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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

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

Docket Nos. 50-400 JL
50-401 OL

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

FEMA STAFF RESPONSE TO WELLS EDDLEMAN'S GENERAL
INTERROGATORIES, INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS DATED OCTOBER 8, 1984

GENERAL INTERROGATORY A

Please provide answers to any general interrogatory in the 9/5/84 set for which the answer has now changed.

ANSWER

No changes.

GENERAL INTERROGATORY C

Do either FEMA Staff or NRC Staff have any objection to me or persons working on my behalf observing the test of the Harris emergency plan when it happens? Are you willing to work out arrangements for such observations? If you have objections, what are they? Do you believe any of these objections could be resolved on an informal basis (e.g. without a Board ruling)? If so, which?

ANSWER

No. Yes, however, the State government has authority in this matter.

Request for Production of Documents

Wells Eddleman hereby requests that the original or best copy or a fully legible copy of any documents identified in response to interrogatories herein, be made available to him for inspection and copying at a mutually agreeable time and place, or that such document be placed in the NRC's Public Document Room and its location/identifier or identifying information be made available to him.

REQUEST

240-4(a) is it still true that you can't identify any documents in response to interrogatory 240-3? (b) If you can't identify the documents, what is the basis (if any) for each answer to each part of your previous response to all parts/subparts of 240-1 and 240-2? Please give the basis separately for each part and subpart of each of 240-1 and 240-2. (c) What specific cites to the ERP for Harris can you make in response to 240-2(d)? (d) What information, if any, will you provide as a supplemental answer to 240-3?

RESPONSE

240-4(a) FEMA Staff did not state that it could not identify any documents in response to interrogatory 240-3. FEMA Staff responded to all documents concerning responsible agencies where "unknown." One document which states essentially, the FEMA response to Interrogatory 240-1(a) is the "North Carolina Emergency Response Plan," Part 2, Page 35.

(b) See above.

(c) "North Carolina Emergency Response Plan," Part 2, Page 35.

(d) See above.

REQUEST

213-A-4: Please provide actual answers to the parts of interrogatories 213-A-1, 213-A-2, and for 213-A-3 as previously served.

RESPONSE

Actual answers have been given.

REQUEST

213-A-5(a) Please state exactly what is the nature of the review of item P-7 of NUREG-0654 which was performed by (i) the RAC (ii) FEMA Staff, was, and when it was done and by whom. (b) Please describe exactly what it is in the ERP that meets criterion II.P.7 (c) How do you interpret the term "in the plant"-- to be cited, to be included, or some other interpretation (please specify).

RESPONSE

215-A-5(a): (i) and (ii) The nature of the review by RAC and FEMA of Item P-7 consisted of finding and reading the listing of SOP's in each section of the plan within an "attachment." Since the titles of the SOP's are not indicative of which sections of the plan the SOP's pertained to, FEMA Staff has asked the State Division of Emergency Management to obtain and submit all available SOP's to the FEMA regional office.

The review was done by the members of the (names attached) RAC and by FEMA Staff on May 15-16, 1984.

(b) The ERP contains a listing of SOP's in each section under an "Attachment" (or Appendix). In the view of the RAC and FEMA Staff, at the time of the review, these listings constituted compliance with Criterion II.P.7. of NUREG-0654. We (FEMA) have now requested copies of the SOP's.

(c) FEMA Staff interprets the term in the plan to mean "to be cited."

(d) FEMA Staff interprets the term "included in the plan" to mean "to be cited."

REQUEST

213-A-6(a) Has any copy of the RAC or FEMA staff evaluation's of the Harris ERP been served on (i) NRC Staff (ii) NC Emergency Planners (iii) other NC government or county government agencies or personnel (iv) CP&L (v) NCEMPA (vi) Harris licensing proceeding intervenor? (b) has any copy of the RAC or FEMA staff evaluations been made available to anyone in any of the listed groups in subparts (i) ... (vi) to (a) above? If so, to whom, and why??? (c) Are you aware of FEMA counsel Perry's statements in the Harris licensing case prehearing conference of May, 1984, regarding availability of the results of these review to the parties to that case? (d) Do you believe FEMA is in compliance with such statements? (e) Do you have available to you a copy of the transcript of the Harris OL case (NRC Docket 50-400) prehearing conference of May 1984 in which FEMA counsel Perry participated or appeared?

RESPONSE

213-A-6(a) (i) One copy of the RAC evaluation has been forwarded to NRC. (ii) Yes. (iii) No. (iv) No. (v) No. (vi) No.

(b) Yes - to NRC Staff member Robert Trojanowski who is also a member of the RAC. He received his copy in May 1984 and to NRC legal staff for their review.

(c) No firsthand knowledge.

(d) Unknown.

(e) No.

REQUEST

57-c-7(4)(a) Is there an arrangement or typographical error on page 12 of your responses to previously Eddleman/J.I. interrogatories concerning

contention 57-C-7? (b) if so, what is the correct answer or answers to 57-c-7-2 and -3??

RESPONSE

57-c-7(4)(a) The paragraph at the top of page 10 was inadvertently inserted at the top of page 12. Simply delete this paragraph from page 12.

(b) The correct answers to 57-C-7-2 are given on page 11.

A modified answer to 57-C-3(a) is as follows:

(a) (i) No FEMA guidance requires the ability to treat severe radiation exposure per se. NUREG-0654, L.1., requires that each organization shall arrange for hospital and medical services capable of evaluating radiation exposure and uptake, including persons prepared to handle contaminated individuals.

NUREG-0654, L.3., requires that each state develop lists indicating the location of hospitals capable of providing medical support for any contaminated injured individual.

REQUEST

57-C-7-5(a) Please provide a more complete answer to 57-C-7-2, giving answers to each of its parts. (b) Does FEMA have any plans for listing, evaluating, or otherwise inquiring into the capability of hospitals around the Harris plant, to treat severe radiation injury per se? (c) If so, please detail all such plans re items inquired about in (b) above. (d) If you have actually done any of the things inquired about in part (b) above, please tell what you have done and all results of it.

RESPONSE

57-c-7-5(a) FEMA Staff is not aware of the identify of any FEMA documents concerning the questions of whether the ability to treat severe radiation exposure per se is required by FEMA guidance or NRC regulation or rule or any applicable law or requirement. The answer

previously given by FEMA Staff is accurate and complete. NUREG-0654 is the only guidance we have in this area and it does not address the subject of "severe radiation exposure treatment."

(b) We are aware of no such requirements.

57-C-7-6(a) Please provide a more complete answer to 57-C-7-2, giving answers to each of its parts. (b) Does FEMA Have any plans for listing, evaluating, or otherwise inquiring into the capability of hospitals around the Harris plant to treat severe radiation injury per se? (c) If so, please detail all such plans re items inquired about in (b) above. (d) If you have actually done any of the things inquired about in part (b) above, please tell what you have done and all results of it.

RESPONSE

57-C-7-6(a)

Referring to 57-C-7-2:

- (a) i Unknown
- ii Unknown
- (b) Unknown; we don't know; no, we haven't inspected.
 - i Unknown
 - ii Unknown, we don't know;
- (d) i We didn't say this.
- (e) NUREG-0654 and the North Carolina ERP.

- (b) No
- (c) Not applicable
- (d) Not applicable

REQUEST

57-C-7-7(a) Please identify all sources of information you rely on or use in making your answers to the above and all previous interrogatories on 57-C-7.

RESPONSE

57-C-7-7(a) No outside sources or consultants were used or relied on, only NUREG-0654, the contentions and interrogatories themselves and the North Carolina ERP.

ATTACHMENT

RAC Members and FEMA Staff who reviewed the Harris Plan on
May 15-16, 1984.

RAC: H. Richard Payne, EPA; Bradley D. Eichorst, FDA; Robert E.
Trojanowski, NRC; George E. Bickerton, USDA; Alvin W. Hall,
DOT; David Lassiter, DOE.

FEMA Staff: Ray Boyette, Tony Foltman, John Heard, Thomas Hawkins,
Doug Hoell, Shana Aucsmith, Cheryl Stovall, Jack Glover.

45 FR 5847
Published 1/24/80

**Memorandum of Understanding
Between NRC and FEMA To
Accomplish a Prompt Improvement in
Radiological Emergency Planning and
Preparedness**

The Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA) have entered into a memorandum of understanding which delineates each agency's lead responsibilities in radiological emergency preparedness. This memorandum responds to a directive from the President dated December 7, 1979 which defined areas of responsibility for emergency preparedness for the two agencies.

Copies of the memorandum are available for public inspection at the NRC Public Document Room, 1717 H Street, N.W., Washington, D.C. Copies of the memorandum may be obtained by writing to Joseph T. Tilton, Director, Division of Rules and Records, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Telephone 301-492-7211. Included with the memorandum, but not published herewith, are two attachments, (A) FEMA/NRC Steering Committee and (B) Duties of NRC Personnel Detailed to FEMA through June, 1980.

The text of the memorandum of understanding is set forth below:

Background and Purpose

This memorandum of understanding establishes a framework of cooperation between the Federal Emergency Management Agency (FEMA) and the

Nuclear Regulatory Commission (NRC) in radiological emergency response planning matters, so that their mutual efforts will be directed toward more effective plans and related preparedness measures at and in the vicinity of nuclear reactors, fuel cycle facilities which are subject to 10 CFR Part 50 Appendix E, and certain other fuel cycle and materials licensees which have potential for significant accidental off-site radiological releases. The memorandum is responsive to the President's decision of December 7, 1979, that FEMA will take the lead in off-site planning and response, his request that NRC assist FEMA in carrying out this role and the NRC's continuing statutory responsibility for the radiological health and safety of the public.

Separate memoranda will be negotiated covering NRC/FEMA cooperation and responsibilities in response to an actual emergency and Public Information activities. In addition, an agreement has already been reached between the NRC and FEMA on September 11, 1979, that chairmanship of the Federal Interagency Central Coordinating Committee should be transferred from NRC to FEMA. This agreement was transmitted to other Federal agencies by a joint letter from the Chairman of NRC and the Director of FEMA. The NRC and FEMA also agreed in principle on September 11, 1979, to the idea of joint participation in the review, assessment and concurrence with regard to State and local emergency response plans. That agreement will be implemented by FEMA coordinating all Federal planning and by FEMA's taking the lead for developing a program for assessing State and local emergency response plans in all elements of off-site radiological emergency planning, and for making findings and determinations as to the adequacy and capability of implementing State and local plans, and to make those findings and determinations available to NRC. The NRC shall review those FEMA findings and determinations for the purpose of making determinations on the overall state of emergency preparedness for issuance of licenses or shutdowns of operating reactors. The NRC proposal to require concurrence in State and local emergency response plans is described in the proposed emergency planning rule (44 FR 75167, December 19, 1979). This arrangement will make the FEMA staff responsible for evaluating the adequacy of State and local plans and for assuring that the plans are capable of implementation on a continuing basis, and will therefore substantially avoid duplicative efforts by NRC staff.

MEMORANDA OF UNDERSTANDING

II. Authorities and Responsibilities

FEMA—Executive Order 12148 charges the Director, FEMA, with establishing policy for and coordinating all civil emergency planning and assistance functions for Executive agencies (Section 2-101). It also provides that "The Director shall represent the President in working with State and local governments and private sector to stimulate vigorous participation in civil emergency preparedness mitigation, response, and recovery programs." (Section 2-104).

On December 7, 1979, the President, in response to the recommendations of the Kemeny Commission on the accident at Three Mile Island, directed that FEMA assume lead responsibility for all off-site nuclear emergency planning and response.

Specifically, the FEMA responsibilities with respect to emergency preparedness as they relate to NRC are:

1. To take the lead in off-site emergency planning and review and assess State and local emergency plans for adequacy.

2. To complete by June 1980, the review of State and local emergency plans in those States affected by operating reactors.

3. To complete, as soon as possible, the review of State and local emergency plans in those States affected by plants scheduled for operation in the near future.

4. To make findings and determinations as to whether State and local emergency plans are adequate and capable of implementation (e.g., adequacy and maintenance of procedures, training resources, staffing levels and qualifications and equipment adequacy).

5. To assume responsibility for emergency preparedness training of State and local officials.

6. To develop and issue an updated series of interagency assignments which would delineate respective agency capabilities and responsibilities and define procedures for coordination and direction for emergency planning and response.

NRC—The Atomic Energy Act of 1954, as amended, requires that the NRC grant licenses only if the health and safety of the public is adequately protected. While the Atomic Energy Act does not specifically require emergency plans and related preparedness measures, the NRC has required consideration of overall emergency preparedness as a part of the licensing process.

10 CFR 50.34 and Appendix E to 10 CFR Part 50 include requirements for the licensee emergency plans. In a Federal Register Notice dated December 24, 1975, entitled "Radiological Incident

Emergency Response Planning: Fixed Facilities and Transportation" (40 FR 59494), the Federal Preparedness Agency, a predecessor of FEMA, outlined responsibilities of various Federal agencies in providing assistance to State and local governments in their radiological emergency response planning. Both FEMA and NRC recognize that these responsibilities are undergoing reevaluation and that this memorandum of understanding will require reissuance of that Federal Register Notice.

Specifically, the NRC responsibilities for emergency preparedness are:

1. To assess licensee emergency plans for adequacy.

2. To verify that licensee emergency plans are adequately implemented (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications and equipment adequacy).

3. To review the FEMA findings and determinations on the adequacy and capability of implementation of State and local plans.

4. To make decisions with regard to the overall state of emergency preparedness (i.e., integration of emergency preparedness on-site as determined by the NRC and off-site as determined by FEMA and reviewed by NRC) and issuance of operating licenses or shut down of operating reactors.

III. Areas of Cooperation

A. NRC Licensing Reviews

FEMA will provide support for NRC reactor, fuel facility and material licensing reviews, as requested, with regard to the assessment of the adequacy of State and local response plans for accidental radiological releases. This will include timely submittal of a letter evaluation suitable for inclusion in NRC safety evaluation reports.

FEMA will provide NRC with an independent assessment of evacuation times around 12 reactor sites which have the highest population density within the 10 mile emergency planning zone or are mutually agreed upon by FEMA and NRC. FEMA and NRC agree to discuss future arrangements for similar assessments to be performed by FEMA at other sites with operating reactors and at points currently under construction.

Substantially prior to the time that a FEMA evaluation is required with regard to fuel facility and material license review, NRC will supply FEMA with a listing of all fuel and material licensees, identify those with potential for significant accidental off-site radiological releases and for those NRC will submit to FEMA the emergency

plans as they are completed.

FEMA routine support will include providing assessments of State and local plans related to reactor Construction Permit and Operating License reviews and continuing assessments of State and local plans during the facility lifetime. To support its findings and assessments, FEMA will make expert witnesses available before the Commission, the NRC Advisory Committee on Reactor Safeguards, NRC hearing boards and administrative law judges, any court actions, and during any related discovery proceedings. Nothing in this document shall be construed in any way to diminish NRC's responsibility for protecting the radiological health and safety of the public.

B. FEMA Review of State and Local Plans

NRC will assist in the development and review of State and local plans through its membership on the Regional Advisory Committees. FEMA will chair the Regional Advisory Committees.

C. Evaluation of Exercises

FEMA and NRC will cooperate in determining exercise requirements for joint licensee, State, local and Federal exercises and will jointly observe and evaluate such exercises. NRC and FEMA will also jointly agree upon the set of exercise scenarios from which the scenario for a particular exercise will be selected.

D. Emergency Preparedness Guidance

NRC has lead responsibility for the development of emergency preparedness guidance for licensees. FEMA has lead responsibility for the development of emergency preparedness guidance for State and local agencies.

NRC and FEMA recognize the need for an integrated assessment of the degree of emergency preparedness by NRC licensees and State and local governments. NRC and FEMA will each, therefore, provide opportunity for the other agency to review and comment on emergency preparedness guidance prior to adoption as formal agency guidance.

E. Training of State and Local Officials

FEMA will assume lead responsibility for emergency preparedness training of State and local officials. NRC will cooperate in assuring existing NRC sponsored training programs are impacted to the minimum extent during the period January to June, 1980. NRC will inform OMB in writing of its intention to pass responsibility to FEMA for its current training program for State and local officials during FY 1980 and will support FEMA in requesting OMB to transfer the training budget to FEMA in years after FY 1980.

MEMORANDA OF UNDERSTANDING

F. Ongoing NRC Programs

Ongoing NRC programs that are related to State and local emergency planning and preparedness that are supported by FY 80 funds, will continue without interruption unless modifications are recommended to the NRC by the FEMA/NRC Steering Committee. (See IV 4 below).

G. Public Information Programs

FEMA will take the lead in developing public information programs. NRC will assist FEMA by reviewing for accuracy educational materials concerning radiation and its hazards for information regarding appropriate actions to be taken by the general public in the event of an accident involving radioactive materials. A separate memorandum of understanding will be negotiated for Public Information activities.

IV. Near-Term Cooperative Measures

In order to achieve a prompt improvement in the state of emergency preparedness at and around nuclear power facilities, and because of the need for an integrated assessment of the degree of preparedness, FEMA and NRC recognize the need for especially close working relationship over the next six months. To this end, FEMA and NRC agree to the following mode of operation through June of 1980.

1. NRC staff will proceed with the evaluation team review of emergency preparedness at each power reactor and will publish Safety Evaluations on each plant.

2. FEMA will provide members to participate with NRC staff on the evaluation teams. The FEMA team members will participate in the preparation of assessments of the off-site plans along with NRC. Team members will perform according to the procedures described in NRC Steering Committee Memorandum dated November 23, 1979, subject: Guidance on Team Reviews.

3. FEMA will provide an interim evaluation of the adequacy of State and local preparedness associated with each power reactor suitable for attachment to the NRC Safety Evaluation. FEMA will report to NRC on the schedules of State and local governments to upgrade their plans and will prepare a final evaluation when the upgraded plans are completed.

4. The NRC interoffice Steering Committee on Emergency Preparedness will be expanded to an NRC/FEMA Steering Committee consisting of equal number of members to represent each agency with one vote per agency. Where the Steering Committee cannot agree on the resolution of an issue, the issue will be referred to NRC and FEMA management. The NRC members will

have lead responsibility for licensee preparedness and the FEMA members will have lead responsibility for State and local preparedness. The Steering Committee will oversee the evaluation team review activities and develop upgraded acceptance criteria for licensee. State and local emergency preparedness, NRC and FEMA will then consider and adopt criteria, as appropriate, in their respective jurisdictions. (See Attachment 1).

5. To permit the orderly transfer from NRC to FEMA of the lead responsibility for evaluating State and local plans and preparedness, the NRC staff who had been performing this function will be assigned through June 1980 to work directly with FEMA. Those incidental activities, such as responding to correspondence that would normally be handled by the NRC's State Programs Emergency Preparedness Staff will continue to be handled by these personnel while assigned to FEMA. (See Attachment 2).

6. NRC will ensure continuation of NRC computer and automatic data processing support (including TERA record keeping system support) to the NRC staff personnel detailed to FEMA.

7. NRC Program Support funds specifically identified in the FY 80 budget (including supplemental), for the emergency preparedness function of NRC's Office of State Programs, and NRC FY 80 travel funds in the amount of \$25,000 will be maintained as is, and continue to be managed by the NRC staff detailed to FEMA, to ensure that ongoing programs affecting State and local government emergency preparedness are not interrupted.

V. Working Arrangements

A. The normal point of contact for implementation of the points in this agreement will be the NRC/FEMA Steering Committee.

B. The Steering Committee will establish the day-to-day procedures for carrying out the arrangements of this memorandum.

VI. Term of Agreement

A. This agreement shall be effective as of January 14, 1980 and shall continue in effect through September, 1980, unless terminated by either party upon 120 days' notice in writing.

B. Amendments or modifications to this Agreement may be made upon written agreement by both parties to the Agreement.

Approved for the U.S. Nuclear Regulatory Commission.
Lee V. Gossick,

Executive Director for Operations.

Dated: January 11, 1980.

Approved for the U.S. Federal Emergency Management Agency.

Frank Camm,

Associate Director for Plans and Preparedness.

Dated: January 11, 1980.

Attachments:

1. FEMA/NRC Steering Committee
2. Duties of NRC Personnel Detailed to FEMA through June 1980.

(5 U.S.C. 552(a))

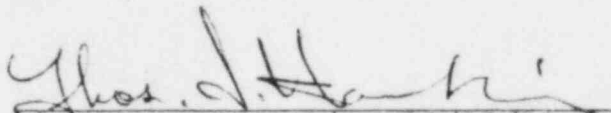
Dated at Bethesda, Md., this 17th day of January 1980. For the Nuclear Regulatory Commission

Lee V. Gossick,

Executive Director for Operations.

AFFIDAVIT

The below subscribed person hereby affirms, subject to penalty of perjury, that he has answered the Interrogatories of Intervenor Wells Eddleman as identified below. The answers are true and correct to the best of his knowledge and belief as is also the attached statement of professional qualifications.


Thomas I. Hawkins 10/22/84

Dated at
Atlanta, Georgia
this 22nd day of October, 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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

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

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

Docket Nos. 50-400-OL
50-401-OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF AND FEMA RESPONSE TO WELLS EDLEMAN'S GENERAL INTERROGATORIES, INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS DATED OCTOBER 8, 1984" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 25th day of October, 1984:

James L. Kelley, Chairman*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Atomic Safety and Licensing Appeal
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
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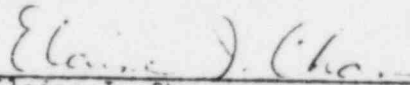
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