

November 13, 1985
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of :
:
GEORGIA POWER COMPANY, et al. :
:
(Vogtle Electric Generating :
Plant, Units 1 and 2) :

Docket Nos. 50-424
50-425

DL

APPLICANTS' RESPONSE TO INTERVENORS'
FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
ON EMERGENCY PLANNING CONTENTIONS

On October 15, 1985, Joint Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy served upon Applicants by mail their First Set of Interrogatories and Requests to Produce Relating to Emergency Planning. Applicants provide herein their responses to those discovery requests.

The Applicants do not intend their response to any of the particular interrogatories or document requests filed by the Intervenors to constitute an admission that the information contained in the response is relevant to the issues identified by the Atomic Safety and Licensing Board ("Board") as being in controversy in this proceeding. Applicants expressly reserve any objections they might have concerning the relevance of that information.

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OBJECTIONS TO INSTRUCTIONS

Applicants object to the preliminary instructions contained in Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning to the extent that (1) the Intervenor's seek to impose requirements upon the Applicants beyond those permitted by the Nuclear Regulatory Commission's Rules of Practice for Domestic Licensing Proceedings, and (2) those instructions request the production of documents protected from discovery by the attorney client privilege or the work product privilege.

RESPONSE TO REQUEST FOR DOCUMENTS

On page 2 of the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning, the Intervenor's set out an unnumbered request for documents. Applicants object to that document request to the extent that it would encompass documents protected from discovery on the basis of the attorney client privilege or work product privilege. The Applicants will produce any documents encompassed by that document request that do not fall within the scope of either of those two privileges.

ANSWERS AND OBJECTIONS TO SPECIFIC INTERROGATORIES

Applicants respond as follows to the individually numbered interrogatories set out in Intervenor's First Set

of Interrogatories and Requests to Produce Relating to
Emergency Planning:

INTERROGATORY: 1. Identify (by name, business address, occupation and employer) a) all individuals who have knowledge or information responsive to each interrogatory and designate the interrogatory or the part thereof which that individual answered; and b) each person you expect to call as an expert witness in this proceeding as well as a description of the subject matter on which that person is expected to testify and the substance of that testimony, the witness's educational and professional background, and the identity of any previous proceeding in which that person has testified.

RESPONSE: a) Applicants object to interrogatory 1(a) on the following grounds:

(1) interrogatory 1(a) is vague, confusing, and not susceptible to a proper response by Applicants,

(2) to the extent that interrogatory 1(a) requests information about persons other than those who provided information used by Applicants in responding to these discovery requests, it is overly broad, unduly burdensome, and oppressive.

Subject to these objections, Applicants further respond to interrogatory 1(a) by stating that the Applicants' responses to the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency

Planning were prepared by Applicants' attorneys based upon information received from the following persons:

W.A. Brannen

Assistant Superintendent
Burke Co. Board of Education
P.O. Box 596
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interrogatory 36

Richard L. Bryant

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226 East 6th Street
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interrogatories, 2, 6, 22,
23-26, 28, 33, and 35-36

Arthur E. Desrosiers

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interrogatories 22, 25-26,
28, 31, 35 and 38

Jean M. DiLuzio

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interrogatories 2, 7, 22-26,
30-33, and 36-39

Steve C. Ewald

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interrogatories 2, 7, 22-26,
30-33, and 36-39

James M. Gaver

Director
Office of External Affairs
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interrogatories 26, 28, 34 and
38-39

Jim Hardeman

Environmental Radiological
Coordinator
Environmental Protection
Division
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Atlanta, Georgia
interrogatories 26 and 38

Dave Moffett

Planner
Georgia Emergency Management
Agency
935 East Confederate Avenue,
S.E.
Atlanta, Georgia
interrogatories 2, 26, 28,
35-36, and 38

W.H. Ollinger

Nuclear Licensing Engineer
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333 Piedmont Avenue, N.E.
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interrogatories 30 and 31

Jim Roberts

Emergency Preparedness
Coordinator
Georgia Power Company
Route 2, Box 299A
Waynesboro, Georgia 30830
interrogatories 22, 25-26,
28, 31, 35 and 38

b) The Applicants have not at this time identified any person whom they expect to call to testify as an expert witness with respect to issues identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 2. How will the Applicants assure that members of the public will take an order to evacuate seriously?

RESPONSE: Applicants object to interrogatory 2 on the following grounds:

(1) interrogatory 2 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 2 requests information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

Subject to those objections, the Applicants further respond to interrogatory 2 by stating that the responsibility for initiating and managing an evacuation of the public from the plume exposure pathway emergency planning zone (plume EPZ) rests with governmental officials, not the Applicants. Accordingly, no requirement exists that the Applicants alone provide assurance that the public will respond appropriately to an order to evacuate. Such assurance, however, is provided by two means: the authority of governmental officials to compel an evacuation and the information provided to the public through the public information and education program.

The authority of the State of Georgia to order an evacuation is set out in the Georgia Emergency Management Act of 1981, as amended. Section 38-3-51(d)(5) of the Official Code of Georgia Annotated empowers the Governor under the declaration of emergency to "direct and compel the evacuation of all or part of the population from any

stricken or threatened area within the state if he deems this action necessary." Section 38-3-22 authorizes the Governor to delegate this responsibility to emergency management officials, and violators of the Act are subject to prosecution under Section 38-3-7. The Chairman, Burke County Board of Commissioners, and the Mayors of incorporated cities within Burke County can also direct and compel evacuation of citizens from threatened or stricken areas within their county or city.

While the Applicants expect an order for evacuation to be taken "seriously" by the public because governmental officials can compel a response and such an order carries the force of the law, the public information and education program will also be instrumental in achieving an appropriate voluntary response from persons within the plume EPZ in the event an evacuation order is issued. The public information brochure that will be distributed annually not only provides to the public information concerning radiation exposure but also sets out instructions about how they should respond to an order to evacuate. The advertisement placed in the telephone directory, signs placed in areas frequented by hunters and fisherman, and notices placed in motels and other similar establishments will advise the transient population of the correct procedures to follow if an evacuation should be ordered. In addition, situation-specific information would be provided

to the public at the time of an emergency by means of the emergency broadcast system. Because an order to evacuate carries the force of the law and because the public will have been informed of both the reasons for responding appropriately and the correct response to make, the Applicants expect that such an order will be taken seriously.

INTERROGATORY: 3. How will the Applicants deal with role conflict for emergency response personnel (e.g., conflicts between their roles as emergency response personnel and as family members)?

RESPONSE: Applicants object to interrogatory 3 on the following grounds:

(1) interrogatory 3 calls for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 3 seeks information beyond the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 4. What impacts will occur if only 20% of emergency response personnel show up during an emergency?

RESPONSE: Applicants object to interrogatory 4 on the following grounds:

(1) interrogatory 4 asks for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 4 requests information outside the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 5. What measures have the Applicants taken (or will the Applicants take) to identify role conflicts for individuals who might be involved in emergency response?

RESPONSE: Applicants object to interrogatory 5 for the following reasons:

(1) interrogatory 5 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 5 requests information beyond the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 6. Will backup personnel be available for the various emergency response positions? Will the backup personnel, if any, have backup personnel?

RESPONSE: Applicants object to interrogatory 6 on the following grounds:

(1) interrogatory 6 asks for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 6 requests information outside the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

If the Intervenor intend interrogatory 6 to solicit information about the ability of Burke County to initiate an emergency response in a timely and efficient manner, which is arguably the subject of contention EP-1(a)/2(b), then the Applicants refer Intervenor to and incorporate herein their response to interrogatory 22, which describes the manner in which Burke County would initiate an emergency response.

INTERROGATORY: 7. How will the Applicants verify that members of the public have read and understand the plan?

RESPONSE: Applicants object to interrogatory 7 on the following grounds:

(1) interrogatory 7 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 7 calls for information outside the scope of those matters identified as being in

controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

Subject to those objections, the Applicants state in further response to interrogatory 7 that members of the general public do not need to read the emergency plans or understand all their provisions in order to understand and follow the instructions of emergency management officials. The emergency plans are detailed, comprehensive documents intended to guide the actions of emergency-management officials, not members of the general public. In view of the nature and purpose of these plans, no need exists for, nor do the Applicants expect, members of the public to review the various plans.

The public information program is, however, designed to communicate clearly and concisely to members of the general public the necessary information about how they will be notified and what their initial actions should be in an emergency. The annual distribution of the public information brochure to residents within the plume EPZ, the advertisement placed in the yellow pages of the telephone directory, and warning signs and notices posted in areas frequented by transients will provide members of the public the information that they may need to respond correctly to the instructions of emergency management officials. Nevertheless, should a member of the public wish to read the plans, they are public documents that will be available to the public at various locations.

INTERROGATORY: 8. What happens to the plan if a significant number of people do not follow the official protection action advisories?

RESPONSE: Applicants object to interrogatory 8 on the following grounds:

(1) interrogatory 8 asks for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 8 requests information beyond the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 9. What effects (such as shadow phenomenon) would result from over-response of the public?

RESPONSE: Applicants object to interrogatory 9 for the following reasons:

(1) interrogatory 9 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 9 asks for information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 10. How will the Applicants deal with persons who delay evacuating?

RESPONSE: Applicants object to interrogatory 10 on the following grounds:

(1) interrogatory 10 requests information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 10 call for information beyond the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 11. Will the Applicants have the authority to force persons to leave?

RESPONSE: Applicants object to interrogatory 11 on the following grounds:

(1) interrogatory 11 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 11 asks for information outside the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 12. Will the Applicants have police powers?

RESPONSE: Applicants object to interrogatory 12 on the following grounds:

(1) interrogatory 12 calls for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 12 requests information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 13. What if people take their pets rather than leaving them?

RESPONSE: Applicants object to interrogatory 13 on the following grounds:

(1) interrogatory 13 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 13 requests information beyond the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 14. What if people take their firearms with them during an evacuation? What measures have Applicants taken or will Applicants take to deal with this likelihood?

RESPONSE: Applicants object to interrogatory 14 on the following grounds:

(1) interrogatory 14 asks for information that is not relevant to the subject matter of this proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 14 seeks information outside the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 15. What measures will be taken to prevent evacuees from returning (for pets or other reasons)?

RESPONSE: Applicants object to interrogatory 15 on the following grounds:

(1) interrogatory 15 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 15 requests information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 16. What measures will be taken to prevent looting during an evacuation?

RESPONSE: Applicants object to interrogatory 16 on the following grounds:

(1) interrogatory 16 requests information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 16 asks for information beyond the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 17. How will Applicants deal with emergency response if another public disaster occurs simultaneously with the plant accident?

RESPONSE: Applicants object to interrogatory 17 on the following grounds:

(1) interrogatory 17 is vague, confusing, and not susceptible to a proper response by Applicants since the Intervenor's do not specify the type or location of the public disaster to which they refer and do not explain what they mean by "deal with emergency response";

(2) interrogatory 17 is overly broad, unduly burdensome, and oppressive;

(3) interrogatory 17 calls for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence; and

(4) interrogatory 17 requests information outside the scope of those matters that the Board identified

as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 18. How will Applicants deal with members of the press during an emergency?

RESPONSE: Applicants object to interrogatory 18 on the following grounds:

(1) interrogatory 18 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 18 asks for information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 19. How will Applicants deal with "tourists" (people who want to "see" a disaster) during an emergency?

RESPONSE: Applicants object to interrogatory 19 on the following grounds:

(1) interrogatory 19 requests information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 19 seeks information beyond the scope of those matters identified by the Board as

being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 20. How will Applicants assure that gear to be used by emergency response personnel is adequate and well maintained? What will be the frequency of checking the equipment?

RESPONSE: Applicants object to interrogatory 20 on the following grounds:

(1) interrogatory 20 calls for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 20 requests information outside the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 21. What measures will be taken to assure that all personnel (primary and secondary) are properly trained to use the equipment?

RESPONSE: Applicants object to interrogatory 21 on the following grounds:

(1) interrogatory 21 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 21 requests information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 22. Will the emergency personnel have beepers at all times to assure that they are available should an emergency occur?

RESPONSE: Burke County emergency personnel will be available on a 24 hour a day basis to respond to any emergency situation that might arise at Plant Vogtle, and a variety of means will exist by which such personnel can be contacted. Should an incident occur at Plant Vogtle warranting notification of offsite authorities, emergency personnel at Plant Vogtle would provide the initial notification to Burke County authorities. The Emergency Notification Network (ENN) would be the primary means by which that notification would be made. A dedicated telephone line that cannot be accessed by the general public, the ENN will have an extension or "drop" serving the Burke County emergency response organizations.

Beginning in early 1986, Burke County will utilize a consolidated dispatching system for its emergency response organizations, with a central dispatcher receiving all requests for emergency assistance. That central dispatcher will be located in the Burke County Emergency Management Agency's Emergency Operations Center (EOC).

Burke County will staff the central dispatcher's position on a 24-hour-per-day basis. The telephone terminal for the ENN extension to Burke County will be located on the console manned by that central dispatcher.

The ENN would be the primary means by which the Applicants would notify Burke County authorities of an incident at Plant Vogtle, with commercial telephone lines providing a backup means of communication. Either of these systems would place Plant Vogtle in direct contact with the central dispatcher in the Burke County EOC.

Upon receipt of notification from Plant Vogtle that an incident has occurred, the central dispatcher will contact the Director of the Burke County Emergency Management Agency (EMA) by radio or telephone. The Burke County EMA Director has radio equipment in both his vehicle and residence, and he is also available by telephone in his residence. If the central dispatcher cannot reach the EMA Director, the dispatcher will contact one of the following persons in succession: EMA Deputy Director, Chief of Operations, Operations Officer, or Radiological Protection Officer. For incidents in the higher event classifications, the EMA Director or his alternate will contact the Chairman of the Burke County Board of Commissioners or his predesignated alternate.

The EMA Director, or any of the designated alternates for him listed above who is contacted by the central

dispatcher, can activate the Burke County Radiological Emergency Plan and initiate an emergency response by Burke County. These members of the key emergency staff would be contacted by telephone, radio, or personal contact if necessary. Those emergency personnel would not, however, wear pagers (beepers) at all times.

To the extent that interrogatory 22 seeks information about emergency personnel other than those employees of Burke County who might be involved in initiating an emergency response, which information is arguably within the scope of contention EP-1(a)/2(b), the Applicants object to that interrogatory on the following grounds:

(1) interrogatory 22 asks for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 22 is overly broad and requests information outside the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 23. Will emergency personnel have access to dedicated lines from their homes for emergency use?

RESPONSE: No emergency personnel will have dedicated telephone lines connected to their homes for use in

emergency situations. Applicants refer Intervenor's to and incorporate herein their response to interrogatory 22 for a description of Burke County's ability to initiate an emergency response in a timely and efficient manner.

INTERROGATORY: 24. What measures will Applicants take to assure that the Burke County EOC maintains 24-hour-per-day staffing?

RESPONSE: The Applicants' response to interrogatory 22 depicts Burke County's ability to initiate an emergency response in a timely and efficient manner on a 24 hour a day basis. Applicants refer Intervenor's to that response and incorporate it herein.

If interrogatory 24 seeks information concerning matters other than Burke County's ability to initiate an emergency response in a timely and efficient fashion, which is arguably the subject of contention EP-1(a)/2(b), then the Applicants object to that interrogatory on the following bases:

(1) interrogatory 24 asks for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 24 is overly broad and calls for information beyond the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 25. What procedures will be followed by the Sheriff's Department in the event of an emergency at Plant Vogtle?

RESPONSE: In their response to interrogatory 22, the Applicants describe the manner in which Burke County would initiate an emergency response in a timely and efficient manner in the event an emergency situation should arise at Plant Vogtle, and the Applicants refer Intervenor's to and incorporate herein that response. The Burke County Sheriff's Department does not have any direct role in initiating a response by Burke County to an emergency arising at Plant Vogtle, and the emergency plans will be amended to reflect that fact.

To the extent that interrogatory 25 asks for information not pertaining to the role of the Burke County Sheriff's Department in the county's initiation of a response to an emergency at Plant Vogtle, which is arguably encompassed within contention EP-1(a)/2(b), the Applicants object to that interrogatory on the following grounds:

(1) interrogatory 25 requests information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 25 is overly broad and seeks information outside the scope of those matters that the

Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 26. Who will have access to the ENN?

RESPONSE: The Emergency Notification Network (ENN) is a dedicated telephone line that can be accessed only by a limited number of individuals within the emergency organizations that would be involved in responding to an emergency at Plant Vogtle and not by members of the general public. Access to and use of the ENN is restricted physically and administratively.

Plant Vogtle has four ENN drops, one located in each of the Control Room, the Technical Support Center (TSC), the Emergency Operations Facility (EOF), and the Backup Emergency Operations Facility (Backup EOF). Access to the Control Room is very limited, which would also physically restrict access to the ENN. In addition, however, administrative controls restrict use of the Control Room's ENN drop. Only the shift supervisor or the onshift operations supervisor can authorize its use. The TSC is a physically secured facility and is only activated in emergency situations. The ENN drop within the TSC is therefore physically secured as well. Similarly, the drops in the EOF and Backup EOF are in locked cabinets or rooms. Administratively, these three latter drops are controlled by the Vogtle Emergency Director who authorizes and directs the

managers of the facilities in the use of the ENN. Georgia Power Company has no ENN drops other than those mentioned above.

The Burke County emergency response organizations also have an ENN drop, which will be located at the central dispatcher's console in the Burke County EOC. That console will be manned 24 hours per day. Only the central dispatcher has authority to communicate with Plant Vogtle on the ENN until the Burke County EMA Director is contacted and arrives at the EOC. At that point, either the EMA Director or his designated communicator assumes responsibility for the ENN and is the sole party authorized to use it.

The State of Georgia is connected to the ENN by three drops. One is located in the Communications Center of the Georgia Emergency Management Agency in Atlanta. This center is a "radio room," staffed 24-hours a day, with access restricted to authorized personnel. GEMA receives its initial notification about an emergency situation at Plant Vogtle through this drop. A second drop is kept in a locked cabinet within the State's Emergency Operations Center. Upon activation of the State's EOC, this instrument is activated and the drop in the Communications Center is deactivated. The State will have a third ENN drop located in its Forward Emergency Operations Center (FEOC). That ENN drop in the FEOC, which would be located

in the Burke County EOC Building, would not be activated until a state response element had been dispatched to the FEOC and the FEOC was operational. Administratively, the State's ENN drops are also controlled. The GEMA communications officer is responsible for ENN communications until relieved by the authorized representative of the Environmental Protection Division of the Department of Natural Resources.

Two ENN drops will serve the Savannah River Plant (SRP). Both drops will be located in the SRP's Emergency Operations Center (EOC), one on the principal communications console for the SRP's EOC and the other in an EOC radiological emergency management support room. As part of the principal EOC communications console, the first drop will be manned 24 hours per day. The second drop will be kept in a locked closet or room until an emergency situation arises at Plant Vogtle, at which time it would be activated and then monitored by EOC staff. The SRP's EOC is in a secured building and access to it is restricted.

INTERROGATORY: 27. How will reliability of the ENN be assured? How will such reliability be maintained?

RESPONSE: Applicants object to interrogatory 27 on the following grounds:

(1) interrogatory 27 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 27 asks for information beyond the scope of those matters identified by the Board as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 28. How will access to the ENN be restricted?

RESPONSE: The physical and administrative controls that will restrict access to the ENN are described in the Applicants' response to interrogatory 26 above, which response Applicants incorporate herein.

INTERROGATORY: 29. Since the ENN is "hard-wired," what measures will assure adequate notification if the ENN fails (due to line failure or any other reason)?

RESPONSE: Applicants object to interrogatory 29 on the following grounds:

(1) interrogatory 29 calls for information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 29 requests information outside the scope of those matters identified as being in

controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

INTERROGATORY: 30. How will Applicants assure that tone-alert radios used to notify area residents are not shut off by those residents?

RESPONSE: The Applicants acknowledge that they cannot absolutely prevent those persons receiving tone alert radios from shutting off or otherwise disabling those radios. The applicable regulations, however, do not impose any such requirement upon the Applicants. Instead, FEMA-43, "Standard Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants" (1983), states at page E-10, "It is recognized that absolute control of tone alert radios is lost once they are given to the public for use in residences." Similarly, FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants" (1985) recognizes at page E-13 that "absolute control of tone alert radios is forfeited once they are given to the public for use in residences."

The Applicants will, however, emphasize to the public the need to maintain the tone alert radios in good operating condition. Through a variety of means, the Applicants will advise the recipients of the tone alert radios about their purpose, how to use them, and the importance of maintaining them properly.

The NOAA tone alert radios will be distributed initially on a door-to-door basis by the Applicants, allowing personal contact to be made with the radio recipients. The persons making that initial distribution will explain the reasons why the radios are being provided, will describe the usefulness of the radios, and will discuss the manner in which the radios will provide emergency information. The operating instructions will be explained with emphasis placed upon the importance of keeping the radio plugged in and the power switch turned on. The radio recipients will be advised where they can obtain further information or free replacement of a radio that does not work properly. Any questions the radio recipient might have about it will be answered.

Two brochures will be distributed to the recipients of the tone alert radios that will provide them with additional information about the NOAA tone alert radio. One of those brochures will be a public information brochure entitled "Safety Information, Alvin W. Vogtle Electric Generating Plant, Plans to Help You During Emergencies." That brochure will be distributed initially prior to the loading of fuel at Plant Vogtle and will be redistributed on an annual basis to each recipient of a NOAA tone alert radio. In addition to the general information about how persons will be notified of an emergency and what their

initial actions should be, that brochure will advise residents of the plume EPZ that the tone alert radios will be one of the methods used to warn them about emergency situations arising at Plant Vogtle and will tell them to check to make sure their radio is working. That brochure will also provide the telephone number and address of Georgia Power Company's Waynesboro District Office and will advise people to contact that office if their radio does not work. The Waynesboro District Office will provide a replacement radio to anyone whose radio does not work properly.

The second brochure will be entitled "Questions and Answers About Your NOAA Weather Radio" and will be distributed with the tone alert radios. That brochure will provide more specific information about the NOAA tone alert radios, including the following subjects:

- What is NOAA.
- Why NOAA radios are provided.
- Information persons will receive on the NOAA radio.
- When the alert system will be activated.
- Who makes NOAA broadcasts.
- Where to place the radio.
- Backup battery power for power failures.
- What to do if the NOAA radio doesn't work.
- How to replace the radio's batteries.

That brochure will also be redistributed on an annual basis to radio recipients.

Thus, the Applicants will communicate to the radio recipients, both at the time of their initial distribution and on an annual basis thereafter, the importance of the NOAA tone alert radios as a source of emergency information during an emergency situation and the need to keep the radios in operating condition. By that means, the Applicants will seek to insure that the number of residents who disconnect their tone alert radios is minimized.

INTERROGATORY: 31. How will Applicants assure that tone alert radios used to notify area residents of emergencies are functioning reliably and are properly maintained?

RESPONSE: The Applicants will establish a register of all radio recipients when the radios are initially distributed. Electric service to all recipients of tone alert radios within the plume EPZ is provided by either Georgia Power Company or the Planters Electric Membership Corporation (EMC). Planters EMC has agreed to provide information monthly to Georgia Power's Waynesboro District Office concerning any persons requesting new electric service or disconnection of existing electric service. The District Office will use that information, together with its knowledge of its own electrical hookups or disconnections in the plume EPZ, to identify new residents.

The Applicants will distribute tone alert radios to any new residents and will update the register of radio recipients periodically.

Annually, the Applicants will distribute replacement batteries to all recipients of a tone alert radio. The two brochures described in the Applicants' response to interrogatory 30 also will be redistributed annually to each radio recipient. As discussed in that response, those brochures emphasize the importance of keeping the tone alert radios plugged in and turned on. Those brochures also tell anyone whose tone alert radio does not work to contact Georgia Power Company's Waynesboro District Office, which will provide a free replacement radio.

While the provision of the information to radio recipients will help insure that the tone alert radios function reliably and are properly maintained, periodic tests will be performed of the NOAA tone alert radio system. The Federal Emergency Management Agency will conduct a test of the emergency notification system for Plant Vogtle to assure that it will be effective. This test will include a statistical survey of plume EPZ residents to determine if they received the alerting signal on their tone alert radios.

Also, the National Weather Service will test the NOAA tone alert radio system on a weekly basis. In the area of

Plant Vogtle, that test program will consist of the transmission of a test tone and message over the system every Wednesday between 11:00 a.m. and noon, unless threatening weather is occurring in the broadcast area. This weekly test will permit all radio recipients to determine if their radios are functioning properly.

INTERROGATORY: 32. Please provide copies of any drafts and final signs, decals, notices, brochures, advertisements or other information to be disseminated to members of the public (transient or other).

RESPONSE: The public education and information materials that the Applicants will use to satisfy the standards set out in 10 C.F.R. § 50. 47(b)(7) consist of (1) an informational brochure to be distributed to all residents of the plume EPZ for Plant Vogtle, (2) an advertisement containing basic emergency information that will be placed in the telephone directory, (3) a sign for use in areas frequented by hunters and fishermen, and (4) a notice to be placed in hotels, motels, and other similar establishments. The text of these materials was provided to the Intervenor on October 4, 1985.

To the extent that the Intervenor request in interrogatory 32 that the Applicants provide copies of drafts of the above listed public education and information materials, the Applicants object to that request on the following grounds:

(1) interrogatory 32 seeks documents that are not relevant to the subject matter of this adjudicatory proceeding and that are not reasonably calculated to lead to the discovery of admissible evidence,

(2) interrogatory 32 is overly broad and asks for documents beyond the scope of those matters that the Board identified as being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985, and

(3) interrogatory 32 requests documents protected from discovery by the attorney client privilege and the work product privilege.

INTERROGATORY: 33. How and where will such notification be provided?

RESPONSE: Applicants object to interrogatory 33 for the following reasons:

(1) interrogatory 33 is vague, confusing, and not susceptible to a proper response since the Intervenor's do not identify what "notification" they are referring to,

(2) interrogatory 33 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(3) interrogatory 33 requests information outside the scope of those matters identified by the Board as

being in controversy in this proceeding in its orders dated August 12, 1985 and October 1, 1985.

In further response to interrogatory 33, the Applicants construe that interrogatory as asking for information concerning the process by which the public information materials listed in the Applicants' response to interrogatory 32 will be distributed to the public. The informational brochure will be distributed personally or by mail to all residents of the plume EPZ prior to the loading of fuel at Plant Vogtle and will be redistributed on an annual basis thereafter. The telephone book advertisement will be placed in the Waynesboro/Sardis telephone directory.

The signs for sportsmen will be posted in outdoor locations likely to be frequented by hunters, fishermen, and members of public enjoying recreational activities. Such signs will be placed along the Savannah River, at the public boat landings within the plume EPZ, and along roads leading into areas of the plume EPZ frequented by hunters and fishermen.

The other notice listed in the Applicants' response to interrogatory 32 will be placed in any hotels, motels, or similar establishments in the plume EPZ.

INTERROGATORY: 34. What facilities in South Carolina will be used to treat injured and contaminated victims of an accident at Plant Vogtle?

RESPONSE: The plume EPZ for Plant Vogtle in South Carolina lies entirely within the boundaries of the Savannah River Plant (SRP) and adjacent federally controlled property secured by the SRP. The SRP is itself prepared to deal onsite with contaminated, injured individuals on a 24-hour a day basis. The Operating Contractor has an established, experienced onsite medical department that can respond to all types of radiological medical emergencies. Onsite facilities include a Decontamination and Treatment Unit where seriously injured and contaminated individuals could be treated. Offsite medical assistance will be provided upon request by the Dwight David Eisenhower Army Medical Center at Fort Gordon near Augusta, Georgia or by the Regional Emergency Assistance Center/Training Site, which is a Department of Energy operated facility at Oak Ridge, Tennessee.

INTERROGATORY: 35. What facilities in Georgia will be used to treat the injured and contaminated victims of an accident at Plant Vogtle?

RESPONSE: To the extent that interrogatory 35 requests information about the onsite emergency response plans for Plant Vogtle, the Applicants object to that interrogatory on the following bases:

(1) interrogatory 35 seeks information that is not relevant to the subject matter of this adjudicatory proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence, and

(2) interrogatory 35 is overly broad and asks for information outside the scope of those matters identified as being in controversy in this proceeding by the Board in its orders dated August 12, 1985 and October 1, 1985.

As stated in the Applicants' emergency plan, Humana Hospital in Augusta, Georgia is the primary facility to be used by the Applicants for treatment of contaminated injured individuals who are on the Plant Vogtle site, with Burke County Hospital in Waynesboro as a backup facility. The State of Georgia's and Burke County's emergency plans list the Burke County Hospital as the primary medical facility for victims of an incident at Plant Vogtle, regardless of whether or not those victims are contaminated. This facility will be the primary facility used for treating members of the general public who are contaminated and injured. Should the capacity of that facility be exceeded, contaminated injured individuals would be taken to Humana Hospital in Augusta. The state plan also provides that any radiation accident victim who requires care that cannot be provided at either of those two facilities can be treated at the Oak Ridge Associated Universities Medical Division, Oak Ridge Hospital of the Methodist Church, in Oak Ridge, Tennessee. All of these facilities would be available to treat contaminated injured individuals in the event of an accident at Plant Vogtle.

INTERROGATORY: 36. How will Applicants assure the availability (including adequate provisions) of adequate evacuation centers in the event of an emergency at Plant Vogtle?

RESPONSE: The Burke County Comprehensive High School, which is currently under construction in Waynesboro, is the facility designated as the Reception Center and Shelter Area to receive and house evacuees. That facility will include 56 instructional units (e.g., class rooms and laboratories) and four common areas: the gym, the cafeteria, the auditorium, and the media center. The school is designed to accommodate approximately 1200 students, and the students can be entirely accommodated, if necessary, within the instructional units. The seating capacity of the gym includes bleacher space for about 2200 people, with additional space on the gym floor, and the cafeteria has a designed seating capacity of about 400 people. The school's auditorium seats a maximum of approximately 2000 people and its media center can hold about 75 people. Therefore, under emergency conditions, the Burke County Comprehensive High School could adequately accommodate, at the same time, the full high school student body and in excess of 4500 additional people within its common areas, if this were needed to be accomplished on sudden notice.

With more advance notice, school officials could elect to dismiss those high school students who were not residents of the evacuated areas. This process is estimated to require approximately 1 1/2 hours, which is the time needed to mobilize school buses and discharge the students.

The present high school in Waynesboro will serve as a backup facility in the event additional capacity is needed. This facility can hold approximately 800 people in the gym and 300 people in the cafeteria. The Waynesboro Elementary School will also serve as a backup reception center, and this facility could accommodate 1200 evacuees.

INTERROGATORY: 37. When do Applicants plan to know and make available the contents of printed brochures, advertisements, warning notices and other information for the public?

RESPONSE: On October 4, 1985, the Applicants served upon the Intervenor copies of the text of (1) the informational brochure to be distributed to all residents of the plume EPZ, (2) the advertisement to be placed in the phone directory, (3) the sign to be used in areas frequented by hunters and fishermen, and (4) the notice to be placed in hotels, motels, and other similar establishments. These constitute the public education and information materials

that the Applicants will rely upon to satisfy the requirements imposed by 10 C.F.R. § 50.47(b)(7).

INTERROGATORY: 38. How would communication, coordination and cooperation among South Carolina and Georgia resources function during an emergency at Plant Vogtle?

RESPONSE: The plume EPZ for Plant Vogtle encompasses areas within both Georgia and South Carolina, with those areas being separated by the Savannah River. The portion of the plume EPZ within South Carolina lies entirely within the boundaries of the Savannah River Plant (SRP) and adjacent federally controlled land. No bridges connect Georgia and South Carolina within the plume EPZ. In fact, the nearest upriver bridge is approximately 22 miles from Plant Vogtle and the nearest downriver bridge is about 18 miles from the plant. Therefore, the Georgia and South Carolina portions of the plume EPZ are in effect isolated from each other. Because of the physical separation of the Georgia and South Carolina portions of the plume EPZ, the use of resources from one state in the other would be minimal.

In the event an emergency is declared at Plant Vogtle, the plant would provide direct notification to the SRP, as well as the State of Georgia and Burke County. That notification would be made by means of the ENN, which is described in the Applicants' response to interrogatory 26. Commercial telephones would provide a backup

means of communication. Thereafter, Plant Vogtle will provide periodic follow up information in accordance with the Vogtle Electric Generating Plant Emergency Plan by the same means of communication.

The assistance that might be provided to Plant Vogtle by SRP is described in the Applicants' response to interrogatory 39, and the Applicants incorporate that response herein. Communications between Plant Vogtle and the SRP would be by the means identified above with the additional capability of transferring hard copy data between the plant and SRP by facsimile machine. The only significant coordination that might be required would be the coordination of radiological monitoring teams, which would be accomplished by means of communications between SRP and Plant Vogtle.

At the alert or higher stage of emergency, the State of Georgia will notify the State of South Carolina. That notification will be made by the Georgia Emergency Management Agency's Emergency Operations Center Chief or his designate by means of commercial telephone to the designated 24-hour telephone number for the South Carolina Emergency Operations Center. Available backup means of communication will include the FEMA National Voice System, the FEMA National Teletype System, and the FEMA National Radio System. The State of South Carolina will then put into effect those portions of its Radiological Emergency

Response Plan which it deems appropriate. Independent of this notification, the State of Georgia would notify the State Radiological Program Directors in adjacent states, including South Carolina, as soon as practical following a radiological emergency. The means of communication used would normally be telephone, with the National Warning System or radio available as back-ups. If necessary, the State of Georgia could use this notification to request assistance from the State of South Carolina under the Southern Mutual Radiation Assistance Plan (SMRAP). SMRAP results from an agreement between 13 states, including Georgia and South Carolina, to assist each other in managing any radiation incident within the 13 states. Such assistance would take the form of providing resources, either personnel or equipment, to perform radiological monitoring.

INTERROGATORY: 39. How will the Department of Energy deal with simultaneous emergencies at Plant Vogtle and the Savannah River Plant?

RESPONSE: In the event of an emergency at Plant Vogtle, the Savannah River Plant (SRP) would supply four types of support to Plant Vogtle, as necessary:

- (1) Provision of local and regional meteorological data upon request.
- (2) Protection of persons under SRP control.

(3) Monitoring and assessment of the radiological hazard on the SRP site and on contiguous federal properties under SRP control.

(4) Additional Radiological monitoring and assessment, if requested by Georgia, South Carolina, or the Nuclear Regulatory Commission.

The occurrence of a simultaneous emergency at the SRP would not prevent it from providing these types of assistance to Plant Vogtle.

SRP meteorological data is collected from a total of seven towers. While natural phenomena might disable one or two of these towers, the ability of the entire system to collect data would not be eliminated. The existence of redundant communications would enable SRP to transmit these data to Plant Vogtle.

With regard to protection of persons under SRP control, SRP procedures and plans for evacuation of any Plant area within the SRP are independent of any other area with the exception of the SRP Emergency Operations Center, which is a self-contained command center located outside the plume EPZ for Plant Vogtle and which is well-protected from outside radiation. Thus, personnel evacuations can occur simultaneously in multiple areas of SRP with no diminution of effectiveness, because they do not rely on augmentation of forces from other areas of the SRP.

To perform the third function listed above, SRP has available to it considerable onsite resources for immediate response in terms of personnel and equipment. Due to its large technical work force and 24-hour a day operation, SRP has approximately 30 health physicists (HPs) onsite at any time. Making a conservative assumption that 50 percent of these HPs will be involved either with monitoring evacuees, in the SRP Emergency Operations Center, or as essential staff in operating facilities, 15 HPs will be available for monitoring duties. Thus, at least seven two-person teams will be available to begin monitoring duties within the first hour. The activities of these teams would be directed by the HP command center located in the SRP Emergency Operations Center. Radiological monitoring data would be collected and assembled, and then analyzed in the SRP Emergency Operations Center. This analysis would be supported by the SRP's computerized dose projection system.

Turning to the fourth function listed above, the Federal Radiological Emergency Response Plan (FRERP) (Interim Plan, Federal Register, September 12, 1984) is the framework by which Federal agencies respond to requests for assistance in the event of a radiological emergency. Requests for such assistance may come from state and local governments, from operators of nuclear facilities, or from

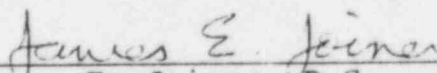
other Federal agencies. The Federal Radiological Monitoring and Assessment Plan (FRMAP) (Interim Plan, Federal Register, September 12, 1984) is a part of the FRERP that establishes a framework for offsite Federal radiological monitoring and assessment activities. The Department of Energy (DOE) is responsible for the establishment of the FRMAP response. The SRP has the responsibility for DOE FRMAP activities in the five-state DOE Radiological Assistance Region 3, which includes Georgia and South Carolina.

Therefore, should Georgia, South Carolina, or Plant Vogtle request assistance from DOE under FRMAP to respond to an emergency at Plant Vogtle, the SRP would normally be the DOE field office providing the response. SRP would already be providing monitoring and assessment of the radiological hazard on the SRP site. Since the SRP onsite field monitoring teams will follow the passage of the plume, they would be in position to continue monitoring offsite in South Carolina. Also, by notifying additional personnel, the SRP could triple the number of monitoring teams to at least 20 within 3 hours.

Should the SRP determine that additional resources are needed to perform a proper response in either or both South Carolina or Georgia, additional equipment and personnel can be obtained from other DOE field offices through the DOE-HQ/Emergency Action Coordinating Team

(EACT), the DOE senior management team at headquarters that coordinates the initial FRMAP response to radiological incidents. The EACT can dispatch additional personnel from other DOE field office sites. If a greater Federal response is required, EACT can direct the activation of the FRMAP. In such a case, DOE can establish a self-contained command post to control offsite radiological monitoring and assessment activities within 24 hours in cooperation with the states of Georgia and South Carolina and the Nuclear Regulatory Commission.

Respectfully submitted,


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
Counsel for Applicants

Dated: November 13, 1985.

Before the Atomic Safety and Licensing Board

AFFIDAVIT

The information reflected in the Applicants' responses to interrogatories 2, 6, 7, 22-26, 28, and 30-39 contained in the Applicants' Response to Intervenor's First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions are true and correct to the best of my knowledge, information and belief.


STEVE C. EWALD

Sworn to and subscribed
before me this 13 day
of November, 1985.

Barbara J. Wilkins
Notary Public

Notary Public, Coweta County, Georgia
My Commission Expires Sept. 15, 1989

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Dated: November 13, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

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