

February 5, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)

Docket Nos. 50-440
50-441

(Perry Nuclear Power Plant,)
Units 1 and 2))

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

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

1. A patient suffering from radiation exposure is not radioactive and poses no hazard to response personnel. Affidavit of Roger E. Linnemann on Contention P ("Linnemann Aff."),

¶ 2.

2. Radioactive contamination results from loose radioactive particles adhering to the body. Contamination is easy to detect and is easily removed by changing clothes and bathing the effected area. Linnemann Aff., ¶¶ 2, 6.

3. No special emergency facilities are required for a patient who is exposed and injured. Linnemann Aff., ¶ 3.

4. For a contaminated patient, procedures are implemented to reduce exposure and control contamination. These procedures are not unique to radiation injury cases. Linnemann Aff., ¶ 3.

5. Radiation injuries are among the easiest medical emergencies to handle. Such injuries are seldom if ever life-threatening and unfold in a predictable sequence over a period of time. Linnemann Aff., ¶ 4.

6. Even an extremely unlikely nuclear plant accident with substantial off-site radiation releases would not generate large numbers of traumatic injuries or the need for a large number of hospital beds. Linnemann Aff., ¶ 5.

7. The characteristics of a radiation release mitigate against the possibility that an individual would receive enough exposure or contamination to require hospitalization. Linnemann Aff., ¶ 6.

8. Emergency plans for the three plume exposure pathway EPZ counties identify four hospitals to handle members of the public who may have had radiation uptake or exposure. The Perry emergency plan designates one of these hospitals to receive radiation injuries from the plant (one of the other hospitals would be its backup). Linnemann Aff., ¶ 8.

9. Extensive training in handling radiation injuries has been provided to all four of the designated hospitals. Eighty-five hospital personnel have been trained. Linnemann Aff., ¶ 9.

10. Multiple injuries from nuclear power plants are rare. Linnemann Aff., ¶ 10.

11. Support hospitals would be able to handle multiple contaminated and injured personnel, using their existing mass casualty procedures. Designated Radiation Emergency Areas could be readily expanded. Linnemann Aff., ¶ 10.

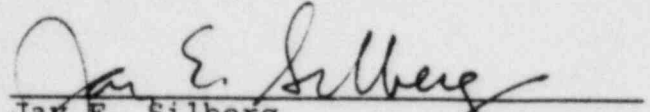
12. The State Plan identifies some 50 hospitals in the counties around the plume EPZ, which should be capable of handling contaminated and exposed individuals, including those who are injured. Linnemann Aff., ¶ 11.

13. Thirty-seven of the hospitals on the State list have diagnostic and/or therapeutic radioisotope facilities, which requires that they be able to handle contaminated and injured patients. Linnemann Aff., ¶ 11.

14. Accredited hospitals must have procedures for the emergency management of individuals who have actual or suspected exposure to radiation or who are radioactively contaminated. All the hospitals listed on the State Plan are indicated to be accredited. Linnemann Aff., ¶ 12.

15. The many available hospitals, with their existing emergency rooms and radioisotope facilities, would be able to handle any conceivable patient load arising from an accident at Perry. Linnemann Aff., ¶ 12.

Respectfully submitted,


Jay E. Silberg
SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

Counsel for Applicants

Dated: February 5, 1985