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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

29 April 1985

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

'85 MAY -3 A11:18

OFFICE OF SECRETARY
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In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
(Shearon Harris Nuclear Power Plant,
Unit 1)

Docket 50-400 OL

ASLBP No. 82-468-01
OL

Eddleman Contentions Concerning Emergency Plan
Brochure additions served 4/16/85

227-CC The brochure evacuation route listings do not give complete directions to the shelters. Since the plan assumes that evacuees will check in at shelters, and there be checked and decontaminated if necessary, failure to provide directions to the shelters from the evacuation routes could lead to evacuees failing to find the shelters, failing to register, and not being decontaminated. Lack of decontamination especially would violate the requirement of 10 CFR 50.47(a)(1) that "adequate protective measures can and will be taken" in a radiological emergency. Specific maps to the shelter^s or clear directions to each, should be in the brochure, to avoid confusion.

227-DD. The title "How Will You Know Where to Go To Be Safe"

is inappropriate because it fails to make adequate distinction between evacuation and sheltering, and because it falsely implies that radioactive material cannot reach the shelters.

FIVE FACTORS for both contentions above: (i) Good cause: info was not available until brochure amendments were served. CP&L's errors could not have been readily anticipated without seeing them. (ii,iv) No other parties or means will represent my interests here. (v) There is little potential for delay since these contentions could be heard in June. They do not broaden the issues significantly and may be amenable to settlement. The requirements of 10 CFR 50.47 for effective emergency planning render these issues important enough to be heard regardless

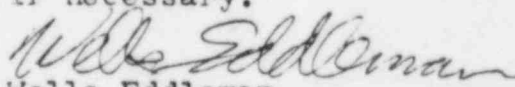
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of the minor delay potential and slight broadening of issues involved. Over 20 issues were admitted on emergency planning. (iii) No particular expertise is required to deal with these issues. As a teacher I am able to provide review and questions concerning the clarity and accuracy of information provided to the public via the brochure. Because these issues are not full of legal complexity, I can deal with them and conduct settlement negotiations, or cross-examination, as required to provide a sound record on these matters. These issues are also simple enough as to not be a great burden on my time or resources.

For the above reasons, Contentions 227-CC and -DD should be admitted for settlement or litigation if necessary.

29 April 1985


Wells Eddleman

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.)
Shearon Harris Nuclear Power Plant, Unit 1)

Docket 50-400
O.L.

CERTIFICATE OF SERVICE

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I hereby certify that copies of Eddleman contentions concerning
Emergency Plan Brochure additions served 4/16/85 85 MAY -3 AM 1:18

HAVE been served this 29 day of April 1985, by deposit in OFFICE OF SECRETARY
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the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with
an asterisk, for whom service was accomplished by _____

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