

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-----------------------------|---|--------------------|
| In the Matter of |) | |
| |) | |
| COMMONWEALTH EDISON COMPANY |) | Docket Nos. 50-456 |
| |) | 50-457 |
| (Braidwood Nuclear Power |) | |
| Station, Units 1 and 2) |) | |

INTERROGATORIES TO INTERVENOR
 BOB NEINER FARMS, INC., ET AL. - SET II

Applicant, Commonwealth Edison Company, hereby serves upon Intervenor Bob Neiner Farms, Inc., et al. this second set of written interrogatories pursuant to 10 C.F.R. § 2.740b. Each interrogatory should be answered separately and fully in writing, under oath or affirmation, within 14 days after service.

NEINER FARMS CONTENTION 3

1. Identify the source(s) (documents and/or persons) of Intervenor's knowledge of the emergency plans for Braidwood Station.

2. Inasmuch as the emergency plans for the Braidwood Station are not yet available, identify the emergency plans which Intervenor contends are inadequate.

3. Define the nature and extent of a "radiological emergency" as contemplated by Intervenors in the preamble of Neiner Farms Contention 3.
4. Identify the document(s) which and/or the person(s) whose opinion provide the basis for the Intervenor's contention that the emergency plans for the Braidwood Station are inadequate.
5. State with particularity the bases for Intervenor's contention that the emergency plans are inadequate.
6. State with particularity the bases for Intervenor's contention that the emergency plans should include the six items specified in Neiner Farms Contention 3. subparagraphs "a" through "f".
7. Inasmuch as the emergency plans for the Braidwood Station are not available, state the bases for Intervenor's inference that the six items specified in Neiner Farms Contention 3 subparagraphs "a" through "f" are not or will not be included in the emergency plans for Braidwood Station.
8. State whether the distribution of brochures which inform the public of radiological emergency procedures

would satisfy Intervenor's concerns expressed in Neiner Farm Contention 3, subparagraph "a". If not, define the program contemplated by Intervenor for informing and educating the public of radiological emergency procedures.

9. State with particularity the elements of the "public" contemplated by Intervenor in Neiner Farm Contention 3, subparagraph "a".
10. Define the nature and extent of a "radiological emergency" as contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "a".
11. Identify the "response [the public] should take" contemplated by the Intervenor in Neiner Farms Contention 3, subparagraph "a".
12. Identify the "means for obtaining instructions" contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "a".
13. State whether the use of sirens and television and radio announcements to notify residents and persons using recreational facilities within 10 miles of Braidwood Station of a radiological emergency would

satisfy Intervenor's concerns expressed in Neiner Farms Contention 3, subparagraph "b". If not, define the "specific plan" contemplated by the Intervenor for such notification.

14. Define the elements of notification as contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "b".
15. Identify the specific recreational facilities contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "b".
16. State with particularity the elements of the "public" contemplated by Intervenor in Neiner Farm Contention 3, subparagraph "b".
17. Define the elements of an "assurance . . . that institutions can be evacuated or adequately protected in a radiological emergency" as contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "c".
18. Identify the specific hospitals and nursing homes contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "c".

19. Identify with specificity all other institutions, if any, contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "c".
20. Define the nature and extent of a "radiological emergency" as contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "c".
21. Define the nature and extent of a "nuclear emergency" as contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "d".
22. State with particularity the amount and type of radiation exposure contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "d".
23. State with particularity the types of injury contemplated by Intervenor resulting from a "nuclear accident" in Neiner Farms Contention 3, subparagraph "d".
24. State with particularity the type(s) of medical treatment contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "d".
25. Identify the bases (documents and/or persons) for Intervenor's belief that as a result of a radiological

accident members of the general public would be exposed to the levels of radiation indicated in answer to question 22.

26. Define the elements of an "assurance that these facilities are capable of handling the treatment" as contemplated by the Intervénors in Neiner Farms Contention 3, subparagraph "d".
27. Define the nature and extent of "an accident" as contemplated by Intervénors in Neiner Farms Contention 3, subparagraph "e".
28. Define the type and amount of radiation exposure contemplated by Intervénors in Neiner Farms Contention 3, subparagraph "e".
29. Define the nature and extent of "radiation casualties" as contemplated by Intervénors in Neiner Farms Contention 3, subparagraph "e".
30. State with particularity the persons who comprise "operating personnel " as contemplated by Intervénors in Neiner Farms Contention 3, subparagraph "e".

31. Define the elements of a "suitable plan" as contemplated by Intervenor in Neiner Farms contention 3, subparagraph "e".
32. Identify the "public and private organizations" contemplated by Intervenor in Neiner Farms Contention 3, subparagraph "f".
33. Identify by name, title or position, and address all persons Intervenor intends to present as witnesses to testify with regard to Neiner Farms Contention 3.

Submitted by:

Victor Copeland

One Of The Attorneys For
Applicant
COMMONWEALTH EDISON COMPANY

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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COMMONWEALTH EDISON COMPANY) Docket Nos. 50-456
) 50-457
(Braidwood Nuclear Power Station)
Units 1 and 2)

CERTIFICATE OF SERVICE

I hereby certify that copies of the Interrogatories To Intervenor Bob Neiner Farms, Inc., Et Al. - Set II and Interrogatories To Intervenor Bridget Little Roram and Appleseed Alliance were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, this 12th day of March, 1985.

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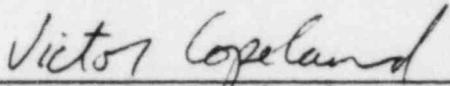
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