

January 14, 1985  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
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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)	)	

APPLICANTS' STATEMENT OF MATERIAL FACTS  
AS TO WHICH THERE IS NO GENUINE ISSUE  
TO BE HEARD ON EPJ-4(c)

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of EPJ-4(c), that there is no genuine issue to be heard with respect to the following material facts:

1. In the Wake County public school system, the Apex Attendance Area has a total of 48 buses available. Of these, only thirty would be used for school evacuation in the event of an emergency at the Harris plant. Pugh Affidavit, ¶ 3.

2. The enrolled student population (490 students) at Apex Elementary School would be evacuated using seven buses (with a combined capacity of 504 students). Pugh Affidavit, ¶ 3.

3. The 537 students enrolled at A.V. Baucom Elementary School would be evacuated using eight buses (with a combined capacity of 576 students). Pugh Affidavit, ¶ 3.

4. At Apex Middle School, eleven buses (with a combined capacity of 682 students) would evacuate the enrolled student population of 679 students. Pugh Affidavit, ¶ 3.

5. At Apex High School, four buses (with a combined capacity of 248 students) would be used to evacuate the approximately 190 students who do not provide their own transportation. Pugh Affidavit, ¶ 3.

6. The Fuquay-Varina Attendance Area has a total of 8 small buses and 30 large buses available. Of these, all of the small buses and 29 of the large buses would be used for school evacuation in the event of an emergency at the Harris plant. Pugh Affidavit, ¶ 4.

7. The enrolled student population (387 students) at Fuquay-Varina Elementary School would be evacuated using six large buses (with a combined capacity of 432 students). Pugh Affidavit, ¶ 4.

8. The 510 students enrolled at Lincoln Heights Elementary School would be evacuated using one small bus and seven large buses (with a combined capacity of 534 students). Pugh Affidavit, ¶ 4.

9. At Fuquay-Varina Middle School, seven small buses and seven large buses (with a combined capacity of 644 students) would evacuate the enrolled student population of 624 students. Pugh Affidavit, ¶ 4.

10. At Fuquay-Varina High School, nine large buses (with a combined capacity of 558 students) would be used to evacuate the approximately 500 students who do not provide their own transportation. Pugh Affidavit, ¶ 4.

11. At both the high schools within the EPZ, significant numbers of students provide their own transportation. Pursuant to school policy, with prior written parental consent, these students would be released in the event of an evacuation, to take advantage of their available means of private transportation. Pugh Affidavit, ¶ 3 n.2, ¶ 4 n.4.

12. At Wake Chapel School, a K-8 private school in Fuquay-Varina, one small bus (with a capacity of 20 students), two larger school buses (with a combined capacity of 85 students), and the personal vehicles of seven school staff personnel (each carrying 1 adult staff person plus 3 students) are available to evacuate the enrolled student population of 125 students, in the event of an emergency at Harris. Pugh Affidavit, ¶ 5.

13. At Moncure Elementary School, in Chatham County, five buses (with a combined capacity of 330 students) are available to evacuate the enrolled student population of 280 students, in the event of an emergency at Harris. Pugh Affidavit, ¶ 6.

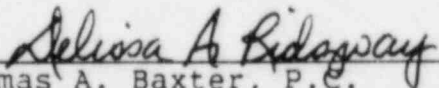
14. The figures used to assess the need for resources reflect several conservatisms which may in fact reduce the number of buses actually needed for school evacuation. First, school officials indicate that daily student absenteeism averages 5%

to 10% of enrollment (depending upon, e.g., the season). Second, the inclusion of standees in the calculation of bus capacity would increase the capacity of each large bus by approximately 10 students. Pugh Affidavit, ¶ 7.

15. Ample bus capacity exists to accommodate contingencies such as, e.g., a day when fewer students than usual drive to school. Pugh Affidavit, ¶ 8.

16. Based on contacts with appropriate school authorities, there is confidence that sufficient transportation resources are available to evacuate the schools in the EPZ in a single trip, in the event of an emergency at Harris. Pugh Affidavit, ¶ 9.

Respectfully submitted,

  
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