

PROCEEDINGS

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 WELLS EDDLEMAN (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 and "Further Rulings on Admissibility of Offsite Emergency Planning Contentions Submitted by Intervenor Eddleman" of June 14, 1984, Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that Intervenor Wells Eddleman 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

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request for production of documents must be served no later than August 30, 1984.

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 Mr. Eddleman or any individual acting on his behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and Mr. Eddleman must produce immediately any additional documents he, or any individual acting on his 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.

"Onsite emergency plan" refers to the "Carolina Power & Light Company, Shearon Harris Nuclear Power Plant Unit 1, Plant Operating Manual, Volume 1, Part 2."

"Document(s)" means all writings and records of every type in the possession, control or custody of Mr. Eddleman or any individual acting on his 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 Mr. Eddleman; a document shall be deemed to be within the "control" of Mr. Eddleman or any individual acting on his 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 Eddleman 30

30-1(a). Identify specifically all groups of persons in the Harris plume EPZ whose "evacuation may be infeasible or very difficult" for whom you assert Potassium Iodide (KI) should be available.

(b). To the best of your knowledge, state the approximate number of persons in each of the groups identified in the answer to (a) above.

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

(d). State the total number of doses of KI that you believe should be available for all persons in the Harris plume EPZ whose "evacuation may be infeasible or very difficult."

(e). Specify the bases for your answer to (d) above.

30-2. Describe any and all changes you believe must be made in offsite emergency plans to meet your concern expressed in Eddleman 30. Describe in detail the bases for your belief that such changes must be made.

30-3. Describe any and all actions believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory 30-2 above) to meet your concern expressed in Eddleman 30. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 57-C-3

57-C-3-1(a). Identify all NRC and FEMA rules, regulations, regulatory guides, and publications which you believe pertain to Alert and Notification Systems for emergencies at commercial nuclear power plants.

(b). State whether you contend that the authorities identified in answer to (a) above specify requirements for night notification which differ from those for day notification.

(c). If the answer to (b) above is affirmative, identify which sections of each identified authority are asserted to specify different requirements for night notification than for day notification.

57-C-3-2(a). State whether you believe the Alert and Notification System described in the offsite emergency plans will fail to comply with the authorities identified in the answer to Interrogatory 57-C-3-1(a) above.

(b). If the answer to (a) above is affirmative, specify all sections of all authorities identified in answer to Interrogatory 57-C-3-1(a) with which you believe the Alert and Notification System described in the offsite emergency plans will fail to comply when that system is activated "at night, e.g. in the hours between 1 a.m. and 6 a.m."

(c). As to each section of each authority identified in answer to (b) above, described in detail the bases for your conclusion, including the reasons for identifying the requirement.

(d). If the answer to (a) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 57-C-3.

57-C-3-3. Explain in detail the bases for your belief that the Alert and Notification System described in the offsite emergency plans would not provide "notification at night, e.g. in the hours between 1 a.m. and 6 a.m. when most people living near the plant would normally be asleep."

57-C-3-4. Explain in detail the bases for your belief that the Alert and Notification System described in the offsite emergency plans would not assure that persons "would be timely awakened to take sheltering action."

57-C-3-5(a). State whether you believe that it is more likely that persons indoors will be alerted by the Alert and

Notification System described in the offsite plans if the windows are open than if the windows are closed.

(b). If the answer to (a) above is other than affirmative, explain in detail the bases for your answer.

57-C-3-6(a). State whether you believe that more persons in the plume EPZ will have their windows open on a summer night than on a summer day.

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

57-C-3-7(a). State whether you believe that more persons in the plume EPZ will have air conditioners on, on a summer night than on a summer day.

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

57-C-3-8(a). State whether you contend that special provisions are necessary for night notification of persons in boats or houseboats or other craft on Jordan Lake or Harris Reservoir.

(b). If the answer to (a) above is affirmative, describe in detail the special provisions you believe are necessary.

(c). If the answer to (a) above is affirmative, specify the bases for your belief that such special provisions are necessary.

57-C-3-9(a). Describe in detail the "automatic phone-dialing equipment" to which Eddleman 57-C-3 refers.

(b). Identify the entity or entities from which the equipment identified in answer to (a) above is available. Note specifically which information about equipment availability has been obtained from Jesse Riley.

(c). Identify all utility companies and governmental entities (if any) who have obtained the type of equipment described in the answer to (a) above, for use in public alerting and notification in the event of an emergency at a commercial nuclear power plant.

57-C-3-10. Describe any and all changes you believe must be made in the offsite emergency plans to meet your concerns as expressed in Eddleman 57-C-3. Describe in detail the bases for your belief that such changes must be made.

57-C-3-11. 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 57-C-3-10 above) to meet your concern as expressed in Eddleman 57-C-3. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 57-C-10

57-C-10-1(a). Identify all NRC and FEMA rules, regulations, regulatory guides, publications, and endorsed national standards which you believe pertain to sheltering and its effectiveness in a radiological emergency.

(b). State whether you believe the offsite emergency plans fail to comply with the authorities identified in the answer to (a) above.

(c). If the answer to (b) above is affirmative, specify all sections of all authorities identified in answer to (a) above with which you believe the offsite emergency plans fail to comply.

(d). If the answer to (b) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 57-C-10.

57-C-10-2(a). Specify and individually describe each and every type of "useful analysis or information on sheltering effectiveness" which you believe should be included in the offsite emergency plans, but which is not presently included in those plans.

(b). As to each type of "analysis or information identified in answer to (a) above, specify the bases for your conclusion that it must be included in the offsite emergency plans.

57-C-10-3(a). State whether you contend that the information presently included in the offsite emergency plans illustrates a lack of "knowledge of sheltering effectiveness" on the part of offsite emergency response officials charged with protective action decisionmaking.

(b). If the answer to (a) above is affirmative, specify the bases for your conclusion.

(c). If the answer to (a) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 57-C-10.

57-C-10-4(a). State whether you contend that State and local emergency response officials must document the entirety of their knowledge of "sheltering effectiveness" in the offsite emergency plans.

(b). If the answer to (a) above is affirmative, specify the bases for your conclusion, and explain why all such knowledge must be included in the offsite emergency plans themselves rather than in other reference documents available for reference by emergency response authorities, and specifically how such information would be used for protective action decisionmaking.

(c). If the answer to (a) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 57-C-10.

57-C-10-5. Identify all bases for your allegation that offsite emergency response authorities charged with protective action decisionmaking lack "knowledge of sheltering effectiveness."

57-C-10-6. Describe any and all changes you believe must be made in offsite emergency plans (other than those identified in answer to Interrogatory 57-C-10-2(a) above) to meet your concerns expressed in Eddleman 57-C-10. Describe in detail the bases for your belief that such changes must be made.

57-C-10-7. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answers to Interrogatories 57-C-10-2(a) and 57-C-10-6 above) to meet your concerns expressed in Eddleman 57-C-10. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 57-C-13

57-C-13-1. Specify and explain in detail the bases for your assertion that "[t]he highest PF areas [in hospitals and nursing homes] need to be determined in advance to comply with 10 C.F.R. 50.47(a)(1)'s requirement for assurance of appropriate protective action."

57-C-13-2(a). Specify all "criteria" you believe to be appropriate for "identifying" "the highest PF in hospitals and nursing homes."

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

57-C-13-3(a). Identify the areas of hospitals and nursing homes generally that you believe would have "the highest PF."

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

57-C-13-4(a). State whether you contend that State and local emergency response officials must document their knowledge of "the highest PF in hospitals and nursing homes" in the offsite emergency plans.

(b). If the answer to (a) above is affirmative, specify the bases for your conclusion, and explain in detail why all such knowledge must be included in the plans themselves.

(c). If the answer to (a) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 57-C-13.

57-C-13-5. Describe any and all changes you believe must be made in offsite emergency plans to meet your concerns expressed in Eddleman 57-C-13. Describe in detail the bases for your belief that such changes must be made.

57-C-13-6. 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 57-C-13-5 above) to

meet your concerns expressed in Eddleman 57-C-13. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 144

144-1(a). Identify specifically (by reference to Major Functional Area, Major Tasks and Position Title or Expertise) each and every case in which "CP&L's emergency personnel levels" allegedly do not meet the provisions of Table 2 of NUREG-0737, Supplement 1 for "On-Shift" personnel.

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

144-2(a). Identify specifically (by reference to Major Functional Area, Major Tasks and Position Title or Expertise) each and every case in which "CP&L's emergency personnel levels" allegedly do not meet the provisions of Table 2 of NUREG-0737, Supplement 1 for "Capability for Additions" within 30 minutes.

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

144-3(a). Identify specifically (by reference to Major Functional Area, Major Tasks and Position Title or Expertise) each and every case in which "CP&L's emergency personnel levels" allegedly do not meet the provisions of Table 2 of NUREG-0737, Supplement 1 for "Capability for Additions" within 60 minutes.

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

144-4. Describe any and all changes you believe must be made in the onsite emergency plan to meet the concerns expressed in Eddleman 144. Describe in detail the bases for your belief that such changes must be made.

144-5. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in answer to Interrogatory 144-4 above) to meet the concerns expressed in Eddleman 144. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 154

154-1(a). State whether you contend that Annex B of the onsite emergency plan is the "procedure" for dose projection to be followed by "plant operators" in an emergency.

(b). If the answer to (a) above is affirmative, state the bases for your answer.

(c). If the answer to (a) above is other than affirmative, explain in detail how your response is consistent with the allegations set forth in Eddleman 154.

154-2(a). State whether you are aware that Annex B of the onsite emergency plan provides the technical bases for dose projection, but is not itself the "procedure" for dose projection to be followed by "plant operators" in an emergency.

(b). If the answer to (a) above is other than affirmative, state the bases for your answer.

154-3. State whether you are aware that Annex E to the onsite emergency plan is a list of plant emergency procedures, which indicates that Plant Emergency Procedures O-PEP-341, O-PEP-342, O-PEP-343, and O-PEP-344 are entitled, respectively, "Initial Dose Projections," "Whole Body Dose Projections," "Thyroid Dose Projections" and "Automation of Dose Projection Procedures."

154-4(a). List and describe in detail all steps which you believe "plant operators" must take in the performance of a dose projection.

(b). With respect to each step listed in answer to (a) above, state whether you believe "plant operators" are capable of properly implementing that step.

(c). With respect to each step identified in (b) above as one which "plant operators" are allegedly unable to properly implement, state the bases for your belief as to the alleged incapability of the "plant operators."

154-5(a). State whether you contend that "plant operators" lack sufficient formal education to make dose assessments.

(b). If the answer to (a) above is affirmative, specify the bases for your answer.

(c). If the answer to (a) above is affirmative, identify specifically the formal education you believe is needed to make dose assessments, but which you believe "plant operators" lack, and explain why you believe such education is necessary, and the bases for your belief that "plant operators" lack such education.

154-6(a). State whether you contend that "plant operators" lack adequate training to make dose assessments.

(b). If the answer to (a) above is affirmative, specify the bases for your answer.

(c). If the answer to (a) above is affirmative, identify specifically the training you believe is needed to make dose assessments, but which you believe "plant operators" lack, and explain why you believe such training is necessary, and the bases for your belief that "plant operators" lack such training.

154-7(a). Identify specifically all ways in which, in your opinion, "plant operators" are "unqualified" to make dose assessments (other than those identified in answer to Interrogatories 154-1 and 154-2 above).

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

154-8. Describe any and all changes you believe must be made in the onsite emergency plan to meet the concerns expressed in Eddleman 154. Describe in detail the bases for your belief that such changes must be made.

154-9. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in answer to Interrogatory 154-8 above) to meet the concerns expressed in Eddleman 154. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 213

213-1(a). Identify specifically and describe in detail any provisions you believe should be included in the notification plan for Harris Reservoir which are not included in the notification plan for Jordan Lake.

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

213-2(a). Specify the number of boats you believe are necessary to provide notification for Harris Reservoir.

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

213-3(a). Specify the number of personnel you believe are necessary to provide notification for Harris Reservoir.

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

213-4(a). Identify specifically and describe in detail all "provisions for boat or traffic accidents" in an evacuation of Harris Reservoir which you believe should be made, including "limiting the number of boaters on the lake when the Harris reactor is critical or whenever fuel handling operations are in progress at Harris."

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

213-5(a). State whether you know of any lake where the number of boaters on the lake is limited to a specified figure during the period when a commercial nuclear power plant within a ten-mile radius of the plant is "critical" or "fuel handling operations are in progress."

(b). If the answer to (a) above is affirmative, list the name of each and every such lake, and the name of the commercial nuclear power plant within a ten-mile radius of each identified lake.

213-6(a). Explain in detail why you believe that "swimmers and water-skiers *** will be harder to get out."

(b). Identify all bases for your allegation that "swimmers and water-skiers *** will be harder to get out."

213-7. Describe any and all changes you believe must be made in offsite emergency plans to meet your concerns expressed in Eddleman 213. Describe in detail the bases for your belief that such changes must be made.

213-8. 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 213-7 above) to meet your concerns expressed in Eddleman 213. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on Eddleman 215

215-1(a). State the occupation and business address of "expert Paul Holmbeck."

(b). Identify the professional and educational qualifications and experience of "expert Paul Holmbeck."

215-2. For each individual alleged "conservatism" identified in Eddleman 215, specify the bases for your allegation that the specific alleged conservatism "may force evacuation time estimates upwards and provide inaccurate estimates for decisionmakers during an emergency."

215-3. Identify specifically all groups of persons for whom you contend the "assumption of evacuation from home" is unrealistic.

215-4(a). With respect to each group identified in answer to Interrogatory 215-3 above, state whether you contend that the members of that group would not return to their homes before evacuation.

(b). With respect to each individual group identified in answer to Interrogatory 215-3 above, specify the bases for your conclusion as to whether the members of that group would return to their homes before evacuating.

215-5. Identify all bases for your allegation that "[h]ouseholds with 2 vehicles may evacuate in both vehicles rather than linking up."

215-6. Identify the approximate percentage of households in the Harris plume EPZ which own two vehicles.

215-7. Identify the approximate percentage of households in the plume EPZ with two vehicles which you believe "may evacuate in both vehicles rather than linking up."

215-8. Identify all bases for your allegations challenging the "apparent assumption that those households without vehicles will automatically evacuate with neighbors (or can) at the rate of one vehicle per household."

215-9. Identify the approximate percentage of "households without vehicles" which you believe might be unable to obtain evacuation transportation through neighbors, friends or relatives.

215-10. With respect to each individual "conservatism" alleged in Eddleman 215, describe in detail the changes you believe must be made in "CP&L's evacuation time study" to meet your concern with respect to that specific "conservatism."

Interrogatories on Eddleman 224

224-1. Explain in detail what type of information you understand must be included in an evacuation time estimate study to comply with the NUREG-0654 provision that "[t]he adverse weather frequency used in [the] analysis shall be identified"

224-2. Explain in detail why you believe NUREG-0654 provides for the identification in an evacuation time estimate study of "[t]he adverse weather frequency used."

224-3(a). Explain in detail why you believe a failure to "identify the adverse weather frequency used" would make an evacuation time estimate study "unreliable for guiding emergency response personnel in decision making."

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

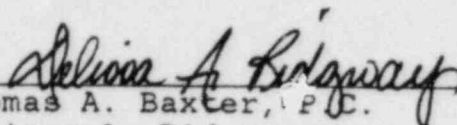
224-4. Describe specifically any and all changes you believe must be made in the evacuation time estimate study for the Harris plume EPZ to meet your concerns expressed in Eddleman 224.

Request For Production Of Documents

Applicants request that Intervenor Wells Eddleman 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

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
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AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)
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(Shearon Harris Nuclear Power)
Plant))

Docket No. 50-400 OL

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Emergency Planning Interrogatories and Request for Production of Documents To Intervenor Wells Eddleman (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)
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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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