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September 4, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED

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

Docket No. 50-400 OL

RICHARD WILSON RESPONSES TO APPLICANTS'
EMERGENCY PLANNING INTERROGATORIES (FIRST SET)

General Interrogatories

1. (a) (b) (c) I relied on no one.
2. (a) (b) Not applicable.
3. (a) (b) (c) None designated yet.
4. (a) (b) (c) No documents were used.
5. (a) (b) (c) No documents were used.
6. (a) (b) No sources used.
7. (a) (b) None designated yet.

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Interrogatories on Wilson 11

11-1(a) Groups for which entry into the plume EPZ might be necessary are: 1. Parents of children in day care. 2. Parents with children at home. 3. People with other family members or non-family dependents who do not have vehicles. 4. People needing to secure their businesses. 5. Emergency personnel reporting for duty (still in their private vehicles). 6. Emergency workers (rescue squad, fire, police) on duty. 7. Maintenance personnel for equipment such as electrical transmission lines, natural gas pipelines, telephone equipment.

11-1(b) All groups except perhaps group 4 (people needing to secure their businesses) should be permitted to enter if the evacuation process would not be disrupted.

11-1(c) Group 1 - Probably greater than 500
Group 2 - Probably greater than 500
Group 3 - No estimate yet
Group 4 - No estimate yet
Group 5 - 50-100 vehicles
Group 6 - No estimate yet
Group 7 - 10-20 vehicles

11-1(d) (e) Group 1 - There is no other assured mechanism of evaluation of pre-school children not in the care of their parents. Neither licensed day care centers nor individuals caring for one or more children may have adequate vehicles to safely transport the children. Denial would lead to argument and conflict at traffic control points. Denial could delay the evacuation of children.

Group 2 - There is no other assured mechanism of evacuation of children of all ages who might be temporarily left at home alone. Children might not be able to read the Applicants' pamphlet, tune in EBS, or proceed to designated group evacuation points. They might hide in their homes in an emergency situation. Denial would have same consequences as for Group 1.

Group 3 - Answer to Group 2 applies to this group as well, which might include mentally and physically handicapped people; elderly people, or non-English speaking visitors.

Group 5 - Evacuation plans depend heavily on local emergency workers. Many may be outside the EPZ at the time of the emergency, but their participation is assumed in the planning. Denial of entry could invalidate many parts of the emergency plans. Crime, fires, and illnesses occurring concurrently with the evacuation also need to be dealt with.

Group 6 - Emergency workers from outside the EPZ may also be required to carry out evacuation plans. See answer to Group 5 above.

Group 7 - Failure to allow entry could result in communications failures, prolongation of previous failures, or fires and explosions (natural gas pipeline in Apex). I do not know what consequences there would be of maintenance lapses at facilities such as Allied Chemical, CP&L Cape Fear, and Universal Polymer Products.

11-2 Offsite emergency plans should

1. Specify what groups of people will be allowed entry and define the effect on the overall evacuation effort of allowing these people to enter.
2. Address in some detail how traffic control points will be located, staffed, and managed to handle the numbers of anxious, probably very insistent people demanding entry into the EPZ for the reasons listed above, which may be justifiable, and for many other reasons which they may feel very strongly about.

11-3 See 11-2 above.

R. Wilson

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CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN) Docket No. 50-4000L
MUNICIPAL POWER AGENCY)
(Shearon Harris Nuclear Power Plant))

CERTIFICATE OF SERVICE

I hereby certify that copies of Richard Wilson Responses to Applicants Emergency Planning Interrogatories (First Set) have been served this 4th day of September 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

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