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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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'81 NOV 23 P4:21

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

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COASTAL CHAMBER OF COMMERCE OF NEW HAMPSHIRE

PETITION TO INTERVENE

NOW COMES the Coastal Chamber of Commerce of New Hampshire and respectfully petitions the Commission for leave to intervene in the Domestic Operating License proceedings pursuant to 10 CFR S 2.714.

I. The Intervenor. The Coastal Chamber of Commerce of New Hampshire is a public interest group located at 822 Lafayette Road, Hampton, New Hampshire. The Coastal Chamber of Commerce of New Hampshire is a non-profit voluntary organization dedicated to promoting business in the towns of Rye, North Hampton, Hampton Falls, Seabrook, and Hampton including Hampton Beach, and to the preservation of a healthy business climate conducive to encouraging tourist travel to and within the seacoast of New Hampshire.

II. The Intervenor's Interests. The Coastal Chamber of Commerce of New Hampshire has specific interests and concerns regarding the development of operating plans, especially the evacuation planning, for the Seabrook Station project.

The Coastal Chamber of Commerce of New Hampshire 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 the Chamber's interest as discussed above and as follows:

- 1) to obtain, analyze and act upon information available to the parties to the proceedings;
- 2) To insure that all available avenues and safeguards are taken prior to issuing an operating license which will insure a healthy and safe business atmosphere and which will guarantee insofar as is possible that operation of the Seabrook Station will not have an adverse impact on the economy of the seacoast area or the State of New Hampshire.

- 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 the Coastal Chamber of Commerce of New Hampshire intervention would be to further its interests as set forth above; and to furnish to Commission such information and analysis as it has regarding the effect of the operation and emergency preparedness on the public safety and the economic viability of the Seacoast region.

IV. The Position of the Coastal Chamber of Commerce of New Hampshire

The position of the Coastal Chamber of Commerce of New Hampshire is that a Domestic Operating License should not be issued until all of the following decisions have been made and all activities accomplished:

- 1) Establish time limits within which all personnel within the 10 mile radius of the Seabrook Station can be safely evacuated;
- 2) A feasibility study is completed, using time limits established in #1 above, to determine whether or not an evacuation could in fact be carried out in time; and
- 3) Provision is made for both local and state review and final approval of any evacuation plan prior to the plan being used by the Public Service Company in its application for an operating license from the Commission.

The Coastal Chamber of Commerce of New Hampshire's Petition to Intervene should not cause any delay in the proceedings

Respectfully submitted

Coastal Chamber of Commerce of
New Hampshire
By its Executive Director

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