

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

BOSTON EDISON COMPANY, et al.)

(Pilgrim Nuclear Generating Station,
Unit 2))

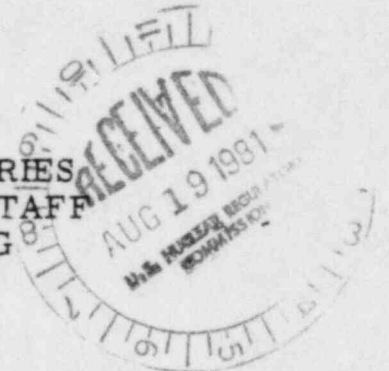
Docket No. 50-471

INTERVENOR CLEETONS' INTERROGATORIES
TO NUCLEAR REGULATORY COMMISSION STAFF
RELATIVE TO EMERGENCY PLANNING
AND TMI-2 RELATED ISSUES

Pursuant to 10 C. F. R. Section 2.720 (h) (2) (ii), the Intervenor Cleetons requests that the attached Interrogatories be answered fully, in writing, and under oath by NRC personnel (hereinafter, "Staff") with the knowledge of the facts and designated by the Executive Director for Operations.

Please answer each question in six parts as follows:

- A. Provide the direct answer to the question.
- B. Identify each document, and the particular parts thereof, which in any way serves as a basis for the answer.
- C. Identify all documents known to the Staff which pertain to the subject matter questioned but which do not serve as bases for the Staff's answer, including documents which provide or support an answer different from that provided by the Staff.



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- D. Set forth the name, affiliation and title of each individual who participated in any way in the preparation of the Staff's answer, whether or not said individual is an official or employee of the NRC.
- E. Set forth the name and title of any Staff member who did not participate in the preparation of the Staff's answer and who has, or may have, more direct personal knowledge of the subject matter of the question that the individual(s) identified in Section D.
- F. Identify the person(s), if any, whom the Staff intends to have testify on the subject matter questioned and state their qualifications.

For purposes of these requests, the term "document(s)" refers to the original and copy (but not both if identical in every respect) of any printed, written, recorded, transcribed, punched, taped, filmed, photographed or graphic matter, whether sent or received or neither, whether a draft or otherwise, however produced or reproduced, and both sides thereof, including but not limited to, any memorandum, correspondence, letter, affidavit, court paper, transcript, diary, report, study, telegram, table, telex message, record, chart, paper, work paper, graph, index, book notebook, pamphlet, periodical, tape, data sheet, data processing card, note, notation, minute desk calendar, appointment book, sound recording, computer print-out or microfilm.

INTERROGATORIES

1. What was the state of emergency preparedness in the Harrisburg area and in the Commonwealth of Pennsylvania on March 28, 1979? Please explain fully and in detail.

2. Had Metropolitan Edison and the Commonwealth of Pennsylvania conducted any tests of emergency preparedness? Had they checked supplies, hospital readiness, traffic control plans and security troop emplacement for the protection of citizens and their property around the TMI complex? Please describe fully and give all bases for your answer.
3. In the opinion of Staff is the state of emergency preparedness in the immediate and extended area around the proposed Pilgrim II less adequate, equal to, or better than that around TMI-2 on March 28, 1979? Please detail all differences and similarities.
4. To Staff's knowledge have any of the emergency planners spent more than a few hours inspecting specific problem areas described in the studies for evacuation at Pilgrim II? Please give full details of time spent, methods used, and qualifications of planners.
5. If a thorough study has not been done, why has a matter so crucial to the health and safety of the public been ignored?
6. We were told by Mr. Froelich, of the Environmental Protection Division of the NRC, that the NRC had an evacuation plan for Cape Cod. What is the evacuation plan? Please describe in detail.
7. If the NRC has no plan for evacuating Cape Cod, does the Federal Emergency Management Agency have such a plan? Please describe fully.
8. If there are no plans for evacuating Cape Cod, what are the reasons that a matter so essential to the health and safety preparedness of the public been neglected? Please list all reasons.

9. Does Staff know whether any study of the voluntary, partial (pregnant women and small children), and general evacuation, which took place after the accident at TMI-2, have been done? Please give full results of such a study.

10. If a study of these evacuations has not been done, why has this excellent opportunity to learn more about the health and safety needs, and the behavior, of the public in an actual emergency been overlooked? Please explain fully.

11. What study has been conducted by the NRC, or by any agency or person(s) commissioned by the NRC, or by any other person(s), concerning the biological effects of ionizing radiation upon the general population in the immediate and extended areas surrounding TMI-2? What are the detailed findings, to date, of this study? What future health problems are projected?

12. If the study referred to in 11 has not been done, when is such a study planned? Why has a study so vital to the health and safety of the public been delayed? Please give a full explanation.

13. Has the NRC, or any person(s) or organization, conducted a study of persons in the immediate and extended area around TMI-2, who are at special risk, like Mrs. Cleeton? (See attached letter) This would include persons with respiratory illness, extended irradiation through medical and dental x-rays, radiation therapy, and/or a family history of cancer. If so, what are the findings? Please give full details.

14. If such a study has not been done, why has ^a matter which would necessarily involve the health and safety of a substantial percentage of the public been disregarded? Please explain fully.

15. Has a study been done of the psychological and economic effects of the accident at TMI-2? How many people have had to sell their homes at a loss, in order to leave the area? How many people have had to consult psychologists or psychiatrists due to their concerns about the health and safety of themselves and their families? Please list all findings of such a study.
16. If such a study has not been done, can Staff explain why a matter deeply involving the health and safety of the public, as well as their economic welfare, has been omitted from consideration?
17. In previous hearings an opportunity for limited appearance statements from local citizens was deferred until the hearings on emergency planning. In Staff's opinion, at what times and locations are those limited appearance statements likely to be authorized?

Respectfully submitted,

Alan R. Cleeton

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