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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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,
Units 1 and 2)

Dockets 50-400 OL
50-401 OL

9 November 1984

RESPONSE TO APPLICANTS' EMERGENCY PLANNING
INTERROGATORIES TO CHANGE (5 Oct. 1984)

On 5 October 1984 Applicants served "Applicants' Emergency Planning Interrogatories and Request for Production of Documents to Sponsors of EPJ-1 (CCNC), EPJ-4 (CHANGE), and EPJ-5 (Wilson)." Following are the responses of Intervenor CHANGE to same.

General Interrogatories

1(a). Daniel F. Read, P.O. Box 2151, Raleigh, NC 27602, Employer--N.C. Court of Appeals, P.O. Box 2779, Raleigh, NC 27602; Wells Eddleman, 718-A Iredell St., Durham, NC 27705, Employer--Self, and Carolina Friends School, Durham, NC; Dr. Richard Wilson, 729 Hunter St., Apex NC 27502, Employer--Wake Health Services, 729 Hunter St, Apex, NC 27502.

1(b). See answers to individual interrogatories. Most answers are based on general knowledge common to all intervenors.

1(c). See answer 1(b).

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- 2(a). Not applicable.
- 2(b). See answer 2(a).
- 3(a). Unknown at this time.
- 3(b). See answer 3(a).
- 3(c). See answer 3(b).
- 4(a). See answer 1(b). Otherwise, documents will be identified in answers to specific interrogatories.
- 4(b). See answer 4(a).
- 4(c). See answer 4(b).
- 5(a). See answers to Specific Interrogatories.
- 5(b). See answer 5(a).
- 6(a). See answer 5(a).
- 6(b). See answer 6(a).
- 7(a). Unknown at this time.
- 7(b). See answer 7(a).

Specific Interrogatories

EPJ-4(a)-1. General knowledge based on attending school in North Carolina and observing school buses, reading papers about student drivers (Dates unknown).

EPJ-4(a)-2. Common experience with 16 to 18-year olds. Contention reads "should not" not "cannot."

EPJ-4(a)-3(a). Authorization indicating that the parents have been fully advised as to the possible consequences of an accident, worst possible evacuation scenario, and duties their children may be required to perform in such situations.

-3(b). To ensure that parents are fully informed of the role their children might be required to assume in accident situations.

EPJ-4(a)-4. See answer EPJ-4(a)-2.

EPJ-4(a)-5. Yes. See answer EPJ-4(a)-4.

EPJ-4(a)-6. None.

EPJ-4(a)-7(a). Not applicable.

-7(b). See answer EPJ-4(a)-7(a).

EPJ-4(a)-8. Unknown at this time. Subject to later objection.

EPJ-4(a)-9. See answer EPJ-4(a)-8. Subject to later objection.

EPJ-4(b)-1. Experience with school bus drivers, too general to identify specifically.

- EPJ-4(b)-2. Maximum high school education.
- EPJ-4(b)-3. General experience. No specific basis.
- EPJ-4(b)-4. Unknown at this time.
- EPJ-4(b)-5. Common human experience.
- EPJ-4(b)-6. See answer EPJ-4(b)-5.
- EPJ-4(b)-7. See answer EPJ-4(b)-6.
- EPJ-4(b)-8. Concern for wife, husband, children, or other members of the immediate family. ~~XX~~
- EPJ-4(b)-9. Unknown at this time.
- EPJ-4(b)-10. Unknown at this time.
- EPJ-4(b)-11. See answer to EPJ-4(b)-7.
- EPJ-4(b)-12. Unknown at this time.
- EPJ-4(b)-13. None.
- EPJ-4(b)-14(a). Not applicable.
- 14(b). Not applicable.
- EPJ-4(b)-15. Unknown at this time. Subject to later objection.
- EPJ-4(b)-16. Unknown at this time. Subject to later objection.
- EPJ-4(c)-1(a). No.
- EPJ-4(c)-1(b). Common sense. Conversations of Dr. Wilson with parents of schoolchildren in Apex area.
- EPJ-4(c)-1(c). Unquantified at this time.
- EPJ-4(c)-1(d). Not applicable.
- EPJ-4(c)-2. Reading the plan; not mentioned therein.
- EPJ-4(c)-3. Should at least be considered, perhaps provision of sufficient school buses so that two trips not necessary. More detailed response not ready at this time.
- EPJ-4(c)-4. Page 6-5 of evacuation time estimate.
- EPJ-4(c)-5. Unknown at this time.
- EPJ-4(c)-6. Not quantified at this time.
- EPJ-4(c)-7. Unknown at this time.
- EPJ-4(c)-8. Unknown at this time.
- EPJ-4(d)-1(a). Yes.
- 1(b). Yes.
- 1(c). Human experience, with family relationships in particular.

EPJ-4(d)-2(a). Not quantified at this time.

-2(b). See answer EPJ-4(d)-2(a).

EPJ-4(d)-3(a). Traffic congestion at schbols and along routes to and from schools, diversion of law enforcement and other emergency personnel.

EPJ-4(d)-3(b). Common sense and human experience.

EPJ-4(d)-4(a). Unquantified at this time.

-4(b). See answer EPJ-4(d)-4(a).

EPJ-4(d)-5(a). Unquantified at this time.

-5(b). See answer EPJ-4(d)-5(a).



Daniel F. Read
PO Box 2151
Raleigh, NC 27602

I hereby affirm that I have prepared the foregoing responses, totalling four (4) pages, and that the information contained therein is true and correct. ~~XXXXXXXXXXXX~~



Daniel F. Read
PO Box 2151
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STATE OF NORTH CAROLINA
COUNTY OF WAKE

I, Debbie T. Barnes (Truelove), notary public for the State and County aforesaid, do hereby certify that Daniel F. Read appeared before me and executed the foregoing, this 9 day of November, 1984.

3

Debbie T. Barnes (Truelove)
Notary Public

My Commission Expires: 2-3-86

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CERTIFICATE OF SERVICE

OFFICE OF SECRETARY
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I hereby certify that copies of "Response to Applicants' EPH Inter-
rogatories to CHANGE (5 Oct. 1984)" were served this 9 day
of November, 1984, by deposit in the U.S. Mail, first-
class postage prepaid, upon all parties whose names appear
below, except those whose names are marked with an asterisk,
for whom service was accomplished by hand delivery.

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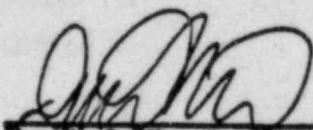
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