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December 12, 1984

UNITED STATES OF AMERICA⁸⁴ DEC 14 A11:38
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
OFFICE OF SECRETARY
GENERAL INVESTIGATIVE
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 CONTENTION 57-C-13

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of Eddleman Contention 57-C-13 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Eddleman Contention 57-C-13 claims that the areas with the highest protection factor (PF) of each hospital and nursing home within the Harris plume exposure pathway EPZ should be determined in advance (before the emergency preparedness exercise) to comply with the requirements of 10 C.F.R. § 50.47(a)(1).

2. In response to the concerns raised by this Contention, a survey of each nursing home, hospital and family care facility within the EPZ has been undertaken to determine the best PF area of each facility. Pugh Affidavit, ¶ 5.

3. Based on information about the nature of radiological releases, criteria for determining the best PF areas were developed to complete the survey. Pugh Affidavit, ¶¶ 3-4.

4. The survey procedure involved interviewing the owners or administrators of each facility and inspecting those structural features which determine the effectiveness

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of the structure in reducing radiological doses. The survey was conducted by shelter analysts certified by the Federal Emergency Management Agency. Pugh Affidavit, ¶¶ 5-6.

5. As a result of this survey, the best protection factor of each facility has been identified whenever possible. Where a significantly better PF area was not readily identifiable, guidance on steps that can be taken to minimize the dose received by persons in the facility are contained in the survey results. Pugh Affidavit, ¶¶ 8-9.

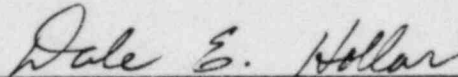
6. In order to assist in identifying areas where patients might be moved in an accident situation, the owners or administrators of all facilities were orally apprised at the time of the survey of which areas within their facility provide the best protection from a radiation release. Pugh Affidavit, ¶ 12.

7. A followup letter will be sent to all owners or administrators to tell them of the survey results and recommend a preferred sheltering location within their facility. The Division of Emergency Management will also retain this information for reference at the time an accident may occur. Pugh Affidavit, ¶ 12.

8. The actions taken are adequate to identify the best PF areas of each hospital, nursing home and family care facility within the Harris plume EPZ and, therefore, satisfy the requirements of 10 C.F.R. § 50.47(a)(1).

This 12th day of December, 1984.

Submitted by:



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