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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the  
ATOMIC SAFETY AND LICENSING BOARD

In the matter of:	)	
	)	
	)	
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE)	)	Docket Nos.: 50-443
ET AL.	)	and
	)	50-444
	)	
(Seabrook Station, Units 1 and 2)	)	December 15, 1982

THE STATE OF NEW HAMPSHIRE'S SECOND SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO THE NUCLEAR REGULATORY COMMISSION STAFF

Pursuant to 10 C.F.R., Section 2.740(b) and 2.720(h)(2)(II), the Intervenor State of New Hampshire requests that the attached Second Set of Interrogatories be answered fully in writing and under oath by any members of the Nuclear Regulatory Commission Staff ("Staff") who have personal knowledge thereof. The answer to each Interrogatory should contain the name(s) and identification of the person(s) supplying the answer and whether or not he or she has verified the answer.

As used herein, the term "document" means all original writings of any nature whatsoever and all non-identical copies thereof in the possession, custody, or control of Staff and includes but is not limited to the following items: communications, correspondence, notes, field notes, studies, reports, summaries, instructions, charts, schedules, sketches and drawings, records, accounts and accounting records, opinions and reports of consultants.

As used herein, the term "identify" means:

1. In the case of a natural person:
  - (a) name;
  - (b) last-known address;
  - (c) employer or business affiliation; and
  - (d) occupation and business position held.
2. In the case of a document:
  - (a) identity of the person or persons preparing it;
  - (b) its title or a description of the general nature of the subject matter;
  - (c) the identity of the addressee;
  - (d) date of preparation;
  - (e) identity of persons who can identify it; and
  - (f) all of the aforementioned information should be supplied with such reasonable particularity as is sufficient for a specific demand for production. In lieu of the foregoing, a copy of the document may be supplied.
3. In the case of oral statements and communications:
  - (a) when and where they were made;
  - (b) identity of each of the makers and recipients thereof;
  - (c) the medium of communication; and
  - (d) substance of the statement and/or communication.

Pursuant to 10 C.F.R., Section 2.740(e), responses should be supplemented. If Staff cannot answer the Interrogatories in full, so state and indicate when Staff expects to be able to answer the Interrogatory.

The State of New Hampshire further requests that Staff, pursuant to 10 C.F.R., Section 2.741, provide copies of or make available for inspection and copying the documents identified by Staff in response to the accompanying Interrogatories within thirty (30) days after service hereof. Production of such documents shall be at the Office of the Attorney General in Concord, New Hampshire, or at a mutually convenient place.

I. INTERROGATORIES RELATED TO SPECIFIC CONTENTIONS

CONTENTION NH 10

Control Room Design

The Seabrook Station control room design does not comply with general design criteria 19 through 22 and 10 C.F.R. Part 50, Appendix A, and NUREG 0737, item I.D.1 and I.D.2.

NH 10.11

Letter from DeVincentis to Miraglia dated 5/12/82 indicates that Public Service Company of New Hampshire, Inc. (hereinafter PSNH) was provided with a waiver from Preliminary Design assessment required by NUREG 0700 and NUREG 0737 I.D.1., and that the NRC would not perform a control room design review until after the PSNH DCRDR submittal. The effect of this appears to be that at present there is no assessment of the Seabrook control room. Explain why the waiver was allowed, and when NRC intends to determine whether the PSNH design is acceptable. Please identify and produce all documents related to the Staff's grant of this waiver.

CONTENTION NH 13

Operations Personnel Qualifications and Training

The Applicant has not demonstrated that the following operations personnel are qualified and properly trained in accordance with NUREG 0737, Items I.A.1.1, I.A.2.1, I.A.2.3, II.B.4, I.C.1, and Appendix C: (a.) station manager; (b.) assistant station manager; (c.) senior reactor operators; (d.) reactor operators; (e.) shift technical advisors.

NH 13.1

Does the Staff believe that the Applicant is in full compliance with NUREG 0737, Item I.A.1.1? If not, explain in what ways the Applicant has failed to comply with this NUREG 0737 requirement.

NH 13.2

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG 0737, Item 1.A.1.1.

NH 13.3

Does the Staff believe that the Applicant is in full compliance with NUREG 0737, Item II.B.4? If not, explain in what ways the Applicant has failed to comply with this NUREG 0737 requirement.

NH 13.4

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG 0737, Item II.B.4.

NH 13.5

Does the Staff believe that the Applicant is in full compliance with NUREG 0737, Item I.A.2.3? If not, explain in what ways the Applicant has failed to comply with this NUREG 0737 requirement.

NH 13.6

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG 0737, Item 1.A.2.3.

NH 13.7

Explain the Staff's position regarding the adequacy of the FSAR in providing for training to Reactor Operators and Senior Reactor Operators in the following areas:

- (a) recognition of emergency conditions;
- (b) classification of observed emergency conditions in accordance with the Emergency Classification System;
- (c) notification of emergencies to off-site authorities;

- (d) recommendation of protective actions to off-site authorities; and
- (e) direction of station staff to take protective actions.

Please identify all documents prepared by the Staff which discuss the Staff's review of training in the above-mentioned areas.

#### CONTENTION NH 20

The accident at Three-Mile Island demonstrated the inability of all parties involved to comprehend the nature of the accident as it unfolded; communicate the necessary information to one another, to the Federal, State, and local governments, and to the public in an accurate and timely fashion; and to decide in a timely manner what course to take to protect the health and safety of the public. The applicant in these proceedings has not adequately demonstrated that it has developed and will be able to implement procedures necessary to assess the impact of an accident, classify it properly, and notify adequately its own personnel, the affected government bodies, and the public, all of which is required under 10 C.F.R. 50.47 and Appendix E, and NUREG 0654.

#### NH 20.1

Please identify all persons who were or are responsible in a supervisory capacity for the Staff review of the Seabrook Station Radiological Emergency Plan generally, submitted as a separate volume of the Final Safety Analysis Report. Also identify those persons who were or are responsible in a supervisory capacity for the review of each of the following specific sections of the emergency plan:

- §6.0 "Emergency Facilities and Equipment;"
- §7.0 "Communications;"
- §8.0 "Organization;"



§11.0 "Emergency Notification and Public Information;" and

§12.0 "Maintaining Emergency Preparedness."

NH 20.2

Has the Staff approved of the Applicant's Emergency Action Levels, referenced in Appendix A of the Emergency Plan, as required by 10 C.F.R. Part 50, Appendix E, Section IV,B? If not, please explain why not.

NH 20.3

Is it the Staff's understanding that a classifiable event will be declared whenever the Emergency Action Levels indicate that such a declaration is in order, or will the emergency director have the discretion not to declare an emergency even though it is indicated by the applicable EAL? If the latter, describe the factors upon which the emergency director must make this determination.

NH 20.4

What is the Staff's position with regard to the adequacy of the Emergency Plan to ensure that the shift superintendent, unit supervisor, or other personnel will properly and promptly recognize emergency conditions and classify the observed conditions in accordance with the emergency classification system. Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents which have been prepared for the purpose of studying, reviewing or critiquing the ability of the applicant to recognize and classify emergency conditions when they arise.

NH 20.5

What is the Staff's position with regard to the adequacy of the Emergency Plan to ensure that the appropriate State of New Hampshire authorities will be notified within fifteen(15) minutes of a classifiable event? Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents which have been prepared for the purpose of studying, reviewing, or critiquing the Applicant's ability to notify State of New Hampshire authorities in the proper, prompt fashion.

NH 20.6

Please explain the Staff's position regarding the adequacy of the emergency response organization and procedures as described in Section 8.2 of the Applicant's Emergency Plan. Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents relating to the review and critique of this section of the Emergency Plan.

NH 20.7

What is the Staff's position regarding the adequacy of the Emergency Plan with respect to the primary and backup communication systems for use between:

- (a) the Emergency Operations Facility and the Media Center;
- (b) the Technical Support Center and the Emergency Operations Facility;
- (c) the Technical Support Center and the New Hampshire Incident Field Office for Seabrook; and
- (d) all the emergency response centers described in Section 6.0 of the Emergency Plan and the New Hampshire Emergency Operations Center in Concord.



Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents pertaining to the study, review or critique of the communication systems described in the answer to this Interrogatory.

NH 20.8

Does the Staff believe that a data transmission system is required to communicate necessary amounts of information to the New Hampshire Emergency Operation Center? If so, please explain why; if not, explain why not.

NH 20.9

What is the Staff's position with regard to the adequacy of the proposed location of Seabrook Station's Emergency Operations Facility and Media Center? Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents relating to the review and critique of the proposed locations of these two emergency centers.

CONTENTION NH 21

The State contends that the Applicant's Emergency Plan does not demonstrate how, in case of an accident resulting in a site area or general emergency, the large number of people in the zone of danger may be protected or evacuated. Until there is reasonable assurance that adequate on-site and off-site protective measures can and will be taken, the Board should not issue an operating license.

NH 21.1

Please identify all the persons who were or are responsible in a supervisory capacity for the Staff review and evaluation following sections of the Emergency Plan:

§9.0 "Emergency Response," and

§10.0 "Emergency Measures"

NH 21.2

Has the Applicant submitted to the NRC what the Staff considers to be an "on-site radiological emergency response plan"? If so, please identify it. If not, does the staff expect the Applicant to submit one?

NH 21.3

Please explain the Staff's position on the adequacy of the emergency plan as submitted by the Applicant with respect to protecting people in the zone of danger around the Seabrook plant, identifying and describing in detail all aspects of the Emergency Plan which the Staff feels is deficient in this regard. Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff concerning the review and/or critique of this aspect of the Emergency Plan.

NH 21.4

Explain the Staff's position respecting the adequacy of the emergency plan concerning arrangements which have been made for transportation of and medical treatment for injured personnel, identifying and producing pursuant to 10 C.F.R. Section 2.741 all the documents prepared by the Staff concerning the Staff's review and/or critique of this part of the Emergency Plan.

NH 21.5

Please explain the Staff's position regarding the measures which will be taken to minimize personnel exposures from external and or internal sources of radiation, as referenced in Section 10 3.3, P. 10-3 of the emergency plan.

NH 21.6

What is the Staff's understanding of the term "emergency radiological protection programs"? Please explain the Staff's position on the adequacy of any such programs.

CONTENTION SAPL SUPPLEMENT 3

SAPL Supp. 3.20

Explain whether the Applicant has complied with the requirements of NUREG 0737 I.C.1. which requires an analysis of transients and accidents postulating multiple failures and operator errors. If the Applicant has complied, please identify and produce, pursuant to 10 C.F.R. Section 2.741, the documents which demonstrate compliance. If the Applicant has not complied, please indicate the Staff's position on what documentation will be required for compliance.

SAPL Supp. 3.21

Referring to State's previous Interrogatory 3.14, Staff interpreted it as referring to documents other than those prepared for Seabrook. This was not the State's intention. We request only that the Staff identify all documents prepared by the Staff for review of Seabrook which relate to an analysis of transients and accidents which postulate multiple failures including operator errors. By this Interrogatory, we do not seek a massive number of documents but rather specific documents which were prepared by the Staff to satisfy its obligations under the provisions of 45 Fed. Reg. 40101 or to review the Applicant's compliance with NUREG 0737 I.C.1.

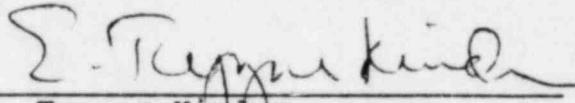
SAPL Supp. 3.22

Explain the reasons why the Staff chose not to consider the economic impact on the Seacoast area in particular and on the State generally in the event of a significant release of radioactivity to groundwater at the Seabrook facility.

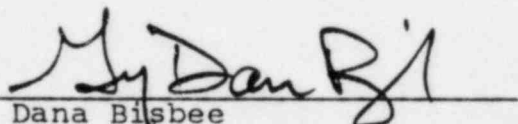
Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

GREGORY H. SMITH  
ATTORNEY GENERAL

By   
E. Tupper Kinder  
Assistant Attorney General

Dated: December 15, 1982

By   
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Attorney  
Environmental Protection Div.  
Office of Attorney General  
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Tel. (603) 271-3679

NUCLEAR REGULATORY COMMISSION

Dated: \_\_\_\_\_ By \_\_\_\_\_  
Its \_\_\_\_\_

DISTRICT OF COLUMBIA

Personally appeared \_\_\_\_\_, before me,  
the undersigned officer, and made oath that the foregoing  
statements are true to his best knowledge and belief.

\_\_\_\_\_  
Notary Public/Justice of the  
Peace

Dated: \_\_\_\_\_

CERTIFICATE OF SERVICE

I, E. Tupper Kinder, Esquire, do hereby certify that a copy  
of the foregoing State of New Hampshire's Second Set of  
Interrogatories and Request for Production of Documents to the  
Nuclear Regulatory Commission Staff has been mailed this 15th  
day of December, 1982, by first class mail, postage prepaid, to:

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DOCUMENTS BRANCH

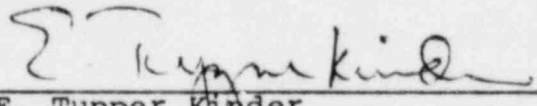
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E. Tupper Kinder

Dated: December 15, 1982