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January 29, 1985

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In the Matter of
Carolina Power & Light Company and North
Carolina Eastern Municipal Power Agency
(Shearon Harris Nuclear Power Plant)
Docket No. 50-400 01

Administrative Judges Kelley, Bright and Carpenter:

The Licensing Board has previously rejected Eddleman Contentions 250 and 251, conditioned on a reaffirmation of a commitment "to include in Annex I of the offsite plan all the map information called for by [NUREG-0654] §§ II.J.10.a and b, in legible form prior to fuel loading of the [Harris] facility." See LBP-84-29B, 20 N.R.C. 389, 418 (1984). Based on discussions with the State, this letter reaffirms that commitment.

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Bright and Carpenter
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NUREG-0654 Criterion J.10.a indicates that offsite emergency plans shall include:

Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan);

Annex I of Revision 1 of the North Carolina Emergency Response Plan in Support of the Shearon Harris Nuclear Power Plant (September 1984) -- served on the Board and the parties on October 3, 1984 -- included a 20-mile "Operations Map" which includes, inter alia, evacuation routes, evacuation areas (called "zones"), and evacuation shelters.^{1/} A separate map being prepared by the Radiation Protection Section of the North Carolina Department of Human Resources will include "preselected radiological sampling and monitoring points" as specified by NUREG-0654. This separate map will be included in the next revision of the offsite plan, well before fuel load. (In addition, Applicants note that the State will also be including a 50-mile "Ingestion Pathway Map" in the upcoming revision. See Offsite Plan, at I-1).

^{1/} According to the offsite plans for some nuclear facilities, evacuees would first report to a "relocation center" where they would be registered and, if needed, provided with temporary accommodations at a separate public "shelter area." (See Criterion J.12, defining "relocation center"). In contrast, under the concept of operations reflected in the Harris offsite plan, the evacuating public reports directly to the evacuation shelters for registration and any other necessary services. Any evacuees needing temporary accommodations would stay at the facility where they register. Thus, the North Carolina plan provides for a single type of facility to serve both functions; therefore, only one type of facility is reflected on the map. The "Evacuation Schedule" section of the map correlates each identified evacuation shelter with the evacuation area ("zone") from which it would receive evacuees.

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NUREG-0654 Criterion J.10.b further indicates that offsite plans shall include:

Maps showing population distribution around the nuclear facility.
This shall be by evacuation areas * * *.2/

The "Evacuation Schedule" section of the "Operations Map" included in Annex I of Revision 1 of the offsite plan shows both the permanent and the peak season populations for each of the evacuation zones, thus exceeding the NUREG-0654 criterion.

Respectfully submitted,

Delissa A. Ridgway

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Counsel for Applicants

cc: Attached Service List

2/ Contrary to the implication of LBP-84-29B, 20 N.R.C. at 417-18, offsite plans need only indicate population distribution by "evacuation areas". According to NUREG-0654 Criterion J.10.b., "licensees [in their onsite emergency plan] shall also present the [population distribution] information in a sector format [i.e., in addition to the "evacuation areas" format]" (emphasis supplied). Thus, both onsite and offsite plans are to include maps showing population distribution by "evacuation area," while onsite plans must also show it "in a sector format."

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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