

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Public Service Company of)
New Hampshire, et al)
(Seabrook Station, Units 1 & 2)

SEACOAST ANTI-POLLUTION LEAGUE

PETITION TO INTERVENE

NOW COMES the Seacoast Anti-Pollution League (SAPL) of New Hampshire and respectfully petitions the Commission for leave to intervene in the Domestic Operating License proceedings pursuant to 10 CFR § 2.71.

I. The Intervenor. The Seacoast Anti-Pollution League is a public interest group located at 5 Market Street, Portsmouth, New Hampshire. SAPL is a non-profit, voluntary organization dedicated to promoting charitable and educational objectives, including particularly the preservation and enhancement of environmental quality in the State of New Hampshire and increasing public awareness of environmental goals. SAPL's concern is predominately associated with the 18-mile New Hampshire seacoast area, but including within it and within its members' concern the northeastern Massachusetts coastal area.

II. The Intervenor's Interests. SAPL has specifically addressed environmental and safety issues concerning the development of the Seabrook Station project which is located along the 18-mile New Hampshire Seacoast area. SAPL has been an intervenor in the construction permit and related proceedings from the earliest stages.

SAPL petitions the Commission for leave to intervene in the Domestic Operating License proceedings of the Seabrook Station, Units 1 and 2, in order to further SAPL's interests as discussed above and as follows:

- 1) to obtain, analyze and act upon information available to the parties to the proceeding;
- 2) to insure that all available alternatives to the proposed licensing are fully studied, developed, described, and wherever feasible, implemented when appropriate to insure the well-being, environmental quality, health and safety of the seacoast region;

- 3) to insure, in particular, that a feasible emergency preparedness plan be demonstrated, to include an adequate time frame and standards for evacuation in the event of a Class 9 accident beyond the low population zone;
- 4) to insure that the proposed operation of the plant complies and cooperates with local and state emergency preparedness procedures;
- 5) to insure that the proposed operation of the plant is consistent with that of public health and safety.

III. Intervenor's Interest in the Subject Matter of the Proceedings.

The grounds for SAPL's intervention would be to further its interests as set out above; and to furnish the Commission such information and analysis as it has regarding the effect of the operation and emergency preparedness on the public safety and environmental quality of the Seacoast region.

IV. The Position of SAPL.

SAPL's position is that the NRC has failed to require development of an evacuation plan beyond the low population zone and failed to evaluate the consequences of a Class 9 accident, including the necessity for evacuation beyond the low population zone. As a result, the Public Service Company emergency preparedness plan will not adequately, nor feasibly, protect the public health and safety of the seacoast region of the State of New Hampshire.

SAPL's Petition to Intervene should not cause any delay in the proceeding.

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE
By Its Attorneys,

LAW OFFICES OF ROBERT A. BACKUS

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November 13, 1981

CERTIFICATE OF SERVICE

This is to certify that on this 13th day of November, 1981, the undersigned sent copies of the within by first-class mail, postage prepaid, to all parties indicated below:

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