commercial nuclear power plant.

(b). Specify each item identified in answer to (a) above with which you believe the offsite plans will fail to comply. As to each such item, describe in detail the bases for your conclusion, including the reasons for identifying the item.

17-2(a). Identify, to the best of your knowledge, the approximate number of "hearing-impaired" persons in the portion of Wake County within the Harris plume EPZ.

(b). Identify, to the best of your knowledge, the approximate number of "hearing-impaired" persons in the portion of Harnett County within the Harris plume EPZ.

(c). Identify, to the best of your knowledge, the approximate number of "hearing-impaired" persons in the portion of Lee County within the Harris plume EPZ.

(d). Identify, to the best of your knowledge, the approximate number of "hearing-impaired" persons in the portion of Chatham County within the Harris plume EPZ.

(e). As to each number identified in answer to (a) through (d) above, specify the bases for your answer.

17-3. Identify any existing means of notifying "hearing-impaired" persons in the Counties of Wake, Harnett, Lee and Chatham of non-nuclear emergencies.

17.4(a). State whether you contend that the provisions in the Harris emergency public information brochure (and the special needs postcard enclosed in the brochure) for the identification and special notification of the hearing-impaired are inadequate.

(b). If the answer to (a) above is other than an unqualified negative, explain in detail why the provisions identified in (a) above are inadequate.

(c). If the answer to (a) above is other than an unqualified negative, state the bases for your belief that the provisions identified in (a) above are inadequate.

17-5. Describe any and all changes you believe must be made in offsite emergency plans to provide adequate notification to the hearing-impaired population within the plume EPZ in the event of an emergency at the Harris plant. Describe in detail the bases for your belief that such changes must be made.

17-6. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory 17-5 above), to

provide adequate notification to the hearing-impaired population within the plume EPZ in the event of an emergency at the Harris plant. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on CHANGE 25

25-1. Identify all NRC and FEMA rules, regulations, regulatory guides, publications, and endorsed national standards which you believe require special provisions for the transportation of "families with one private vehicle, which private vehicle is used to drive the principal wage-earner to work, leaving dependents at home."

25-2(a). Identify the approximate number of families within the plume EPZ "with one private vehicle, which private vehicle is used to drive the principal wage-earner to work, leaving dependents at home."

(b). Identify the approximate number of individuals (excluding the "principal wage-earners") who are members of the families identified in the answer to (a) above.

(c). Describe in detail the bases for your answers to (a) and (b) above.

25-3(a). Identify the approximate number of "principal wage-earners" within the plume EPZ who drive their family's only vehicle to their place of employment whom you assert (i)

would return home to pick up their families before evacuating,
(ii) would evacuate directly from their place of employment.

(b). Describe in detail the bases for your answer to
(a) above.

25-4. Identify specifically the geographic boundaries of
all "low income areas" to which CHANGE 25 refers.

25-5(a). Identify the percentage of the families to which
CHANGE 25 refers which you believe would be able to obtain
rides with neighbors, family and friends in the event of an
evacuation due to an emergency at the Harris plant.

(b). Describe in detail the bases for your answer to
(a) above.

25-6. Describe any and all changes you believe must be
made in offsite emergency plans to "address the problem of fam-
ilies with one private vehicle, which private vehicle is used
to drive the principal wage-earner to work, leaving dependents
at home." Describe in detail the bases for your belief that
such changes must be made.

25-7. Describe any and all actions you believe must be
taken, or changes you believe must be made (other than those
identified in the answer to 25-6 above) to "address the problem
of families with one private vehicle, which private vehicle is
used to drive the principal wage-earner to work, leaving depen-
dents at home." Describe in detail the bases for your belief
that such actions must be taken and such changes made.

Interrogatories on CHANGE 29

29-1(a). State whether you are aware that the Harris emergency public information brochure for distribution to the public within the plume EPZ advises parents that, in the event of an evacuation, their children who are in school within the plume EPZ would be evacuated directly from school to specified locations outside the plume EPZ, and directs parents not to drive to the schools to pick up their children.

(b). State whether you are aware that the EBS announcements for broadcast in the event of an evacuation will advise parents that their children who are in school within the plume EPZ are being evacuated directly from school to specified locations outside the plume EPZ, and will direct parents not to drive to the schools to pick up their children.

(c). Identify and explain in detail all bases for your assumption that parents would disregard the instructions of the public information brochure and the EBS announcements not to go to the schools to pick up their children.

29-2. Identify the approximate percentage of parents whom you believe would go to the schools to pick up their children in the event of an evacuation, despite the instructions to the contrary in the public information brochure and the EBS announcements.

29-3(a). Identify and explain in detail all ways in which evacuation of the plume EPZ might be hindered if the number of parents you believe may go to school to pick up their children in an evacuation actually do go to the schools to pick up their children.

(b). Describe in detail the bases for your answer to (a) above.

29-4. Describe any and all changes you believe must be made in offsite emergency plans to address your concern expressed in CHANGE 29. Describe in detail the bases for your belief that such changes must be made.

29-5. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory 29-4 above) to address your concern expressed in CHANGE 29. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on CHANGE 30

30-1(a). List individually each function which rescue squads may be relied upon to perform in an emergency at the Harris plant, but which you believe may not be adequately performed in an emergency due to alleged lack of "sufficient authority" of squad leaders "over the members of their squads."

(b). With respect to each function listed in your answer to (a) above, indicate (i) the approximate number of rescue squad workers who actually would make themselves available to perform that function in an emergency and (ii) the number of additional personnel you contend are required to successfully implement that function.

30-2(a). Identify specifically all rescue squads whose leaders you believe "occupy merely titular posts and do not possess sufficient authority over the members of their squads to assure continuing participation in emergency activities in the event of a radiological emergency."

(b). Identify the leaders of the rescue squads listed in the answer to (a) above.

30-3(a). State whether you contend rescue squads respond to the authority of their leaders in other types of emergencies and disasters, but might not do so "in the event of a radiological emergency."

(b). If the answer to (a) above is affirmative, identify and explain in detail all bases for your answer.

(c). If the answer to (a) above is other than affirmative, explain in detail how your answer is consistent with the allegations set forth in CHANGE 30.

30-4. Identify and describe in detail all past situations (if any) illustrating the alleged lack of "sufficient

authority" of rescue squad leaders "over the members of their squads."

30-5. Identify and describe in detail all measures (including training and equipment) which you understand are being taken or will be taken to assure that rescue squad members perform their assigned functions in the event of a radiological emergency.

30-6(a). State whether you contend that any of the measures identified in answer to Interrogatory 30-5 above are inadequate to assure that rescue squad members perform their assigned functions in the event of a radiological emergency.

(b). If the answer to (a) above is affirmative, specify each of the measures identified in answer to Interrogatory 30-5 above which you believe to be inadequate to assure that rescue squad members perform their assigned functions in a radiological emergency. Describe in detail the bases for your belief that the specified measures are inadequate.

30-7. Describe any and all changes you believe must be made in offsite emergency plans to assure that rescue squad members perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such changes must be made.

30-8. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those

identified in the answer to Interrogatory 30-7 above) to assure that rescue squad members perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on CHANGE 31

31-1(a). State whether you are aware that the Harris emergency public information brochure for distribution to the public within the plume EPZ instructs members of the public not to use their telephones in the event of a radiological emergency (unless they need special assistance), so that all telephone lines can be used for official emergency business.

(b). State whether you are aware that the EBS announcements for broadcast in the event of a radiological emergency will direct members of the public not to use their telephones in the event of a radiological emergency (unless they need special assistance), so that all telephone lines can be used for official emergency business.

(c). State whether you believe that, in a radiological emergency, a significant percentage of the public would disregard the instructions of the public information brochure and the EBS announcements not to use their telephones in the event of a radiological emergency (unless they need special assistance).

(d). If the answer to (c) above is affirmative, identify and explain in detail all bases for your answer.

(e). If the answer to (c) above is affirmative, identify the percentage of the general public whom you believe would use their telephones, despite the instructions to the contrary of the public information brochure and the EBS announcements.

(f). If the answer to (c) above is other than affirmative, explain in detail how your answer is consistent with the allegations set forth in CHANGE 31.

31-2(a). Describe in detail all types of calls which you assert would be made "during the early stages of an emergency," including (but not limited to) -- with respect to each type of call -- the general type of caller, the general type of recipient, the purpose of the call, the probable duration of the call and whether the call would be long distance.

(b). Explain in detail how the calls identified in the answer to (a) above "will tend to delay evacuation of the general public in the EPZ." Describe in detail the bases for your conclusions.

31-3. Identify all bases for your allegation that "[t]he recent tornado disaster in North Carolina showed an increase of approximately 25% in telephone traffic."

31-4. Identify all bases for your suggestion that "a more dramatic increase" than that alleged to have occurred in the recent tornado would occur in the event of a radiological emergency at Harris.

31-5. Identify all bases for your allegation that "a more dramatic increase in the shorter time immediately following a sudden emergency would result in serious communication problems."

31-6. Describe in detail the "serious communication problems" to which CHANGE 31 refers.

31-7. Specify in detail the load capacities for all telephone systems servicing the Harris plume EPZ.

31-8(a). Identify all telephone systems (if any) which you believe shut down temporarily due solely to the alleged increase in telephone traffic at the time of "[t]he recent tornado disaster in North Carolina."

(b). Specify the bases for your answer to (a) above.

(c). With respect to each telephone system identified in answer to (a) above, state the duration of the shutdown, and specify the bases for your answer.

(d). With respect to each telephone system identified in answer to (a) above, identify the time at which the shutdown occurred.

31-9. Describe any and all changes you believe must be made in offsite emergency plans to address your concern expressed in CHANGE 31. Describe in detail the bases for your belief that such changes must be made.

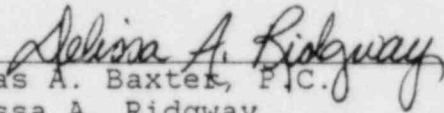
31-10. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory 31-9 above) to address your concern expressed in CHANGE 31. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Request For Production of Documents

Applicants request that Intervenor CHANGE respond in writing to this request for production of documents and produce the original or best copy of each of the documents identified or

described in the answers to each of the above interrogatories,
at a place mutually convenient to the parties.

Respectfully submitted,


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Dated: August 9, 1984

RELATED CORRESPONDENCE

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OFFICE OF SECRETARY
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BRANCH

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	
AND NORTH CAROLINA EASTERN)	Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant))	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Emergency Planning Interrogatories and Request for Production of Documents To Intervenor CHANGE (First Set)" were served by deposit in the United States Mail, first class, postage prepaid, this 9th day of August, 1984, to all those on the attached Service List.



Delissa A. Ridgway

DATED: August 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY) Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN) 50-401 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant, Units 1 and 2))

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