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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

RICHARD WILSON INTERROGATORIES TO  
THE APPLICANT ON EPJ-5, WILSON 11,  
WILSON 12b2, WILSON 12b3.

GENERAL INTERROGATORIES

1. Please list the names and affiliations of each person responding to these interrogatories and the specific ones they respond to.

2. Please make each document identified in response to the interrogatories below available for inspection and copying.

SPECIFIC INTERROGATORIES

1. a) Do you have a mechanism for identifying non-ambulatory homebound people in the EPZ?

b) If so, how many such people are there, and what is the mechanism for identifying them?

c) How will new people in this category be identified as they become disabled or move into the EPZ?

d) If you do have a mechanism, how have you tested its effectiveness and accuracy?

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e) If you do not have a mechanism, are you preparing or planning one? Please present the current status of such a project or plan.

f) If your mechanism for identifying non-ambulatory home-bound people has not been put into effect, how can you be confident that the numbers will not overwhelm the sources of assistance? If you have estimated, please state the basis for your estimates.

~~g~~ According to Section III F2b of the Wake Co. Plan (p 5) the Rescue Squads of Apex, Fuquay-Varina and Holly Springs will be primarily responsible for evacuating non-ambulatory people. However they also have other duties which might conflict with this activity. The following questions are therefore relevant.

g) ~~g~~) How many vehicles each from the rescue squad, the police department, and the fire departments in each community will be required should secondary notification be necessary? How many workers per vehicle?

h) ~~h~~) What will be the time interval following the evacuation order during which this notification will be carried out?

i) ~~i~~) Have you revised or are you studying the estimates of time and vehicles required for secondary notification presented in the ETE Study? If so, please present the status of your study.

2 a) How many vehicles each from the rescue squad in each community will be required for evacuating hospital and nursing home residents? How many workers per vehicle.?

2 b) What will be the time interval following the evacuation order during which this evacuation will be carried out?

2 c) How long will one round trip from the following sites to the nearest appropriate designated shelter take? Include loading and unloading time. Include assumptions regarding traffic conditions.

1. ESE Sector, 9-10 mile zone
2. NNE Sector, 2-3 mile zone
3. NE Sector, 8-9 mile zone
4. SE Sector, 10 mile zone

2 d) How many round trips from all special facilities does each rescue squad estimate they will have to make?

3 a) What shelters and decontamination stations will, under the direction of the Emergency Management Agency, will be operated or manned by the Rescue Squads from Apex, Fuquay-Varina, and Holly Springs?

3 b) How many workers will be required at each of these areas?

3 c) What will be the time interval following the evacuation order during which this activity will be performed?

4 a) How many vehicles, workers, and hours would be required to respond fully to a serious accident with 10 seriously injured people and 20 less seriously injured people at the SHNPP site?

b) Which rescue squads would be involved in such assistance? How many vehicles and workers from each?

c) Please attach copies of all written agreements between the rescue squads and the Applicant for emergency service at the SHNPP site.

d) Based on these documents, would the Applicant expect the rescue squads to provide all necessary assistance for an accident such as that described in part a above?

5. Please prioritize the 5 duties (a-e) assigned primarily to the rescue squads in Section III F2 of Wake County Plans (p.5). That is, which activities would be done if there were not enough resources for the local squads to do them all? In addition to the 5 duties in the plan, please include routine responses to illness and injury in the priority list.

6.a) How will the Wake County EMS Director receive requests for assistance from local squads?

b) Who will make specific evacuation assignments to county rescue squads assisting the local squads?

c) How will county rescue squad workers know the sites of special facilities and non-ambulatory home-bound people?

d) Which rescue squads would be the first, second, and third areas asked by the EMS Director?

e) How many vehicles and workers from each would be available, considering other routine and special responsibilities they might have?

7.a) How many vehicles capable of transporting non-ambulatory people does the Apex, Fuquay-Varina, and Holly Springs Rescue Squads have? How many non-ambulatory people can each vehicle carry?

b) How many members does each rescue squad have?

c) How many members from each would be available and would respond in case of an evacuation?

d) How many members of each squad are single?

e) How many from each squad live outside the EPZ?

f) How many from each squad work outside the EPZ?

g) Have any of the squads been involved in a major emergency requiring full mobilization?

h) In your planning what percentage of the full staff of each rescue squad have you assumed will be available? On what do you base this assumption? Please list all documents and case citations you would use to support this assumption.

8.a) Homebound non-ambulatory people will be scattered throughout the EPZ. How long will one round trip including loading and unloading time from the following sites to the nearest designated shelter take? Please include assumptions regarding traffic conditions.

- a) W Sector 6-7 mile zone
- b) SSW Sector 6-7 mile zone
- c) NNW Sector 6-7 mile zone

9.a) Who will be allowed to enter the EPZ during the evacuation?

b) Will parents of children in day care be allowed to enter?

c) Will parents with children at home be allowed to enter?

d) Will people with other family members or non-family dependents (which might include mentally, handicapped, physically handicapped, elderly, or non-English-speaking people) be allowed to enter?

e) Will people needing to secure their businesses be allowed to enter?

f) Will emergency workers reporting for duty (still in their private cars) be allowed to enter?

g) Will emergency workers (rescue squad, fire, police) on duty be allowed to enter?

h) Will maintenance personnel for CP&L electrical transmission lines, Dixie Pipelines, Southern Telephone equipment, Allied and Universal Polymer Chemical Plants, CP&L Cape Fear Plant be allowed to enter? Are these facilities aware of this policy and have they consented?

i) For each answer above to parts b-h which is NO, please explain why not.

j) For each answer above which is not unequivocally YES or NO please explain the criteria by which decisions would be made.

k) What training and written instructions will be given to people at traffic check points to guide their decisions?

l) If an official at a traffic check point wishes to make an exception, does he/she have the power to do so? If not who must he/she consult?

m) On a map showing all traffic control points at entrances to the EPZ, please show how a large number of cars trying to enter the EPZ would be diverted.

n) For each answer to parts b-h above, please estimate the number of vehicles which will try to gain entry.

10. Please demonstrate your calculation that there would be 410 households in the EPZ that have no transportation. Please state and justify all assumptions.

11. Have you revised this estimate?

12.a) How many households in the EPZ have one car which is driven out of the EPZ to work each day? b) How many with 2 cars which are driven out of the EPZ?

c) If these considerations raised the percentage of households without vehicles from 5.5% (410/7347) to 30% or 50%, would ride-sharing with neighbors be adequate to evacuate the population? Please provide an explanation of your answer and document your assumptions.

d) Were these considerations investigated during the preparation of the Evacuation Time Estimates? If not, why not?

e) If ride-sharing were not adequate, who would decide when and where pick-up points would be established? What criteria would be used to make the decisions?

13.a) How many households in the EPZ have one car which is driven to work in the EPZ?

b) Does the NETUAC simulation include the "counter-current" flow of traffic of these vehicles trying to reach home?

c) Will traffic control points permit "counter-current" flow during the evacuation?

d) The time required for travel from work to home was not explicitly mentioned in the ETE. Was it considered?

*RW*