

January 14, 1985

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
REGULATORY & SERVICE
BRANCH

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))	

APPLICANTS' STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE IS NO GENUINE ISSUE
TO BE HEARD ON EDDLEMAN 215(3)

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of Eddleman 215(3), that there is no genuine issue to be heard with respect to the following material facts:

1. The Harris ETE utilizes a state-of-the-art computer simulation designed to project evacuation times as accurately as possible. Simplifying assumptions must be used in order to develop input data that can be effectively used for the computer simulation. Klimm Affidavit, ¶ 3.
2. NUREG-0654 recognizes that some such assumptions must be made. Appendix 4 to NUREG-0654, which contains acceptance criteria for evacuation time estimates, provides that the analyses should indicate the assumptions which underlie the time estimates. Klimm Affidavit, ¶ 3.

3. The assumptions used to develop the evacuation time estimates presented in the Harris ETE (including the methodology used to estimate vehicle demand of permanent residents) were developed based upon informal discussions held with state and county emergency preparedness officials, empirical data on past evacuations; and the knowledge and experienced obtained by HMM Associates in conducting similar evacuation time studies for more than 20 nuclear power plant sites throughout the country. Klimm Affidavit, ¶ 4.

4. The assumptions incorporated into the Harris ETE are consistent with those used by HMM Associates in its compilation of similar analyses for other nuclear power plant sites. Most of the more than twenty evacuation time analyses prepared by HMM Associates already have been found acceptable by the NRC; the remaining analyses are currently under review. Klimm Affidavit, ¶ 3.

5. The ETE used the best data available at the time of the study to estimate the number of households within the EPZ which do not own vehicles and, accordingly, would need some type of transportation assistance in an evacuation. The methodology used in the ETE assumes that vehicle occupancy rates for the non-auto-owning population are the same as those for the auto-owning population; that is, one vehicle per household. Klimm Affidavit, ¶ 5.

6. The ETE figure of 410 households was based on data from the 1980 Census of Population, Advance Estimates of Social, Economic, and Housing Characteristics. The ETE estimates of this population were refined (based on later, more detailed Census data indicating 655 households), for the purpose of assessing the transportation resources available to evacuate persons needing official transportation assistance. The refined figures would have no discernible impact on the evacuation times presented in the ETE. Klimm Affidavit, ¶ 5 n.2.

7. In the event of an actual evacuation due to an emergency at the Harris plant, transportation for all non-auto-owning households would be furnished through rides with friends, neighbors, or relatives, or through coordinated efforts by state and county emergency preparedness officials. The exact number of vehicles necessary to evacuate this population category would vary based upon several factors, including the type and numbers of transportation resources available at the time of the evacuation. Klimm Affidavit, ¶ 6; Mileti Affidavit, ¶ 2.

8. The assumption that non-auto-owning households would evacuate at the rate of one vehicle per household was specifically reviewed with the local emergency preparedness officials and determined to be appropriate as the most realistic means of representing the evacuation traffic which

would be generated in the provision of transportation assistance (by friends or family, or emergency response personnel) for non-auto-owning households. Klimm Affidavit, ¶ 7.

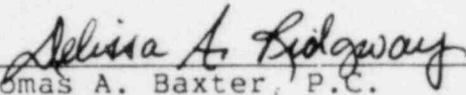
9. The assumption that non-auto-owning households would each generate the traffic associated with one vehicle is a reasonable means of simulating traffic along the roadway network, following internal routes to collect non-auto-owning passengers. (This traffic could range from cars or vans going to individual homes to pick up evacuees, to larger vehicles -- such as buses -- traveling from one pickup point to another to pick up evacuees.) Klimm Affidavit, ¶ 8.

10. For purposes of estimating evacuation times, the type and number of vehicles used to evacuate the non-auto-owning population within the EPZ are relatively insignificant, because that population category is a relatively small percentage of the total population within the EPZ. A reduction of a total of 410 (or 655) vehicles would not reduce evacuation time estimates appreciably -- i.e., a reduction of 10 minutes might be achieved by changing this assumption to include no vehicles to handle the non-auto-owning population. Klimm Affidavit, ¶ 9.

11. Eliminating the challenged assumption (to -- in effect -- reflect no vehicles to evacuate the non-auto-owning population) would underestimate the time required for evacuation. Klimm Affidavit, ¶ 9 n.4.

12. The assumption that the non-auto-owning population would evacuate at the rate of one vehicle per household results in realistic estimates of the evacuation times for the Harris EPZ. The assumption is not a "conservatism" that results in an overestimate of evacuation times. Klimm Affidavit, ¶ 10.

Respectfully submitted,


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