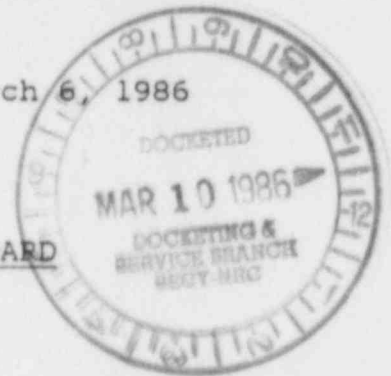


March 6, 1986

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-4
(IDENTIFICATION OF EXISTING HOSPITALS FOR
TREATMENT OF CONTAMINATED INJURED INDIVIDUALS)

Pursuant to 10 C.F.R. § 2.749(a), Applicants state in support of "Applicants' Motion for Summary Disposition of Joint Intervenor's Contention EP-4" that no genuine issue exists to be resolved with respect to the following material facts:

1. As admitted by the Board, Joint Intervenor's Contention EP-4 concerns the identification of hospitals for the treatment of contaminated injured individuals.

2. The "Vogtle Electric Generating Plant Unit 1 and Unit 2 Emergency Plan" (Vogtle Plan) identifies Humana Hospital (in Augusta, Georgia) as the primary medical facility to be used by Applicants for treatment of contaminated injured individuals from the Plant Vogtle site, with Burke County Hospital (in Waynesboro, Georgia) as a back-up facility. "Affidavit of Jean M. DiLuzio on Contention EP-4" ("DiLuzio Affidavit") at ¶ 3.

3. "Annex D, Plant Vogtle, to The Georgia Radiological Emergency Plan" ("Georgia Plan") identifies Burke County Hospital as the primary medical facility in Georgia for treatment of any members of the general public who might be contaminated and injured as a result of an accident at Plant Vogtle. "Affidavit of Billy J. Clack on Contention EP-4" ("Clack Affidavit") at ¶ 3.

4. The Georgia Plan identifies Humana Hospital as the secondary medical facility in Georgia for the care of offsite victims of an accident at Vogtle. Clack Affidavit at ¶ 4.

5. The Georgia Plan provides that any victim of a radiological accident at Vogtle who requires care that cannot be provided at either Burke County Hospital or Humana Hospital can be treated at Oak Ridge Hospital (in Oak Ridge, Tennessee). Clack Affidavit at ¶ 5.

6. The Georgia Plan is being revised to delete reference to Burke County Hospital and Humana Hospital as facilities for the care of individuals who are injured but not contaminated. Clack Affidavit at ¶¶ 3-4.

7. The "Burke County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Vogtle Electric Generating Plant" ("Burke County Plan") is being amended to be completely consistent with the Georgia Plan. "Affidavit of Richard L. Bryant on Contention EP-4" ("Bryant Affidavit") at ¶¶ 3-5.

8. The "Vogtle Electric Generating Plant Response Guide, SR 402.1" ("SRP Response Guide") identifies the Savannah River Plant ("SRP") Medical Building and the Dwight D. Eisenhower Army Medical Center (at Fort Gordon, South Carolina) as the medical facilities in the vicinity of Plant Vogtle for the treatment of any SRP transients or employees who might be contaminated and injured as a result of an accident at Plant Vogtle. "Affidavit of Kevin P. Twine on Contention EP-4" (Twine Affidavit") at ¶ 3.

9. The SRP Response Guide also provides that additional radiological medical support can be obtained through the Radiation Emergency Action Center and Training Site ("REACTS") in Oak Ridge, Tennessee. Twine Affidavit at ¶ 4.

10. The "Vogtle Electric Generating Plant Site Specific Radiological Emergency Response Plan, Part 7, SCORERP" ("South Carolina Plan"), "Annex Q, Part 2, Fixed Nuclear Facility (FNF) Radiological Emergency Response Plan (RERP) To The Aiken County Emergency Operations Plan (EOP)" ("Aiken County Plan"), "Annex Q, Part 2, Fixed Nuclear Facility (FNF) Radiological Emergency Response Plan (RERP) To The Allendale County Emergency Operations Plan (EOP)" ("Allendale County Plan"), and "Annex Q, Part 2, Fixed Nuclear Facility (FNF) Radiological Emergency Response Plan (RERP) To The Barnwell County Emergency Operations Plan (EOP)" ("Barnwell County Plan") all consistently identify Aiken Community Hospital (in Aiken,

South Carolina) and Humana Hospital as the medical facilities for the treatment of any other members of the general public in South Carolina who might be contaminated and injured as a result of an accident at Plant Vogtle. "Affidavit of Anthony J. Wynn on Contention EP-4" ("Wynn Affidavit") at ¶ 3; "Affidavit of Bobby R. Mauney on Contention EP-4" ("Mauney Affidavit") at ¶ 3; "Affidavit of Harold W. Awbrey on Contention EP-4" ("Awbrey Affidavit") at ¶ 3; "Affidavit of Herman E. Wald on Contention EP-4" ("Wald Affidavit") at ¶ 3.

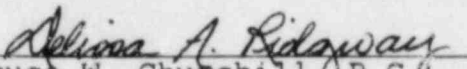
11. Due to the extensive nuclear operations at the SRP site, the SRP Medical Building has a special unit dedicated to the treatment of contaminated injured persons; and REACTS is a U.S. Department of Energy-operated facility which is a national center for the observation, assessment and treatment of radiation patients, including the contaminated injured. Twine Affidavit at ¶ 4.

12. Burke County Hospital, Humana Hospital, Oak Ridge Hospital, Aiken Community Hospital and Eisenhower Army Medical Center are all accredited by the Joint Commission for Accreditation of Hospitals, which requires approved procedures for treatment of contaminated injured individuals. DiLuzio Affidavit at ¶ 4; Clack Affidavit at ¶ 5.

13. All Vogtle-specific emergency response plans -- both onsite and offsite -- identify medical facilities for the treatment of contaminated injured individuals. DiLuzio

Affidavit at ¶ 5; Clack Affidavit at ¶ 6; Bryant Affidavit at ¶ 6; Wynn Affidavit at ¶ 4; Mauney Affidavit at ¶ 4; Awbrey Affidavit at ¶ 4; Wald Affidavit at ¶ 4; Twine Affidavit at ¶ 5.

Respectfully submitted,


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