

September 28, 1984

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
EDWARD J. BERRY
WASHINGTON, D.C.

In the Matter of)

CAROLINA POWER AND LIGHT COMPANY AND)
NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)

Docket Nos. 50-400 OL
50-401 OL

(Shearon Harris Nuclear Power Plant,)
Units 1 and 2))

FEMA RESPONSE TO INTERROGATORIES
DATED AUGUST 31, 1984
PROPOUNDED BY WELLS EDDLEMAN

ANSWERS

General Interrogatories

INTERROGATORY 1. What is FEMA's or NRC Staff's reviewers or
affiant's understanding of the subject matter of this contention?

ANSWER: EPJ 1: Severe snow and ice conditions and their effects
on evacuation times, and/or local and state capabilities to clear
evacuation routes are the subject matter of this contention but are not
necessarily NUREG-0654 requirements. FEMA Staff infers, from the ETE
study, that these conditions are not sufficiently frequent in the Harris
plant plume exposure pathway zone to warrant consideration beyond that
which presumably was included in the ETE study.

Regarding Section IV.E.8 of the State plan (page 50), FEMA Staff has
no knowledge of the number of snow plows available in or near the Harris
10-mile EPZ or the amount of time required to effectively clear the roads
of snow or ice.

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EPJ-2: NUREG-0654, Appendix 4, requires that the ETE study include estimates of the number of people in the EPZ without transportation. The ETE study does include these estimates; FEMA has no basis for questioning the 240 figure estimate mentioned in this contention. NUREG-0654 does not require that the State plan provide an estimate of the number of people without transportation in the EPZ.

In regard to the portion of this contention which implies that the State plan should suggest the means people without transportation should use to get to pickup point and that the State plan should contain criteria for determining when and where the pick-up points would be "established as required", FEMA Staff opinion is that the plan statement on page 47 meets FEMA guidelines.

EPJ-3: FEMA staff has not yet formulated its position on this contention.

EPJ-4: (a)-(d) FEMA Staff has no knowledge of the demographic characteristics of the school bus drivers, their trustworthiness, whether or not students have parental authorization to drive buses, etc. These types of investigations are not FEMA responsibilities.

EPJ-5: FEMA guidelines do not require listings of non-ambulatory people in the plan. FEMA does encourage state and local governments to compile such listings, and we understand the state and local governments involved with the Harris plant emergency planning are currently making these compilations.

FEMA Staff will be more knowledgeable about the number of vehicles available for transportation of non-ambulatory people after the December 1984 exercise is conducted.

EDDLEMAN 57-C-7 27: According to the State plan, the RPS SOP's contain the information asked for in this contention. NUREG-0654 does not require the lists to be included in the State plan.

EDDLEMAN 240-33: See response under specific interrogatory. An Appendix is unnecessary since an SOP listing is included at the conclusion of each part of the plan. Also see response to specific Interrogatory 213-A-1(a) through (g).

INTERROGATORY 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 this contention?

ANSWER: FEMA Staff has read these contentions and the State and County plans under discussion. FEMA Staff has made no analysis, inquiry, study or investigation (AISI) into these contentions or their subject matter.

INTERROGATORY 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.

ANSWER: N.A.

INTERROGATORY 4: From 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 one is warranted for this contention (even though it has not been made) (c) whether NRC Staff plans for AISI 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.

ANSWER: (a) No; (b) no; (c) N.A.; (d) N.A.; (e) none; (f) none; (g) unknown; (h) unknown; (i) FEMA staff will respond to these contentions under the provisions of the Memorandum of Understanding between FEMA and NRC.

INTERROGATORY 5: Identify all documents the FEMA or the NRC 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.

ANSWER: N.A.

INTERROGATORY 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.

ANSWER: N.A.

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.

ANSWER: N.A.

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

ANSWER: N.A.

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

ANSWER: N.A.

INTERROGATORY 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).

ANSWER: N.A.

INTERROGATORY 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?

ANSWER: N.A.

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

ANSWER: Unknown.

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

ANSWER: N.A.

INTERROGATORY 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.

ANSWER: N.A.

INTERROGATORY 15: Has FEMA or NRC Staff, any witness identified in response to interrogatory 12, or anyone acting in behalf of the Staff or such 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?

ANSWER: N.A.

INTERROGATORY 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 calculation or analysis and all documents used in making such calculation or analysis or relied upon in it or supplying information used in it.

ANSWER: N.A.

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

ANSWER: N.A.

INTERROGATORY 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.

ANSWER: N.A.

INTERROGATORY 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?

ANSWER: N.A.

INTERROGATORY 20: Identify each person, including telephone number, address, and field of expertise and qualifications (complete) (if any) 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.

ANSWER: Thomas I. Hawkins, John C. Heard (address, qualifications, etc. attached to previous set of interrogatories, dated August 14, 1984).

INTERROGATORY 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.

ANSWER: Unknown.

INTERROGATORY 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) or 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 interrogatory.

ANSWER: None.

INTERROGATORY 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.

ANSWER: N.A.

INTERROGATORY 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?

ANSWER: N.A.

INTERROGATORY 25: Identify any other information or source of information not identified in response to the the above interrogatories 1 thru 24 on which you, or 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).

ANSWER: None.

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

ANSWER: (a) No; (b) No.

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

ANSWER: Given above.

Specific Interrogatories on Eddleman Contention 240

INTERROGATORY 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.

ANSWER: (a) Volunteer fire departments, rescue squads and the Landfill Department, with support from Carolina Power and Light Company (and SERT, if possible) and under the direction of the Chatham County Department of Emergency Management (Chatham County Plan, pages 33, 35). (b) unknown; (c) unspecified in plan; (d) unknown; (i) Refer to Chatham County Plan, pages 32, 35; (ii) See page 45, 46 of the Chatham County Plan; (iii) Chatham County Department of Emergency Management; (with assistance from the RPS representative on SERT) unknown.

INTERROGATORY 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, the capabilities of such support agencies, or the shelters where each such agency will (or is intended to) provide support for decontamination of evacuees.

ANSWER: (a) Answer given above under 240-1(a) and (d)(iii); (b) unspecified in plan; (c) unspecified in plan; (d) North Carolina Emergency Response Plan; remainder of known information given above in interrogatory 240-1.

INTERROGATORY 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 or 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 identified that agency or person, or discusses or describes or evaluates that person or agency's capabilities for providing decontamination.

ANSWER: (a)(i) unknown; (ii) unknown; (iii) unknown; (iv) unknown; (v) unknown.

Specific Interrogatories on Eddleman 213

INTERROGATORY 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? (f) when will FEMA begin review of this 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 scheduled 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 bring 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.

ANSWER: The Regional Assistance Committee (RAC) along with the FEMA Staff reviewed the Harris Plan and found Item P-7 of NUREG-0654 to meet requirements. However, we have requested copies of all Standard Operating Procedures (SOPs) listed in the plan for additional information and clarification.

INTERROGATORY 213-A-2(a) through (e): 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 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 id it does? If so, what is to be done, and when is it to be completed? Please identify all documents containing 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 part of your answers.

ANSWER: See above response.

INTERROGATORY 213-A-3(a): Where are the implementing 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.

ANSWER: See above response.

Specific Interrogatories on Eddleman 57-C-7

INTERROGATORY 57-C-7-1(a): Do you know if any hospitals (i) listed on section V.B.3 of the Staff (offsite) Harris emergency response plan are not 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 not prepared to treat severe radiation exposure cases? (b) If your answers 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. does 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.

ANSWER: (a) No; (b) N.A.; (c) unknown; (d) unknown.

INTERROGATORY 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 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.

ANSWER: (a) unknown (b) unknown (c) unknown (d) N.A. (e) N.A.

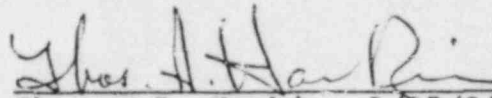
INTERROGATORY 57-C-3(a): Please identify all documents concerning the question of whether the ability to treat severe radiation exposure per se is required by (i) any FEMA guidance (ii) any NRC regulation (iii) any NRC rule (iv) any applicable law or requirement, including the Atomic Energy Act.

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.

ANSWER: NUREG-0654 does not require the ability to "treat severe radiation exposure per se". (See NUREG-0654, II, L.1.).

AFFIDAVIT

The below subscribed persons hereby affirm, subject to penalty of perjury, that they have answered the Interrogatories of Intervenor Wells Eddleman as identified below. The answers are true and correct to their best knowledge and belief as are also the attached statements of professional qualifications.


Thomas I. Hawkins 9/25/84

Dated at
Atlanta, Georgia
this 25 day of September, 1984

Thomas I. Hawkins

Professional Qualifications

My present position is Emergency Management Program Specialist for the Federal Emergency Management Agency. I am assigned to the Radiological Emergency Planning liaison position between FEMA Region IV and the States of North and South Carolina. In this position, I am responsible for the review of radiological emergency plans and preparedness for the State of North Carolina and the State of South Carolina and for the local governments within these States.

I have held the position of Emergency Management Program Specialist (or its equivalent) since December 1981. I have been employed by FEMA since July 1978.

From April 1964 to January 1977 I was employed as Planning Director of Clayton County, Georgia.

My formal education is as follows:

- AB Degree, Emory University, Atlanta, GA, 1958
- Master of City Planning Degree, Georgia Tech., Atlanta, GA, 1963
- Completed Radiological Emergency Response Course at the U.S. Department of Energy's Nevada Test Site, April 1982
- Completed Radiological Defense Officer and Radiological Defense Instructor Course, Georgia Emergency Management Agency, Atlanta, GA, March 1982
- Completed Basic Management Seminar for Emergency Management Personnel, Valdosta State College, Thomasville, GA, Winter Quarter, 1980
- Completed Radiological Emergency Planning Seminar, National Emergency Training Center, Emmitsburg, Maryland, October 1982