

February 10, 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-7 (EMERGENCY PLANNING IN SOUTH CAROLINA)

Pursuant to 10 C.F.R. § 2.749(a), Applicants state in support of Applicants' Motion for Summary Disposition of Joint Intervenors' Contention EP-7 that no genuine issue exists to be resolved with respect to the following material facts:

1. The litigable issue extant in Joint Intervenors' Contention EP-7 concerns the availability of emergency plans for that portion of the Vogtle Electric Generating Plant's (VEGP) plume exposure pathway emergency planning zone (plume EPZ) falling within the State of South Carolina.

2. The plume EPZ for VEGP in South Carolina encompasses parts of three counties: Aiken County, Allendale County, and Barnwell County. Most of the area in South Carolina within the VEGP plume EPZ is part of the

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Savannah River Plant, a facility owned and operated by the United States Department of Energy. Affidavit of Jean M. DiLuzio on Contention EP-7 at ¶13.

3. On February 5, 1986, the Applicants submitted the following site specific emergency response plans developed for emergencies at VEGP by the State of South Carolina, Aiken County, Allendale County, Barnwell County, and the U.S. Department of Energy's Savannah River Operations Office:

- (a) VEGP Site Specific Radiological Emergency Response Plan -- Part 7, South Carolina Operational Radiological Emergency Response Plan (SCORERP).
- (b) Fixed Nuclear Facility Radiological Emergency Response Plan -- Annex Q, Part 2, to the Aiken County Emergency Operations Plan.
- (c) Fixed Nuclear Facility Radiological Emergency Response Plan -- Annex Q, Part 2, to the Allendale County Emergency Operations Plan.
- (d) Fixed Nuclear Facility Radiological Emergency Response Plan -- Annex Q, Part 2, to the Barnwell County Emergency Operations Plan.
- (e) Vogtle Electric Generating Plant Response Guide, SR 402.1, U.S. Department of Energy, Savannah River Operations Office.

Id. at ¶14.

4. These plans establish the basis for a response to an emergency at VEGP by the different governmental authorities having jurisdiction over those portions of South Carolina within the VEGP plume EPZ. Id.

Respectfully submitted,

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