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November 15, 1985

RELATED CORRESPONDENCE  
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UNITED STATES OF AMERICA<sup>85</sup>  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

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

Docket Nos. 50-424  
50-425

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APPLICANTS' SECOND SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
ON EMERGENCY PLANNING CONTENTIONS

These interrogatories and these requests for production of documents are directed to Joint Intervenor Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy and pertain to contentions admitted by the Atomic Safety and Licensing Board (Board) in its Memorandum and Order (Ruling on Joint Intervenor's Proposed Contentions on Emergency Planning) dated August 12, 1985.

Answers or objections to these interrogatories and responses or objections to the requests for production of documents must be served within the time specified by the Board in its Order (Setting Discovery Schedule for Emergency Planning Contentions) dated September 19, 1985.

The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately

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and fully in writing under oath or affirmation. The interrogatories are intended to be continuing in nature and, pursuant to 10 C.F.R. § 2.740(e), the answers must be immediately supplemented or amended, as appropriate, should Intervenors obtain any new or differing information responsive to the interrogatories.

The requests for production of documents are filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenors produce and furnish copies of, or permit Applicants to inspect and copy, any documents that are responsive to the requests and that are in the possession, custody, or control of Intervenors. The requests for production of documents are also continuing in nature, and Intervenors must produce immediately any documents they obtain which are responsive to the requests.

#### I. INSTRUCTIONS

The following instructions and definitions apply to Applicants' interrogatories and requests for production of documents.

When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, transcript, book, pamphlet, handwritten notes, etc.) and state the following information as applicable to the particular document: document name, title, number,

author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely. When identification of a person is requested, state the person's full name, present employer or business affiliation, present address, and present telephone number.

The following terms shall have the meaning indicated below:

1. "VEGP" or "Vogtle" means the Vogtle Electric Generating Plant, Units 1 and 2.
2. "Joint Intervenors," "Intervenors," "you," or "your" refers to Georgians Against Nuclear Energy (GANE) or Campaign for a Prosperous Georgia (CPG) and all directors, officers, shareholders, members, employees, agents, consultants, attorneys, or other representatives of GANE or CPG.
3. "Document" means any handwritten, typed, printed, graphic, photographic, mechanically recorded, computer stored, filmed, or other verbal or pictorial matter of whatever character, however produced or reproduced, of any kind and description. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original. "Document" shall be construed

broadly, and includes, but is not limited to, inter-office and intra-office memoranda, other memoranda, letters and other correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes of telephone calls and personal conversations, other notes, speeches, articles, transcripts, recordings, telegrams, telecopies, telex messages, and all other writings or recordings of any kind.

4. The "Vogtle Plan" refers to the "Vogtle Electric Generating Plant Unit 1 and Unit 2 Emergency Plan," Volumes 1 and 2, served on Joint Intervenors on November 30, 1984, including Revision 1, dated May 1985, served on Joint Intervenors on May 17, 1985.

5. The "County Plan" refers to the "Burke County Emergency Management Agency Radiological Emergency Plan For Nuclear Incidents/Accidents Involving Vogtle Electrical Generating Plant," dated April 1985, served on Joint Intervenors on May 3, 1985.

6. The "State Plan" refers to "Annex D, Plant Vogtle, to the Georgia Radiological Emergency Plan," dated April 1985, served on Joint Intervenors on May 3, 1985, as well as to the "State of Georgia Radiological Emergency Plan -- Base Plan."

7. "Offsite plans" refers to the "County Plan" and the "State Plan," as defined above.

## II. INTERROGATORIES

In answering each interrogatory, please recite the interrogatory before providing the response.

### A. Specific Interrogatories

#### CONTENTION EP-1/EP-1(a)/EP-2(b) (24-hour Staffing of Burke County ENN Link)

EP-1(a)-14. Describe each occasion on which Ms. Pam Smith had "difficulty in contacting emergency personnel in Burke County," stating for each such occasion the date and time of the attempted contact, the person or organization that was being contacted, and the means by which the contact was attempted to be made.

EP-1(a)-15. Describe each occasion on which anyone other than Ms. Pam Smith had "difficulty in contacting emergency personnel in Burke County," stating for each such occasion the identity of the person attempting to make the contact, the date and time of the attempted contact, the person or organization that was being contacted, and the means by which the contact was attempted to be made.

EP-1(a)-16. In their response to interrogatory 22 of the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning, the Applicants describe the consolidated dispatching system that will be

used by Burke County for its emergency response organizations. Do you contend that that dispatching system will fail to provide for "24-hour per day manning of communications links that initiate emergency response actions" by Burke County in accordance with NUREG-0654 Criterion F.1.a?

EP-1(a)-17. If your answer to interrogatory EP-1(a)-16 is affirmative, describe each respect in which that dispatching system fails to provide for "24-hour per day manning of communications links that initiate emergency response actions."

EP-1(a)-18. If your answer to interrogatory EP-1(a)-16 is affirmative, describe any changes you believe must be made to that dispatching system and all other actions you believe must be taken to provide for "24-hour per day manning of communications links that initiate emergency response actions by Burke County."

EP-1(a)-19. Do you contend that the consolidated dispatching system will not result in the 24-hour per day manning of the Emergency Notification Network ("ENN") link by Burke County?

EP-1(a)-20. If your answer to interrogatory EP-1(a)-19 is affirmative, then describe each respect in which that dispatching system fails to provide for 24-hour per day manning of the ENN link by Burke County.

EP-1(a)-21. If your answer to interrogatory EP-1(a)-19 is affirmative, then describe any changes you



believe must be made in that dispatching system and all other actions you believe must be taken to provide for 24-hour per day manning of the ENN link by Burke County.

CONTENTION EP-2/EP-2(a)  
(Administrative Controls Over ENN Use)

EP-2(a)-8. In their response to interrogatory 26 of the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning, the Applicants describe the physical and administrative controls that will restrict access to and use of the ENN. Do you contend that these controls are not adequate to restrict the use of the ENN to the transmission of official and necessary messages?

EP-2(a)-9. If your response to interrogatory EP-2(a)-8 is affirmative, then for each ENN terminal for which you contend the administrative controls are insufficient state:

- (a) the location for that terminal,
- (b) how the existing controls fail to restrict the use of that ENN terminal to the transmission of official and necessary messages, and
- (c) what additional controls you believe are necessary to restrict the use of that terminal to the transmission of official and necessary messages.

CONTENTION EP-2/EP-2(c)  
(Use of NOAA Tone Alert Radios)

EP-2(c)-22. In your response to interrogatory EP-2(c)-10 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, you state that your allegation that tone alert radios "are often shut off permanently by residents who become aggravated by its tendency to go off frequently without reason" was "based on experience with tone alert radios at other nuclear facilities and other applications." For each nuclear facility or "other application" to which you were referring, state

- (a) its identity and location,
- (b) the type of tone alert radio used there,
- (c) the purpose for which that nuclear facility or other application used tone alert radios, and
- (d) a description of the particular "experience" to which you are referring.

EP-2(c)-23. In your response to interrogatory EP-2(c)-12 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions you describe the area around Plant Vogtle as having weather that is "often severe." With respect to that response describe:

- (a) what specific geographic area you are referring to as "the area around Plant Vogtle" (in terms of counties, cities or towns, and distance from Plant Vogtle);



(b) what types of weather phenomena you are referring to as "severe" weather; and

(c) how often each of those types of weather phenomena occurred in "the area around Plant Vogtle" in each year since 1980.

EP-2(c)-24. Do you contend that the NOAA tone alert radios to be used by the Applicants will be turned off or otherwise disabled by residents for any reason other than their alleged "tendency to go off frequently without reason?"

EP-2(c)-25. If your response to interrogatory EP-2(c)-30 is affirmative, then

(a) state each and every reason that you contend those radios will be shut off or disabled by residents, and

(b) identify any nuclear plant or other facility that had residents of the surrounding area shut off or disable tone alert radios for that reason.

CONTENTION EP-4  
(Identification of Existing Hospitals for  
Treatment of Contaminated Injured Individuals)

EP-4-8. In your response to interrogatory EP-4-2 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, you state that "Burke County Hospital does not have adequate facilities to treat contaminated individuals." What specific personnel, equipment, or facilities do you

contend Burke County Hospital lacks that it would need to treat contaminated injured individuals?

EP-4-9. In your response to interrogatory EP-4-3 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, you state that "Humana Hospital lacks the capability to treat contaminated individuals." What specific personnel, equipment, or facilities do you contend Humana Hospital lacks that it would need to treat contaminated injured individuals?

EP-4-10. In your response to interrogatory EP-4-4 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, you state that "Oak Ridge Hospital lacks the capability to treat contaminated individuals." What specific personnel, equipment, or facilities do you contend Oak Ridge Hospital lacks that it would need to treat contaminated injured individuals?

CONTENTION EP-5  
(Reception Center Capacity)

EP-5-13. The Applicants' response to interrogatory 36 of the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning describes the capacity of the primary and backup reception centers in Burke County to accommodate evacuees in the event of a radiological emergency at Plant Vogtle. Do

you contend that those facilities could not accommodate all evacuees from Burke County?

EP-5-14. If your answer to interrogatory EP-5-13 is affirmative, then state

(a) the total number of evacuees that you contend would have to be accommodated at reception centers in Burke County,

(b) the bases on which you contend that all of those evacuees could not be accommodated at the primary and backup reception centers described in the Applicants' response to interrogatory 36, and

(c) the number of those evacuees whom you contend could not be accommodated in those facilities.

CONTENTION EP-7  
(Simultaneous Emergencies at Plant  
Vogtle and Savannah River Plant)

EP-7-37. In your response to interrogatory EP-7-1 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, you state that "there are many emergency situations which might affect both Plant Vogtle and the Savannah River Plant (weather-related and others)." Identify specifically each type of emergency situation to which you are referring.

EP-7-38. For each type of emergency situation to which you are referring in your response to interrogatory EP-7-1, state:

(a) the probability of that event occurring at Plant Vogtle,

(b) whether Plant Vogtle is designed to withstand that event,

(c) the probability that the occurrence of such an event would cause a radiological accident at Plant Vogtle,

(d) the probability of that event occurring at the Savannah River Plant,

(e) whether the Savannah River Plant is designed to withstand such an event, and

(f) the probability that the occurrence of that event would cause a radiological accident at the Savannah River Plant.

EP-7-39. For each type of emergency situation to which you are referring in your response to interrogatory EP-7-1, state the probability of such an event occurring simultaneously at both Plant Vogtle and the Savannah River Plant.

EP-7-40. In their response to interrogatory 39 of the Intervenor's First Set of Interrogatories and Requests to Produce Relating to Emergency Planning, the Applicants describe the types of assistance that the Savannah River Plant would provide to Plant Vogtle in an emergency situation. Do you contend the Savannah River Plant would be unable to provide any of these types of assistance to

Plant Vogtle if emergencies were to occur simultaneously at both facilities?

EP-7-41. If your response to interrogatory EP-7-40 is affirmative, then identify each type of assistance that you contend the Savannah River Plant would be unable to provide to Plant Vogtle if emergencies were to occur simultaneously at both facilities and describe in detail the reasons why Savannah River Plant would be unable to provide that assistance.

EP-7-42. In your response to interrogatory EP-7-13 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions you state that "in the event of simultaneous emergencies at SRP and Plant Vogtle, resources responding to the emergencies would be divided between the two." Identify each "resource" to which you are referring.

EP-7-43. For each resource to which you are referring in your response to EP-7-13, state:

(a) what role that resource would have in responding to an emergency at Plant Vogtle,

(b) what role that resource would have in responding to an emergency at the Savannah River Plant,

(c) why that resource would not have the capability of responding to simultaneous emergencies at both plants, and

(d) what additional personnel, equipment, or facilities that resource would need to be able to respond to simultaneous emergencies at both plants.

B. General Interrogatories

G-11(a). State the name, present or last known address, and present or last known employer of each person who provided information used in preparing your response to each interrogatory herein.

(b). Identify all such information that was provided by each person and the specific interrogatory response for which such information was provided.

G-12(a). Identify all documents in your possession, custody, or control (including all relevant page citations) that you used or referred to in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

G-13(a). Identify any other source of information, not previously identified in response to interrogatories G-11 or G-12, that you used or referred to in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.



G-14. Identify each document requested by Applicants' Second Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions for which Intervenor claim a privilege against production. Include in the identification all addresses or recipients of the original or a copy of the document, a brief description of its subject matter, and the nature of the privilege claimed.

G-15. In your response to interrogatory EP-G-5 of the Applicants' First Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions you identify Seymour Shaye as someone you may call as an expert witness. With respect to Mr. Shaye state:

- (a) his address, employer, and title;
- (b) his educational and professional background;
- (c) the basis for his qualification to testify as an expert witness on emergency planning issues;
- (d) the contentions regarding which you expect him to testify;
- (e) the subject matters on which you expect him to testify;
- (f) the substance of the facts and opinions to which you expect him to testify; and
- (g) a summary of the grounds for each such opinion.

### III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenor respond in writing to the following requests for production of documents and produce or make available for inspection and copying at a designated location each of the documents requested below that is in the possession, custody, or control of Intervenor. A document shall be deemed to be within the "control" of the Intervenor if the Intervenor or their attorneys have ownership, possession, or custody of the document or a copy thereof, or have the right to secure the document or copy from any person, organization, or public or private entity having physical possession thereof.

#### A. General Document Requests

G-4. Applicants request that Intervenor produce or make available for inspection and copying each and every document identified or described in the answer to any of the specific or general interrogatories above.

G-5. Applicants request that Intervenor produce or make available for inspection and copying each and every document that Intervenor used or referred to in preparing

the response to any of the specific or general  
interrogatories above.

Respectfully submitted,

*James E. Joiner*

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Dated: November 15, 1985

November 15, 1985

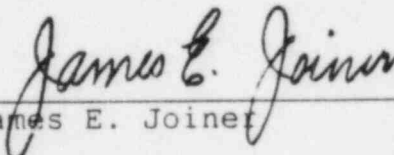
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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|--------------------------------------|---|--------------------|
| In the Matter of                     | : |                    |
|                                      | : |                    |
| GEORGIA POWER COMPANY, <u>et al.</u> | : | Docket Nos. 50-424 |
|                                      | : | 50-425             |
| (Vogtle Electric Generating          | : |                    |
| Plant, Unit 1 and 2)                 | : |                    |

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' Second Set of Interrogatories and Requests for Production of Documents on Emergency Planning Contentions, dated November 15, 1985, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (\*) by hand delivery, this 15th day of November, 1985.

  
James E. Joiner

Attorney for Applicants

Dated: November 15, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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