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USNRC

'84 SEP 24 P2:23
September 19, 1984

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER AND LIGHT COMPANY)	
AND NORTH CAROLINA EASTERN)	Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power Plant))	

RICHARD WILSON INTERROGATORIES TO THE NRC
STAFF AND FEMA WITH REGARD TO EPJ-5 and
WILSON 11, 12b2, 12b3

1 a) Did the Staff and FEMA support or oppose the admission of proposed Wilson Contentions 7a, 7d, 7f, 11, 12b2, 12b3?

b) Please state the basis for your positions on each of these contentions and provide all references you used to support your positions.

2 a) Please state your positions on the admitted contentions Wilson 11, 12b2, 12b3, and EPJ-5.

b) If different from answers to 1b above, please state the basis and relevant references.

c) Please list the documents, including NRC decisions and cases, that you would present as exhibits at hearing in support of your positions.

3. With respect to the FEMA Regional Assistance Committees informed evaluation comments on the Off-Site Radiological Emergency Response Plans for the SHNPP done May 1984,

a) Please explain in detail the inconsistencies and unreasonableness referred to in the comment on NUREG item E6 (the relevance of this question to this contention is that if more emergency vehicles and time are required for notification, then fewer vehicles and less time will be available for evacuation and traffic control).

b) Please explain in detail what you believe to be the most accurate way for counties to identify the mobility-impaired to which you referred in NUREG item J10d. Please include your definition of "mobility-impaired". and the reasons that would cause a resident to be considered "mobility impaired"? Please include as examples any procedures adopted by other counties which achieve this goal in what you believe to be an optimal fashion.

4. With respect to entrance into the EPZ during the evacuation,

- a) What groups are usually allowed to enter?
- b) What groups do you believe should be allowed to enter?
- c) Do you think that pre-arranged criteria should be established for entrance or that the personnel at each traffic control point should make the decisions?

5.a) Is the "vehicle-owning population" as determined by U.S. Census data a reliable estimate of the number of households within the EPZ during a workday that would not have transportation?

b) If not, how should the estimate be done?

c) If so, why shouldn't vehicles driven to work outside the EPZ be subtracted from the total number available for evacuation?

6. Please identify each person who helped answer these interrogatories.

AWB

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'84 SEP 24 P2:21

Docket No. 50-400.0L

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CERTIFICATE OF SERVICE

I hereby certify that copies of Richard Wilson Interrogatories to The Applicant on EPJ-5, Wilson 11, Wilson 12b2, Wilson 12b3 and Richard Wilson Interrogatories to The NRC Staff and FEMA with regard to EPJ-5 and Wilson 11, 12b2, 12b3 have been served this 19th day of September 1984, by deposit in the US Mail, first-class postage pre-paid, upon all parties whose names are listed below, except those whose names are marked with an asterisk, for whom service was accomplished by _____.

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US Nuclear Regulatory Commission
Washington, D. C. 20555

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