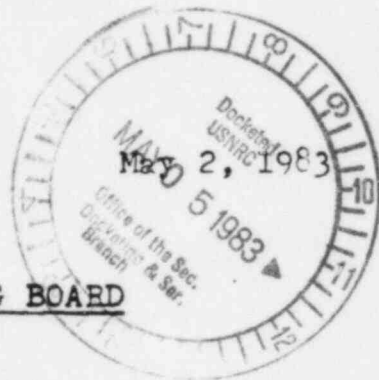


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Dockets 50-400 OL
50-401 OL

ASLBP No. 82-168-C1
OL

Wells Eddleman's Contentions re CP&L Site
Emergency Plan (SHNPP Operating Manual,
Volume 3, Book 1)

I received this plan 3-31-83. Thus today is the last day to file contentions based on it (4-30 being a Saturday). I have twice contacted Hill Carrow, counsel for CP&L, and he advises me there will be no major changes to this plan when CP&L provides its June 1, 1983 update referred to in John O'Neill's recent letter to the Board.

CONTENTIONS

("the plan" or "SEP")

150. The Site Emergency Plan does nothing to address the concerns expressed in deferred Eddleman contentions 2, 29 (deferred part) 30 (deferred part), 55, 57, 63, 97, 99, 100, 117, 118 or 124.

BASIS: The plan does not refer to any of the concerns listed in these contentions.

151. The plan does not provide the medical personnel available to treat personnel injured onsite, required by NUREG-0737 Rev. 1, p. 17, re 10 CFR 50 Appendix E, item 5.

BASIS: Annex A thereto omits this information.

152. The SEP fails to comply with NUREG-0737, Rev. 1, p. 18 item (d) which requires communications to NRC from control room, TSC and EOF to be tested monthly.

BASIS: no provision in the SEP, see page 5-5.

153. The SEP does not provide sufficient communication in the event of the failure of the plant ^{PABX} ~~RRX~~ telephone system.

BASIS: The backup power to radio fixed systems is not identified, nor specified; batteries for battery-powered radio systems are not required to be tested or replaced on any schedule. See page 3-7.

154. Plant operators are assigned to make the dose assessments (see Table 2.2.3, page 2). These personnel are unqualified to make the detailed judgments that may be required by the procedures for dose estimating, given in Annex B of the SEP.

BASIS: Annex B says the health physics staff should do the job. But they are not designated to do it initially. The complexity of judgment required in Annex B speaks for itself -- it is beyond the training, as far as the SEP establishes, of ordinary reactor operators. Moreover, there are no educational or other requirements for operators that assure they will exercise good judgment in dealing with this complex task under the pressure of accident conditions, especially in accidents that proceed rapidly to general emergency status.

155. the SEP fails to specify or provide the ERFIS required by NUREG-0737, Rev. 1, pp 19-20, for the TSC.

BASIS: All it says (p. 3-7) is that the ERFIS "will be provided". There are no specifications or guarantees that the ERFIS provided will meet the requirements of NUREG-0737, Rev. 1, e.g. item (h) pp 19-20. that the ERFIS provide necessary meteorological and reg. guide 1.97 info.

156. The SEP fails to comply with item (i) of NUREG-0737, Rev. 1, p.20, which requires complete plant drawings and diagrams and records in the TSC. These are not mentioned in SEP Table 3.1-1 and not

specified as being complete and available IN the TSC, as required, any place in the SEP. BASIS: Included above.

157. The SEP does not comply with item (k) of NUREG-0737, Rev. 1, p. 20 which requires the TSC to be designed in accord with good human factors engineering. BASIS: The SEP does not mention human factors engineering with respect to the TSC and gives no analysis to show that any human factors engineering in the TSC is any good.

158. The EOF and TSC radiation protection is inadequate to comply with the requirement of NUREG-0737 Rev. 1 that exposure be held below 5 rem in each of these locations for the duration of an accident. BASIS: Per pages 3-2 and 3-4 of the SEP, the protection of these areas will hold exposure below 5 rem only for a design basis accident. Accidents beyond design basis do happen, and have, e.g. at TMI-2, a reactor of almost exactly the same power as Harris 1. Thus, Harris should provide ability to hold personnel exposure in the EOF and TSC below 5 rem for an accident beyond design basis, at least as severe as the release from TMI-2, during its entire duration, i.e. well into April '79, while releases still were going on from TMI-2.

159. The EOF fails to comply with item (h) p. 22 of NUREG-0737 Rev. 1 in that diagrams and information complete and up to date as required thereof is not mentioned in Table 3.1.1 for the EOF and not established elsewhere in the SEP. BASIS: included above.

160. The initial and later assignments of emergency personnel from the Harris plant staff in the SEP fail to assure that these personnel are qualified for those assignments.

BASIS: Table 2.2-3 of the SEP designates, for example, the Senior specialist-Electrical to run the OSC, and multi-media trained personnel to run the fire brigade. Nothing but a bald statement says that these people will be trained. No plan of training, no qualification requirements, no requirement of when

these personnel have received training or how well they did in it or how recently they have been trained or re-trained, is mentioned in the SEP.

STATEMENT WHY THESE CONTENTIONS
COULD NOT HAVE BEEN MADE
EARLIER

CP&L had not made this site emergency plan available until 3-31-83. Intervenors are not required to formulate specific contentions on documents they have not yet seen. Further, I could not have predicted CP&L's failures in this plan based on the FSAR or ER or other available information 5-14-82 when contentions were due in this proceeding.

CERTIFICATE OF SERVICE:

This has been served by first class mail May 2, 1983 to:

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)
Atomic Safety and Licensing Board
US Nuclear Regulatory Commission
Washington DC 20555

George F. Trowbridge (attorney for Applicants)
Shaw, Pittman, Potts & Trowbridge
1800 M St. NW
Washington, DC 20036

Ruthanne G. Miller
ASLB Panel
USNRC Washington DC 20555

Office of the Executive Legal Director
Attn Dockets 50-400/401 O.L.
USNRC
Washington DC 20555

Phyllis Lotchin, Ph.D.
108 Bridle Run
Chapel Hill NC 27514

Docketing and Service Section
Attn Dockets 50-400/401 O.L.
Office of the Secretary
USNRC
Washington DC 20555

Dan Read
CHANGE/FLP
Box 524
Chapel Hill NC 27514

John Runkle
CCNC
307 Granville Rd
Chapel Hill NC 27514

Karen E. Long
Public Staff Atty
Box 991
Raleigh, NC 27602

Pat & Slater Newman
CAMP
2309 Weymouth Court
Raleigh NC 27612

Travis Payne
Edelstein & Payne
Box 12643
Raleigh NC 27605

Bradley W. Jones
USNRC Region II
101 Marietta St.
Atlanta GA 30303

Richard Wilson, M.D.
729 Hunter St.
Apex NC 27502

Certified by

W. D. Eddleman