

RELATED CORRESPONDENCE

April 22, 1983

USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

'83 APR 22 P1:55

Before Administrative Judges:
Marshall E. Miller, Chairman
Gustave A. Linenberger, Jr.
Dr. Cadet H. Hand, Jr.

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

RESPONSE OF INTERVENORS TO NRC STAFF
FIRST SET OF CONSTRUCTION PERMIT INTERROGATORIES
AND REQUESTS FOR ADMISSIONS TO NATURAL
RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB
CONCERNING CONTENTION 9 (EMERGENCY PREPAREDNESS)
DATED APRIL 8, 1983

Pursuant to 10 CFR §§ 2.742 and § 2.740b, and in accordance with the Board's Construction Permit Scheduling Order of March 29, 1983, Intervenor, Natural Resources Defense Council, Inc. and the Sierra Club, hereby respond to NRC Staff First Set of Construction Permit Interrogatories and Requests for Admissions to Natural Resources Defense Council, Inc. and the Sierra Club Concerning Contention 9 (Emergency Preparedness), dated April 8, 1983.

DS03

General Responses

(a) The direct answer to each interrogatory is provided below.

(b),(c) Documents, if any, will be identified in the direct answer below.

(d) Thomas B. Cochran is the primary NRDC employee who provided the answers to these interrogatories. His qualifications have been provided to all parties at the LWA-1 Hearings.

(e) None.

(f) Experts have not been identified at this time.

Interrogatory

9-1 Define, "seriousness," and "potential scope," as those terms are used in Contention 9(a).

Response

9-1 Intervenors have withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-2(a) Define, "radiological consequences," as that term is used in Contention 9(a).

(b) List all "radiological consequences," which NRDC believes must be considered by Applicants and/or Staff with regard to emergency preparedness.

Response

9-2 Intervenor's have withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-3(a) Define, "emergency situations within and outside the site boundary," as that phrase is used in Contention 9(a).

(b) List all emergency situations which NRDC contends must be considered by Applicants and/or Staff with regard to emergency preparedness.

Response

9-3 Intervenor's have withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-4(a) Define, "capabilities for dose projection," as that phrase is used in Contention 9(a). Does the term refer to computer codes, modeling, or physical hardware?

(b) List all "capabilities for dose projection" that NRDC contends Applicants must employ to satisfy NRC regulations and guidelines.

(c) What models and assumptions does NRDC contend should be used in the dose projections referred to in Contention 9(a)?

(d) Identify the organ doses that NRDC contend should be calculated as part of the dose projections referred to in Contention 9(a).

(e) List all locations (e.g., EPZ, exclusion area boundary) where NRDC contends that doses must be calculated by Applicants.

Response

9-4 Intervenor's have withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-5(a) Define, "real-time," as that term is used in Contention 9(a), by stating the range of time delays acceptable for

meteorological information to be utilized by Applicants in their dose projections.

(b) List all "meteorological information" which NRDC contends must be considered by Applicants in deriving their dose projections.

Response

9-5 Intervenor has withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-6(a) Define, "radiological monitoring teams," as that term is used in Contention 9(a).

(b) List the capabilities which NRC contends the "radiological monitoring teams" must possess in order to adequately respond to radiological incidents at CRBR.

Response

9-6 Intervenor has withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-7 What Commission regulations and/or Staff regulatory guidance does NRDC contend require the capabilities discussed in Contention 9(a)? Cite to specific sections and subsections of the NRC regulations and guidance materials.

Response

9-7 Intervenor has withdrawn Contention 9(a) and therefore no response is required.

Interrogatory

9-8(a) Define, "local emergency response needs and capabilities", as that term is used in Contention 9(b).

(b) Define, "local," by listing the areas around the CRBR site which NRDC contends are "local".

(c) List the "emergency response needs and capabilities" referred to in Contention 9(b). Provide the factual basis for each item which NRDC contends is a "need". Provide the regulatory basis for each item which NRDC contends should be a "capability".

Response

9-8 Intervenor's have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-9 Specifically describe how Applicants and Staff have failed to "properly account" for local emergency response needs and capabilities in designating the EPZs for CRBR.

Response

9-9 Intervenor's have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-10 Describe the methodology and criteria that NRDC contends the Applicants and/or Staff should utilize in designating the plume exposure pathway and ingestion pathway EPZ's for CRBR. Provide the basis for NRDC's answer, by specifically citing regulations, regulatory guidance materials, periodical articles, or books.

Response

9-10 Intervenor's have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-11 Describe the boundaries of the plume exposure pathway and ingestion pathway EPZs for CRBR which NRDC contends are more appropriate than the Applicants' and/or Staff's. If NRDC does not have proposed EPZs for CRBR, does it intend to develop alternate EPZs for CRBR? Set forth the date by which these alternate EPZs will be developed.

Response

9-11 Intervenor have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-12 Describe with particularity the methodologies and criteria which NRDC contends the Applicants and/or Staff must utilize in order to sufficiently analyze evacuation time for the CRBR locality. Provide the basis for NRDC's answer, by specifically citing NRC regulations, regulatory guidance materials, periodical articles, or books.

Response

9-12 Intervenor have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-13(a) Does NRDC contend that there are methodologies and criteria which must be utilized to designate sectors within the EPZs for CRBR?

(b) If the answer to (a) is yes, describe with specificity, and provide the basis for NRDC's answer, by citing NRC regulations, regulatory guidance materials, periodical articles, or books.

Response

9-13(a) Intervenor have withdrawn Contention 9(b) and therefore no response is required.

Interrogatory

9-14(a) Define, "major impediments," as that term is used in Contention 9(c).

(b) Set forth the criteria, parameters, or other factors which NRDC contends should be utilized to distinguish "major" impediments from impediments which are minor, or less serious.

Response

9-14(a) See Answer to Interrogatory 27 of Applicants' Eighth Set of Interrogatories to Intervenor, filed April 14, 1983.

(b) Intervenor has identified no such criteria at this time

Interrogatory

9-15(a) Define, "transient population", and "permanent population", as those terms are used in Contention 4(c).

(b) Set forth the criteria, parameters, data, or other factors that NRDC contends should be utilized in determining whether an individual should be categorized as part of the "transient" or "permanent" populations.

Response

9-15(a) Intervenor defines these terms as used in 10 CFR 50 Appendix E.

(b) Intervenor has identified no such criteria at this time.

Interrogatory

9-16(a) Define, "protective actions," as that term is used in Contention 9(c).

(b) List all protective actions which NRDC contends must be considered by Applicants and/or Staff with regard to emergency preparedness.

Response

9-16(a) Intervenor defines these terms as used in 10 CFR 50 Appendix E.

(b) Intervenor has identified no such criteria at this time.

Interrogatory

9-17 Define, "compatibility of proposed emergency plans," as that term is used in Contention 9(d).

Response

9-17 Intervenors have withdrawn Contention 9(d) and therefore no response is required.

Interrogatory

9-18 List and describe with particularity the "facility design features", which NRDC asserts must be considered to ensure the compatibility of proposed CRBR emergency plans.

Response

9-18 Intervenors have withdrawn Contention 9(d) and therefore no response is required.

Interrogatory

9-19 Describe with particularity the methodology and criteria which NRDC contends should be utilized by Applicants and/or Staff to ensure the compatibility of proposed CRBR emergency plans. In your answer, describe how facility design features, site layout, and site location must be considered. Provide the basis for NRDC's answer, by specifically citing NRC regulations, regulatory guidance materials, periodicals, or books.

Response

9-19 Intervenors have withdrawn Contention 9(d) and therefore no response is required.

Interrogatory

9-20 Define, "authorization", "notification", and "instruction procedures for evacuation," as those terms are used in Contention 9(e).

Response

9-20 Intervenor's have withdrawn Contention 9(e) and therefore no response is required.

Interrogatory

9-21 Does the term, "protective actions," as used in Contention 9(e), have the same meaning as in Contention 9(c)? If not, set forth the definition of "protective actions" as used in Contention 9(e).

Response

Intervenor's have withdrawn Contention 9(e) and therefore no response is required.

Interrogatory

9-22 There is no Interrogatory 9-22.

Interrogatory

9-23 List the CDA types which NRDC contends the Applicants' emergency plans must take into account.

Response

9-23 All CDA types must be taken into account in Applicants' emergency plans.

Interrogatory

9-24(a) List and describe with particularity the protective, evacuation, and monitoring measures which NRDC contends must be taken into account by the Applicants. Provide the basis for NRDC's answer, referring to specific NRC regulations, regulatory guidance materials, periodicals, and books.

(b) Provide the specific basis for NRDC's contention that "special measures" are necessary to cope with a CDA, as compared to other radiological incidents which CRBR may experience.

Response

9-24 See Response to Interrogatory 31 of Applicants' Eighth Set of Interrogatories to Intervenors filed April 14, 1983.

Interrogatory

9-25 What Commission regulations and/or Staff regulatory guidance does NRDC assert require special consideration of CDA's, as opposed to other radiological incidents which CRBR may experience?

Response

9-25 See Response to Interrogatory 31 of Applicants' Eighth Set of Interrogatories to Intervenors filed April 14, 1983.

Interrogatory

9-26 Provide the basis for NRDC's assertion that occurrence of CDA's at CRBR will necessitate "decreased response time," as compared to the response time available following other radiological incidents which CRBR may experience.

Response

9-26 Intervenors draw this conclusion from the analysis provided in Appendix A of the SER.

Interrogatory

9-27 Define "special protective action levels," as that term is used in Contention 9(f).

Response

9-27 Intervenor define this term as used in 10 CFR 50 Appendix E.

Interrogatory

9-28 List and describe with particularity the "special protective actions levels" which NRDC contends would be appropriate for CRBR. If NRDC has not yet developed special protective action levels which it feels are appropriate for CRBR, does it intend to do so in the future? If so, provide the date that you expect to complete development of such action levels.

Response

9-28 See Response to Interrogatory 31 of Applicants' Eighth Set of Interrogatories to Intervenor filed April 14, 1983. Intervenor may develop PAGs.

Interrogatory

9-29 Define "adequate assurance", as that term is used in Contention 9(g).

Response

9-29 Contention 9(g) is a summary statement which tracks the language in the first full paragraph of 10 CFR 50 Appendix E.II. The substantive issues raised are covered in Contention subparts 9(c) and (f).

Interrogatory

9-30 Define "proposed emergency plans", as the term is used in Contention (g).

Response

9-30 Contention 9(g) is a summary statement which tracks the language in the first full paragraph of 10 CFR 50 Appendix E.II. The substantive issues raised are covered in Contention subparts 9(c) and (f).

Interrogatory

9-31(a) State with particularity each item of Applicants' emergency plans which NRDC contends fails to provide adequate assurance that 10 C.F.R. § 50.47(b) will be met.

(b) For each item identified in NRDC's answer to Interrogatory 9-31(a), identify the planning standards of 10 C.F.R. 50.47(b) that NRDC contends the item does not satisfy.

Response

9-31 Contention 9(g) is a summary statement which tracks the language in the first full paragraph of 10 CFR 50 Appendix E.II. The substantive issues raised are covered in Contention subparts 9(c) and (f).

Interrogatory

9-32 There is no Interrogatory 9-32.

Interrogatory

9-33 List all relevant sections and subsections of the CRBR Safety Evaluation Report ("SER") which NRDC contends inadequately discusses emergency preparedness.

Response

9-33 Intervenor's have not yet completed their analysis of the SER, but will provide answers to these interrogatories when their analysis is complete.

Interrogatory

9-34 For each section and subsection listed in NRDC's answer to Interrogatory 9-33, state with particularity the reasons why the Staff's discussion in these sections and subsections are inadequate. Set forth the subject matters which NRDC believes are inadequately discussed, or should be discussed in these sections and subsections.

Response

9-34 Intervenor's have not yet completed their analysis of the SER, but will provide answers to these interrogatories when their analysis is complete.

ADMISSIONS

Admission

9-1 The PSAR, Section 13.3, Emergency Planning, contains a preliminary description of the following items:

- a) Emergency response facilities — Technical Support Center, Operations Support Center and a centralized Emergency Operations Facility — that will be utilized in support of an emergency response at CERBP.
- b) The emergency organization on shift and the augmented emergency organization.
- c) An emergency classification scheme that conforms to NUREG-0654.

d) The method by which Emergency Action Levels are used as thresholds for determining the emergency classification.

e) The means for providing protective measures for persons onsite and offsite.

f) The capability of the Muscle Shoals Emergency Control Center for determining the actual or potential offsite environmental conditions through its assessment actions.

g) The coordination with offsite groups accomplished to date, and the arrangements that will be made with State and local organizations.

h) The authority and responsibilities of the State of Tennessee TEMA as regards to planning for evacuation arrangements, traffic control and support from other State agencies.

Response

9-1 a) Intervenors admit this statement, but do not admit to the adequacy of the description.

b) Intervenors admit this statement, but do not admit to the adequacy of the description.

c) Intervenors can neither admit nor deny this statement since we have not made the comparison with NUREG-0654 at this time.

d) Intervenors admit this statement, but do not admit to the adequacy of this description.

e) Intervenors admit this statement, but do not admit to the adequacy of this description.

f) Intervenors admit this statement, but do not admit to the adequacy of this description.

g) Intervenors admit this statement, but do not admit to the adequacy of this description.

h) Intervenors can neither admit nor deny this statement since we are not familiar with the actual authority and responsibilities of the State of Tennessee TEMA.

Admission

9-2 In Section 13.3 of the Preliminary Safety Analysis Report ("PSAR") for CRBR, the Applicants commit to the following:

- a) The TSC will meet the guidance criteria of NUREG-0696 and the requirements of 10 CFR 50, Appendix E.
- b) The site emergency organizations will augment the shift operations crew in accordance with NUREG-0654, Table B-1.
- c) Providing an outline of the emergency duties and responsibilities of the various plant supervisors in the final plan.
- d) Initial dose projections and notifications to offsite authorities can be accomplished within 15 minutes.
- e) TVA will recommend protective actions to the State and local agencies and will assist these agencies as necessary to implement protective actions.
- f) That specific procedures will be developed to ensure that accidents are properly evaluated, rapid notification made and assessment and protective actions performed.
- g) The Tennessee Radiological Emergency Plan will be included in the final plan as Appendix F.

The preliminary descriptions and commitments concerning emergency preparedness in the CRBRP PSAR Section 13.3, and set forth in Admissions 9-1 and 9-2, provide adequate assurance that facilities, equipment, procedures, onsite emergency organization and offsite support groups will be available to respond to and mitigate the consequences of emergency conditions at CRBRP, with the exception that provision for real-time meteorology and dose projections must be clarified in the final plan.

Response

9-2 a) Intervenors deny this statement. Applicants' commitment is less inclusive.

b) Intervenors admit this statement.

c) Intervenors admit this statement if final plan and CRBRP-REP are synonymous.

d) Intervenors can neither admit nor deny this statement, since we cannot find any reference to such a commitment.

e) Intervenors admit this statement.

f) Intervenors can neither admit nor deny this statement, since we cannot find any reference to such a commitment.

g) Intervenors admit this statement.

Unnumbered paragraph on p. 12 -- Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Admission

9-3 The PSAR, Section 13.3, Emergency Planning, specifies an EPZ of 10 miles with regard to protective measures for the public, and an EPZ of 50 miles with regard to the ingestion pathway.

Response

9-3 Intervenors admit this statement.

Admission

9-4 The PSAR, Section 13.3 contains a list of local civil, fire, law enforcement and medical agencies/organizations within the 5-county area that will participate in the final plans for CRBRP.

Response

9-4 Intervenors admit this statement if the Staff is referring to Table 13.3-1.

Admission

9-5 The PSAR, Section 13.3 commits to incorporating the plan for the State of Tennessee and the plan for that portion of the State of North Carolina within the 50-mile EPZ into Appendix F of the final plan.

Response

9-5 Intervenor can neither admit nor deny this statement as we cannot identify such a commitment.

Admission

9-6 The PSAR, Section 13.3 identifies TEMA as the principal offsite agency having the authority and responsibility for emergency planning for the area around CRBRP.

Response

9-6 Intervenor neither admit nor deny this statement, although we have no basis for believing otherwise.

Admission

9-7 Absent any Federal requirements and guidance regarding the designation of size and shape of EPZs for LMFBR sites, the use of current LWR guidance for establishing EPZs for CRBR is a reasonable conservative approach to the problem.

Response

9-7 Intervenor deny this statement which to our knowledge has not been demonstrated anywhere.

Admission

9-8 The PSAR, Appendix 13.3A contains a preliminary description of the following:

- a) An estimated time for evacuation of the 2-mile, 5-mile and 10-mile sectors of the area within 10 miles of the plant.
- b) The evacuation time estimates that were obtained from the Traffic Management Division of the Tennessee DOT.
- c) The transient and resident population in 16 directional sectors within 10 miles of the plant.
- d) The population information using current (1980) census data and projected figures for the year 2020.
- e) The primary means for evacuation of the population; and the possible use of buses for the Edgewood School.

f) The State and local agencies that would be involved in the support of an evacuation of the population.

Response

9-8 Intervenors admit this statement, without admitting the accuracy or adequacy of such descriptions.

Admission

9-9 The PSAR, Appendix 13.3A commits to the following:

a) The time required to warn all residents and transient persons in any evacuation sector will conform to the requirements of 10 CFR 50, Appendix E.

b) The means of transportation for the population, including any problem associated with the evacuation of Edgewood School will be specifically addressed in the final plan.

Response

9-9 a) Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

b) Intervenors admit this statement without admitting the adequacy of this discussion.

Admission

9-10 The above preliminary descriptions and commitments concerning emergency preparedness in the CRBRP PSAR Section 13.3 and set forth in Admissions 9-8 and 9-9 provide adequate assurance that the final plan will contain evacuation time estimates that meet the requirements of current Federal regulations.

Response

9-10 Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Admission

9-11 The PSAR, Section 13.3 Emergency Planning, contains a preliminary description of the following:

a) The emergency response facilities, equipment, procedures and personnel that would be utilized in the response to an emergency at CRBRP.

b) Other TVA plans and emergency instructions (e.g., Spill Prevention Control and Countermeasure Plan) that will be complimented by the final emergency plan.

c) The contents of the appendices to the final plan which will describe the methods TVA will use to detect and evaluate the severity of an emergency situation, notify and activate emergency organizations, evaluate potential offsite consequences, recommend protective actions and mitigate the consequences of the accident.

d) Protective measures to be employed on-site and offsite.

e) A radiological analysis of the facility design features, and site layout and location with respect to consideration of surroundings.

f) The plume EPZ and ingestion EPZ, including the counties and States involved.

g) The local, State and Federal organizations that will be participating in the final plan.

Response

9-11 Intervenors admit this statement without admitting the adequacy of these descriptions.

Admission

9-12 Section 2 of the PSAR provides a description of site characteristics (layout and location).

Response

9-12 Intervenors admit this statement.

Admission

9-13 Sections 4 thru 12 of the PSAR provide a description of the facility design features.

Response

9-13 Intervenors admit this statement.

Admission

9-14 Section 13.3 of the PSAR commits to the following:

- a) The plans for local and State agencies will be incorporated as Appendix F to the final plan.
- b) The plan will utilize the liaisons already established in developing the Browns Ferry, Sequoyah, Watts Bar and Bellefonte Radiological Emergency Plans with the States of Alabama and Tennessee.
- c) TVA will maintain liaison with the Tennessee Emergency Management Agency, particularly with respect to the availability of emergency services.
- d) TVA will provide all necessary radiological training for local offsite support groups.
- e) The emergency classification system will be compatible with the system used by the State and local emergency organizations.

Response

9-14 Intervenors admit this statement.

Admission

9-15 The above preliminary descriptions and commitments concerning emergency preparedness in the CRBRP PSAR and set forth in Admissions 9-11 through 9-14 provide adequate assurance that the final emergency plans (on-site and offsite) will be compatible with facility design features and site layout and location.

Response

9-15 Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Admission

9-16 The PSAR, Section 13.3, Emergency Planning, contains a preliminary description of the following:

- a) The individual onsite (and designee) in charge of all activities.
- b) The methods for notifying the site emergency organization and offsite agencies.
- c) The time required for notification of offsite agencies and warning of the public.

- d) The protective measures and implementation methods employed for onsite persons.
- e) The responsibilities of State and local governments for the decision to implement protective measures for the public.

Response

9-16 Intervenors admit this statement without admitting the adequacy of such descriptions.

Admission

- 9-17 The PSAR, Section 13.3 commits to the following:
- a) TVA will recommend protective actions to State and local agencies and will assist these agencies in implementing protective actions for the public.
 - b) TVA will provide a prompt notification system for State and local governments to alert the public within a 10-mile area around the plant that protective actions may be required.
 - c) The initial dose projection and notification of offsite authorities can be accomplished within 15 minutes.
 - d) The time to warn all residents and transients in any evacuation sector (within 10 miles of the plant) will conform to the requirements of 10 CFR 50, Appendix E.

Response

9-17 a) and b) Intervenors admit this statement without admitting the adequacy of such descriptions.

- c) See Response to Request for Admission 9-2(d).
- d) See Response to Request for Admission 9-9(a).

Admission

9-18 TVA currently utilizes a combination of fixed sirens, mobile sirens and tone alert radios for the prompt notification system for the 10-mile EPZ for Browns Ferry and Sequoyah Nuclear Plants.

Response

9-18 Intervenors lack the requisite information to either admit or deny this statement.

Admission

9-19 The preliminary descriptions and commitments concerning emergency preparedness in the CRBRP PSAR Section 13.3, as set forth in Admissions 9-16 and 9-17, in part provide adequate assurance that the final plans will meet the requirements of current Federal regulations with regard to procedures by which protective actions will be carried out, including authorization, notification, and instruction procedures for evacuations.

Response

9-19 Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Admission

9-20 The PSAR, Section 13.3 (Emergency Plan) contains a description of the radiological analysis of CRBRP performed using the Site Suitability Source Term (SSST).

Response

9-20 Intervenors admit there is such an analysis, however, believe this analysis is in error. See our LWA-1 testimony.

Admission

9-21 Current Federal regulations related to preliminary emergency plans do not require special emergency measures, including increased protective, evacuation and monitoring measures, reduced response time and special protective action levels.

Response

9-21 Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Admission

9-22 The preliminary plan includes a description of the General Emergency classification - events are in progress or have occurred which involve actual or imminent substantial core failure with potential for loss of containment integrity.

Response

9-22 Intervenors admit this statement without admitting the adequacy of the description.

Admission

9-23 The preliminary plan includes the method by which Emergency Action Levels (e.g., specific measured values or observable conditions) will be used as thresholds for determining the emergency classifications.

Response

9-23 Intervenors admit this statement without admitting the adequacy of the description.

Admission

9-24 The preliminary plan commits to providing final plans which include procedures that provide the capability to cope with a spectrum of accidents ranging from those of little consequence to major core melt.

Response

9-24 Intervenors admit this statement without admitting the adequacy of the description.

Admission

9-25 The PSAR, Section 13.3, Emergency Planning, contains a preliminary description of the following:

a) A provision for final plans that will meet the acceptance criteria of NUREG-0654.

b) Goals and objectives that are to be ensured by the establishment of a final plan (note: see Section 13.3.1 of the PSAR).

c) Local, State and Federal agencies that will be participating in the CRBRP final plan.

d) Facilities, equipment, procedures, and a site emergency organization that will be used to identify, respond to, assess and mitigate the consequences of an accident at CRBRP.

Response

9-25 a)-b) Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

c) Intervenors admit this statement.

d) Intervenors admit this statement without admitting the adequacy of the items identified.

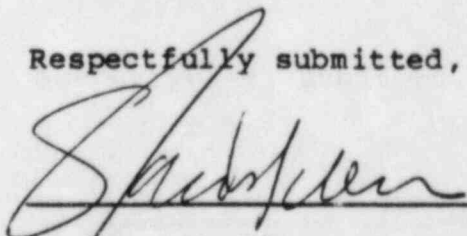
Admission

9-26 The preliminary description concerning emergency preparedness in CRBR PSAR Section 13.3, as set forth in Admission 9-25, in part provides adequate assurance that the proposed emergency plans will meet the requirements of 10 C.F.R. 50.47(b)

Response

Intervenors can neither admit nor deny this statement since it calls for a legal conclusion.

Respectfully submitted,



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