

FILED: June 22 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

Docket Nos.

50-443 OL
50-444 OL

(Seabrook Station, Units 1 and 2)

SAPL CONTENTIONS ON NEW HAMPSHIRE
RADIOLOGICAL EMERGENCY RESPONSE PLAN

CONTENTION 1

The New Hampshire Radiological Response Plan (NHRERP), is insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 C.F.R. §.47(a)(1), in that the plan is incomplete.

Basis: The NHRERP is incomplete in that the town EPZ's have not been set up, state police have not yet received high-band portable radios (see page 2.2-6), the line of succession from governor has not yet been established (reference page 2.2-9), radios for field units, especially DPH field monitoring teams are not yet available (see page 2.2-11), four-channel emergency medical communications and systems have not yet been installed (page 2.2-14), a dispatch center for emergency medical mobile units has not been selected (page 2.2-14), reception facilities have not been designated (page 2.6-28), monitoring locations for the Seabrook Station EPZ have not yet been determined (page 2.5-15), Seabrook Station reception facilities have

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not yet been determined (page 2.6-28). These are only a few of the many incompletions which prevent the NHRERP from providing a basis upon which reasonable assurance as required by the regulation can be established.

CONTENTION 2

Contrary to the requirement of NUREG-0654 II A 2.b, New Hampshire law does not provide clear authority for the governor to order a protective response, to include evacuation.

Basis: NH RSA 107:8.

CONTENTION 3

Contrary to the requirements of NUREG-0654 II A 1.b, there is no designation of the role of each organization and sub-organization in the NHRERP.

Basis: The plan fails to define the role of the municipal corporations in the plan and fails to acknowledge the lack of town plans.

CONTENTION 4

The evacuation estimate set forth in Table 2.6-7 is unreliable and underestimated.

Basis: The evacuation time estimates fail to comply with the requirements of NUREG-0654 J8 and Appendix 4. This contention is based, in part, on NUREG-CR2-2903, "An Independent Assessment of Evacuation Time Estimates for a Peak Population Scenario in the Emergency Planning Zone of the Seabrook Nuclear Power Station". This contention is also based on the "Dynamic Evacuation Analysis;

Independent Assessments of Evacuation Times From the Plume Exposure
Pathway Emergency Planning Zones of Twelve Nuclear Power Stations,
February 1981, Federal Emergency Management Agency.

CONTENTION 5

The NHRERP fails to make an adequate showing that 24 hour per day capability exists to determine the doses received by emergency personnel and hence fails to comply with 10 C.F.R. 50.47 (b) (11) and NUREG-0654 K3.

Basis: There has been no discussion of what equipment will be provided at the reception centers for Division of Welfare and Red Cross workers monitoring evacuees. The exposures of the numbers of emergency workers who will need to be in the proximity of contaminated evacuees cannot be handled by the small amount of equipment described in Section 2.7.2 The Division of Public Works and Highways employees responsible for clearing the roadways, the State Police and all other involved in an emergency response in the EPZ will require dosimeters. There are too few dosimeters and of those there are, too few have the capacity to measure exposures beyond the 20R range. DPH staff will be overburdened with other responsibilities such as analysis of environmental media, estimation of the total population dose and locating and tracking the plume. There has been no showing that DPH has adequate staff to monitor and evaluate worker exposure records, too.

CONTENTION 6

The NHRERP fails to meet the requirements of 10 C.F.R. 50.47 (b) (11) and NUREG-0654 K 56 because there has been no showing that the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment have been established. Furthermore, there has been no showing that there exists a means for waste disposal.

Basis: There have been no decontamination centers set up (see page 1.3-10) and no showing that such centers, when and if set up, will be adequately staffed and equipped and able to perform the numbers of decontaminations that might be required. No numerical comparison of hospital treatment capacities and emergency workers who might require treatment have been made. Waste disposal as described in the NHRERP is not realistic. The Division of Public Health Services will likely be overburdened with other tasks as it is. No disposal site for contaminated materials is specified.

CONTENTION 7

The periodic exercises of emergency response capabilities as described in the NHRERP do not satisfy the requirements of 10 C.F.R. 50.47 (b) (14) or NUREG-0654 1 b.

Basis: NUREG-0654 1 b states that "Some exercises should be unannounced." The NHRERP at page 3.1-4 states that: "The date and time period described in the scenario will coincide with the scheduling agreed upon with the utility, with other states in the EPZ, and with NRC and FEMA." The NHRERP does not satisfy the

requirement for unannounced exercises. Only under wholly unannounced conditions can the readiness of emergency response organizations be given a true test.

CONTENTION 8

The NHRERP fails to comply with the requirements of 10 C.F.R. 50.47 (b) (10) and NUREG-0654 J 11. The measures for protecting the public from contamination through the ingestion exposure pathway are not adequate.

Basis: Maps for recording survey and monitoring data, key land use data, dairies, food processing plants, water sheds, water supply intake and treatment plants and reservoirs have not yet been prepared (see page 2.4-10. The NHRERP states that: "In New Hampshire, contamination of dairy feed is not likely to be a significant problem, since 75-80% of all feed is stored." No provision for the other 20-25% of feed is made. No provision is made for the case in which contamination of animal feed occurs before harvest time. A list of all public water supplies does not appear in the Appendix as is stated at page 2.6-45. Lists of commercial agricultural facilities for the Seabrook Station EPZ do not appear in the appendix as claimed at page 2.6-45. There has been no showing that there are lists with the names and locations of all facilities which process milk and other food or agricultural products from the Seabrook Station EPZ as is required by NUREG-0654 J 11. The Division of Public Health has failed to show that it has adequate staffing to perform the monitoring

and evaluation of milk, water and other foods as described in Appendix B at XIV.


CONTENTION 9

The NHRERP fails to comply with the requirements of 10 C.F.R. 50.47 (b) (10) and NUREG-0654 J 12 as it has made no showing that the means for registering and monitoring of evacuees at relocation centers in host areas exist or that personnel and equipment are available to provide the capability of monitoring all EPZ residents and transients within a 23 hour period.

Basis: Decontamination of evacuees cannot be provided as necessary unless the capability exists to monitor all of the residents and transients who have evacuated the EPZ. There are no reception centers designated for the Seabrook Station EPZ (see page 1.3-18). There has been no showing that there is provision for adequate trained staff to run these centers. There has been no showing that the state is in possession of sufficient equipment and supplies to equip these centers. There are no letters of agreement with the local Red Cross chapters which are, under this plan, responsible for providing food and shelter to evacuees. The local Red Cross directors' names are missing from page 1.3-18. The office of the Division of Welfare responsible for oversight of the operation of the Reception Centers is not named (see page 1.3-22). How the NHCDA IFO controller is to direct the operations of the reception centers in addition to all of his or her other responsibilities is not spelled out. Which state emergency workers and which local emergency workers will be free to

conduct monitoring functions at the reception centers is never clearly stated. Whether such workers will report to perform these tasks is also in question.

Respectfully submitted,
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