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RELATED CORRESPONDENCE

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October 5, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
OFFICE OF SECRETARY
DUCKETING & SERVICE

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	
AND NORTH CAROLINA EASTERN)	Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant))	

APPLICANTS' EMERGENCY PLANNING INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO SPONSORS OF EPJ-1 (CCNC),
EPJ-4 (CHANGE), and EPJ-5 (WILSON)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Final Set of Rulings on Admissibility of Offsite Emergency Planning Contentions, Ruling on Petition For Waiver of Need for Power Rule, and Notice of Upcoming Telephone Conference Call" (August 3, 1984), Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that the intevenor sponsors of EPJ-3, EPJ-4 and EPJ-5 answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below. Answers or objections to these interrogatories and responses or objections to the

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request for production of documents must be served no later than October 29, 1984.

These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should any of the intervenor sponsors of EPJ-3, EPJ-4 and EPJ-5 or any individual acting on their behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and the intervenor sponsors of EPJ-3, EPJ-4 and EPJ-5 must produce immediately any additional documents any of them, or any individual acting on their behalf, obtains which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which the sponsors of the joint contention rely.

Definitions. As used hereinafter, the following definitions shall apply:

"Applicants" is intended to encompass Carolina Power & Light Company, North Carolina Eastern Municipal Power Agency and their contractors for the Harris Plant.

"Offsite emergency plans" refers to the "North Carolina Emergency Response Plan In Support of The Shearon Harris Nuclear Power Plant," Parts 1-5.

"Document(s)" means all writings and records of every type in the possession, control or custody of any of the sponsors or any individual acting on their behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of the sponsors a document shall be deemed to be within the "control" of the sponsors or any individual acting on their behalf if any sponsor (or individual acting on his behalf) has ownership, possession or custody of the document or copy thereof, or has the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof.

General Interrogatories

1(a). State the name, present or last known address, and present or last known employer of each person known to the sponsors to have first-hand knowledge of the facts alleged, and upon which the sponsors relied in formulating allegations, in each of the contentions which are the subject of this set of interrogatories.

(b). Identify those facts concerning which each such person has first-hand knowledge.

(c). State the specific allegation in each contention which the sponsors contend such facts support.

2(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which the sponsors relied in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

3(a). State the name, address, title, employer and educational and professional qualifications of each person the sponsors intend to call as an expert witness or a witness relating to any contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) regarding which each such person is expected to testify.

(c). State the subject matter as to which each such person is expected to testify.

4(a). Identify all documents in the possession, custody or control of any of the sponsors, including all relevant page citations, pertaining to the subject matter of, and upon which the sponsors relied in formulating allegations in each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each such document relates.

(c). State the specific allegation in each contention which the sponsors contend each document supports.

5(a). Identify all documents in the possession, custody or control of any of the sponsors, including all relevant page citations, upon which the sponsors relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

6(a). Identify any other source of information, not previously identified in response to Interrogatory 2 or 5, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

7(a). Identify all documents which the sponsors intend to offer as exhibits during this proceeding to support the contentions which are the subject of this set of interrogatories or which the sponsors intend to use during cross-examination of witnesses presented by Applicants and/or the NRC Staff and/or the Federal Emergency Management Agency ("FEMA") Staff on each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each document relates and the particular page citations applicable to each contention.

Interrogatories on EPJ-3

EPJ-3-1(a). Identify specifically each group of "volunteer workers" -- including volunteer police, rescue, and fire departments -- on which the plan relies whose response to an emergency you consider to be "extremely questionable."

(b) With respect to each group identified in response to (a) above, provide all bases for your assertion that the response of those personnel is "extremely questionable."

EPJ-3-2. Identify all bases for the 50% response assumption cited in the contention.

EPJ-3-3. For each group listed in response to Interrogatory EPJ-3-1(a) above, identify and describe in detail each emergency (if any) to which that group has been asked to

respond where the response rate was less than 50% of that requested. State the bases for your answer.

EPJ-3-4(a). For each group identified in response to Interrogatory EPJ-3-1(a) above, list individually each function which that group may be relied upon to perform in an emergency at the Harris plant, but which you believe may not be adequately performed in an emergency due to a failure of personnel to respond.

(b) With respect to each function of each group listed in your response to (a) above, indicate (i) the approximate number of personnel in that group who actually would make themselves available to perform that function in an emergency and (ii) the number of additional personnel you contend are required to successfully implement that function.

EPJ-3-5. With respect to each group identified in response to Interrogatory EPJ-3-1(a) above, identify and describe in detail all measures (including training and equipment) which you understand are being taken or will be taken to assure that the members of that group perform their assigned functions in the event of a radiological emergency.

EPJ-3-6(a). State whether you contend that any of the measures identified in response to Interrogatory EPJ-3-5 above are inadequate to assure that the members of the specified groups perform their assigned functions in the event of a radiological emergency.

(b) If the response to (a) above is affirmative, specify each of the measures identified in response to Interrogatory EPJ-3-5 above which you believe to be inadequate to assure that the members of the specified groups perform their assigned functions in a radiological emergency. Describe in detail the bases for your belief that the specified measures are inadequate.

EPJ-3-7. Identify and describe in detail all bases for the belief that emergency workers will experience "conflict between organizational and family responsibilities."

EPJ-3-8. Describe in detail the consideration which you believe should be given "to composition which would avoid conflict between organizational and family responsibilities."

EPJ-3-9. With respect to each group identified in response to Interrogatory EPJ-3-1(a) above, describe any and all changes you believe must be made in offsite emergency plans to assure that the members of that group perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such changes must be made.

EPJ-3-10. With respect to each group identified in response to Interrogatory EPJ-3-1(a) above, describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in response to

Interrogatory EPJ-3-9 above) to assure that the members of that group perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such actions must be taken and such changes made.

EPJ-3-11. Identify and describe in detail all bases for your belief that teachers will refuse to supervise students on school buses and at shelters because the teachers will want to take their cars and be with their families.

EPJ-3-12. Identify and describe in detail all past emergencies (if any) in which teachers abandoned their students in order to protect personal property (for example, their cars) or to be with their families. State the bases for your answer, including the date, place and type of emergency involved, as well as the name of the teacher(s).

EPJ-3-13. Indicate (i) the approximate number of teachers who actually would make themselves available to perform the assigned functions in an emergency and (ii) the number of additional personnel you contend are required to implement those functions.

EPJ-3-14. Identify and describe in detail all measures (including training and equipment) which you understand are being taken or will be taken to assure that teachers perform their assigned functions in the event of a radiological emergency.

EPJ-3-15(a). State whether you contend that any of the measures identified in response to Interrogatory EPJ-3-14 above are inadequate to assure that the teachers perform their assigned functions in the event of an emergency.

(b) If the response to (a) above is affirmative, specify each of the measures identified in response to Interrogatory EPJ-3-14 above which you believe to be inadequate to assure that the teachers perform their assigned functions in a radiological emergency. Describe in detail the bases for your belief that the specified measures are inadequate.

EPJ-3-16. Describe any and all changes you believe must be made in offsite emergency plans to assure that teachers perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such changes must be made.

EPJ-3-17. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in response to Interrogatory EPJ-3-16 above) to assure that teachers perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on EPJ-4(a)

EPJ-4(a)-1. Identify all bases for the assertion that fifty percent of school bus drivers are high school juniors and seniors.

EPJ-4(a)-2. Identify all bases for your asserted expectation that high school student school bus drivers cannot "be expected to perform as emergency personnel without explicit and specific authorization from their parents."

EPJ-4(a)-3(a). Identify and describe in detail the substance of the "explicit and specific authorization" which you assert should be obtained from the parents of high school student bus drivers.

(b) Explain in detail the purpose of the "explicit and specific [parental] authorization" which the contention advocates.

EPJ-4(a)-4. Identify all bases for your assertion that, even with parental authorization, high school student bus drivers "should not be trusted to perform in emergency situations."

EPJ-4(a)-5. State whether you contend that high school student bus drivers are less likely to perform their assigned function in a radiological emergency than are adult bus drivers. Provide all bases for your response.

EPJ-4(a)-6. Identify and describe in detail all measures (including training and equipment) which you understand are being taken or will be taken to assure that bus drivers perform their assigned functions in the event of a radiological emergency.

EPJ-4(a)-7(a). State whether you contend that any of the measures identified in response to Interrogatory EPJ-4(a)-6 above are inadequate to assure that bus drivers perform their assigned functions in the event of a radiological emergency.

(b) If the response to (a) is affirmative, specify each of the measures identified in response to Interrogatory EPJ-4(a)-6 above which you believe to be inadequate to assure that bus drivers perform their assigned functions in a radiological emergency. Describe in detail the bases for your belief that the specified measures are inadequate.

EPJ-4(a)-8. Identify any and all changes you believe must be made in offsite emergency plans to assure that bus drivers perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such changes must be made.

EPJ-4(a)-9. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in response to Interrogatory EPJ-4(a)-8 above) to assure that bus drivers perform their assigned functions in

the event of a radiological emergency. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on EPJ-4(b)

EPJ-4(b)-1. Identify all bases for the assertion that adult bus drivers "have minimal education."

EPJ-4(b)-2. Describe the level of education defined as "minimal education" in the contention.

EPJ-4(b)-3. Identify all bases for the assertion that adult bus drivers "are paid very low wages."

EPJ-4(b)-4. Specify the amount of the "very low wages" paid to adult bus drivers as compensation.

EPJ-4(b)-5. Identify all bases supporting the asserted relationship between level of education and compensation, on the one hand, and willingness to perform assigned functions in an emergency, on the other.

EPJ-4(b)-6. Identify all bases for the assertion that adult bus drivers "cannot be trusted to put their jobs above family obligations."

EPJ-4(b)-7. Identify all bases for the assumption that adult bus drivers will experience conflict between filling their assigned emergency functions and filling their "family obligations."

EPJ-4(b)-8. List each and every "family obligation" to which the contention refers.

EPJ-4(b)-9. Identify and describe in detail all past emergencies (if any) in which bus drivers failed to perform their emergency duties. State the bases for your answer, including the date, place and type of emergency involved, as well as the name of the bus driver(s).

EPJ-4(b)-10. Indicate (i) the approximate number of adult bus drivers who actually would make themselves available to perform the assigned functions in an emergency and (ii) the number of additional personnel you contend are required to implement those functions.

EPJ-4(b)-11. Identify all bases for the assertion that adult bus drivers "cannot be trusted" to "perform adequately in emergency situations."

EPJ-4(b)-12. Identify and describe in detail all past emergencies (if any) in which bus drivers failed to "perform adequately in emergency situations." State the bases for your answer, including the date, place and type of emergency involved, as well as the name of the bus driver(s).

EPJ-4(b)-13. Identify and describe in detail all measures (including training and equipment) which you understand are being taken or will be taken to assure that bus drivers

perform their assigned functions in the event of a radiological emergency.

EPJ-4(b)-14(a). State whether you contend that any of the measures identified in response to Interrogatory EPJ-4(b)-13 above are inadequate to assure that bus drivers perform their assigned functions in the event of a radiological emergency.

(b) If the response to (a) is affirmative, specify each of the measures identified in response to Interrogatory EPJ-4(b)-13 above which you believe to be inadequate to assure that bus drivers perform their assigned functions in a radiological emergency. Describe in detail the bases for your belief that the specified measures are inadequate.

EPJ-4(b)-15. Describe any and all changes you believe must be made in offsite emergency plans to assure that bus drivers perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such changes must be made.

EPJ-4(b)-16. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in response to Interrogatory EPJ-4(b)-15 above) to assure that bus drivers perform their assigned functions in the event of a radiological emergency. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on EPJ-4(c)

EPJ-4(c)-1(a). State whether you contend that each and every school bus in the Harris plume EPZ "makes two runs each day."

(b) Describe in detail the bases for your answer to (a) above.

(c) If the answer to (a) above is other than affirmative, identify (i) the approximate number of school buses in the EPZ that make "two runs each day" and (ii) the approximate number of school buses that make only one run each day.

(d) Describe in detail the bases for your answer to (c) above.

EPJ-4(c)-2. Identify specifically and in detail all bases for your assertion that "two round trips to the shelter sites" was not considered in traffic control plans.

EPJ-4(c)-3. Describe specifically and in detail all ways in which you contend that "two round trips to the shelter sites" should be considered in traffic control plans.

EPJ-4(c)-4. Identify specifically and in detail all bases for your assertion that "two round trips to the shelter sites" was not considered in the evacuation time estimate.

EPJ-4(c)-5. Describe specifically and in detail all ways in which you contend that "two round trips to the shelter sites" should have been considered in the evacuation time estimate.

EPJ-4(c)-6. With respect to each school in the Harris plume EPZ, specify the approximate number of "[s]tudents who do not normally ride buses."

EPJ-4(c)-7. Describe any and all changes you believe must be made in offsite emergency plans to address your concerns expressed in EPJ-4(c). Describe in detail the bases for your belief that such changes must be made.

EPJ-4(c)-8. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in response to Interrogatory EPJ-4(c)-7 above) to address your concern expressed in EPJ-4(c). Describe in detail the bases for your belief that such actions must be taken or such changes made.

Interrogatories on EPJ-4(d)

EPJ-4(d)-1(a). State whether you are aware that the Harris emergency public information brochure for distribution to the public within the plume EPZ advises parents that, in the event of an evacuation, their children who are in school within the plume EPZ would be evacuated directly from school to

specified locations outside the plume EPZ, and directs parents not to drive to the schools to pick up their children.

(b). State whether you are aware that the EBS announcements for broadcast in the event of an evacuation will advise parents that their children who are in school within the plume EPZ are being evacuated directly from school to specified locations outside the plume EPZ, and will direct parents not to drive to the schools to pick up their children.

(c). Identify and explain in detail all bases for your assumption that parents would disregard the instructions of the public information brochure and the EBS announcements not to go to the schools to pick up their children.

EPJ-4(d)-2(a). Identify the approximate percentage of parents whom you believe would go to the schools to pick up their children in the event of an evacuation, despite the instructions to the contrary in the public information brochure and the EBS announcements.

(b). Please provide the basis for the percentage you used in response to (a).

EPJ-4(d)-3(a). Identify and explain in detail all ways in which evacuation of the plume EPZ might be hindered if the number of parents you believe may go to school to pick up their children in an evacuation actually do go to the schools to pick up their children.

(b). Describe in detail the bases for your answer to (a) above.

EPJ-4(d)-4(a). Please describe in detail any and all changes you believe must be made in offsite emergency plans to address your concern expressed in EPJ-4(d).

(b). Describe in detail the bases for your belief that such changes must be made.

EPJ-4(d)-5(a). Please describe in detail any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory EPJ-4(d)-4 above) to address your concern expressed in EPJ-4(d).

(b). Describe in detail the bases for your belief that such actions must be taken and such changes made.

Interrogatories on EPJ-5

EPJ-5-1(a). Describe in detail the type of "listing" or "mechanism" for identifying homebound non-ambulatory persons that you contend should be included in the offsite emergency plans.

(b). Do you contend that the offsite plans must contain a listing of homebound non-ambulatory persons? If your answer is other than an unequivocal "No," describe in detail the bases for your answer including references to any regulations or other documents that impose such a requirement.

EPJ-5-2(a). Identify each and every "State standard" for transporting hospitalized patients in ambulances or rescue squad vehicles. Please reference all statutes and regulations by name and number.

(b). For each "State standard" identified in answer to (a) above, state whether or not you allege that any ambulances or rescue squad vehicles that might be used to transport homebound non-ambulatory persons in the event of an accident at the Harris plant are not adequately equipped to meet that standard. Describe in detail the bases for your allegation, specifically identifying how ambulances or rescue squad vehicles are deficient in failing to meet such standard.

(c). For each "State standard" identified in answer to (a) above, identify by name and address each and every ambulance company, rescue squad or other organization that you contend has vehicles which are not adequately equipped to meet that standard.

(d). For each ambulance company, rescue squad, or other organization identified in (c) above, describe in detail the bases for your allegation that its vehicles do not meet any such "State standard."

(e). For each ambulance company, rescue squad, or other organization identified in (c) above, state what percentage of its vehicles and the type of vehicles you allege are not adequately equipped to meet each "State standard" referenced in (a) above.

(f). With respect to any deficiencies identified in answer to (a) - (e) above, describe in detail what actions you believe must be taken in order for those ambulances and rescue squad vehicles to be adequately equipped to meet "State standards" for transporting hospitalized patients.

EPJ-5-3(a). Identify all bases for your assertion that "a sufficient number of vehicles equipped adequately to transport the non-ambulatory from hospitals and homes will not be available."

(b). State the number of vehicles to transport non-ambulatory persons from hospitals and homes that you allege will be available, and state the number of those that you allege are not "adequately equipped." Discuss in detail the bases for your answers and identify all sources of your information.

(c). State what number of vehicles adequately equipped to transport the non-ambulatory from hospitals and homes you contend would be "sufficient." Discuss in detail the bases for your answers and identify all sources of your information.

(d). State the number of non-ambulatory persons you contend will need transportation in the event of an accident at the Harris plant. Identify how many of these persons are hospitalized and how many are homebound. Discuss in detail the bases for your answers and identify all sources of your information.

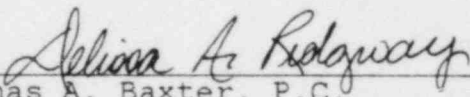
EPJ-5-4. Describe any and all changes you believe must be made in the offsite emergency plans to meet the concerns expressed in EPJ-5. Describe in detail the bases for your belief that such changes must be made.

EPJ-5-5. Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in answer to Interrogatory EPJ-5-4 above), to meet the concerns expressed in EPJ-5. Describe in detail the bases for your belief that such actions must be taken and such changes made.

Request For Production of Documents

Applicants request that the intervenor sponsors of EPJ-3, EPJ-4, and EPJ-5 respond in writing to this request for production of documents and produce the original or best copy of each of the documents identified or described in the answers to each of the above interrogatories, at a place mutually convenient to the parties.

Respectfully submitted,



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Dated: October 5, 1984

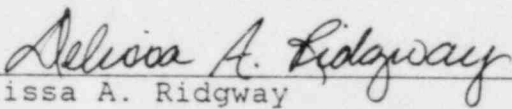
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
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and NORTH CAROLINA EASTERN)	Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)	
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(Shearon Harris Nuclear Power)	
Plant))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Emergency Planning Interrogatories and Request for Production of Documents To Sponsors of EPJ-3 (CCNC), EPJ-4 (CHANGE), and EPJ-5 (Wilson)" were served this 5th day of October, 1984, by deposit in the U.S. mail, first class, postage prepaid, upon the parties listed on the attached Service List.


Delissa A. Ridgway

Dated: October 5, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN) Docket No. 50-400 OL
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(Shearon Harris Nuclear Power)
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