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June 30, 1982

United States Nuclear
Regulatory Commission
Washington, D.C. 20555

ATTENTION: Director, Division of Licensing

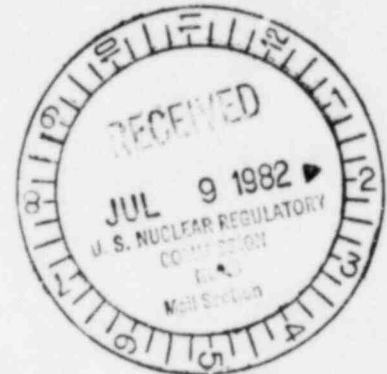
RE: State of New Hampshire's Comments
on Draft Environmental Statement-
Seabrook Station, Units 1 and 2,
Docket Numbers 50-443, 50-444

Gentlemen:

By this letter the State of New Hampshire submits the following comments on the Draft Environmental Statement related to the operation of Seabrook Station, Units 1 and 2.

1. Assessment of Radioactive Releases
Through the Groundwater

Although the Draft Environmental Statement recognizes that the groundwater is a possible pathway for release of radioactivity into the environment, the Draft Environmental Statement contains little information concerning the impact of such a release. Information concerning the nature of groundwater on the site and its movement appears sketchy. The principle direction of movement is apparently toward the estuary. However, the relationship between the groundwater and the surface waters in the marsh and estuary does not appear to be analyzed. Further, the extent to which bedrock fracturation may affect the direction and speed of movement of the contaminants in the groundwater has not been considered. The statement admits that groundwater hydrology at the site is highly complex and that preoperational groundwater



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measurements may no longer be valid. However, the statement goes on to make predictions and presumptions concerning the rate and direction of groundwater flow. Based upon the lack of reliable data, the State cannot accept these predictions and presumptions and can certainly not accept the categorization of them as "conservative" by the staff.

The staff implies that groundwater interdictive measures would be necessary and advisable if a release to the groundwater occurred. However, the statement admits that the path which contaminated groundwater would follow is very difficult to determine. The staff apparently relies on its "conservative" estimate of travel time from the reactors to the marsh of 170 days as a sufficient time to develop an interdictive plan. The State does not feel that the 170 days provides a sufficient amount of time to develop the highly complex information which would be required for the development of a successful interdictive plan. If one considers that access to the site could be limited for an extended period of time in the event of a major accident, that extensive field work in the charting of groundwater movement would be required, and that design and construction of an interdictive measure would be complex and time consuming, the 170 days is unlikely to provide sufficient time to prevent perhaps a large concentration of radioactivity from being released to the marsh.

The Draft Environmental Statement gives no consideration to the environmental impact of a major radioactive release on the extremely valuable salt water marsh environment. Further, there is no assessment of the impact of a release to the marsh on surrounding land uses. The area surrounding the Hampton-Seabrook Estuary is an important area to the State from an economic point of view. The possibility of limitation of the use of this area must be viewed as an extremely serious matter.

In summary, the Draft Environmental Statement does not adequately assess the impact, from an environmental and economic point of view, of a release of radioactive material to the groundwater. Further, the statement fails to provide an adequate analysis of mitigation measures which might be feasible in the event of such a release.

2. Accident Risk and Impact Assessment

The Draft Environmental Statement does not adequately assess accident risks and their consequent impact since it fails to assess worst case conditions. Similarly, the Draft Environmental Statement (at 5-46) calculates population exposure based on two hour radiation doses. Given existing information concerning population densities in the area of the Seabrook plant and their evacuation time frames, the selection of a two hour period is neither conservative nor reasonable. The Draft Environmental Statement does not use an evacuation model which takes into account factors unique to the Seabrook site (see Appendix F). Several evacuation time estimates have been developed for the Seabrook site which would have provided more accurate data than the model used in the Draft Environmental Statement.

The Draft Environmental Statement is required to address socio-economic and biological impacts by the provisions of 45 Federal Register 40102, 40103. However, the Draft Environmental Statement fails to adequately consider the socio-economic impact of the loss of use of portions of New Hampshire's seacoast area in the event of a serious accident. Similarly, no analysis is presented for the impact of a serious accident on the valuable salt marsh eco-system which comprises a significant portion of the seacoast area.

Finally, although the provisions of 45 Federal Register 40103 require that "the staff take steps to identify additional cases that might warrant early consideration of either additional features or other actions which would prevent or mitigate the consequences of serious accidents," the staff in conclusory fashion has stated that no special or unique circumstances about the Seabrook site would require such action. The Draft Environmental Statement does not adequately consider the emergency response capabilities, or lack thereof, for the Seabrook site to support this conclusion.

Very truly yours,

E. Tupper Kinder by GDB

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Assistant Attorney General
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