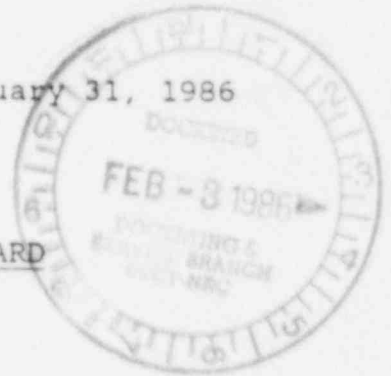


January 31, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2))

APPLICANTS' STATEMENT OF MATERIAL FACTS AS TO WHICH NO
GENUINE ISSUE EXISTS TO BE HEARD REGARDING
CONTENTION EP-1/EP-1(a)/EP-2(b)
(24-HOUR STAFFING OF BURKE COUNTY ENN LINK)

Pursuant to 10 C.F.R. § 2.749(a), Applicants state in support of "Applicants' Motion for Summary Disposition of Joint Intervenors' Contention EP-1/EP-1(a)/EP-2(b)" that no genuine issue exists to be resolved with respect to the following material facts:

1. As admitted by the Board, Joint Intervenors' Contention EP-1/EP-1(a)/EP-2(b) concerns the 24-hour staffing of the Burke County Emergency Notification Network ("ENN") link.

2. The "Burke County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Vogtle Electric Generating Plant" identifies four means -- one primary and three back-up means -- by which Burke County could be notified of an emergency at Plant Vogtle. "Affidavit of Richard L. Bryant on Contention EP-1/EP-1(a)/EP-2(b)" ("Bryant Affidavit") at ¶3.

3. The ENN -- a dedicated telephone network linking offsite emergency response officials with Plant Vogtle -- will be the primary means for notification to Burke County of an emergency at Plant Vogtle. Bryant Affidavit at ¶4.

4. As first back-up to the ENN, Burke County could be notified via commercial phone lines using a specific "24-hour" emergency number at the Burke County Emergency Operations Center ("EOC"). Bryant Affidavit at ¶4.

5. The second back-up to the ENN will be the Burke County EMA radio network. Bryant Affidavit at ¶4.

6. A receiver for each of these three means of notification -- the ENN, the EOC emergency number, and the Burke County EMA radio network -- will be located on the central dispatcher's console in the new Burke County EOC. Bryant Affidavit at ¶5.

7. Burke County will staff the central dispatcher's position on a 24-hour-per-day basis. Therefore, the ENN, the EOC emergency number, and the Burke County EMA radio network all will be staffed on a 24-hour-per-day basis, and the use of any of them would place Plant Vogtle in direct contact with the Burke County EOC. Bryant Affidavit at ¶5.

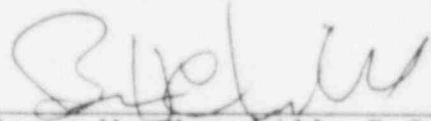
8. The third back-up to the ENN is via commercial phone lines to a specific "24-hour" emergency number for the Sheriff's Department. That phone is located on the Sheriff's Dispatcher's console, which is staffed on a 24-hour-per-day basis.

Pursuant to procedure, the Sheriff's Dispatcher would then advise the central dispatcher (in the EOC) of the notification from Plant Vogtle. Bryant Affidavit at ¶6.

9. Upon notification of an emergency at Plant Vogtle (via any of the four identified means), the central dispatcher would contact the EMA Director (a full-time position) or a designated alternate pursuant to a specific predetermined line of succession. The line of succession was specifically developed to assure the 24-hour-per-day availability of an official with the authority to respond to an emergency at Plant Vogtle. Each individual in the line of succession has the authority to initiate an emergency response by Burke County. Bryant Affidavit at ¶¶1,7, Exhibit A.

10. The Burke County ENN link and the three back-up means for notification to Burke County of a Vogtle emergency thus all will be staffed on a 24-hour-per-day basis, and the procedure for initiation of Burke County emergency response will be the same regardless of the means used to notify Burke County of the emergency. Bryant Affidavit at ¶18.

Respectfully submitted,



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Dated: January 31, 1986