

AFFIDAVIT OF JAMES A. MACDONALD
ON NECNP III.2

JAMES A. MACDONALD, being on oath, deposes and says as follows:

1. I am Manager of the Radiological Protection Group, employed by Yankee Atomic Electric Company. My professional qualifications appear in the Operating License Application (FSAR Chapter 13).
2. The Seabrook Station electric power systems design and design basis of structures, systems and components important to safety for protection against natural phenomena meet the requirements of GDCs 2 and 17 of 10CFR50, Appendix A. The connection of these design considerations and bases with the Radiological Emergency Plan is unclear.

The Radiological Emergency Plan (REP) establishes the means for initial emergency response by on-site station personnel, notification of off-site authorities and augmentation of the on-site staff with the remainder of the company emergency response organization as described in Section 8 of the REP. The implementation of emergency response actions by the emergency response organization is indeed geared to an emergency condition or conditions at either of the two units or both simultaneously. The major response functions of emergency classification, off-site authority notification, company emergency response personnel notification and activation, on-site accident diagnosis and prognosis, and off-site radiological condition assessment and protective action recommendation are all performed regardless of the type of accident and whether one or both units are affected.

A point-by-point analysis of the 10CFR50.47(b) bases cited for this contention is as follows:

50.47(b)(1) As stated above, the REP addresses station emergency conditions - regardless of whether more than one unit at the site is affected. The principle off-site consideration to be made by the emergency response organization is whether the accident condition(s) produces or has the potential to produce off-site radiological consequences for which consideration of public protective action is necessary. The station emergency response organization and those of off-site authorities are geared to satisfy this principle function. An off-site radiological threat from one unit would be sufficient for off-site authorities to implement public protective action. A simultaneous threat from the second unit would be met with the same response.

50.47(b)(2) The Shift Superintendent is notified by one or both Unit Shift Supervisors. Based on the information on existing conditions provided to the Shift Superintendent, he makes a determination of the emergency classification and assumes the responsibility to make off-site authority and company emergency response personnel notifications. Two people are not only not necessary for this step, but would be a detriment. One and only one person on shift must be charged with the responsibility for relating site conditions, especially abnormal and emergency, to all remaining shift and nonshift personnel and off-site authorities.

As stated earlier, the emergency response organization is geared to site emergencies - one or both units. No duplication is necessary or advisable.

50.47(b)(3) As indicated throughout the above discussions, the emergency response organizations - both on-site and off-site - would respond to an emergency at the station site - whether one or both units were affected. The technical capacity required of response groups is the same.

50.47(b)(4) If the emergency response organization is geared to handle simultaneous emergencies in both units - as it is - then it can handle an emergency in one and a "minor impairment" in the other, simultaneously.

50.47(b)(6) As indicated earlier, the Shift Superintendent is solely responsible for state police notification. He obviously only requires one communication link for this action, and inter-unit confusion is avoided by this plan arrangement. Each Unit Shift Supervisor and staff can concentrate on emergency condition mitigation and termination at their respective unit.

50.47(b)(7) First, the Technical Support Center (TSC) personnel do not disseminate emergency information to the public (see Radiological Emergency Plan, Section 8.2.2.15). Second, the REP establishes an organizational chain of command whereby the TSC personnel report to the Emergency Director. This would be the case for both single unit and dual unit emergencies. This is how each TSC function is indeed coordinated.

50.47(b)(8) The emergency facilities described in Section 6 of the REP are all, with the exception of the dual Technical Support Centers, singly established facilities for emergency response organization implementation for emergencies at the station site - one or both units. The TSCs are duplicated so the shift personnel for each unit can be assisted by a support staff dedicated to each unit and the emergency difficulties each may be experiencing.

50.47(b)(9) First, the regulation cited does not state that the Applicant's emergency plan must "provide for radiological monitoring equipment with a sufficient range of measurement to identify the full amount of radiation which could be released in a core melt at both units of the Seabrook reactor". Rather, it states the need for "Adequate methods, systems, and equipment for assessing and monitoring actual or potential off-site consequences of a radiological emergency condition...".

Second, the radiological assessment capability at Seabrook Station is described in Section 6.2.2 of the REP. More detail is available in Section 12.3.4 of the FSAR. This information demonstrates the regulatory requirement is met.

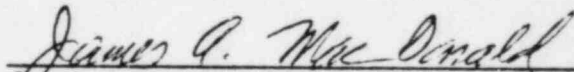
50.47(b)(10) Emergency Planning Zones are established in accordance with 10CFR50.33(g). The Seabrook Station EPZ has been established accordingly.

50.57(b)(11) As indicated in Section 10.4.4 of the REP, each emergency center will be equipped with the radiation protection gear necessary for the emergency response organization personnel assigned to duty in that center. In accordance with the regulation, the REP establishes (see Table 10.2 of the REP) emergency dose limits in accordance with the EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

50.47(b)(13) As indicated in Section 12.2.4 of the REP, general plans for establishing the Recovery Organization are specified - all that is prudent beforehand and the regulation requires.

50.47(b)(15) As indicated in Section 12.2 of the REP, the Seabrook Station emergency planning arrangements include a training program for each and every member of the emergency response organization - as the regulation requires. This training of these personnel in their emergency response roles prepares them for site emergency situations - one or both units.

Based on the above, I feel there is no issue relative to NECNP III.2 on which factual hearings are warranted.

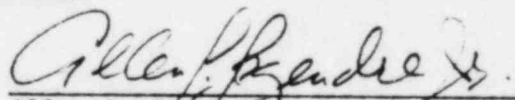

James A. MacDonald

COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss

February 11, 1983

Then appeared before me the above suscribed James A. MacDonald and made oath that he was the author of the foregoing affidavit and the statements set forth therein are true to the best of his knowledge.


Allen L. Legendre, Jr., Notary Public
My Commission Expires August 5, 1988

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on February 14, 1983, I made service of the within "Applicants' Twentieth Motion for Summary Disposition (Contention NECNP III.2)," by mailing copies thereof, postage prepaid, to:

Helen Hoyt, Chairperson
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Rep. Beverly Hollingworth
Coastal Chamber of Commerce
209 Winnacunnet Road
Hampton, NH 03842

Dr. Emmeth A. Luebke
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

William S. Jordan, III, Esquire
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, DC 20006

Dr. Jerry Harbour
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

E. Tupper Kinder, Esquire
Assistant Attorney General
Office of the Attorney General
208 State House Annex
Concord, NH 03301

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Roy P. Lessy, Jr., Esquire
Office of the Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

David L. Lewis
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Rm. E/W-439
Washington, DC 20555

Mr. John B. Tanzer
Designated Representative of
the Town of Hampton
5 Morningside Drive
Hampton, NH 03842

Roberta C. Pevear
Designated Representative of
the Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844

Mrs. Sandra Gavutis
Designated Representative of
the Town of Kensington
RFD 1
East Kingston, NH 03827


Edward J. McDermott, Esquire
Sanders and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

Jo Ann Shotwell, Esquire
Assistant Attorney General
Environmental Protection Bureau
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

Ms. Olive L. Tash
Designated Representative of
the Town of Brentwood
R.F.D. 1, Dalton Road
Brentwood, NH 03833

Edward F. Meany
Designated Representative of
the Town of Rye
155 Washington Road
Rye, NH 03870

Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801



Thomas G. Dignan, Jr.