

RELATED CORRESPONDENCE

8 October 1984

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

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

Docket 50-400 OL

ASLBP No. 82-468-01
OL

Wells Eddleman's Second Round Interrogatories
and Request for Production of Documents to
CP&L and NC/County emergency Planners

General Interrogatories

A. Please provide answers to the general interrogatories (11th and 12th sets) previously provided, with respect to each item below to which any of them applies, or to which the answer has changed, as if those general interrogatories were fully set out here.

B. Are all references to the State Emergency Plan (in support of the Shearon Harris Nuclear Power Plant) in your responses of October 1, 1984, to Revision 1 of that plan? If not, which ones are to another version and which version do they refer to (please identify version for each).

Specific Interrogatories on
Contentions 57-C-7 and 240

240-4(a) Where in the emergency plan does it say which Chatham County Fire Departments are responsible for decontamination of evacuees at shelters? (b) Have these departments been specifically trained in decontamination techniques as distinct from radiation monitoring? Please give all details of such training, and identify all documents including texts, notes, course outlines, or other training materials on decontamination used in training these fire departments; please identify which fire departments have received what training, and for each document identified, specify how and from whom (e.g. which fire department) it was used in training re decontamination. (c) Do any of the fire departments listed in your answer 240-1(b) have a plan for decontaminating evacuees at a shelter? If so, is the plan written? Please identify all documents containing such plan(s) for each fire department.

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240-5(a) Which of the fire departments listed in your response to Interrogatory 240-1(b) is a volunteer fire department? (b) How many fulltime personnel are in each fire department listed in your response to 240-1(b)? (c) How many persons have you estimated or computed will be required for decontamination of evacuees at each shelter listed in your response to 240-1(b)? How were these estimates made? Are they in writing? Do these estimates depend on a particular method of decontamination, or methods? If so, what are these methods? Please identify all documents concerning the decontamination methods to be used by the Chatham County fire departments, and estimates or calculations of the numbers of persons required to decontaminate evacuees at each shelter, specifying for which shelter the estimate or calculation is made. (d) Do your past answers, e.g. to 240-1(d)(iii) as modified by responses to 240-2, fully and completely describe the capabilities of each Chatham County fire department to carry out decontamination of evacuees from a nuclear accident at Shearon Harris? If not, please provide all additional information re these capabilities which you have. (e) which RPS and/or CP&L personnel, and how many, are you counting on to assist ~~xxx~~ each fire department in decontamination in Chatham County?

240-6(a) Where can I get a copy of the Chatham County Department of Emergency Operation Resources Handbook? (b) Is this a document CP&L possesses? (c) Does the State emergency planning office have a copy?

240-7 (a) Who provides backup for decontamination at each site in Chatham County? (b) What assurances or agreements does Chatham County have that such backup will be available? Please identify all documents other than the emergency plan re such backup; please identify any specific parts of the plan other than part 2 p.35 which concern this matter (backup for decontamination). (c) Can you identify any specific parts of the Emergency Plan other than part 2, p.35, which give information specifically asked about in the various parts of interrogatory 240-3? If so, please identify all of them fully. (d) If you don't identify specific parts in response to part (c) above (and/or past interrogatory 240-3) does that mean you don't know what they are? Does it mean you haven't looked them up? Does it mean you don't know if they're in the plan? What does your lack of identifying specific parts or pages of the plan mean with respect to the questions in interrogatory 240-3?

57-C-7-4(a) Why did you say 57-C-7-2(c) is "not applicable"? (b) Do you know the capabilities necessary to treat persons seriously injured by radiation per se? (c) If so, what are these capabilities?

57-C-7-5(a) Has the State of NC or its Radiation Protection Section or its emergency planners made any investigation into which hospitals (local and regional) near any nuclear plants are capable of providing medical services needed by people seriously injured by exposure to radiation alone? (b) Please identify all documents concerning any such investigation, its results, and/or the capabilities of such hospitals. Please identify the nuclear plants and hospitals involved in each such investigation. (c) Does the State or any county emergency planning agency have any information about their ability of local and/or regional hospitals near the Harris plant site, e.g. any of those listed on part I pp 68-70 of the emergency response plan for Harris, to provide medical services for persons seriously injured by exposure to radiation? If so, please identify all documents containing such information and state what else you know.

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57-C-7-6(a) In your answer to 57-C-7-3, please identify what portion(s) or page(s) of NUREG-0654 you believe is applicable (b) do you believe that persons could be seriously injured by radiation alone in the course of a nuclear accident at the Harris plant? Please state all basis for your belief and identify all documents concerning such belief or its basis. (c) Have workers, e.g. in Czechoslovakia, been seriously injured by radiation at nuclear power plants? Please identify all documents concerning such injuries which you possess or know of. (d) Do you have any documents concerning the treatment of radiation sickness or other injuries caused by exposure to radiation? Please identify all such documents, and any documents you possess which include such information.

57-C-7-7(a) In arranging for treatment of persons injured at Shearon Harris, did you evaluate the ability of the doctors and hospitals (e.g. Rex hospital, NC Memorial) involved there, to treat persons seriously injured by radiation alone? If so, what were the results? If not, why not? (b) In your opinion (including that of any doctors on your staff or consulting for you) ~~is~~ is there any difference between the capabilities needed for a hospital or doctor to treat a contaminated injured person (e.g. a person with cuts or a broken bone or other injury, who is also contaminated with radioactive material) and the capabilities needed to treat a person seriously injured by radiation exposure? If there are, what are the differences? Please give all basis for your answer and identify all documents concerning the differences of which you or your staff or consultant(s) are aware.

PRODUCTION OF DOCUMENTS

Wells Eddleman hereby requests that the original or best copy of all documents identified in response to any of the above interrogatories be made available for inspection and copying at a mutually agreeable time and place.


Wells Eddleman, 10/8/84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Docket 50-400
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CERTIFICATE OF SERVICE

I hereby certify that copies of W.E. Interrogatories to NRC Staff/FEMA
and separate W.E. Interrogatories to CP&L/N.C. Emergency planners

HAVE been served this 8 day of October 1984, by deposit in
the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with
an asterisk, for whom service was accomplished by hand for
interrogatories to CP&L/State of NC/NC county emergency planners
(Delivered to counsel Dale Hollar's office in Raleigh NC)

* Express mail Oct 9 - Ethics Federal Hudson

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)
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