

February 1, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNPC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 85 FEB -5 A9:48

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC	)	Docket Nos. 50-440
ILLUMINATING COMPANY	)	50-441
	)	
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	

APPLICANTS' STATEMENT OF MATERIAL  
FACTS AS TO WHICH THERE IS NO  
GENUINE ISSUE TO BE HEARD ON CONTENTION M

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of Contention M in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. There is no regulatory requirement that each jurisdiction with the plume exposure pathway emergency planning zone (EPZ) have its own independent radiation monitoring system or that such systems be fixed. NUREG-0654, Criterion H.7; Affidavit of Ronald W. Smith on Contention M ("Smith Affidavit"), ¶ 3; Affidavit of Richard R. Bowers on Contention M ("Bowers Affidavit"), ¶¶ 2, 7.

2. The State of Ohio has independent radiological assessment capability, including off-site radiological monitoring teams. Smith Affidavit, ¶ 4.

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3. The State has three fully-equipped off-site radiological teams capable of high, mid and low range gamma radiation readings, alpha and beta radiation detection, radioiodine and particulate air sampling. Smith Affidavit, ¶¶ 4, 7.

4. The State has a radio communication system for the immediate and simultaneous data transmission from the field teams to the State and County Emergency Operation Centers and the Perry Emergency Operations Facility. Smith Affidavit, ¶¶ 4, 6.

5. The State radiation monitoring teams are sufficient in number, equipment and communications capability to track a radiation plume independently of the Applicants' radiation monitoring teams. Smith Affidavit, ¶ 8.

6. The Department of Energy, EPA and NRC have field radiation monitoring teams with comparable capability as the State's teams. Smith Affidavit, ¶ 9.

7. A fixed radiation monitoring system would require approximately 103 locations to be sure that a radiation plume would be tracked. Bowers Affidavit, ¶ 2.

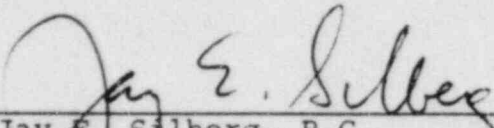
8. The Federal Emergency Management Agency has studied and rejected the concept of a fixed monitoring system based on consideration of maintenance, repair and calibration. Bowers Affidavit, ¶ 2.

9. Mobile survey teams are more effective in evaluating accidental releases than are fixed monitoring locations. Bowers Affidavit, ¶¶ 3-5.

10. Reliance on mobile survey teams is consistent with regulatory guidance. Bowers Affidavit, ¶ 4.

11. Both NRC and the State have fixed independent radiation monitoring systems in place in the plume exposure pathway EP2.

Respectfully submitted,

  
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