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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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' STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NO
GENUINE ISSUE TO BE HEARD ON EDDLEMAN-154

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion For Summary Disposition of Eddleman-154, that there is no genuine issue to be heard with respect to the following material facts:

1. Annex B of the onsite emergency plan explains the basis for the dose projection calculation methods. It is not itself a procedure for use by operators performing dose projections. Black Affidavit, ¶ 3.

2. The dose projection procedures for use by Harris operators -- like those in use at other operating nuclear plants across the nation -- are written to involve no detailed operator judgment. Black Affidavit, ¶ 4.

3. Dose projection calculations are not necessary to make initial protective action recommendations to offsite authorities. Instead, a flow chart (Figure 4.5-1 of the

onsite plan) is used to make recommendations based upon plant conditions. Black Affidavit, ¶¶ 5 - 7.

4. After the initial recommendations are made, dose projection calculations are performed to confirm the initial recommendations. Black Affidavit, ¶ 8.

5. These calculations may be performed either by using the ERFIS computer, or by using a pocket calculator. Black Affidavit, ¶¶ 9-10.

6. A step-by-step "cookbook"-type procedure has been developed for the manual method of performing dose projection calculations. Black Affidavit, ¶ 10.

7. Regardless of whether the dose projection calculations are performed using the ERFIS computer or a pocket calculator, the procedures are written to involve no detailed operator judgment. Black Affidavit, ¶¶ 2, 4, 9, 12, 19.

8. All personnel who may be assigned to perform dose projections receive training in the methods used to perform those projections. The operators must demonstrate a satisfactory understanding of the steps of the dose projection procedures, and must provide correct answers to sample problems using the applicable procedures. Black Affidavit, ¶ 12.

9. Prior to the exercise, a number of practice drills will be conducted requiring satisfactory performance of dose projection calculations. The shift operators' performance

is critiqued by controller/evaluators knowledgeable in the subject. Black Affidavit, ¶ 13.

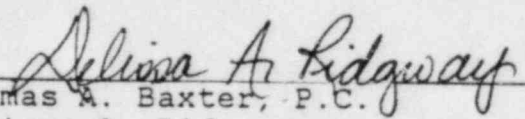
10. One practice drill will be a rehearsal for the pre-licensing full-scale exercise, using a complete scenario, with controller/evaluators. Dose projections performed by the shift operators will be compared against the correct answers included in the drill scenario. Black Affidavit, ¶ 14.

11. Prior to operation of the Harris plant above 5% power, a pre-licensing full-scale exercise will be conducted, which will once again test the shift operators' dose projection capabilities. This exercise will be observed and scored by federal evaluators. Black Affidavit, ¶ 15.

12. Controller/evaluators for drills and exercises will rate shift operators' performances, and any unsatisfactory ratings will result in retraining of individuals. Black Affidavit, ¶ 16.

13. The NRC Staff has approved the descriptions of Applicants' emergency plan training program and Applicants' drills and exercises program, as contained in the onsite plan. Black Affidavit, ¶ 17.

Respectfully submitted,


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