

REGISTERED CORRESPONDENCE

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OFFICE OF SECRETARY
DOCKETING & SERVICE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
GEORGIA POWER COMPANY, <u>et al.</u>	:	Docket Nos. 50-424 ⁰²
(Vogtle Electric Generating	:	50-425 ⁰²
Plant, Units 1 and 2)	:	

APPLICANTS' FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
ON EMERGENCY PLANNING CONTENTIONS

These interrogatories and these requests for production of documents are directed to Joint Intervenors Campaign for a Prosperous Georgia/Georgians Against Nuclear Energy and pertain to contentions admitted by the Atomic Safety and Licensing Board in its "Memorandum and Order (Ruling on Joint Intervenors' Proposed Contentions on Emergency Planning)" dated August 12, 1985.

Answers or objections to these interrogatories and responses or objections to the requests for production of documents must be served within the time specified in the Commissioner's Rules of Practice. Response times would be controlled by a Board order establishing a discovery schedule, if such an order issues prior to the time for filing of these responses.

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The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately and fully in writing under oath or affirmation. The interrogatories are intended to be continuing in nature and, pursuant to 10 C.F.R. § 2.740(e), the answers must be immediately supplemented or amended, as appropriate, should Joint Intervenors obtain any new or differing information responsive to the interrogatories.

The requests for production of documents are filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenors produce and furnish copies of, or permit Applicants to inspect and copy, any documents that are responsive to the requests and that are in the possession, custody, or control of Joint Intervenors. The requests for production of documents are also continuing in nature, and Joint Intervenors must produce immediately any documents they obtain which are responsive to the requests.

I. INSTRUCTIONS

The following instructions and definitions apply to Applicants' interrogatories and requests for production of documents.

When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, transcript, book, pamphlet, handwritten notes, etc.) and state the following information as applicable to the particular document:

document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely. When identification of a person is requested, state that person's full name, present employer or business affiliation, present address, and present telephone number.

The following terms shall have the meaning indicated below:

1. "VEGP" or "Vogtle" means the Vogtle Electric Generating Plant, Units 1 and 2.
2. "Joint Intervenors," "Intervenors," "you," or "your" refers to Georgians Against Nuclear Energy (GANE) or Campaign for a Prosperous Georgia (CPG) and all directors, officers, shareholders, members, employees, agents, consultants, attorneys, or other representatives of GANE or CPG.
3. "Document" means any handwritten, typed, printed, graphic, photographic, mechanically recorded, computer stored, filmed, or other verbal or pictorial matter of whatever character, however produced or reproduced, of any kind and description. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original. "Document" shall be construed broadly, and includes, but is not limited to, inter-office and intra-office memoranda, other memoranda, letters and other correspondence, reports, surveys,

tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes of telephone calls and personal conversations, other notes, speeches, articles, transcripts, recordings, telegrams, teletypes, telex messages, and all other writings or recordings of any kind.

4. The "Vogtle Plan" refers to the "Vogtle Electric Generating Plant Unit 1 and Unit 2 Emergency Plan," Volumes 1 and 2, served on Joint Intervenors on November 30, 1984, including Revision 1, dated May 1985, served on Joint Intervenors on May 17, 1985.

5. The "County Plan" refers to the "Burke County Emergency Management Agency Radiological Emergency Plan For Nuclear Incidents/Accidents Involving Vogtle Electrical Generating Plant," dated April 1985, served on Joint Intervenors on May 3, 1985.

6. The "State Plan" refers to "Annex D, Plant Vogtle, To The Georgia Radiological Emergency Plan," dated April 1985, served on Joint Intervenors on May 3, 1985, as well as to the "State of Georgia Radiological Emergency Plan -- Base Plan."

7. "Offsite plans" refers to the "County Plan" and the "State Plan," as defined above.

II. INTERROGATORIES

In answering each interrogatory, please recite the interrogatory before providing the response.

A. Specific Interrogatories

Contention EP-1/EP-1(a)/EP-2(b)
(24-hour Staffing of Burke County ENN Link)

EP-1(a)-1. In GANE's April 11, 1984 "Supplement To Petition For Leave To Intervene and Request For Hearing" and in CPG's May 25, 1984 "Amendment To Supplement To Petition For Leave To Intervene and Request For Hearing," Intervenors identified an April 4, 1984 conversation between Dr. Judy Gordon and Ms. Pam Smith as a basis for your allegation that there is "occasionally * * * difficulty in contacting emergency personnel in Burke County due to the lack of a full-time emergency planner." Describe all bases for that allegation, including (but not limited to) an identification of the date and time of each unsuccessful attempted contact, and the means used in the attempted contact (i.e. commercial telephone, the Emergency Notification Net ("ENN"), etc.).

EP-1(a)-2. Describe in detail the April 4, 1984 conversation between Dr. Judy Gordon and Ms. Pam Smith, including (but not limited to) the time of the conversation, a listing of all persons present during any part of the conversation, and a discussion of the substance of the conversation.

EP-1(a)-3. State whether you contend that Director of the Burke County Emergency Management Agency is not a full-time position. If your answer is affirmative, specify the bases for your answer.

EP-1(a)-4. State whether you contend that the difficulties allegedly encountered in contacting Burke County emergency personnel still exist even though Director of the Burke County Emergency Management Agency is now a full-time position. If your answer is affirmative, specify the bases for your answer.

EP-1(a)-5. State whether you contend that the Burke County ENN link will not be staffed on a 24-hour basis. If your answer is affirmative, specify the bases for your answer.

EP-1(a)-6. State whether you contend that Burke County fails to provide for "24-hour per day manning of communications links that initiate emergency response actions" in accordance with NUREG-0654 Criterion F.1.a. If your answer is affirmative, specify the bases for your answer.

EP-1(a)-7. If your answer to Interrogatory EP-1(a)-6 above is affirmative, identify each respect in which Burke County allegedly fails to provide for "24-hour per day manning of communications links that initiate emergency response actions", and specify the bases for your answer.

EP-1(a)-8. If your answer to Interrogatory EP-1(a)-6 above is affirmative, describe all changes you believe must be made to the Cont. Plan and all other actions you believe must be taken to provide for "24-hour per day manning of communications links that initiate emergency response actions." Specify the bases for your answer.

EP-1(a)-9. State whether you contend that the procedure to be followed by the Sheriff's Department upon notification of an emergency at Vogtle could not initiate an emergency response in a timely and efficient fashion. If your answer is affirmative, specify the bases for your answer.

EP-1(a)-10. If your answer to Interrogatory EP-1(a)-9 above is affirmative, identify each respect in which the procedure to be followed by the Sheriff's Department is allegedly inadequate to initiate timely emergency response, and specify the bases for your answer.

EP-1(a)-11. If your answer to Interrogatory EP-1(a)-9 above is affirmative, describe all changes you believe must be made to the County Plan and all other actions you believe must be taken to assure that the procedure to be followed by the Sheriff's Department is adequate to initiate timely emergency response. Specify the bases for your answer.

EP-1(a)-12. State whether you contend that changes must be made in the County Plan to meet the concern expressed in EP-1/EP-1(a)/EP-2(b) as admitted by the Board (i.e., 24-hour staffing of the Burke County ENN link). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-1(a)-13. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-1(a)-12 above) to meet the concern expressed in EP-1/EP-1(a)/EP-2(b) as admitted by the Board (i.e., 24-hour staffing of the Burke County ENN link). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-2/EP-2(a)
(Administrative Controls Over ENN Use)

EP-2(a)-1. State whether you contend that there are inadequate administrative controls over the ENN system to restrict use of the system to the transmission of official and necessary messages. If your answer is affirmative, specify the bases for your answer.

EP-2(a)-2. If your answer to Interrogatory EP-2(a)-1 above is affirmative, identify specifically (by location) all ENN terminals for which you contend there are insufficient administrative controls. Specify the bases for your answer.

EP-2(a)-3. For each ENN terminal specified in your answer to Interrogatory EP-2(a)-2 above, describe the existing administrative controls over the use of that terminal. Specify the bases for your answer.

EP-2(a)-4. For each ENN terminal specified in your answer to Interrogatory EP-2(a)-2 above, describe the administrative controls which you believe should be in place for that terminal, but which are not now in place. Specify the bases for your answer.

EP-2(a)-5. For each individual administrative control identified in your answer to Interrogatory EP-2(a)-4 above, list by jurisdiction all emergency response organizations within the plume EPZs of other nuclear plants in the U.S. which have implemented that specific administrative control over their dedicated emergency telecommunications systems. Specify the bases for your answer.

EP-2(a)-6. State whether you contend that changes must be made in the Vogtle Plan and/or the offsite plans to meet the concern expressed in EP-2/EP-2(a) as admitted by the Board (i.e., administrative controls over ENN use). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-2(a)-7. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-2(a)-6 above) to meet the concern expressed in EP-2/EP-2(a) as admitted by the Board (i.e., administrative controls over ENN use). If your answer is

affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-2/EP-2(c)
(Use of NOAA Tone Alert Radios)

EP-2(c)-1. State whether you object only to the use of NOAA tone alert radios, or also to the use of other types of tone alert radios. If you object to tone alert radios other than NOAA radios, state all types to which you object, and explain in detail the reasons for your objections.

EP-2(c)-2. State whether you contend that some tone alert radio system other than the NOAA system should be used in the Vogtle plume EPZ. If your answer is affirmative, specify the bases for your answer.

EP-2(c)-3. If your answer to Interrogatory EP-2(c)-2 above is affirmative, identify specifically the tone alert radio system you propose for use in the Vogtle plume EPZ, describe its advantages over the NOAA system, and list all other U.S. nuclear plants which have the type of tone alert radio you propose in use within their plume EPZs.

EP-2(c)-4. Identify specifically each type of tone alert radio which is commercially available in the United States. Specify the bases for your answer.

EP-2(c)-5. Describe in detail each type of tone alert radio listed in your answer to Interrogatory EP-2(c)-4 above, specifically identifying the differences between the various types. Specify the bases for your answer.

EP-2(c)-6. Identify all U.S. nuclear plants which have public alert/notification systems which are comprised (entirely or in part) of any type of tone alert radio. Specify the bases for your answer.

EP-2(c)-7. Of the nuclear plants listed in your answer to Interrogatory EP-2(c)-6, identify those plants which have systems which do not use NOAA tone alert radios. Specify the bases for your answer.

EP-2(c)-8. Identify specifically the type of tone alert radios in use at each of the nuclear plants listed in your answer to Interrogatory EP-2(c)-7 above. Specify the bases for your answer to Interrogatory EP-2(c)-8.

EP-2(c)-9. Of the nuclear plants listed in your answer to Interrogatory EP-2(c)-6, identify those plants which have systems which do use NOAA tone alert radios. Specify the bases for your answer.

EP-2(c)-10. State the bases for the allegation that tone alert radios "are often shut off permanently by residents who become aggravated by [the] tendency to go off frequently without reason."

EP-2(c)-11. State whether you contend that tone alert radios frequently sound truly "without reason" -- that is, at times other than during periodic tone alert system testing, severe storm watches and warnings, and marine interest watches and warnings, or other emergency. Specify the bases for your answer.

EP-2(c)-12. State whether you contend that NOAA tone alert radios are more likely than other types of tone alert radios to sound truly "without reason" -- that is, at times other than during periodic tone alert system testing, severe storm watches and warnings, and marine interest watches and warnings, or other emergency. Specify the bases for your answer.

EP-2(c)-13. State how often NOAA tone alert radios sound truly "without reason" -- that is, at times other than during periodic tone alert system testing, severe storm watches and warnings, and marine interest watches and warnings, or other emergency. Specify the bases for your answer.

EP-2(c)-14. State how often other tone alert radios (those which are not NOAA radios) sound truly "without reason" -- that is, at times other than during periodic tone alert system testing, severe storm watches and warnings, and marine interest watches and warnings, or other emergency. Specify the bases for your answer.

EP-2(c)-15. State whether you contend that it is acceptable to use NOAA tone alert radios in other plume EPZs around the country, but not in the Vogtle plume EPZ. Specify the bases for your answer.

EP-2(c)-16. Explain in detail how -- if at all -- conditions in the Vogtle plume EPZ differ from conditions in the plume EPZs of the other nuclear plants which have public alert/notification systems using NOAA tone alert radios. Specify the bases for your answer.

EP-2(c)-17. State whether you contend that the area encompassed by the Vogtle plume EPZ experiences more severe storm watches and warnings and marine interest watches and warnings than are experienced in the plume EPZs of other U.S. nuclear plants where NOAA tone alert radios are in use. If your answer is affirmative, specify the bases for your answer.

EP-2(c)-18. State whether you contend that the alert/notification system for the public within the plume EPZ of a nuclear plant is required to be designed so that it cannot be deliberately disabled by the members of the public for whose benefit it has been installed. Specify the bases for your answer.

EP-2(c)-19. If you contend that the alert/notification system for the public within the plume EPZ of a nuclear plant must be designed so that it cannot be disabled by the members

of the public for whose benefit it has been installed, identify with specificity all NRC and FEMA rules, regulations, regulatory guidance and other authority which require or provide for such a design.

EP-2(c)-20. State whether you contend that changes must be made in the Vogtle Plan and/or the offsite plans to meet the concern expressed in EP-2/EP-2(c) as admitted by the Board (i.e., the use of NOAA tone alert radios vs. some other type of tone alert radios). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-2(c)-21. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-2(c)-20 above) to meet the concern expressed in EP-2/EP-2(c) as admitted by the Board (i.e., the use of NOAA tone alert radios vs. some other type of tone alert radios). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-2/EP-2(h)
(Public Information For Transients)

EP-2(h)-1. State all bases for your allegation that there is "no assurance that transients who are unfamiliar with the area will understand the implications of a warning signal."

EP-2(h)-2. Identify with specificity each transient population (if any) within the Vogtle plume EPZ -- other than the transient population on, and along the banks of, the Savannah River -- which you contend might not understand the meaning of a warning signal. Specify the bases for your answer.

EP-2(h)-3. For each population identified in your answer to Interrogatory EP-2(h)-2 above, specify the postulated location of that population at the time a warning signal is sounded. Specify the bases for your answer.

EP-2(h)-4. For each location identified in your answer to Interrogatory EP-2(h)-3 above, specify the size of the peak population that could be at that location at the time a warning signal is sounded. Specify the bases for your answer.

EP-2(h)-5. For each population identified in your answer to Interrogatory EP-2(h)-2 above, specify the pre-emergency public information means (e.g., billboard, etc.) you propose to advise that population of the meaning of a warning signal. Specify the bases for your answer.

EP-2(h)-6. For each of the specific pre-emergency public information means identified in your answer to Interrogatory EP-2(h)-5 above, list all U.S. nuclear plants which have public information programs using that means to educate transients about the meaning of a warning signal. Specify the bases for your answer.

EP-2(h)-7. For each of the specific pre-emergency public information means identified in your answer to Interrogatory EP-2(h)-5 above, specify precisely each individual location where you propose to place that means (including, but not limited to, the name and street address of the establishment, where it would be located within the establishment, etc.). Specify the bases for your answer.

EP-2(h)-8. State whether you contend that changes must be made in the Vogtle Plan and/or the offsite plans to meet the concern expressed in EP-2/EP-2(h) as admitted by the Board (public information for transients). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-2(h)-9. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-2(h)-8 above) to meet the concern expressed in EP-2/EP-2(h) as admitted by the Board (public

information for transients). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-4
(Identification of Existing Hospitals For
Treatment of Contaminated Injured Individuals)

EP-4-1. State whether you contend that "the plans do not adequately identify medical service facilities capable of treating contaminated injured individuals." If your answer is affirmative, describe all such alleged deficiencies, and specify the bases for your answer.

EP-4-2. State whether you contend that Burke County Hospital (Waynesboro, Georgia) lacks the capability to treat contaminated injured individuals. If your answer is affirmative, specify the bases for your answer.

EP-4-3. State whether you contend that Humana Hospital (Augusta, Georgia) lacks the capability to treat contaminated injured individuals. If your answer is affirmative, specify the bases for your answer.

EP-4-4. State whether you contend that Oak Ridge Hospital of the Methodist Church (Oak Ridge, Tennessee) lacks the capability to treat contaminated injured individuals. If your answer is affirmative, specify the bases for your answer.

EP-4-5. State whether you contend that other local and regional medical facilities exist (other than those identified in Interrogatories EP-4-1, EP-4-2, and EP-4-3) that have the capability to treat contaminated injured individuals. If your answer is affirmative, list the name and location of each such facility, and the bases for your assertion that it has the capability to treat contaminated injured individuals.

EP-4-6. State whether you contend that changes must be made in the offsite plans to meet the concern expressed in EP-4 as admitted by the Board (identification of existing hospitals for treatment of contaminated injured individuals). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-4-7. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-4-5 above) to meet the concern expressed in EP-6 as admitted by the Board (identification of existing hospitals for treatment of contaminated injured individuals). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-5
(Reception Center Capacity)

EP-5-1. State whether you contend that the offsite plans fail to "assure that adequate emergency facilities, namely reception centers, will be readily available for use in the event of a radiological emergency at VEGP." If your answer is affirmative, specify the bases for your answer.

EP-5-2. State whether you contend that Burke County Comprehensive High School students must be dismissed in order to accommodate evacuees. Specify the bases for your answer.

EP-5-3. Specify the number of students enrolled in Burke County Comprehensive High School, and the enrollment capacity. Specify the bases for your answer.

EP-5-4. Specify the number of evacuees that you contend must be accommodated in the Reception Center. Specify the bases for your answer.

EP-5-5. List individually each of the common areas (e.g., gym, auditorium, library, study hall, cafeteria, hallways, etc.) of Burke County Comprehensive High School and, for each individual common area, specify the number of evacuees that could be accommodated in that area without dismissal of the students at that school. Specify the bases for your answer.

EP-5-6. Specify the number of evacuees that could be accommodated in Burke County Comprehensive High School if the students at that school are dismissed. Specify the bases for your answer.

EP-5-7. State whether you dispute that the old high school on Park Avenue and the Elementary School on Academy Avenue (both in Waynesboro) have been designated as backup facilities to Burke County Comprehensive High School, for use in an evacuation as necessary. If your answer is affirmative, specify the bases for your answer.

EP-5-8. Specify the number of evacuees that could be accommodated in the old high school on Park Avenue in Waynesboro. Specify the bases for your answer.

EP-5-9. List individually each of the common areas (e.g., gym, auditorium, library, cafeteria, hallways, etc.) of the Elementary School on Academy Avenue in Waynesboro and, for each individual common area, specify the number of evacuees that could be accommodated in that area without dismissal of the students at that school. Specify the bases for your answer.

EP-5-10. Specify the number of evacuees that could be accommodated in the Elementary School on Academy Avenue in Waynesboro if the students at that school are dismissed. Specify the bases for your answer.

EP-5-11. State whether you contend that changes must be made in the County Plan to meet the concern expressed in EP-5 as admitted by the Board (Reception Center capacity). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-5-12. State whether you contend that actions must be taken and changes must be made (other than those identified in the answer to Interrogatory EP-5-11 above) to meet the concern expressed in EP-5 as admitted by the Board (Reception Center capacity). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-6
(Content of Public Information Brochure,
Phone Directory Ad, and Transient Warning Notices)

EP-6-1. Identify all emergency public information brochures (in use in the plume EPZs of other U.S. nuclear plants) which you deem adequate.

EP-6-2. State specifically each change you propose to the content of the Vogtle emergency public information brochure, indicating in each instance the exact language you propose to add or delete and the precise location where the language should be inserted or deleted.

EP-6-3. For each individual proposed change identified in your answer to Interrogatory EP-6-1 above, explain why the change is needed and state all bases for the proposed change.

EP-6-4. For each individual proposed change identified in your answer to Interrogatory EP-6-1 above, specify the regulation or other authority which you contend necessitates the change, and explain in detail why the change is necessary to comply with the cited regulation or other authority.

EP-6-5. For each individual proposed addition to the brochure identified in your answer to Interrogatory EP-6-1 above, list all U.S. nuclear plants which have emergency public information brochures that include such language.

EP-6-6. Identify all emergency public information phone directory ads (in use in the plume EPZs of other U.S. nuclear plants) which you deem adequate.

EP-6-7. State specifically each change you propose to the content of the Vogtle emergency public information phone directory ad, indicating in each instance the exact language you propose to add or delete and the precise location where the language should be inserted or deleted.

EP-6-8. For each individual proposed change identified in your answer to Interrogatory EP-6-7 above, explain why the change is needed and state all bases for the proposed change.

EP-6-9. For each individual proposed change identified in your answer to Interrogatory EP-6-7 above, specify the regulation or other authority which you contend necessitates the change, and explain in detail why the change is necessary to comply with the cited regulation or other authority.

EP-6-10. For each individual proposed addition to the phone directory ad identified in your answer to Interrogatory EP-6-7 above, list all U.S. nuclear plants which have emergency public information phone directory ads that include such language.

EP-6-11. Identify all transient warning notices, posters, signs, etc. (in use in the plume EPZs of other U.S. nuclear plants) which you deem adequate.

EP-6-12. State specifically each change you propose to the content of the transient warning notices for the Vogtle EPZ, indicating in each instance the exact language you propose to add or delete and the precise location where the language should be inserted or deleted.

EP-6-13. For each individual proposed change identified in your answer to Interrogatory EP-6-12 above, explain why the change is needed and state all bases for the proposed change.

EP-6-14. For each individual proposed change identified in your answer to Interrogatory EP-6-12 above, specify the

regulation or other authority which you contend necessitates the change, and explain in detail why the change is necessary to comply with the cited regulation or other authority.

EP-6-15. For each individual proposed addition to the transient warning notices identified in your answer to Interrogatory EP-6-12 above, list all U.S. nuclear plants which have transient warning notices that include such language.

EP-6-16. State the name, present or last known address, and present or last known employer of each person with whom you have consulted or conferred concerning (in general) emergency public information brochures, emergency public information phone directory ads, and/or transient warning notices, posters, signs, etc., and/or (specifically) the content of the brochure, phone directory ad, and transient warning notices for use in the Vogtle plume EPZ. Describe in detail any information provided by each such person, and specify the date and time of each such consultation, conference or other contact.

EP-6-17. State whether you contend that changes must be made in the Vogtle Plan and/or the offsite plans to meet the concern expressed in EP-6 as admitted by the Board (content of public information brochure, phone directory ad, and transient warning notices). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-6-18. State whether you contend that actions must be taken and changes must be made (other than those specifically identified in the answers to Interrogatories EP-6-2, EP-6-7, EP-6-12 and EP-6-17 above) to meet the concern expressed in EP-6 as admitted by the Board (content of public information brochure, phone directory ad, and transient warning notices). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

Contention EP-7
(Simultaneous Emergencies at Vogtle and Savannah River Plant)

EP-7-1. Identify specifically each type of "emergency situation" which you contend would "threaten the safe operation of Vogtle [and] might also endanger operations at the Savannah River Plant." Describe in detail the bases for your answer.

EP-7-2. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state the probability of occurrence of that event at Vogtle. Describe in detail the bases for your answer.

EP-7-3. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state the probability of occurrence of that event at the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-4. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state the probability of occurrence of that event at both Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-5. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state whether Vogtle is designed to withstand such an event. Describe in detail the bases for your answer.

EP-7-6. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state whether the Savannah River Plant is designed to withstand such an event. Describe in detail the bases for your answer.

EP-7-7. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state the probability of such an event causing a radiological accident at Vogtle, and identify all bases for your belief that such an event could cause a radiological accident at Vogtle.

EP-7-8. For each individual type of "emergency situation" identified in your answer to Interrogatory EP-7-1 above, state the probability of such an event causing a radiological accident at the Savannah River Plant, and identify all bases for your belief that such an event could cause a radiological accident at the Savannah River Plant.

EP-7-9. State all bases for your allegation that, in the event of emergencies at both Vogtle and the Savannah River Plant, "Department of Energy offices [would] be prevented from providing aid to Vogtle."

EP-7-10. Identify (including, but not limited to, specific references to the emergency plans) each type of assistance that the Vogtle Plan and/or the offsite plans indicate will be provided by the Department of Energy ("DOE") and/or the Savannah River Plant ("SRP") that DOE and/or SRP would be unable to provide in the event of simultaneous emergencies at Vogtle and SRP. Describe in detail the bases for your answer.

EP-7-11. For each individual type of assistance identified in your answer to Interrogatory EP-7-10 above, explain why the Department of Energy and/or the Savannah River Plant would be unable to provide that assistance in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-12. For each individual type of assistance identified in your answer to Interrogatory EP-7-10 above, explain why some Department of Energy office other than the Savannah River Plant, or some other state or federal agency or other organization, could not provide that assistance. Describe in detail the bases for your answer.

EP-7-13. State all bases for your allegation that, in the event of simultaneous emergencies at Vogtle and the Savannah River Plant, "other federal, state and local assistance resources would be divided between the two sites."

EP-7-14. Identify specifically each federal, state and local agency or organization whose resources allegedly "would be divided between the two sites" in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-15. For each individual agency or organization identified in your answer to Interrogatory EP-7-14 above, specify (including, but not limited to, specific references to the emergency plans) each type of assistance that the agency is relied upon to provide in the event of an emergency at Vogtle. Describe in detail the bases for your answer.

EP-7-16. For each individual agency or organization identified in your answer to Interrogatory EP-7-14 above, specify (including, but not limited to, specific references to any applicable emergency plans) each type of assistance that the agency is relied upon to provide in the event of an emergency at the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-17. For each individual agency or organization identified in your answer to Interrogatory EP-7-14 above, explain

specifically why that agency or organization could not provide the necessary assistance for both sites in the event of simultaneous emergencies. Describe in detail the bases for your assistance.

EP-7-18. For each individual agency or organization identified in your answer to Interrogatory EP-7-14 above, identify -- with specific reference to each type of assistance identified in your answer to Interrogatories EP-7-15 and EP-7-16 above -- the additional resources needed by that agency to provide that type of assistance in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-19. Identify the additional "impacts" of evacuation in the event of simultaneous emergencies at Vogtle and the Savannah River Plant that would not occur if only one of the two facilities had an emergency necessitating evacuation. Describe in detail the bases for your answer.

EP-7-20. For each individual "impact" identified in your answer to Interrogatory EP-7-19 above, explain fully all ways in which the emergency plans should give consideration to that "impact." Describe in detail the bases for your answer.

EP-7-21. State all bases for your allegation that there would be an "overload of medical facilities" in the event of simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-22. Identify specifically each medical facility which allegedly would be overloaded in the event of the simultaneous emergencies at Vogtle and the Savannah River Plant that you hypothesize. Describe in detail the bases for your answer.

EP-7-23. For each individual medical facility identified in your answer to Interrogatory EP-7-22 above, specify (including, but not limited to, specific references to the emergency plans) the type of assistance that the medical facility is relied upon to provide in the event of an emergency at Vogtle. Describe in detail the bases for your answer.

EP-7-24. For each individual medical facility identified in your answer to Interrogatory EP-7-22 above, specify (including, but not limited to, specific references to any applicable emergency plans) the type of assistance that the medical facility is relied upon to provide in the event of an emergency at the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-25. For each individual "emergency situation" identified in your answer to EP-7-1, identify specifically the additional medical facilities allegedly needed for adequate response to simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-26. State all bases for your allegation that there would be an "overload" of emergency vehicles in the event of

simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-27. Identify specifically each source of emergency vehicles which allegedly would be overloaded in the event of the simultaneous emergencies at Vogtle and the Savannah River Plant that you hypothesize. Describe in detail the bases for your answer.

EP-7-28. For each individual source of emergency vehicles identified in your answer to Interrogatory EP-7-27 above, specify (including, but not limited to, specific references to the emergency plans) the type and function of the vehicles that the source is relied upon to provide in the event of an emergency at Vogtle. Describe in detail the bases for your answer.

EP-7-29. For each individual source of emergency vehicles identified in your answer to Interrogatory EP-7-27 above, specify (including, but not limited to, specific references to any applicable emergency plans) the type and function of the vehicles that the source is relied upon to provide in the event of an emergency at the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-30. For each individual "emergency situation" identified in your answer to Interrogatory EP-7-1, identify specifically the additional emergency vehicles allegedly needed for adequate response to simultaneous emergencies at Vogtle and the

Savannah River Plant. Describe in detail the bases for your answer.

EP-7-31. State whether you contend that there would be inadequate "coordination of activities of Georgia and South Carolina's agencies" in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-32. Identify specifically the Georgia agencies and the South Carolina agencies whose activities allegedly would be inadequately coordinated in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-33. For each individual agency identified in your answer to Interrogatory EP-7-32, specify (including, but not limited to, specific references to the emergency plans) the activities of that agency that allegedly would be inadequately coordinated in the event of simultaneous emergencies at Vogtle and the Savannah River Plant. Describe in detail the bases for your answer.

EP-7-34. For each alleged example of potential inadequate coordination of Georgia and South Carolina agencies in the event of simultaneous emergencies at Vogtle and the Savannah River Plant, explain fully and specifically all ways in which the emergency plans should be changed to assure adequate coordination. Describe in detail the bases for your answer.

EP-7-35. State whether you contend that changes must be made in the Vogtle plan and/or the offsite plans (other than those specifically identified in your answers to Interrogatories EP-7-20 and EP-7-34) to meet the concern expressed in EP-7 as admitted by the Board (simultaneous emergencies at Vogtle and the Savannah River Plant). If your answer is affirmative, describe any and all such changes, and describe in detail the factual and regulatory bases for your belief that such changes must be made.

EP-7-36. State whether you contend that actions must be taken and changes must be made (other than those specifically identified in the answers to Interrogatories EP-7-18, EP-7-20, EP-7-25, EP-7-30, EP-7-34, and EP-7-35) to meet the concern expressed in EP-7 as admitted by the Board (simultaneous emergencies at Vogtle and the Savannah River Plant). If your answer is affirmative, describe any and all such changes and actions, and describe in detail the factual and regulatory bases for your belief that such actions must be taken and such changes made.

B. General Interrogatories

G-1. State the name, present or last known address, and present or last known employer of each person who prepared, assisted in preparing, or provided information relating to your

admitted emergency planning contentions or the bases for those contentions. Describe each such person's role and any information provided.

G-2. State the name, present or last known address, and present or last known employer of each person with whom you have communicated regarding your admitted emergency planning contentions. Identify the date and describe the substance of each such communication.

G-3(a). State the name, present or last known address, and present or last known employer of each person known to you to have knowledge of the facts alleged, and upon which you relied in formulating allegations, in each of your contentions which are the subject of this set of interrogatories.

(b). Identify those facts concerning which each such person has knowledge.

(c). State the specific allegation in each contention which you contend such facts support.

G-4(a). State the name, present or last known address, and present or last known employer of each person who provided information used in preparing your response to each interrogatory herein.

(b). Identify all such information which was provided by each person and the specific interrogatory response in which such information is contained.

G-5(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as a witness or expert witness relating to each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) regarding which each such person is expected to testify.

(c). State the subject matter as to which each such person is expected to testify.

(d). State the substance of the facts and opinions as to which each such expert witness is expected to testify, including a summary of the grounds for each opinion.

G-6(a). Identify all documents in your possession, custody or control, including all relevant page citations, pertaining to the subject matter of, and upon which you relied or to which you referred in formulating allegations in, each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each such document relates.

(c). State the specific allegation in each contention which you contend each document refers to or supports.

G-7(a). Identify all documents in your possession, custody or control (including all relevant page citations) which you used or referred to in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

G-8(a). Identify any other source of information, not previously identified in response to Interrogatory G-4 or G-7, which was used or referred to in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

G-9(a). Identify all documents which you intend to offer as exhibits during this proceeding to support the contentions which are the subject of this set of interrogatories or which you intend to use during cross-examination of witnesses presented by Applicants and/or the NRC Staff and/or the Federal Emergency Management Agency ("FEMA") Staff on each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each document relates and the particular page citations applicable to each contention.

G-10. Identify each document requested by "Applicants' First Set of Interrogatories and Requests for Production of Documents On Emergency Planning Contentions" for which Interveners claim a privilege against production. Include in the identification all addressees or recipients of the original or a copy of the document, a brief description of its subject matter, and the nature of the privilege claimed.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenor respond in writing to the following request for production of documents and produce or make available for inspection and copying at a designated location each of the documents requested below that is in the possession, custody, or control of Intervenor. A document shall be deemed to be within the "control" of the Intervenor if Intervenor or their attorneys have ownership, possession or custody of the document or a copy thereof, or have the right to secure the document or copy from any person, organization, or public or private entity having physical possession thereof.

A. Specific Document Requests

Contention EP-1/EP-1(a)/EP-2(b) (24-hour Staffing of Burke County ENN Link)

EP-1(a)-1. All documents that refer to, relate to, or contain information about any difficulty encountered by anyone in contacting emergency personnel in Burke County, including -- but not limited to -- the Director of the Burke County Emergency Management Agency.

EP-1(a)-2. All documents that refer to, relate to, record, or contain information about an April 4, 1984 conversation between Dr. Judy Gordon and Ms. Pam Smith.

EP-1(a)-3. All documents that refer to, relate to, or contain information about the hours during which the Burke County EOC is staffed.

EP-1(a)-4. All documents that refer to, relate to, or contain information about the hours during which the Burke County ENN link is staffed.

EP-1(a)-5. All documents that refer to, relate to, or contain information about the extent to which Burke County provides for "24-hour per day manning of communications links that initiate emergency response actions" in accordance with NUREG-0654 Criterion F.1.a.

EP-1(a)-6. All documents that refer to, relate to, or contain information about the adequacy of the procedure to be followed by the Sheriff's Department to initiate an emergency response in a timely and efficient fashion.

Contention EP-2/EP-2(a)
Administrative Controls Over ENN Use

EP-2(a)-1. All documents that refer to, relate to, or contain information about existing administrative controls over ENN use.

EP-2(a)-2. All documents that refer to, relate to, or contain information about any asserted need for additional administrative controls over ENN use.

EP-2(a)-3. All documents that refer to, relate to, or contain information about any additional administrative controls over ENN use that you assert should be imposed.

EP-2(a)-4. All documents that refer to, relate to, or contain information about administrative controls over the dedicated emergency telecommunications systems (such as ENN) in use by emergency response organizations within the plume EPZs of other nuclear plants in the U.S.

Contention EP-2/EP-2(c)
(Use of NOAA Tone Alert Radios)

EP-2(c)-1. All documents that refer to, relate to, or contain information about the types of tone alerts that are commercially available in the United States.

EP-2(c)-2. All documents that refer to, relate to, or contain information about the types of tone alerts in use in the plume EPZs of U.S. nuclear plants other than Vogtle.

EP-2(c)-3. All documents that refer to, relate to, or contain information about the advantages and/or disadvantages of one type of tone alert radio over another.

EP-2(c)-4. All documents that refer to, relate to, or contain information about how often tone alert radios sound.

EP-2(c)-5. All documents that refer to, relate to, or contain information about tone alert radios being "shut off

permanently by residents who become aggravated by [the] tendency to go off frequently."

EP-2(c)-6. All documents that refer to, relate to, or contain information about the alleged tendency of tone alert radios to go off "without reason."

EP-2(c)-7. All documents that refer to, relate to, or contain information about the frequency of severe storm watches and warnings and marine interest watches and warnings in the Vogtle plume EPZ and in the plume EPZs of other U.S. nuclear plants where NOAA tone alert radios are in use.

Contention EP-2/EP-2(h)
(Public Information for Transients)

EP-2(h)-1. All documents that refer to, relate to, or contain information about the alleged inability of transients to understand the implications of a warning signal.

EP-2(h)-2. All documents that refer to, relate to, or contain information about the locations of transients within the Vogtle plume EPZ.

EP-2(h)-3. All documents that refer to, relate to, or contain information about the number of transients within the Vogtle plume EPZ.

EP-2(h)-4. All documents that refer to, relate to, or contain information about the reasons for the presence of

transients within the Vogtle plume EPZ (e.g., driving through the area, visiting in the area, employed in the area, etc.).

EP-2(h)-5. All documents that refer to, relate to, or contain information about the means of pre-emergency public information/education used in the plume EPZs of other nuclear plants to educate transients about the meaning of a warning signal.

EP-2(h)-6. All documents that refer to, relate to, or contain information about your proposals for pre-emergency education of transients about the meaning of a warning signal.

Contention EP-4
(Identification of Existing Hospitals For
Treatment of Contaminated Injured Individuals)

EP-4-1. All documents that refer to, relate to, describe, or otherwise contain information about, what facilities and equipment are necessary for the treatment of contaminated injured individuals.

EP-4-2. All documents that refer to, relate to, or contain information about the capability of Burke County Hospital (Waynesboro, Georgia) to treat contaminated injured individuals.

EP-4-3. All documents that refer to, relate to, or contain information about the capability of Humana Hospital (Augusta, Georgia) to treat contaminated injured individuals.

EP-4-4. All documents that refer to, relate to, or contain information about the capability of Oak Ridge Hospital of the Methodist Church (Oak Ridge, Tennessee) to treat contaminated injured individuals.

EP-4-5. All documents that refer to, relate to, or contain information about the capabilities of local and regional medical facilities -- other than Burke County Hospital, Humana Hospital, and Oak Ridge Hospital of the Methodist Church -- to treat contaminated injured individuals.

Contention EP-5
(Reception Center Capacity)

EP-5-1. All documents that refer to, relate to, or contain information about the ready availability of Burke County Comprehensive High School, the old high school on Park Avenue in Waynesboro, and the Elementary School on Academy Avenue in Waynesboro for use as reception centers in the event of an emergency.

EP-5-2. All documents that refer to, relate to, or contain information about the number of students enrolled at Burke County Comprehensive High School and/or the enrollment capacity of that school.

EP-5-3. All documents that refer to, relate to, or contain information about the number of evacuees that the Reception Center for Burke County must accommodate.

EP-5-4. All documents that refer to, relate to, or contain information about the number of evacuees that could be accommodated in the common areas of Burke County Comprehensive High School without dismissal of the students at that school.

EP-5-5. All documents that refer to, relate to, or contain information about the number of evacuees that could be accommodated in Burke County Comprehensive High School if the students at that school are not dismissed.

EP-5-6. All documents that refer to, relate to, or contain information about the number of evacuees that could be accommodated in the old high school on Park Avenue in Waynesboro.

EP-5-7. All documents that refer to, relate to, or contain information about the number of evacuees that could be accommodated in the common areas of the Elementary School on Academy Avenue in Waynesboro without dismissal of the students at that school.

EP-5-8. All documents that refer to, relate to, or contain information about the number of evacuees that could be accommodated in the common areas of the Elementary School on Academy Avenue in Waynesboro if the students at that school are dismissed.

Contention EP-6
(Content of Public Information Brochure,
Phone Directory Ad, and Transient Warning Notices)

EP-6-1. All documents supporting the changes you propose to the Vogtle emergency public information brochure in your answer to Interrogatory EP-6-1.

EP-6-2. All documents supporting the changes you propose to the Vogtle emergency public information phone directory ad in your answer to Interrogatory EP-6-5.

EP-6-3. All documents supporting the changes you propose to the transient warning notices for the Vogtle EPZ in your answer to Interrogatory EP-6-9.

EP-6-4. All documents supporting the changes you propose to the Vogtle Plan and/or the offsite plans in your answer to Interrogatory EP-6-13.

EP-6-5. All documents supporting the actions and changes you propose in your answer to Interrogatory EP-6-14.

Contention EP-7
(Simultaneous Emergencies at Vogtle and Savannah River Plant)

EP-7-1. All documents that refer to, relate to, or contain information about the identification of "emergency situations" which you contend would "threaten[] the safe operation of Vogtle [and] might also endanger operations at the Savannah River Plant."

EP-7-2. All documents that refer to, relate to, or contain information about the probability of occurrence of "emergency situations" at Vogtle.

EP-7-3. All documents that refer to, relate to, or contain information about the probability of occurrence of "emergency situations" at the Savannah River Plant.

EP-7-4. All documents that refer to, relate to, or contain information about the probability of occurrence of "emergency situations" at both Vogtle and the Savannah River Plant.

EP-7-5. All documents that refer to, relate to, or contain information about the extent to which Vogtle is designed to withstand the "emergency situations" you postulate.

EP-7-6. All documents that refer to, relate to, or contain information about the extent to which the Savannah River Plant is designed to withstand the "emergency situations" you postulate.

EP-7-7. All documents that refer to, relate to, or contain information about the probability that the "emergency situations" you postulate will cause a radiological accident at Vogtle.

EP-7-8. All documents that refer to, relate to, or contain information about the probability that the "emergency situations" you postulate will cause a radiological accident at the Savannah River Plant.

EP-7-9. All documents that refer to, relate to, or contain information about the probability that the "emergency situations" you postulate will cause radiological accidents at both Vogtle and the Savannah River Plant.

EP-7-10. All documents on which you base your belief that an "emergency situation" could cause a radiological accident at Vogtle.

EP-7-11. All documents on which you base your belief that an "emergency situation" could cause a radiological accident at the Savannah River Plant.

EP-7-12. All documents on which you base your allegation that, in the event of an emergency at both Vogtle and the Savannah River Plant, "Department of Energy offices [would] be prevented from providing aid to Vogtle."

EP-7-13. All documents that refer to, relate to, or contain information about the assistance that the Vogtle Plan and/or the offsite plans indicate will be provided by the Department of Energy ("DOE") and/or the Savannah River Plant ("SRP") that DOE and/or SRP would be unable to provide in the event of simultaneous emergencies at Vogtle and SRP.

EP-7-14. All documents on which you base your allegation that, in the event of simultaneous emergencies at Vogtle and the Savannah River Plant, "other federal, state and local assistance resources would be divided between the two sites."

EP-7-15. All documents that refer to, relate to, or contain information about "other federal, state and local assistance resources" that you contend would be divided between Vogtle and the Savannah River Plant in the event of simultaneous emergencies.

EP-7-16. All documents that refer to, relate to, or contain information about additional "assistance resources" allegedly needed for adequate response to simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-17. All documents that refer to, relate to, or contain information about additional "impacts" of evacuation in the event of simultaneous emergencies at Vogtle and the Savannah River Plant that would not occur if only one of the two facilities had an emergency necessitating evacuation.

EP-7-18. All documents on which you base your allegation that there would be an "overload of medical facilities" in the event of simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-19. All documents that refer to, relate to, or contain information about additional medical facilities allegedly needed for adequate response to simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-20. All documents on which you base your allegation that there would be an "overload" of emergency vehicles in the event of simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-21. All documents that refer to, relate to, or contain information about additional emergency vehicles allegedly needed for adequate response to simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-22. All documents on which you base your allegation that there would be an "inadequate coordination of activities of Georgia and South Carolina's agencies" in the event of simultaneous emergencies at Vogtle and the Savannah River Plant.

EP-7-23. All documents that refer to, relate to, or contain information about actions allegedly needed to assure adequate coordination of Georgia and South Carolina agencies in the event of simultaneous emergencies at Vogtle and the Savannah River Plant.

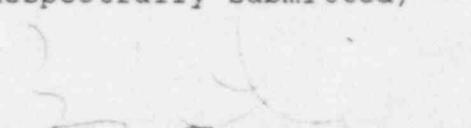
B. General Document Requests

G-1. Applicants request that Intervenors produce or make available for inspection and copying each and every document that Intervenors used or referred to in preparing each of your contentions which are the subject of this set of interrogatories.

G-2. Applicants request that Intervenor produce or make available for inspection and copying each and every document identified or described in the answer to any of the specific or general interrogatories above.

G-3. Applicants request that Intervenor produce or make available for inspection and copying each and every document that Intervenor used or referred to in preparing the response to any of the specific or general interrogatories above.

Respectfully submitted,


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Dated: September 20, 1985

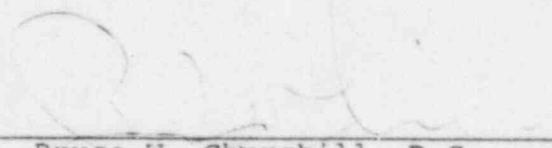
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' First Set Of Interrogatories and Requests For Production Of Documents On Emergency Planning Contentions," dated September 20, 1985, were served upon those persons on the attached Service List by deposit in the United States mail, first class, postage prepaid, this 20th day of September, 1985.



Bruce W. Churchill, P.C.

Dated: September 20, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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