

July 15, 1982

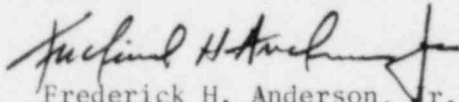
Mr. Louis L. Wheeler, Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Wheeler:

As suggested in our phone conversation of July 12th,
I have attached a complete copy of my response to
the Draft Environmental Statement - OL Stage covering
the Seabrook Station.

I regret that page 3 of that response was missing when
it arrived in your office.

Thank you for your assistance.


Frederick H. Anderson, Jr.
Jewell St. RFD #2 Box 308
South Hampton NH 03827

C002B

June 29, 1982

U.S. NUCLEAR REGULATORY COMMISSION
Washington DC 20555
ATTN: Director Division of Licensing

Dear Sir:

As a resident of South Hampton, N.H. I would like to take this opportunity to clarify several aspects of the Draft Environmental Statement - OL Stage.

Chapter 4: AFFECTED ENVIRONMENT

Section 4.2 Facility Description

4.2.6 Power Transmission System

In its Final Safety Analysis Report (FSAR) the Applicant notes that "two of the three lines to Seabrook Station will be installed and will be in service prior to Unit 1 startup. The third line is scheduled to be available for Unit 2 operation." (FSAR 8.1.1) No mention of this is made in the ER-OL filed by the applicant.

The staff should comment on the environmental impact of the Westerly Seabrook-Scobie line vs. the Southerly Seabrook-Tewksbury line, given that the completion of the second plant may be delayed for an extended time or cancelled (note that an NRC staff report that lists Seabrook II as one of 19 unlikely to be completed). The NRC should participate in the decision as to which line will be built next: Seabrook-Scobie or Seabrook-Tewksbury given that a third line may not be required. The NRC should also determine if a third line is required even if the second unit is built.

The staff should also be made aware that NEET, a subsidiary of New England Power, is proposing to construct a high voltage line to Southern New England to bring power from Quebec hydro plants, and also to sell power from Seabrook and other stations. In the future NEET may seek to use the Seabrook-Scobie line as a tie-in to the Quebec line. (The New Hampshire Site Evaluation Committee recently held hearings on Phase I of this project.)

If the Southerly route is selected, the impact of a corridor first heading West and then dropping through South Hampton should be compared with that of other Southerly alternatives.

Section 4.3 Project Related Environment Description

4.3.1 Land

It is noted that "the total land area owned by the utility in connection with the Seabrook Station is approximately 363 ha (896 acres). The land area within the site boundary, or exclusion area boundary, is approximately 291 ha (719 acres)."

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No specific description, maps, etc. are provided for the area outside the site. The staff should be provided with a complete description of this land, and a statement as to its future use. The staff should be made aware that the Applicant has on about 11 acres of this land built and is operating a storage area for construction materials for the second plant directly in the path of the state and Federally approved transmission right of way (see attached letter from the N.H. Assistant Attorney General). The applicant applied for state permission to change the transmission route in the vicinity of the storage area (one of the court cases referred to in DES-OL 4.2.6)

4.3.6 Historic and Archeological Sites

It was stated that "during consultation with the State Historic Preservation Officer, the applicant was notified that local citizens are developing information with regard to two proposed historic districts in South Hampton for the state's consideration of their possible eligibility for inclusion in the National Register for Historic Places. The districts are along the path of the approved transmission corridor."

In fact, the Southerly line would pass right through one historic district (Jewelltown) and within clear view of another (Hilltop) that contains the Town Common, Town Hall, Barnard School and South Hampton Baptist Church. A third district (Highland Road) would also be impacted by a change in the Westerly/Southerly corridor proposed by the applicant.

These districts have been adopted by the Town of South Hampton, under New Hampshire law, and any further action by the State and the National Register would only add to the status of these areas.

Note also that over a year ago the Advisory Council on Historic Preservation wrote to Harold Denton of the NRC and I believe also to the applicant informing them of the requirement to "evaluate the significance of such properties." (See attachment)

RAI 310.15

In RAI 310.15 the applicant claims that "the operation and maintenance of the line would have no unacceptable impact on these historical resources. In operation, the lines are silent except during inclement weather when under the worst case conditions (heavy precipitation) corona associated noise could reach 50 to 55 dB (A) at the transmission corridor edge. Whereas this noise level is the equivalent of moderate rainfall on foliage it is intuitively obvious that the imposition of this transmission line noise would be imperceptible over natural noises. It would also be highly unlikely that one would choose such weather to view the exterior features of such historical resources."

The Applicant seems to ignore the visual impact that 70-100 foot dual and triple steel or wooden poles would have on the districts. South Hampton, like other towns, maintains rigid controls on any exterior modification to structures and new construction within a historic district (see attachment) and such structures would without question do irreparable harm to these districts.

Also in RAI 310.15 the Applicant refers to Indian Ground Hill stating that "no systematic excavation has been performed in this area. Transmission line operation and maintenance will not disturb the topsoil and therefore should not impact archeological resources." The Applicant ignores the impact that construction would have (the Southerly line would pass right over Indian Ground Hill) and also ignores the damage that operation and maintenance would have on any potential future public use of this area. During the 1972 State hearings the applicant was made aware of the possible significance of Indian Ground Hill via questioning by the Assistant Attorney General and yet it has not studied the area further. The Applicant should be immediately required to undertake a systematic excavation of this area.

Section 4.1.2 of the FES-CP examined the lines with reference to criteria established by the Federal Power Commission ("Electric Power Transmission and the Environment" 1971). In addition to the avoidance of historic sites, it suggested the avoidance of scenic or recreation areas and the desire to achieve "minimum possible view by the general public." All three criteria would be abridged if the Southerly line were erected within direct view of the center of South Hampton and its historic district. Furthermore, the Jewelltown historic district contains the Pow Wow River, used for canoeing, fishing, ice skating and other recreational activities.

Chapter 5: ENVIRONMENTAL CONSEQUENCES AND MITIGATING ACTIONS

5.5.1.2 Induced Voltage and Low-Level Electric Fields

"The staff believes that humans would not chronically be exposed to field gradients in excess of the maximum edge of right of way value (2 kV/m) because people are not permitted to live on the right of way and therefore, would not receive a long term, constant exposure."

The staff should be aware that some of the apartments in the Whitehall Village complex in Amesbury, Massachusetts (just over the state line from South Hampton) are within 20 feet of the edge of the right of way, and that the specific exposure that residents will have is not known (and may be altered by a number of conditions). The staff suggests that a value of 4-20 kV/m is the equivalent to the 100 kV/m exposure of laboratory animals that resulted in "significant effects", and it concludes that humans will not be exposed to harmful levels.

However, a slightly different scaling factor would result in a different conclusion - that harmful effects from low-level electric fields may result. Those living along the right of way should not be a part of experimentation without their consent.

The staff notes that "if ongoing research were to conclude that protective measures were warranted, a variety of actions could be considered including, but not limited to: increasing the width of rights-of-way to limit the field strengths to which the public would be exposed at the edge of the right-of-way; giving potential right-of-way users specific warnings of possible risks; and using shield wires or other types of retrofitting techniques that could reduce field gradients to a prescribed level."

As noted earlier apartments in the Whitehall Village complex are already extremely close to the Right of Way, and any widening would still leave other residents subject to their effects (even if some apartments were condemned). Warning signs would not be effective with children, many of whom live in Whitehall Village.

The staff should note that another alternative lies in placing the lines underground in certain sensitive areas, and that if this might be ordered at a later time it should be required now before the lines are erected. The Massachusetts DPU has before it a proposal to place part of the Southerly line underground.

Finally, it should be asked who will assume the responsibility for judging that ongoing research has reached the stage where mitigating actions are required? The Applicant?

5.7 Historic and Archeological Sites

The DES states in full that "the operation and maintenance activities of the undertaking are not expected to affect any cultural resource sites in or eligible for the National Register of Historic Places."

As noted earlier, several sites in South Hampton are awaiting a ruling on their eligibility. Further, the NRC should not limit its consideration to only sites in the Federal Register, but also those designated by Towns acting under State law. Mitigating actions are definitely required to minimize the impact on these historic and archeological sites.

5.8 Socioeconomics

No statements are made with regard to the socioeconomic impact of the overhead lines. The proposed Southerly line will cut through South Hampton, dramatically affecting current property values of many homes and also any potential for future residential development. Given that the town has no appreciable commercial base the socioeconomic impact could be devastating.

OTHER ISSUES

The following excerpt from the FES-CP indicates a significant area in which the Applicant has changed the method of construction of the transmission lines.

Section 4.5 MEASURES AND CONTROLS TO LIMIT ADVERSE EFFECTS DURING CONSTRUCTION

4.5.1 Applicant Commitments

...

" 8. The use of wood H-frame supports and preservation of screening vegetation at road crossings will be used to minimize ground level view of the transmission system when possible."

The wooden structures are also referred to in FES-CP Section 3.8.4. The Applicant has in fact not lived up to its "commitment" but has installed steel H-frame towers along the Seabrook-Newington right of way (except single steel towers along the B&M ROW and at the Interstate 95 crossing). Wooden H-frames were described by PSC's environmental consultant in the original State hearing (Page 499): "Pole selection. Wood pole H-frame compatible to low land landscape because of low profile. Wood is appropriate to the rural character. In built up urban areas expressing technology such as Portsmouth interchange and related residential commercial-industrial area, are more sophisticated pole factors appropriate." Steel H-frames have never been proposed to State or Federal authorities. The Applicant should be required to use wooden poles in all rural areas.

In summary, it is my contention that the NRC should evaluate the environmental impacts of the Westerly vs. Southerly line and determine which should be built next (given that a third line may not be required).

If the Southerly line (Seabrook-Tewksbury) is built, alternative routes or methods of construction (underground in sensitive areas) should be ordered in order to avoid the impact the operation of high voltage lines along new rights-of-way would have on Historic Districts, archeological sites, areas of public assembly, recreation areas, and the health of citizens.

Thank you for this opportunity to respond to the DES-OL.

Regards,



Frederick H. Anderson, Jr.
Jewell Street
South Hampton NH 03827

ACTING ATTORNEY GENERAL
GREGORY H. SMITH

THE STATE OF NEW HAMPSHIRE

ASSISTANT ATTORNEYS GENERAL
JOHN T. PAPPAS
EDWARD N. DAMON
WILBUR A. GLAHN, III
E. TUPPER KINDER
DEBORAH J. COOPER
ANDREW R. GRAINGER
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DAVID L. HARRIGAN
MARK H. PUFFER
ANNE R. CLARKE
MARC R. SCHEER



THE ATTORNEY GENERAL

STATE HOUSE ANNEX

25 CAPITOL STREET

CONCORD, NEW HAMPSHIRE 03301

December 30, 1980

ASSISTANT ATTORNEYS GENERAL

DONALD J. FERRAULT
RICHARD C. NELSON
JEFFREY R. COHEN
PAUL W. HODES

MARTIN R. JENKINS
PETER W. MOSSEAU
BETSY S. WESTGATE
MARTHA V. GORDON
PETER C. SCOTT, JR.
EDWARD L. CROSS

ATTORNEYS

MICHAEL A. PIGNATELLI
BRIAN T. TUCKER
PAUL BARBADORO
LORETTA S. PLATT

Frederick J. Coolbroth, Esq.
Public Service Company of New Hampshire
1000 Elm Street, P.O. Box 330
Manchester, New Hampshire 03105

Re: Public Service Company Transmission Line Route:
Kensington/South Hampton

Dear Mr. Coolbroth:

This letter is to confirm our telephone conversation of December 22, 1980. At that time, I advised you of my telephone conversation with Fred Anderson of South Hampton in which he advised me that the Public Service Company was seeking site plan approval from the Kensington Planning Board for an 11-acre tract to serve as an equipment storage area for the Seabrook nuclear plant. It was Mr. Anderson's understanding that the 11-acre tract was directly under the transmission line route approved in 1972 by the New Hampshire Site Evaluation Committee.

As per our telephone conversation, you have determined that the tract in question is, in fact, on the presently approved transmission line route. Therefore, it is my feeling that Public Service Company should immediately advise the Site Evaluation Committee of its intent to dedicate the parcel to a use potentially inconsistent with the transmission line. Although it is my understanding that the Company plans to request a route change from the Site Evaluation Committee, the change is by no means a foregone conclusion. If a change is not approved by the Committee, the Public Service Company, obviously, will have to accept any risks that the use of the parcel in question may be inconsistent with the location of the transmission line. I assume that under no circumstances would the Company assert that the transmission line route must change because of its own actions, such as the equipment storage use discussed above.

Legal Counsel
Charitable Trusts
Antitrust Section

(603) 271-7556
(603) 271-3591
(603) 271-3640
(603) 271-3685



Consumer Protection (603) 271-3641
Criminal Justice (603) 271-3671
Eminent Domain (603) 271-3675
Environmental Protection (603) 271-3679
Employment Security Council (603) 271-3712

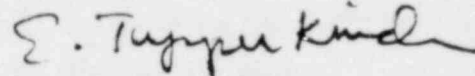
OFFICE OF THE ATTORNEY GENERAL

PAGE 2

Frederick J. Coolbroth, Esq.
December 30, 1980

Please provide me with additional information concerning this matter and the Company's intentions regarding use of the presently approved transmission line route at your earliest convenience.

Very truly yours,



E. Tupper Kinder
Assistant Attorney General
Environmental Protection Division

jlh

cc: William A. Healy, Chairman
Site Evaluation Committee

Martin L. Gross, Esq.
Sulloway, Hollis & Soden

✓ Fred Anderson, Jr.

Advisory
Council On
Historic
Preservation

1121 F Street, N.W.
Washington, D.C. 20540

May 5, 1981

Mr. Harold Denton
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

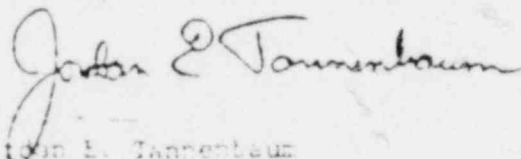
Dear Mr. Denton:

We have been informed that the placement of transmission lines associated with construction on the Seabrook Station, an undertaking of the Nuclear Regulatory Commission, may have an effect on the South Hampton Historic District, South Hampton, New Hampshire. This property may possess historical and architectural significance and therefore may be eligible for inclusion in the National Register of Historic Places.

Section 800.4(a) of the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), sets forth the method of evaluating the significance of such properties. We request that you initiate this evaluation and inform us of your findings. If the evaluation results in a determination by the Secretary of the Interior that the property is eligible for inclusion in the National Register, you should follow the remaining steps in Section 800.4 to evaluate the effect of the undertaking on the property and, if appropriate, request the Council's comments. Should you have any questions or require additional assistance, please call Joseph F. Hough at 254-3495.

Thank you for your cooperation.

Sincerely,



John E. Tannenbaum
Chief, Eastern Division of
Project Review

Enclosure

PDR

~~8105080199~~

South Hampton Historical District Commission

Purposes and Procedures

SECTION 1

PURPOSES To preserve for generations to come the unique collections of historically, architecturally and culturally significant buildings and structures which characterize the town of South Hampton, to encourage their maintenance and restoration, and to insure that new buildings and structures, and alterations, to existing buildings and structures, and uses of buildings and structures within the Districts are in visual harmony with their neighbors in order that districts be preserved which will reflect the cultural, social, economic, political and architectural history of the town of South Hampton, conserve and maintain property values in such Districts, foster civic beauty, strengthen the local economy, and generally provide an opportunity to benefit the education, pleasure and welfare of all citizens of the municipality.

SECTION 2

PROCEDURES: CERTIFICATE OF APPROVAL NOTICE OF DISAPPROVAL

Any person wishing to construct, alter, repair, move, demolish, or otherwise change the exterior appearance of a structure within a district or construct a new structure within a district or institute a new use of land or buildings within a district must obtain a Certificate of Approval from the Historic District Commission before any other building permits otherwise required by the town are obtained.

A Application forms are available from the Building Inspector or Historic District Commission.

B Upon the receipt of an application form the Historic District Commission shall within fifteen days,

1 determine that the application is of no interest and notify the applicant in writing that he may proceed

OR

2 determine that the application is of interest and schedule a public hearing.

C Notice of Public Hearings shall be advertised at least 15 days in advance in a newspaper of general circulation in the municipality, shall be posted in at least three public places, and shall be sent by registered mail to abutting property owners and those owning property directly across the street.

D Public hearing shall be open to the general public and testimony may be received from any party.

E Certificates of Approval or Notices of Denial shall be issued within 45 days of the filing of an application in accord with RSA 31-89 a-f.

F Applications from Applicants for a Certificate of Approval shall show:

- 1 Name of owner of land
- 2 Description of land and buildings involved
- 3 Names and addresses of abutting property owners and those directly across the street.

4 A description of work proposed to be done, which should include all information as required for a building permit and any other information as deemed necessary by the Historical District Commission.

G Decision of the Historic District Commission shall be made in accord with the guidelines for decisions listed below.

H Decisions of the Historic District Commission shall be appealable to the Board of Adjustment as provided for in RSA 31-89 h.

I Enforcement shall be as provided for in RSA 31-89 j and k.

SECTION 3

GUIDELINES FOR DECISIONS ON APPROPRIATENESS: The following principles shall be followed in the granting of a Certificate of Approval within an Historic District:

A If proposed construction will not have any visible impact on the exterior of the building or structure it shall be deemed of no interest.

B Painting of the same color and routine repair to existing structures not involving any other exterior changes shall be deemed of no interest. Parties interested in promoting the spirit and intent of the District should come before the Commission for guidance in the selection of historically appropriate colors, or details.

C When determining the appropriateness of all other alterations, restorations, or remodeling of existing structures the following criteria shall be used:

1 Structures of importance because of their date of construction or their architecture should be altered to restore features to their original appearance.

2 Structures merely typical of their age and style should be altered in a fashion typical of that age or style, if in keeping with the character of the District.

D New structures, or buildings moved in from outside the District, must conform in general size, scale, and style to the existing structures within the District. In addition, it shall conform to the general style of the district by being similar to neighboring structures in the following criteria:

1 Openings within the facade or a percentage of the facade: i.e. doors and windows.

2 Similarity of construction materials and surface texture: i.e. rough, smooth, wood, brick, etc.

3 Similarity of roofs: i.e. slopes and shapes.

4 Similarity of architectural details: i.e. cornices, lintels, arches, porches, balustrades, wrought iron work, chimney, etc.

5 Similarity of landscaping and ground covering: i.e. grass, brick, granite, etc.

E Before a building or other structure is demolished or moved out the District, the applicant shall in good faith prepare a detailed plan for the reuse of the site and the Commission may grant a Certificate of Approval

Such Certificate of Approval shall only be granted upon a showing by the applicant that to deny such a Certificate would result in a hardship unique to the property in question, and that such hardship is not common to neighboring properties, within the District.

South Hampton Historic Commission

Passed by a vote of the town at the Town Hall July 3, 1974