

October 8, 1984

## UNITED STATES OF AMERICA

## NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARDDOCKETED  
USNRC

'84 OCT 11 AM 1:30

In the Matter of )

Carolina Power &amp; Light Company )

And North Carolina Eastern Municipal )  
Power Agency )

(Shearon Harris Nuclear Power Plant) )

Docket No. 50-400 OL

CONSERVATION COUNCIL'S INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS TO  
APPLICANTS ON EMERGENCY PLANNING CONTENTIONS (FIRST SET)

Per the Board's Memorandum and Order, dated August 3, 1984, the last day for filing discovery requests on emergency planning contentions is October 8, 1984. The last day to respond to these requests is to be October 31, 1984, with the deadline for motions for summary disposition to be December 21, 1984. The Conservation Council is the lead intervenor on EPJ 3.

INTERROGATORIES ON EPJ 3 (VOLUNTEER WORKER CONFLICT)

3-1 For each of the responses below, state who made the response, their position, and business address.

3-2 For each of the responses below, supply all basis for the response, including all material they relied on in responding (cite each fully).

3-3 What witnesses do Applicants expect to present in the hearing on this contention? For each, include name, address, position, and summary of their testimony.

3-4 What is the total number of volunteer workers--including volunteer police, rescue, fire departments, and teachers--expected to be utilized during an alert?

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3-5 For each of the workers enumerated in the response to Interrogatory 3-4 above, please answer the following:

- a) what is his/her current position? (ex. volunteer fireman, etc.)
- b) what role is he/she expected to play during an alert?
- c) how will he/she be alerted as to the emergency?
- d) how long will it take him/her to arrive at his/her position during the alert after he/she is notified?
- e) how long is he/she expected to be at that position?
- f) what duties will he/she be expected to fill during the alert?
- g) in what manner will he/she be permitted to communicate with his/her family while at his/her position?
- h) is he/she expected to relieve any other workers (paid or volunteer)?
- i) how will he/she be allowed any time off for food or necessities while on duty?

3-6 What training will each of the workers enumerated in the response to Interrogatory 3-4 above receive in the following areas:

- a) the duties he/she is expected to perform during an alert?
- b) the hazards of radiation?
- c) the proper use of monitoring devices?
- d) the proper use of protective gear?
- e) how to communicate to others under his/her supervision what is happening during the alert?

3-7 For any training described in the response to Interrogatory 3-6 above, please answer the following:

- a) who will conduct the training?
- b) how often will the training be conducted?
- c) will any of this training be certified?

d) how will the persons doing the training ascertain whether all of the  
both  
volunteer workers needing training have been/trained and trained properly?

3-8 Please provide a brief summary of the training described in the response to Interrogatory 3-6 above.

3-9 Have the Applicants contacted all organizations and agencies which are expected to supply volunteers during an alert?

3-10 Which agencies and organizations have been contacted?

3-11 For each agency listed above in the response to Interrogatory 3-10, please answer the following:

a) who made the contact?

b) which personnel of the agency or organization was contacted?

c) when were these contacts made?

d) what was discussed during each contact?

e) have memoranda of understanding (MOUs) or any other such documents been signed with any of the contacted agencies?

3-12 Have Applicants or any person under their direction studied the potential  
in volunteer workers  
role conflicts/which might occur around the Shearon Harris site during an emergency?

3-13 Are Applicants aware of any studies made of role conflict around any other nuclear plant during an emergency?

3-14 Are Applicants aware of any studies made of role conflict during any other emergencies, i.e. not related to nuclear plant evacuation?

3-15 Have Applicants or any person under their direction studied the locations of the families of volunteer workers enumerated to the response to Interrogatory 3-4 above?

3-16 If the response to Interrogatories 3-12 through 3-15 above is affirmative, please provide a copy of that study or studies.

3-17 Do the contracts of teachers who are expected to respond to an alert contain explicit provisions relating to such alerts?

3-18 If the response to Interrogatory 3-17 above is affirmative, what provisions are in the teacher contracts?

3-19 How many students will each teacher be expected to supervise?

3-20 How many teachers and students will be on each bus?

3-21 How many teachers and students will be in each shelter?

3-22 How many of the volunteer workers expected to respond to an alert will in fact respond? Please explain the response.

3-23 What steps have been taken to identify those volunteer workers which might not respond to an alert?

3-24 For which organizations (volunteer and non-volunteer), have the Applicants paid attention to the composition which would avoid conflict between organizational and family responsibilities?

3-25 For each organization identified in the response to Interrogatory 3-24, what was done?

REQUEST FOR PRODUCTION OF DOCUMENTS

For each document referred to above, will Applicants make it available to Counsel for the Conservation Council at a mutually agreed upon location?

Respectfully submitted,

  
John Runkle  
General Counsel

Conservation Council of NC  
307 Granville Road  
Chapel Hill, NC 27514  
919/942-7935  
942-0600

This is the 8<sup>th</sup> day of October, 1984.

CERTIFICATE OF SERVICE

I hereby certify that copies of the Conservation Council's Interrogatories and Request for Production of Documents to Applicants on Emergency Planning Contentions (First Set) were served upon the following persons by deposit in the U.S. Mail, postage prepaid, or by hand delivery to the following: DOCKETED  
10/11/84  
ALL 11:31

James L. Kelley  
Atomic Safety & Licensing Board  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

Richard E. Jones  
Vice President--CP&L  
PO Box 1551  
Raleigh, NC 27602

Glenn O. Bright  
same address

Robert Gruber  
Public Staff, Utilities Commission  
PO Box 991  
Raleigh, NC 27602

Dr. James H. Carpenter  
same address

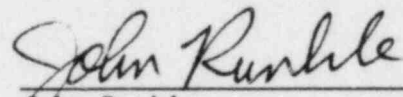
Thomas Baxter  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20036

Docketing and Service (3cc)  
Office of the Secretary  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Linda Little  
Governor's Waste Management Board  
325 N. Salisbury St., Room 513  
Raleigh, NC 27611

Charles A. Barth  
Office of the Executive Legal Director  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

Daniel F. Read  
PO Box 2151  
Raleigh, NC 27602

  
John Runkle

M. Travis Payne  
PO Box 12643  
Raleigh, NC 27605

Conservation Council of NC  
307 Granville Road  
Chapel Hill, NC 27514

Dr. Richard D. Wilson  
729 Hunter Street  
Apex, NC 27502

This is the 8<sup>th</sup> day of October,  
1984.

Wells Eddleman  
718-A Iredell Street  
Durham, NC 27705

Bradley W. Jones  
US NRC--Region II  
101 Marrietta Street  
Atlanta, GA 30303

Spence W. Perry  
Associate General Counsel  
FEMA  
500 C Street, S.W. Ste. 480  
Washington, D.C. 20740