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USNRC

85 FEB 25 P1:36

Docket Nos. 50-440 and 50-~~440~~ OFFICE OF SECRETARY  
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Now comes Sunflower Alliance, and sets forth the following as material facts in support of its opposition to summary disposition of Contention M:

- Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

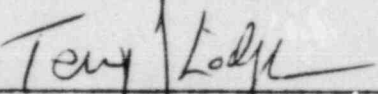
Applicant has failed to mention any cost  
opposition to independent monitoring systems in all affected counties.  
the State Plan still contains the 19

4. At p. 35 of the FEMA Exercise Report from the November, 1984 emergency drill at PNPP, there was a specific finding that emergency officials showed a lack of familiarity with sampling procedures for testing irradiated materials.

5. NUREG-0654 identifies as a local responsibility that there be methods of rapidly assessing actual or potential magnitude and locations of radiological hazards through liqued or gaseous release pathways. Id. at 58. The Ashtabula County Radiological Emergency Response Plan at p. I-1 indicates only that local officials will "support" the state "as requested."

6. Contrary to Applicant's allegation at para. 11 of its "Statement of Material Fact," the State of Ohio does not have fixed independent radiation monitoring systems in place, but uses three mobile vehicles. FEMA Exercise Report at 33. These vehicles are apparently heqdquartered at the Ohio DSA offices in Worthington, Ohio, and require 3 or more hours of driving time to get to PNPP. Id.

Respectfully submitted,

  
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