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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

8-31-84

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

In the Matter of CAROLINA POWER AND LIGHT CO. et al. (Shearon Harris Nuclear Power Plant, Unit 1)	Docket 50-400 OL ASLBP No. 82-472-03 OL

Wells Eddleman's Interrogatories to NRC Staff and FEMA
(6TH Set)
and FEMA

Wells Eddleman hereby requests the NRC Staff, to answer the following interrogatories before 9/19, 1984 or such other date as counsel for the Staff, FEMA and I agree on. These interrogatories are submitted under 10 CFR 2.720(h)(ii) and inquire into the studies, information, and knowledge of NRC staff with respect to my contentions on which discovery is now open. Since I cannot read the minds of the staff, and this information is not contained in documents which the staff has provided to me, I am unable to obtain this information by other means. Where the information is contained in a document I can obtain from NRC (Public Document Room, etc), I still need the identification of the document in order to obtain the information. The staff has resources and information which exceed what I have, and as a party, their position and information are necessary to making my case in this proceeding. These interrogatories are continuing in nature and should be supplemented when answers change.

GENERAL INTERROGATORIES

In all interrogatories herein, "you" or "Staff" means NRC Staff or FEMA.

For each of contentions EPs 1,2,3,4+5 and Eddleman contentions 57-C, 7, 240 + 213-A please provide the following information by answering each of these questions.

1. What is [FEMA's or] NRC Staff's reviewer's or affiant's understanding of the subject matter of this contention?

2. Has FEMA or NRC Staff made any analysis, inquiry, study or investigation into, (a) this contention (b) the subject matter of this contention (c) the allegation(s) in this contention (d) the basis of this contention (e) the information relied upon by intervenor(s) in support of this contention?

3. For all parts of your response to Interrogatory 2 above for which your answer is affirmative, please provide the following information: who made the analysis, inquiry, study or investigation; what was being considered in such analysis, inquiry, study or investigation ("AISI"); the content of the AISI, the results of the AISI, whether the AISI has been completed, whether a date for completing the AISI has been established if it is not complete, what that date is, all documents used in the AISI, all persons consulted

in the course of the AISI, all documents containing information discovered or analysis or study or information developed during or as a result of the AISI (identify each such document and state what information or results it contains), whether staff believes additional analysis is warranted, or further AISI needs or may need to be undertaken on this contention, and whether any persons participating in the AISI are to be called as witnesses for the Staff in this case, and what questions the staff AISI is intended to answer and what information it seeks to develop if it is not complete.

4. For all responses to parts of (2) above for which NRC staff's or FEMA's answer is other than affirmative, please state (a) whether NRC staff or FEMA plans to perform any AISI on this contention, (b) whether anyone on NRC Staff has stated that AISI of any kind is warranted for this contention (even though it has not been made) (c) whether NRC Staff plans for AISI or FEMA's, on this contention include a date for beginning or for ending such AISI, (d) those dates, for all affirmative answers to (c) above, (e) what AISI FEMA or NRC staff will undertake on this contention (f) what AISI NRC staff desires to undertake on this contention (g) all reasons why no AISI is planned on this contention if none is planned (h) all reasons why no AISI has been done yet on this contention if none has been done (i) what the responsibilities of NRC staff and of FEMA with respect to this contention are.

5. Identify all documents the Staff relied on in opposing the admission of this contention, and any specific facts not stated in the Staff's opposition to admission of such contention (already filed in this case) upon which Staff relied in making such opposition. FEMA or the

6. Identify all documents not identified in Staff's interrogatories to Wells Eddleman or to Joint Intervenors (to present -- a continuing interrogatory) upon which the Staff relied in making each such interrogatory.

7. Identify by name, personal or business address, FEMA or NRC staff position or title (if any), and telephone number (if known) each person on NRC staff or consultant to NRC staff or known to NRC Staff or consulted by NRC staff in the staff's analysis of the subject matter of this contention prior to (a) its filing (b) its admission; state for each such person what analysis was performed by that person.

8. State all professional qualifications of each person identified in response to interrogatories 7, 3,4, .

9. Provide any statements of the analysis made by persons identified in response to interrogatories 3,4, or 7x above, and identify all documents containing such information or statements not previously identified.

10. Give the identifier number, date, source, and title of all documents identified in response to interrogatories above, which are available through NRC PDR (Public Document Room).

11. Will NRC Staff make available copies of documents identified in response to the above interrogatories to Wells Eddleman for inspection and copying, for documents not available through NRC's PDR?

12. Identify by name, FEMA or NRC staff position if any, address and telephone number each person whom NRC staff intends to xxx use or call as a witness in this proceeding.

13. State fully the professional qualifications of each person identified in response to interrogatory 12 above.

14. Summarize the position (or planned testimony) with respect to each contention on which such person is expected to testify, for each person identified in response to interrogatory 12 above.

15. Has FEMA or NRC Staff, any witness identified in response to interrogatory 12, or anyone acting in behalf of the Staff or such x witness or at their direction, made any calculation or analysis (not identified in response to interrogatories 1 through 4 above) with respect to this contention?

16. If the answer to interrogatory 15 above is yes in any case, provide the name, business or personal address, telephone number and professional qualifications of each person who has made such calculation or analysis, stating for each what contention it relates to, what person (or Staff) it was made for or at the direction of, and identifying all documents containing such calculationor analysis and all documents used in making such calculation or analysis or relied upon in it or supplying information used in it.

17. Provide a summary of each AISI, calculation or analysis ~~xmxx~~ for which the answer to interrogatory 15, or interrogatory 2 above, is yes.

18. Please give the accession number, date and originator of each document identified in response to interrogatory 16, which is available at the NRC PDR.

19. Will FEMA or NRC Staff make available to Wells Eddleman for inspection and copying all documents identified in response to interrogatory 16 above which are not available through the PDR?

20. Identify each person, including telephone number, address, and field of expertise and qualifications (complete) (if any) ~~fx~~ who answered interrogatories with respect to this contention; if more than one person contributed to an answer, identify each such person, providing the information requested above in this interrogatory for each such person, and state what each such person's contribution to the answer was, for each answer.

21. Identify all documents which the FEMA or Staff proposes or intends to use as exhibits with respect to this contention during this proceeding, including exhibits of Staff witnesses (identifying the witness for each, if such a witness has been designated), and exhibits to be used during cross-examination of witnesses of any party (stating for each which witness it is to be used in cross-examination of), and identifying for each the particular pages or chapters to be used as exhibits.

22. Identify all documents which FEMA or NRC staff relied upon in answering interrogatories with respect to this contention, which have not been identified in response to interrogatories 1 through 21 above, stating for each which answer(s) re which contention(s) it was used for, and each specific fact and page number therein on which NRC staff relied or which NRC staff used in answering such interrogaatory.

23. Please give the accession number, date, and originator of each document identified in response to interrogatories 21 or 22 above which is available through the NRC PDR.

24. Will FEMA or NRC Staff provide Wells Eddleman with copies of the documents identified in response to interrogatory 21 or 22 above which are not available at the PDR, for inspection and copying?

25. Identify any other information or source of information not identified in response to the the above interrogatories 1 thru 24, or with upon which any member of NRC staff relied, or which any such member of staff used, in answering each interrogatory with respect to this contention, naming the contention and response in which each such source was used, and the location of the information used or relied on in such source (e.g. page number, section, chapter, etc).

26 (a) Does the Staff, or FEMA now agree with the contention? (b) Does the Staff now agree with any part of the contention?

27. If answer to (b) above is affirmative, which part(s) and why?

Specific Interrogatories on Eddleman 240

240-1(a) What agency of Chatham County government is responsible for the decontamination of evacuees at the Chatham County shelters? (b) if different agencies have responsibility for decontamination of evacuees at different shelters, please state which agency is responsible for which shelter, and whether the county agencies provide decontamination for evacuees (or will be prepared to provide it) at all Chatham County shelters. (c) If anyone other than an agency of Chatham County government is responsible (or to be responsible) for decontamination of evacuees at any shelter in Chatham County, please list the responsible persons or agencies for each such shelter. (d) For each agency or person who has responsibility for decontaminating evacuees at any shelter in Chatham County, what is the capability of each such agency or person to carry out such decontamination? Please address (i) establishment of radiological response teams (ii) training of these teams (iii) directing of these teams, fully in your answer, and fully and completely describe the capabilities of each such team to carry out decontamination of evacuees from a nuclear accident at Shearon Harris.

240-2(a) Which organization(s) are responsible for providing support for decontamination of evacuees in Chatham County? (b) Identify each shelter for which each support agency, identified in response to (a) above, will or can provide support. (c) For each such agency or shelter, what are the capabilities to provide support for decontamination of evacuees? (d) Please identify all documents concerning responsibility for providing support for decontamination of evacuees in Chatham County, who will provide this support, and the capabilities of such support agencies, or the shelters where each such agency will (or is intended to) provide support for decontamination of evacuees.

240-3(a) Please identify all documents concerning the responsible agencies or agency of Chatham County which will provide decontamination for evacuees from a nuclear accident at Shearon Harris, including (i) which shelters each such agency has primary or backup responsibility for (specify the type of responsibility, i.e. primary, backup); (ii)the capabilities of each such agency for decontamination (iii) the establishment, training or direction of Radiological Response Teams in Chatham County or to be used in Chatham County in the event of a nuclear accident at Shearon Harris; (iv) any other agency's responsibility or capabilities for providing decontamination for evacuees at shelters in Chatham County, which information is used or relied upon by emergency planners of the State of NC or Chatham County; (v) any agency or person who is expected to provide decontamination for evacuees at any shelter(s) in Chatham County in the event of a nuclear accident at Shearon Harris, which identifies that agency or person, or discusses or describes or evalutes that person or agency's capabilities for providing decontamination.

Specific Interrogatories on 213-a:

213-A-1(a) Does the Harris offsite emergency response plan now conform to evaluation criterion II.P.7 of NUREG-0654? (b) If so, how? (c) If not, why not? (d) What additional information is required to bring the plan for the Harris plant into compliance with NUREG-0654 evaluation criterion II.P.7? (e) When is this information now scheduled to be completely incorporated into the plan? When will all of the information required to comply with criterion II.P.7 be in the plan?

213-A-1 continued

(f) when will FEMA begin review of thie information submitted to ensure compliance with NUREG-0654 criterion II.P.7 for the Shearon Harris off-site emergency response plan? When is that review shheduled to be completed?
(g) Please identify all documents concerning (i) compliance or noncompliance of the Harris off-site Emergency Response Plan (ERP) with NUREG-0654 criterion II .P.7;(ii) information required to brin the Harris ERP into compliance with this criterion;(iii) actions required to bring the Harris offsite ERP into compliance with this criterion; (iv) comments by FEMA or any other emergency planning agency, or any person (including consultants and staff of emergency planning organizations) concerning the compliance (or lack of compliance) of the Harris offsite ERP with NUREG-0654 evaluation criterion II.P.7;(v) drafts or information to be added to the Harris ERP to meet evaluation criterion II.P.7;(vi) comments on those drafts;(vii) evaluation of the Harris ERP (offsite) vs. NUREG-0654 criterion II.P.7 by FEMA or anyone else.

213-A-2(a) Do you believe that all requirements of evaluation criterion II.P.7 of NUREG-0654 are met by the present form of the Harris offsite emergency response plan? (b) Please give all reasons for your answer to (a) including cites to every specific part of the plan which you believe detail or contain implementing procedures, all parts of the plan which do not in your opinion contain sufficient implementing procedures, and all reasons why you believe the plan in its present form does, or does not, fully comply with criterion II.P.7 of NUREG-0654. Please identify all documents containing information used in forming your belief or making your answer to either (a) above or above parts of (b).
(c) If you don't know whether the Harris offsite ERP does or does not fully comply with evaluation criterion II.P.7 of NUREG-0654, do you plan or are you now doing anything to find out if it does? If so, what is to be done, and when is it to be completed? Please identify all documents concerning your review of the Harris offsite ERP for NUREG-0654 criterion II.P.7 compliance, including documents containing any results of such review(s) or comments on such reviews or drafts thereof.
(d) What implementing procedures are required for an offsite emergency response plan in your opinion?
(e) Is there anything about the present form of the Harris offsite ERP that (i) does (ii) does not, comply with evaluation criterion II.P.7 of NUREG-0654? If so, what does comply, and what does not? Please provide all reasons for your answer(s) including any documents or rules or review standards you used in making your answer or any review or analysis underlying your answer(s) or any of your answers.

213-A-3(a) Where are the implementin procedures in the Harris offsite emergency response plan? Please list each one and explain why, in your view, it is an adequate (or inadequate) implementing procedure for compliance with NUREG-0654 criterion II.P.7.

Interrogatories on 57-C-7

57-C-7-1(a) Do you know if any hospitals (i) listed on section V.B.3 of the State (offsite) Harris emergency response plan are now prepared to treat severe radiation exposure per se? (ii) not listed in the Harris ERP section V.B.3, but (ii-a) local (ii-b) regional hospitals around the Harris plant, are now prepared to treat severe radiation exposure cases? (b) If you answer to any part(s) of (a) or (b) above, or to (a) or (b) above, is affirmative, identify the hospital(s) and give all reasons for your answer. (c) Please state what types or levels of severe radiation exposure (e.g. dose up to 400 rem) each hospital is prepared to treat, i.e. what are the severe radiation injuries or exposure levels each is prepared to treat. (d) please identify all documents concerning the ability of each such hospital to treat severe radiation injuries or exposure.

57-C-7-2(a) Does the Harris offsite ERP presently list (i) local hospitals with the necessary capabilities to provide medical services for those seriously injured by radiation alone ? (ii) regional hospitals with the necessary capabilities to provide medical services for those seriously injured by radiation alone? (b) what capabilities do you maintain each such hospital has for providing medical services to persons seriously injured by radiation? How do you know each has those capabilities? Have you inspected each hospital to evaluate the existence of those capabilities? How do the capabilities of each such hospital meet or exceed the "necessary capabilities" required to provide medical services for those seriously injured by radiation alone? (c) what are the necessary capabilities required to provide medical services for persons seriously injured by radiation, for (i) local hospitals (ii) regional hospitals, around the Harris nuclear plant? How do you know these capabilities are necessary? How do you know that other capabilities are not necessary for providing medical services to persons seriously injured by radiation? (d) If you or your attorney(s) say that knowledge or inspection or evaluation of the capabilities of hospitals to provide medical services for persons seriously injured by radiation are (i) irrelevant (ii) objectionable (iii) outside the scope of this contention, please explain fully how you know that any hospital has the "necessary capabilities to provide medical services for those seriously injured by radiation alone"? (e) Please identify all documents concerning each matter inquired about in each part of (a) thru (d) above.

57-C-3(a) Please identify all documents concerning the question of whether the ability to treat severe radiation exposure per se is required by (i) any FEMA guidance (ii) any NRC regulation (iii) any NRC rule (iv) any applicable law or requirement, including the ATomic Energy Act.

PRODUCTION OF DOCUMENTS

Wells Eddleman hereby requests that the original or best copy of each document identified in response to the above interrogatories be produced for inspection and copying at a mutually agreeable time and place.

Wells Eddleman

Wells Eddleman
8-31-84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.) Docket 50-400
Shearon Harris Nuclear Power Plant, Unit 1) O.L.

CERTIFICATEOF SERVICE

I hereby certify that copies of W.E. Interrogatories to Applicants/NC Emergency Planners on contentions 240, 213-a and 57-C-7, and of W.E. Interrogatories to NRC Staff/FEMA Staff on the same contentions

HAVE been served this 31 day of August 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 omission from sefvice per oral order of March 1983

Judges James Kelley, Glenn Bright* and James Carpenter* (1 copy each)
Atomic Safety and Licensing Board
US Nuclear Regulatory Commission
Washington DC 20555

George F. Trowbridge (attorney for Applicants)
Shaw, Pittman, Potts & Trowbridge
1800 M St. NW
Washington, DC 20036

Office of the Executive Legal Director
Attn Dockets 50-400/401 O.L.
USNRC
Washington DC 20555

Docketing and Service Section (3x)
Attn Dockets 50-400/401 O.L.
Office of the Secretary
USNRC
Washington DC 20555

John Runkle
CCNC
307 Granville Rd
Chapel Hill Nc 27514

Travis Payne
Edelstein & Payne
Box 12607
Raleigh NC 27605

Robert Gruber
Exec. Director
Public Staff
Box 991
Raleigh NC 27602

Richard Wilson, M.D.
729 Hunter St.
Apex NC 27502

*Ruthanne G. Miller
ASLB Panel
USNRC Washington DC 2055 5

E Spence W. Perry
Plan FEMA Room 840
ONM 500 C St SW
Washington DC 20740

Dan Read
CHANGE/FLP
5707 Waycross
Raleigh, NC 27606

Dr. Linda W. Little
Governor's Waste Mgt. Bd.
513 Albemarle Bldg.
325 N. Salisbury St.
Raleigh, NC 27611

*Bradley W. Jones
USNRC Region II
101 Marietta St.
Atlanta GA 30303

Certified by W. E. Eddleman