UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket Nos. 50-413
DUKE POWER COMPANY, ET AL.	)	50-414
	)	
(Catawba Nuclear Station, Units 1 and 2)	)	July 11, 1983

PALMETTO ALLIANCE AND CAROLINA ENVIRONMENTAL STUDY GROUP
SUPPLEMENT TO PETITONS TO INTERVENE
REGARDING EMERGENCY PLANS

Pursuant to 10 CFR Section 2.714(a)(3)(b) and the Board's Order of July 13, 1983, Intervenors Palmetto Alliance and the Carolina Endvironmental Study Group (CESG) hereby file this Supplement to their Petitions to Intervene listing the contentions which they seek to have litigated in this matter, and the bases therefor, fully reserving their right to amend or expand this filing on the basis of information not now known to them such as may be contained in amendments to Emergency Plans for the Facility, the Applicants' Final Safety Analysis Report, Environmental Report, or Application, or the Commission Staff's Safety Evaluation Report or Environmental Statements, which have yet to be filed in this proceeding; or for other good causes as provided for by 10 CFR Section 2.714(a)(1). Should the Board

construe any of these contentions as an attack upon any rule or regulation of the Commission, or any provision thereof, Intervenors request that such rule or regulation be identified and that Intervenors be permitted to seek an exception to or waiver of the application of such rule or regulation with respect to this particular proceeding.

Intervenors Palmetto Alliance and CESG would respectfully show that the Application for the necessary licenses to own, use and operate the utilization facilities known as the Catawba Nuclear Station, Units 1 and 2, should be denied or appropriately conditioned since the grant of such licenses would contravene the National Environmental Policy Act of 1969 (NEPA), Pub. L. 91-190, 42 U.S.C.A. Section 4332, where the environmental costs will outweigh the economic, technical or other benefits, new and additional information now being available which alters the consideration made at the Construction Permit stage for the facility; the requirements of 10 CRF Section 50.57 can not be met where the Applicants can not demonstrate that the facility has been constructed in conformity with the construction permit, that it has been constructed and will be operated in conformity with the Application, the Atomic Energy Act, and the rules and regulations of the Commission; the Applicants are not technically or financially qualified to engage in the activities for which they seek licensing; and there is a lack of reasonable assurance that license activities will be conducted in compliance with Commission regulations or that such activities can be conducted

without endangering or being inimical to the health and safety of the public; and that the requirements of 10 CRF Section 50.47 can not be met where there is no reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency in support of which Intervenors would contend:

1. Public information provided by Applicants and state and local officials is not adequate to ensure appropriate responses to notification procedures.

The principle source of information is Applicant's brochure, which is inadequate, intentionally deceptive regarding potential health effects of radiation, and misleading, in that:

A significant body of scientific evidence that indicates health effects at very low levels of radiation is not cited. Therefore, people with compelling reasons to stay (such as farmers tending to livestock) may not take the threat seriously, especially after being repeatedly told in the past that radiation is not particularly harmful, and that a serious accident is extremely unlikely. It does not indicate that there is danger in accumulated radiation dosage. It does not give adequate information on protection from beta and gamma rays. It does not specify how young "very young" is. There is no chart to indicate overexposure during non-routine releases or accident to put into perspective the possible dose received before or during an

evacuation. It does not specify ingestion dangers from contaminated food and water. It does not specify the importance of getting to reception areas for registration for purposes of notification for evacuees' re-entry to their homes, nor of emergency notification for evacuees, accounting for fiscal aspects of evacuation and for the basis of establishing legal claims which might result from the evacuation, as specified in "Catawba Site Specific NUREG Criteria" p. B2, #3. In fact, citizens are told they may go directly to "stay with friends or relatives living at least 15 miles from the plant" (p. 10 #5) Neither does it state that the reception areas exist to provide decontamination of people and vehicles. It states that in an emergency at Catawba, citizens "would be given plenty of time to take necessary action." This cannot be guaranteed in the event of a sudden pressure vessel rupture, where sheltering would be indicated. This eventuality is not mentioned. It assumes all recipients can read, and at a certain level of comprehension. As a primary source of information, it is imperative that all have access to and understanding of the emergency procedures to be taken. There is no information concerning the existence of a "plume exposure pathway," which would influence a citizen's choice of escape route. Although this information may be available via other media during a crisis, it is important for citizens to be aware of this phenomenon beforehand. Although the North Carolina state plan calls for emergency information to be distributed as detailed in Part 1, Section IV, 2,3, and 4, no

such material other than Applicants' brochure has been made available. When and if such material is formulated, it should include information on points of concern as listed in this contention. The emergency brochure falsely reassures residents that they "would be given plenty of time to take necessary action" in the event of an emergency. In the event of a vessel rupture, such as one resulting from a PTS incident, a catastrophic failure of the containment is a proximate likelihood. In that event, significant releases would reach residents well before they were able to remove themselves from harm even under Duke's overly optimistic evacuation time estimates.

2. The information gathering procedures proposed by the mobile monitoring teams and thermoluminescent dosimeters are not adequate to provide emergency operations personnel with the immediate information required to make decisions necessary to reasonably assure the health and safety of the public under conditions of radiological release to the environment. Under accident conditions TLD's do not provide information quickly enough to adequately assist appropriate emergency decision making. Rather, they only provide a post hoc assessment of conditions. Similarly, mobile teams cannot provide timely and comprehensive information.

It is essential that information is gatherered that is sufficient to:

1. quickly determine the direction of movement of radioactive clouds and the spatial characteristics of the cloud;

2. determine ground level dose rates in the cloud and adjacent areas and anticipate the pathway and ground level dose rates at points more distant ;from the site.

This information is vital for adequate emergency notification, evacuation, and post-evacuation activities. Without substantial improvements in the proposed plans' information gathering procedures and devices --such as the installation of a fixed real time monitoring system--the proposed plans cannot meet the reasonable assurance standard of NRC regulations [10 CRF 50.57(a)(3)]; nor can they comply with the regulatory requirements for adequate emergency planning [standards 4 and 9 of 10 CRF 50.47(g)(4) require a system to permit reliable and timely means for asseasing and monitoring off-site releases during a radiological emergency].

3. The emergency plans do not provide for adequate emergency facilities and equipment to support the emrgency response as required by 10 CFR 50.47(b)(8) in that:

a) the plans do not provide for sufficient uncontaminated food, clothing, and bedding for persons who are evacuated. The plan does not attempt to estimate these needs nor provide specific information on how they are to be met.

b) The plans do not demonstrate the unlikely proposition that just 14 reception center/shelters are adequate to register and process some 75,000 evacuees. Indeed, the Catawba Nuclear Station Site Specific Plan (Part 4, SCORERP) provides that "all evacuees, both those ordered and those spontaneous, will be processed through their respective reception centers" (p. B-2). With no clear plan for controlling entry and exit from the reception centers, and no restrictions on who may enter, it is very likely that reception centers will become overcrowded. Persons from outside the evacuation area will be understandably concerned about whether or not they have been exposed to radiation and might well proceed to a nearby reception center -- exacerbating problems of crowding that already loom as serious given the enormity of the task of processing EPZ evacuees at reception centers with limited space and supplies.

4. Intervenors are informed that monitoring equipment used to assess exposure levels of the evacuated population is antiquated and inadequate. 10 CFR 50.47(b)(9) requires adequate equipment for assessing and monitoring offsite consequences of a radiological emergency.

5. The plans for recovery and re-entry into the affected area are inadequate and incomplete in that:

a) There are no adequate provisions for who will pay and maintain decontamination crews.

b) There are no adequate provisions for the availability of sufficient lead containers to enable the storage of contaminated bedding, clothing and wastes without hazard from gamma emitters to personnel and the public.

c) There are no adequate provisions for dealing with contaminated wildlife and offsite domestic animals.

d) There are no adequate provisions that can assure the decontamination of sufficient safe drinking water.

e) The provisions relating to the removal of dead bodies and animal carcasses in the case of a serious accident are inadequate. They merely delegate the responsibility to the Coroner.

6. The emergency plans do not provide reasonable assurance that adequate protective measures can and will be taken [10 CFR 50.47 (a)(1)] in that:

a) There are no adequate provisions to prevent runoff from contaminated areas to non-contaminated areas downstream.

b) There are no adequate provisions for preventing contaminated wildlife from migrating to non-contaminated areas.

c) There are no adequate provisions for preventing contaminated persons from entering a non-contaminated zone. The plans do not make clear whether or not registration at a reception center/shelter is mandatory or not; if mandatory, by what procedures will it be enforced and what effort will these procedures have on evacuation times and traffic flow?

7. In the case of a severe accident, such as a pressure vessel rupture, advance warning would not be possible and evacuation would not be an appropriate response. The only protection provision for such an occurence is sheltering -- staying indoors. The plans do not adequately address the effectiveness of sheltering as a response, nor do they provide for alternative solutions. The plans and public brochure of the Applicants and relevant state and local authorities evidence an inability to adequately plan for the worst possible case and hence fail to provide a reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 CFR 50.47(a)(1).

8. There is no reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency in that the emergency plans of Applicants, the States of North Carolina and South Carolina, and the Counties of Mecklenburg, Gaston and York fail to assign clear and effective primary responsibilities for emergency response and fail to establish specific responsibilities of the various supporting organizations. Conflict, confusion and lack of coordination are likely to prevail. Conditions may be the worst during the 7 to 9 hours after notification of state authorities of the existence of an accident at the Catawba Station while the North Carolina State Emergency Response Team (SERT) assembles and travels from Raleigh to the South Carolina Forward Emergency Operations Center (FEOC),

located dangerously within the 10 miles EPZ at Clover, South Carolina.

The FEOC itself would require at least three and one-half hours to be assembled and staffed from Columbia, South Carolina. While the formal authority to order evacuation of the plume exposure pathway EPZ straddling the North Carolina-South Carolina border rests with the respective state governors, a confusing and ineffective array of consultative and delegative authority appears to cloud the lines of primary responsibility. The residual responsibilities of the respective County governments, agencies and the support organizations are either unspecified or inadequate to the task of effective protective response.

9. The plans do not adequately provide for the early notification and clear instruction to state and local response organizations and the public that are required by 10 CFR 50.47(b)(5) in that:

a) There is little reason to believe that the fixed siren system installed within the EPZ for alerting the populace will operate as assumed. First, there is some question as to whether or not the sirens will operate properly in an emergency. Also, the back-up systems consist of "fixed and mobile sirens, law enforcement sound equipment mounted on vehicles, boats and aircraft and door-to-door notification" (Catawba Nuclear Station

Site Specific Part 4 SCORERP Annex, p. A-1)--systems which would involve a significant drain on law enforcement resources needed to implement evacuation procedures.

Secondly, if the sirens do sound, not all citizens who would be affected and therefore require notification would be able to hear a warning siren. Such a situation could arise as a result of hearing impairments, weather conditions, distance from sirens, etc.

Finally, the inadequacies of the public information (both in terms of content and distribution) make it likely that many residents will not respond to the sirens.

b) In the event of an emergency, citizens uncertain as to how to respond would likely not know who to contact for clarification and instructions.

c) In the event of a power outage the public's access (and possibly the access of state and local authorities with emergency responsibilities) to emergency broadcast information could be seriously impaired. [Without a specific, reasonable plan to deal with such a contingency, the emergency plans do not meet 10 CFR 50.47(b)(6) as well as (b)(5).]

d) There are inadequate provisions for notification of special facilities such as hospitals, prisons, recreation areas, schools, etc. For example, neither the Carowinds Theme Park nor the Heritage U.S.A. religious retreat appear to have any notification plans or procedures. A conservative estimate of a peak summer crowd at Carowinds is 30,000 to 35,000 people.

For such a crowd to be notified and given instructions on how to leave the park in a quick, orderly, and safe manner clearly requires some set of special procedures that is yet to be formulated.

e) The plan does not provide for the availability of a trained, independent, objective person or agency to assess a situation and determine when notification of the public and state and local authorities of an emergency or unusual event is necessary. Plans that leave the regulated industry free to define what is and what is not an emergency are fundamentally unsound.

10. The proposed emergency plans fail to provide a reasonable assurance that the public health and safety will be protected because the responsibility for notification of the public and state and local authorities lies with the Applicant.

Given Duke Power Company's track record of being slow to meet its obligation of informing the public, the NRC and state and local authorities of radiological releases to the environment (for example the 1977 Oconee incidents) and the predictable reluctance of any nuclear plant operator to resort to evacuation procedures, the proposed plans do not adequately assure that the public will be notified of an emergency in a timely manner. Since the writings of James Madison, it has been recognized that power must be wielded only where countervailing powers exist. Even if Duke Power Company's record were spotless a policy that

relied on trust would be unwise and insufficient to provide reasonable assurance of timely notification. It is vital that an independent alert and notification process be established. Such a process could employ real-time monitors that could provide direct emergency information to responsible state and local authorities who, in consultation with Duke Power Company, would make appropriate notification decisions.

11. Effective emergency planning should be required for the City of Charlotte, North Carolina in the event of a radiological emergency at the Catawba Nuclear Station with the full range of protective actions considered including evacuation of the City's population.

Through the process of annexation Charlotte continues to grow rapidly in the direction of the Catawba station, and it will likely encroach on the 10 mile EPZ in the near future. At present the City's nearest boundary is only 10.5 miles from the facility and appears to be directly adjacent to the Applicant's proposed EPZ. Prevailing southwesterly winds make center city Charlotte the most likely target for an airborne release of radioactivity from the plant. See, Catawba Nuclear Station Site Specific, Part 4, SCORERP, p. 2.

In the event of an evacuation of the 10 mile EPZ around Catawba many thousands of people would flow through downtown Charlotte because planned evacuation routes lead through the city; because many EPZ evacuees "assigned" to other routes would

choose these same routes since they are "evacuation travelsheds," i.e., the fastest means of exit from the EPZ. See, Voorhees, Catawba Nuclear Station Evacuation Analysis; and, finally, because many additional "volunteers" will choose to join their neighbors in fleeing the vicinity of the Catawba plant. Prudence and effective protective action for those living near Catawba require emergency planning for the City of Charlotte.

12. Applicants have not provided reasonable assurance that adequate protective measures can and will be taken by state, local and utility emergency preparedness officials and other entitiees and persons, such as medical facilities, fire fighting and law enforcement organizations and social service agencies, in the event of a radiological emergency as required by 10 CFR Section 50.47 and Appendix E, and the specific criteria as set forth in NUREG 0654, Rev. 1. The facility is located in South Carolina near the North Carolina border. Rock Hill, South Carolina, is approximately 5.8 miles from the plant and had a 1975 population of 35,346. Nearby Charlotte, North Carolina, had a population of 281,417 within the city and lies only 10.5 miles from the plant. The Charlotte-Gastonia SMSA had a 1975 population of 592,706, the bulk of which lies within 20 miles of the plant, FSAR, 2.1-1, Table 2.1.3-2. U.S. Department of Commerce, Bureau of the Census, County and City Data Book 1977: A Statistical Abstract Supplement, (Washington, GPO, 1978), pp. 548, 720 and 744. Recreational use of Lake Wylie, adjacent to

the facility and Carowinds amusement park, 8 miles from the plant, and religious gatherings at Heritage, USA, facilities of the PTL Club, and other nearby activities introduce transient populations in excess of 60,000 on a peak day. FSAR, Tables 2.1.3-17 and 2.1.3-19, p. 2.1-3. Applicants are apparently unaware of the Heritage, USA, facilities. Neither state nor local emergency preparedness plans have been developed with respect to the plant to protect people living within either the plume exposure or ingestion pathway EPZs. Although Applicants may anticipate the preparation and development of plans meeting the paper requirements of NUREG 0654, Rev. 1, "a good, well written plan is an important step toward achieving a preparedness capability, but it is only that." FEMA, Report to the President: State Radiological Emergency Planning and Preparedness in Support of Commercial Nuclear Power Plants (June 1980), p. VI-2. Applicants have no intention of conducting the "full-scale exercise," called for by 10 CFR Part 50, App. E(f)(1), but only well-rehearsed drills involving no significant movements of population.

13. The Applicants have not provided reasonable assurances that adequate measures can be taken in the event of a radiological emergency as required by 10 CFR Section 50.47 and Appendix E, by including in the plume exposure pathway EPZ for the facility at least the communities of :Charlotte, NC, Gastonia, NC, and all of Rock Hill, SC. Local emergency response needs resulting from

large population concentrations, the design of the facility and prevailing meteorology make a 10 mile EPZ inadequate in the event of a radiological emergency . The design of the facility is such that the planning basis which underlies the 10 mile standard is inappropriate for application to the facility. 1 NUREG 0396, Planning Basis for the Development of State and Local Government Radiological Emergency Response Plan in Support of Light Water Nuclear Power Plants, (December 1978); NUREG CR 1659, Supra.

14. The Applicants have failed to demonstrate their ability to take effective actions to protect the health and safety of the general public in the event of an accident in that the evacuation time study presented by the Applicants is a piece of fiction in the guise of science and may not be relied upon for determining the ability of Applicants and public authorities effectively to evacuate residents of the Catawba EPZ in a timely manner.

By overestimating the flow of traffic on evacuation routes, the Applicants' time study overestimates actual traffic movement by a factor of between three and twelve. A flow of no more than 900 vehicles/lane/hour should be assumed, according to preliminary estimates by Dr. Sheldon C. Plotkin of the Southern California Federation of Scientists.

Traffic flows are further overestimated by failing to account for voluntary evacuation likely to take place from Charlotte via I-77. All of the study's estimates are premised only on estimates of traffic flow within the EPZ. They fail to

account for backups caused by extra-EPZ congestion, especially on I-77 in Charlotte.

The Applicants' evacuation time estimates erroneously assume quick response by school buses and multiple school bus trips. School buses in South Carolina are driven by high school kids. No public official would dare to send high school kids into an evacuation zone to transport those without vehicles. Time must be allotted for finding drivers.

The Applicants' study is fundamentally useless to making a determination regarding the time within which evacuation can be accomplished in that it makes numerous assumptions regarding work and living habits which are apparently made up out of whole cloth. No references or other data bases are given for the assumptions underlying these evacuation time estimates and they cannot be credited.

The evacuation time estimates should be based only upon worst case conditions, rather than best case conditions. The Applicants' study is far too optimistic in assuming that worst case conditions will require only 156% of the time of best case conditions. The judges are asked to take notice of their own experience in Applicants' counsel trying to reach York, South Carolina, in the midst of what may be a modest snowstorm to Yankee eyes, but which had plainly immobilized the entire vicinity.

Further, Applicants' study naively fails to account for parents going first to their children's schools to pick up their

children before evacuating.

Moreover, Applicants' study, by slight of hand, dismisses the major impact of the presence of large transient populations at Carowinds amusement park and Heritage USA. Those populations will take longer to evacuate than the study assumes and will co-congest I-77 with resident traffic.

The fundamental test of the adequacy of an evacuation plan is whether it can be implemented in such a fashion as to effectively avoid or minimize the radiological effects of a radiation release. Absent a real life, real time evacuation drill to test the system, any study presented in support of the evacuation drill to test the system, any study presented in support of the adequacy of the emergency plans must be technically valid from a theoretical perspective and based upon assumptions having some relationship to the real world situation to which the study is supposed to apply. This study lacks either basis.

A more realistic estimate of evacuation time for the Catawba Nuclear Station in the South Carolina Piedmont is that evacuation will require a minimum of 33 hours, assuming a conservative 600 vehicles/lane/hour vehicle travel time. Applicants are, thus, unable to provide reasonable assurance of being able to avoid or meaningfully minimize radiation exposure in the event of a radiation release at Catawba.

The Applicants thus fail to meet the requirment of NUREG 0654, Rev. 1, Appendix 4, in that their evacuation time estimates

may not be credited by the Commission and fail to meet Commission requirements that it be able to demonstrate the ability of local and state authorities to take effective protective actions.

15. The Applicants and the local and state Plans fail to provide adequate assurance that effective protective actions can be taken because the provisions in the several plans are inadequate with regards to transportation and related evacuatory activities in the event of an evacuation.

The emergency plans fail, fundamentally, to address the peculiar conditions of the areas surrounding the Catawba Nuclear Station. Large segments of these areas are rural. Some of them contain lower income communities. The time estimates used by Applicants assume that 10% of families are without vehicles. But in many of these homes, that vehicle is not home during large parts of the day. Often, those homes will have children and elderly people at home without transportation. No census of varying conditions has been done.

Moreover, the plans are premised on using school buses to transport those without their own tranportation. School buses in South Carolina are driven by high school students. Even if some public official were prepared to leave emergency activities in the hands of sixteen year old youths, none would dare send such a child into an evacuation zone. No provision is made for back-up drivers. Even if the drivers can be found, in many communities those school buses are kept at the driver's home at night and not

at some central motor pool.

Applicants and the local and state planning officials have failed to demonstrate that adequate tranportation facilities are available to evacuate the hospitals and nursing homes in the EPZ. Nor do the plans demonstrate that adequate provisions have been made for transporting young children at day care facilities.

Numerous parents have informed members of Palmetto Alliance that in the event of an evacuation their first response will be to personally pick up their children regardless of paper plans. The state and local plans fail to address this reaction which will slow evacuation and add to confusion.

The experience at Three Mile Island demonstrates that many citizens will not leave the face of a major threat. Southerners have a special commitment to land and home which no government to date has ben able to overcome. Absent a full-scale exercise which demonstratesd that these hard-headed Scotch Irishmen are going to leave, no assurance can be had that the public will leave in the event of an evacuation order.

The emergency plans assume, but do not demonstrate, that adequate buses are available to move school children out in a timely manner. Multiple bus pickups may be needed.

Evacuation plans which fail to assume that human beings--and not computer modelled facsimiles thereof--are to be evacuated cannot but fail in the test. Applicants and state and local emergency planners are unable to provide assurance that the plans can be effectively implemented to protect the residents.

16. The provisions for medical treatment of those exposed and injured by a radiological emergency are inadquate in that:

a) The emergency plans do not demonstrate that a sufficient number of hospitals capable of handling a large influx of radiation victims are available. The Catawba Nuclear Station Site Specific Plan (Appendix 3 of Annex C) only lists the total beds of facilities "considered capable" of providing medical support. The plans do not specify how many beds these facilities have available for the radiologically contaminated. In addition, while a number of hospitals are "considered capable" of providing medical support, only one hospital -- the Divine Saviour Hospital and Nursing Home -- has actually agreed to provide treatment to the radiologically contaminated and it is located within the EPZ. b) The plan does not take into account the fact that some of the above-mentioned hospitals "considered capable" of providing medical support will likely refuse to take radiation victims because decontamination of emergency rooms is too costly and because the plans do not insure the hospitals reimbursement for these expenses. c) The plans do not provide adequate assurance that health personnel will agree to stay on site to treat victims. For example, at Three Mile Island the health personnel were among the first to leave. d) The plans do not provide for sufficient change of contaminated clothing and medical supplies for health personnel.

17. Applicants and local and state planning officials have failed to provide assurance that adequate protective actions will be taken to avoid unnecessary exposure of the population to radiation by failing to provide that radioprotective drugs, specifically KI, is placed in each residence within the 10 mile EPZ, with instructions on use and purpose.

A significant effluent in a radioactive release is radioiodine. The thyroid, which takes up radioiodine, is particularly susceptible to radiation injury. Children are even more radiosensitive in that regard than adults.

Those injuries can be avoided by oral doses of KI. However, to be effective, KI must be ingested before or almost immediately after exposure.

The side effects of KI are only demonstrated to occur with long-term use.

Failure to provide KI to all residents of the EPZ is immoral. It provides an easy way to provide increased protection against a significant somatic injury at low cost. The only real argument against it is that having KI in homes will worry people. For shame.

18. In the event of an emergency, local telephone systems are inadequate to handle the immensely increased volume of telephone calls. Since notification of emergency personnel relies upon telephones and since those without vehicles are expected to call for a ride, major parts of the emergency communications system

will be effectively knocked out. This applies especially to the notification of school bus drivers as specified in the plan.

19. State and local officials and other support personnel charged with responsibilities for action under the Catawba plant emergency plans do not possess the experience, training and technical ability to prepare for a radiological emergency and effectively implement the protective measures required in the plans. The tasks required of personnel under the plans presume knowledge and experience in emergency planning, radiation and radiation health efects, among other areas. Intervenors' members are informed that many specified officials at the state and local level as well as such other key personnel as student school bus drivers are woefully underqualified to perform their assigned tasks under the plans.

Although Applicants may anticipate the preparation and development of plans meeting the paper requirements of NUREG 0654, Rev. 1, "a good, well written plan is an important step toward achieving a preparedness capability, but it is only that." FEMA, Report to the President: State Radiological Emergency Planning and Preparedness in Support of Commercial Nuclear Power Plants (June 1980), p. VI-2. Nothing in the paper plans submitted by Applicants and others can demonstrate this necessary competence which in Intervenors' experience is seriously inadequate.

WHEREFORE: having supplemented their Petitions to Intervene with this list of the contentions which they seek to have litigated in this proceeding, and the bases therefore, Intervenors Palmetto Alliance and Carolina Environmental Study Group request that their Petitions be granted, that they be provided the opportunity to be heard in support of their interests in this matter, and that the Application of Duke Power Company, et al., for licenses with respect to the Catawba Nuclear Station, Units 1 and 2 be denied, or so conditioned as to protect the health, safety and economic interest of Palmetto Alliance and Carolina Environmental Study Group.

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July 11, 1983

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Supplement to Petitions to Intervene" have been served upon the following by deposit in the United States mail this 11th day of July 1983.

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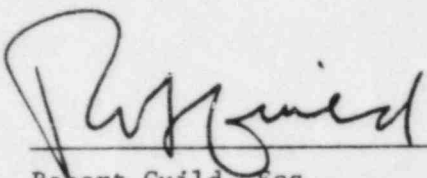

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