

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
GEORGIA POWER CO., et al.  
(Vogtle Electric Generating Plant,  
Units 1 and 2)

Docket Nos. 50-424 and 50-42585 JUN 26 A10:14

## JOINT INTERVENORS' REVISED CONTENTION RELATING TO EMERGENCY RESPONSE

In April, 1984, Intervenor Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy separately filed a contention objecting to the inadequacy of the Applicants' proposed emergency response for Plant Vogtle. The Applicants subsequently withdrew the plan and the Licensing Board ruled that Intervenor could file a new contention relating to emergency response thirty days from the date final plans were submitted for Burke and Richmond Counties. Since that time, at the request of the Board, Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy have joined interventions and are hereinafter referred to as "Intervenor."

In May, 1985, Applicants filed a Preliminary Draft emergency response plan for Burke County. No mention was made of when a final plan would be ready, and no mention was made of a plan for Richmond County. At the end of May, 1985, counsel for the Applicants mailed a letter to counsel for the Intervenor stating that the Richmond County plan had been filed earlier in May; again, no mention was made of when a final plan would be completed and no mention was made of a plan for Richmond County.

On Friday, June 21, 1985, counsel for Applicants informed a representative of Intervenor by telephone that there would be no plan for Richmond County and that the "Preliminary Draft" plan for Burke County was in fact the final plan. Counsel

for the Applicants said he was at a loss to explain why the Board had stated that a plan for Richmond County would be submitted. He further stated that no further plans would be submitted.

Intervenors submit this contention relating to emergency response based on Applicants' statement in late June that all emergency response plans have been filed; the cover of what Intervenors received from Applicants in early May is enclosed, and is clearly stamped "PRELIMINARY DRAFT" in huge letters, letters far larger than the title or anything else in the plan. Further, every page of the plan is stamped DRAFT. There is absolutely no indication anywhere that this is intended by Applicants to represent their final plan.

Only by phone on June 21 did Applicants notify Intervenors that the "final" plan had been submitted. Therefore, Intervenors have until thirty days past that date to file a contention based thereon.

This contention is therefore timely filed in compliance with the order of the Licensing Board.

Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy hereby submit the following contention relating to emergency response, followed by the basis therefore.

Applicants proposed emergency plan fails to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at Plant Vogtle, as required by 10 CFR 50.33, 50.47, 50.54 and Appendix E to Part 50.

Applicants fail to show that each principal response organization has the staff to respond and to augment its initial response on a continuous basis, as required by 10 CFR 50.47(b)(1). For example, Applicants rely upon the Burke County Emergency Management Agency to coordinate emergency planning and operation activities. Applicants fail to note, however, that Burke County has no full-time emergency manager or office. In addition, in listing the state agency resources available to

respond to an emergency at Plant Vogtle (Table D-1) Applicants fail to include an estimate of the number of personnel available at each agency.

Applicants fail to show that provisions exist for prompt communications among principal response organizations to emergency personnel and the public as required by 10 CFR 50.47(b)(6). For example, the Burke County plan states that the means of communication among local governments and respective department/agency personnel within the Plum Exposure Pathway GPZ are, primarily, dedicated circuits and commercial phone lines, and secondly, radio systems. This plan ignores the probability that both dedicated and commercial phone lines will quickly become overloaded and incapacitated and in the event of a radiological accident at the plant the limited radio bans made available to emergency response vehicles will just as quickly become congested. In addition, the Acting Director of Emergency Management of Richmond County, Pam Smith, states that she occasionally has difficulty contacting emergency personnel in Burke County due to the lack of a full-time emergency planner. The plan provides for notification of the public in the Plume Exposure Pathway by use of tone alert radio receivers installed in each household in the EPZ. This provision ignores the fact that these devices are often shut off permanently by residents who become aggravated by its tendency to go off frequently without reason. Applicants cannot ensure that all residents have televisions or radios to turn to for additional information in the event of a radiological accident. Applicants list a number of warning devices that might be implemented such as autos and boats equipped with sirens or loudspeakers, door-to-door contact in remote areas and aircraft equipped with sirens to be used in remote areas; however, there is no assurance that such equipment is available to local governments or that personnel will be available to operate this equipment. An adequate county-wide siren warning system which Smith sees as a top priority in the event of Vogtle operation would require installation of a minimum of 200 sirens for \$5,000 each, totalling \$1,000,000. The County has lacked the funds to install such

a system in the past. The plan also fails to address how sirens will operate in the event of a power failure. Additionally, Applicants provide no assurance that transients who are unfamiliar with the area will understand the implications of a warning signal in the event they are able to hear it. Also, Applicants fail to provide adequately for notification and evacuation of hearing impaired and other handicapped persons.

Similarly, Applicants fail to show that they have the capabilities to notify responsible state and local governmental agencies within 15 minutes after declaring an emergency as required by 10 CFR Appendix E(10)(D)(3) because they rely upon the same unreliable means of communication (dedicated and commercial phone lines and radio) as described above.

Applicants fail to show that adequate emergency facilities and equipment to support the emergency response are provided and maintained as required by 10 CFR 50.47(b)(8). For example, the Burke County plan shows the county has only four emergency medical response vehicles. The Burke County Hospital, which the Plan says will handle the treatment of both radiation-contaminated and noncontaminated injuries, has a bed capacity of only 52. Such facilities are unlikely to be sufficient to service a large number of injured in the event of a fairly serious radiological accident or of an accident external to the plant which results in injury to the plant, such as an earthquake or a nuclear attack, where non-plant related injuries will also be rampant. Furthermore, the Plan does not specify whether the designated Reception Center, the Burke County Comprehensive High School, has developed an adequate plan for early evacuation.

Applicants have not shown, pursuant to 10 CFR Part 50 Appendix E, IV D.2 and 50.47(b)(7) that adequate and credible education and notification procedures will be followed during normal plant operation and in the event of an accident at Vogtle. These requirements include "basic emergency planning information," "general

information as to the nature and effects of radiation," "signs or other measures...helpful if an accident occurs." 10 CFR Appendix E, IV, D.2.

Applicants claim that the Department of Energy (Savannah River Plant Operations Office, Aiken, South Carolina) will provide radiological assistance (advice and emergency action essential for the control of immediate hazards to health and safety) in the event of an emergency at Vogtle. It fails to address the possibility that an emergency situation (for example, an earthquake) which threatens the safe operation of Vogtle might also endanger operations at Savannah River Plant. In this event, not only would Department of Energy offices be prevented from providing aid to Vogtle, other federal, state and local assistance resources would be divided between the two sites. Applicants do not address the impacts of simultaneous evacuation from both plants, or overload of medical facilities and emergency vehicles in the event of injury to persons by the operation of both plants. Nor do Applicants adequately discuss coordination of activities of Georgia and South Carolina's agencies.

The evacuation of the 145,000 citizens of Augusta who live within 26 miles of Plant Vogtle is not addressed in the Emergency Plan though Applicants should be prepared for the displacement of a significant number of the population outside the EPZ due to predictable public response to a limited evacuation. For example, during the accident at Three Mile Island-2, over 30% of the people living within a fifteen mile radius of the plant evacuated though only a precautionary warning to pregnant women and small children within a five-mile radius of the plant had been issued. (J. H. Johnson, "Planning for Spontaneous Evacuation During a Radiological Emergency," Nuclear Safety, Vol. 25, No. 2, March-April 1984) Nor is the likelihood that people will disregard official orders and instructions during a nuclear power plant accident. (Ibid.)

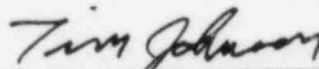
Applicants have failed to plan for a situation where emergency response is hampered by an earthquake and resulting structural damage to roads. The Plan also

fails to address the fact that in the event of an earthquake, sheltering is not possible as residents are directed to remain outside houses and other buildings. Applicants have also failed to provide a complete list of the orchards and farms within the congestion pathway.

Applicants fail to address the effects on evacuation of the many thousand construction workers at Unit 2 of Plant Vogtle if an accident should occur at Unit 1 before completion of construction at Unit 2.

In light of the afore-mentioned facts, Applicants have failed to show that in the event of an accident at Plant Vogtle, adequate notification, communication, education, evacuation and relocation can take place for permanent, transient and special populations living within the Emergency Planning Zone.

Respectfully submitted this, the 24th day of June, 1985,



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for Intervenors  
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and  
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# PRELIMINARY

## 1 DRAFT

ANNEX D

PLANT VOGTLE  
TO THE  
GEORGIA RADIOLOGICAL  
EMERGENCY PLAN

APRIL 1985

Attachment A  
p. 1 of 1

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