

DOCKETED
USNRCUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

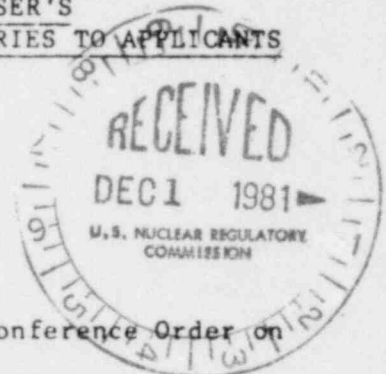
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OFFICE OF SECRETARY
REGULATORY & SERVICE
BRANCH

In the Matter of

Docket No. 50-358-0L

THE CINCINNATI GAS & ELECTRIC
COMPANY, et al.DR. FANKHAUSER'S
INTERROGATORIES TO APPLICANTS(Wm. H. Zimmer Nuclear Power
Station)

Pursuant to the Board's November 5, 1981, Pre-hearing Conference Order on discovery, Dr. Fankhauser hereby submits the following interrogatories to the Applicants under 10 C.F.R. §2.740(b). All information relating to these interrogatories in the possession of the Applicants, its officers, agents, employees, attorneys, and consultants, particularly the Stone & Webster Engineering Corporation, should be provided in Applicants' answers. The Applicants are under a continuing duty to supplement or amend their answers as necessary and as circumstances dictate.

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1. Describe in functional terms all the monitoring equipment to be installed in or around the Zimmer Power Station (hereinafter Zimmer) which will record for both the Applicants and state and local governments or agencies any gaseous radioactive emissions or releases from Zimmer; and, with respect to each monitoring apparatus, include the following:

- a. The types of radioactive isotopes to be monitored;
- b. The monitoring range of each apparatus;
- c. The location(s) and person(s) who will receive the monitoring information;
- d. Whether it will be in continuous operation or will be triggered into operation upon the occurrence of an event such as a radioactive release above a specified quantity.

2. With respect to the proceeding answers, state whether there will be and describe in functional terms devices to be used in conjunction with the monitoring equipment at or around Zimmer which would be able to chart the probable direction, velocity, dispersal rate and magnitude of radioactive releases into the atmosphere. Describe how this information will be used and what persons will have direct access to it.

3. With respect to the Clermont County Radiological Emergency Response Plan (hereinafter CCRERP), state what studies have been made to calculate the number and locations of "mobility impaired" persons in Clermont County. If no such studies have been made, state: (a) whether such studies are planned; and (b) who will perform such studies; and (c) describe how such studies will be made.

4. With respect to the CCRERP, state what assumptions have been made about the following:

a. The amounts of time it will take local officials or others to render evacuation routes in Clermont County passable subsequent to a:

(i) three inch snowfall;

(ii) six inch snowfall;

(iii) twelve inch snowfall.

b. The additional amounts of time it will take to evacuate the populace in Clermont County if there is a:

(i) three inch snowfall;

(ii) six inch snowfall;

(iii) twelve inch snowfall.

5. Describe all studies that have been used to calculate the information provided in the proceeding answer.

6. In the CCRERP, several organizations and agencies, which are comprised in whole or in part by volunteer members, are given responsibility to implement aspects of the emergency plan. For each such agency or organization, identify the number of persons by position who have some responsibility in implementation of the emergency plan.

7. With respect to the answers to the proceeding interrogatory, state whether any survey has been performed to ascertain the accessibility and probable locations of such volunteers during both working days and other times. If such a survey has been conducted, attach a copy to your answers.

8. Describe all training by position for each member of the Clermont County Sheriff's Office and the Clermont County Disaster Service Agency which has been or will be provided so that all persons with these agencies will be fully trained to fulfill their functions described in the CCRERP.

9. State whether or not surveys have been completed to ascertain the number of employees of the Clermont County Hospital who reside within a ten mile radius of Zimmer. If such a survey has been conducted, please attach a copy to your answers.

10. State whether any surveys have been completed to ascertain the numbers and locations of both livestock and domestic animals who reside within:

(a) a ten mile radius of Zimmer; and

(b) a fifty mile radius of Zimmer.

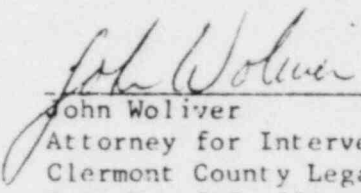
If such surveys have been completed, please attach copies of the same. If such surveys have not been completed, state whether such surveys are planned and describe how these surveys will be implemented.

11. With respect to implementation of the CCRERP, state what assumptions, considerations or planning have been made about the extent, if any, of public disobedience or indifference to evacuation or other instructions. If any such assumptions, considerations, or planning concerning public disobedience or indifference to evacuations or other instructions has been made, state what the possible effects of such public disobedience or indifference would have on the overall effectiveness of the CCRERP.

12. Identify by interrogatory number the names, addresses, and place of employment and position they are in, all persons who answered or contributed to each answer, excluding clerical personnel; and for each such person, set forth a statement of the professional qualifications.

Answers to the foregoing should be submitted in writing and under oath and served upon the undersigned counsel for Dr. Fankhauser within 14 days of service thereof.

Respectfully Submitted,


John Woliver
Attorney for Intervenor Dr. Fankhauser
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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing were mailed to the following this 25th day of November, 1981.

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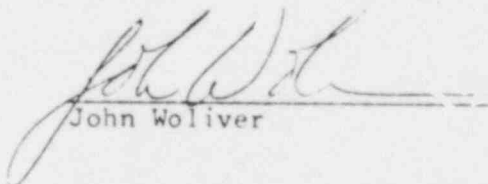
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