

FILED: August 5, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

Docket Nos.

50-443 OL
50-444 OL

(Seabrook Station, Units 1 and 2)

JOINDER

NOW COMES the Seacoast Anti-Pollution League (SAPL), and joins in the Petition for Directed Certification filed by the Attorney General of Massachusetts, Francis X. Bellotti, on July 15, 1983, with regard to the Atomic Safety and Licensing Board decision of June 30, 1983.

In support hereof, SAPL states the following:

1. It had, for the Atomic Safety and Licensing Board, filed separately a pleading opposing the motion of summary disposition as to the contentions for which directed certification is sought.

2. The contentions out of which the request for directed certification arises, NCNP III.12 and III.13, have to do with the validity of certain estimates of evacuation time from the emergency planning zone plume exposure around the proposed Seabrook nuclear plants.

3. Concerns that have prompted SAPL to participate in this proceeding are particularly those regarding feasibility protective action that might be taken in the event of an emergency. Pursuant to 10 C.F.R. 50.47, the ability to provide "reasonable assurance" that "adequate protective measures can and will be taken" in the event of

an emergency is a critical and important safety determination to be made in this licensing proceeding.

3. The decision below, if left unreviewed, threatens to establish as a matter of law, based upon certain procedural rulings, projected estimate for evacuation time which has been contested on factual grounds, and which proffered testimony indicates is wholly inadequate.

4. Two members of this Commission, in dissenting from a denial of a 2.206 petition by the Director of Nuclear Reactor Regulation have agreed that Seabrook poses difficult, and perhaps unique, emergency planning problems. Indeed this Board itself has said that "No one disputes the claim that this area will be at times the most densely populated area in the state". ALAB 422 Slip Opinion at 31.

Respectfully submitted,
Seacoast Anti-Pollution League
By its attorneys,
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August 5, 1983

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