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January 2, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)

(Shearon Harris Nuclear Power Plant))

Docket No. 50-400 OL

APPLICANTS' STATEMENT OF MATERIAL FACTS AS TO WHICH
THERE IS NO GENUINE ISSUE TO BE HEARD ON EDDLEMAN CONTENTION 240

Pursuant to 10 C.F.R. §2.749(a), Applicants state, in support of their Motion for Summary Disposition of Eddleman Contention 240 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Eddleman Contention 240 was admitted into this proceeding solely for the purpose of resolving two issues: (1) What agency of Chatham County government is responsible for the decontamination of evacuees at the Chatham County Shelters? and (2) Which emergency response organizations are assigned the responsibility of providing support for the decontamination of evacuees?

2. Local fire departments have the primary responsibility for decontamination of evacuees at shelters located in Chatham County. Which particular fire department is utilized will depend upon which shelter is opened. If the Northwood High School is opened as a shelter, the North Chatham Fire Department will provide the decontamination team. If the Jordan Matthews High School is used as a shelter, the Siler City Fire Department will provide the decontamination team. If Chatham Central High School is used as a shelter, the Bonlee Fire and Rescue Department and Goldston Fire Department will provide the decontamination team. Scott Affidavit, ¶ 4.

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3. Decontamination stations located at the shelters will be operated under the direction of the fire chief/captain of the fire department with decontamination responsibility. Chatham County Office of Emergency Services will have responsibility for coordinating emergency activities including decontamination. Scott Affidavit, ¶ 5.

4. Backup support for decontamination of evacuees in Chatham County shelters will be provided by local fire departments and rescue squads. Which particular organizations provide backup support will depend upon which shelters are opened. If Northwood High School is used as a shelter, support will be provided by the East Chatham rescue squad. If Jordan Matthews High School is used, support will be provided by the Chatham County Rescue Squad. If Chatham Central High School is opened, support will be provided by the Bonlee Fire and Rescue Department and the Goldston Rescue Squad.

5. Backup support for decontamination for evacuees in Harnett County shelters will be provided by local rescue squad and ambulance services. The following organizations will provide backup support for decontamination in Harnett County: Anderson Creek Rescue Squad, Angier Rescue Squad, Benhaven Rescue Squad, Boone Trail Rescue Squad, Coats Rescue Squad, Dunn Rescue Squad, Erwin Rescue Squad, and the Harnett County Ambulance Service. Assignments of these organizations to specific shelters will be made when standard operating procedures are developed for Harnett County. Pugh Affidavit, ¶ 3.

6. Backup support for decontamination of evacuees in Lee County shelters will be provided by fire departments and rescue squads. Which particular organizations provide backup support will depend upon which shelters are opened. If West Lee Junior High School is used as a shelter, support will be provided by North View Fire Department. If East Lee Junior High is used, support will be provided by Lee County Rescue Squad. If Greenwood Elementary School is used as a shelter, the Sanford City Fire Department will provide support. Additional support at any of these shelters will be available, if needed,

from the Lee County Sheriff's Department and the Sanford City Fire Department. Pugh Affidavit, ¶ 4.

7. Backup support for decontamination of evacuees in Wake County shelters will be provided by fire departments and rescue squads. Support will be available from the following organizations: Northern Wake Rescue Squad, Wake Forest Fire Department, Rolesville Fire Department, Hopkins Fire Department, Zebulon Fire Department, Wendell Fire Department, Knightdale Fire Department, and Six Forks Fire Department. These organizations have not been assigned to specific shelters. A determination of which organization will provide backup support at specific shelters will be made at the time such support is needed. Pugh Affidavit, ¶ 5.

8. Radiation specialists and health physicists from Carolina Power & Light Company will be available, if needed, to provide support for decontamination at shelters in each of the four counties. The State of North Carolina Radiation Protection Section may provide additional expert personnel to assist and consult in the event of more serious contamination problems at the shelters. Pugh Affidavit, ¶ 6; Scott Affidavit, ¶ 7.

9. The appropriate sections of the ERP will be amended to provide additional information about which organizations have primary responsibility for decontamination of evacuees at the Chatham County shelters and which organizations have responsibility for backup support for decontamination at shelters within each of the four counties. The ERP will be amended to specify the types of organizations with decontamination responsibilities. Particular organizations and assignments will be listed in the Standard Operating Procedures for each county. Pugh Affidavit, ¶ 7.

10. The questions raised by the Licensing Board in admitting Eddleman Contention 240 have been resolved.

This 2d day of January, 1985.

Submitted by:

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