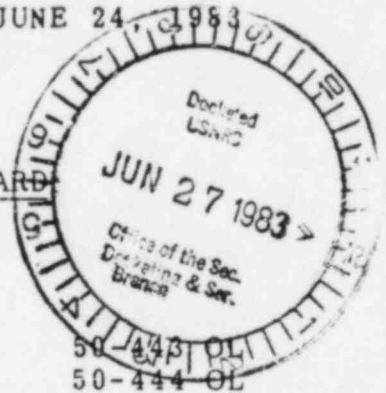


FILED: JUNE 24, 1983

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.

(Seabrook Station, Units 1 and 2)

ERRATA TO
SAPL CONTENTIONS ON NEW HAMPSHIRE
RADIOLOGICAL EMERGENCY RESPONSE PLAN

The following pages and/or corrections should be substituted on the filing made by SAPL entitled above:

1. Pages 1, 3, and 5 attached should replace the present pages 1, 3 and 5.
2. On page 2, line 1 the following: "(page 2.6 28)" should read "(page 1.3-10)".
3. On page 4, Contention 6, line 2 the following: "NUREG-0654 K 56" should read "NUREG-0654 K 5b".

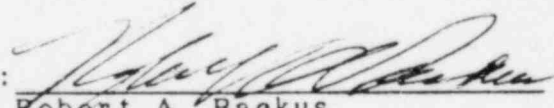
Contention 7, lines 3 and 4 the following: "NUREG-0654 1 b" should read "NUREG-0654 N 1b".

4. Page 6, Contention 9, line 6 the following: "23 hour period" should read "12 hour period".
5. Page 7, line 1 "monitring", should read "monitoring".

Respectfully submitted,
Seacoast Anti-Pollution League
By its attorneys,
BACKUS, SHEA & MEYER

8306290532 830624
PDR ADOCK 05000443
PDR
G

By:


Robert A. Backus
116 Lowell St., Box 516
Manchester, N.H. 03105
Tel: (603) 668-7272

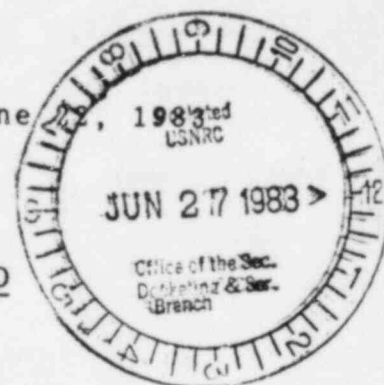
JUNE 24, 1983

DS03

FILED: June 2, 1983rd
USNRC

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 Emergency 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. §50.47(a)(1), in that the plan is incomplete.

Basis: The NHRERP is incomplete in that the town EOC'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 the 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), the four-channel emergency medical communication system has 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 Decontamination Centers have

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 others 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.

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

CERTIFICATE OF SERVICE

Helen Hoyt, Chm.
Admin. Judge
Atomic Safety & Lic.
Board - U.S. NRC
Washington, DC 20555

Thomas G. Dignan, Esq.
Ropes and Gray
225 Franklin Street
Boston, MA 02110

Sen. Gordon Humphrey
Attn: Tom Burack
U.S. Senate
Washington, DC 20510

Dr. Jerry Harbour
Admin. Judge.
Atomic Safety & Lic.
Board - U.S. NRC
Washington, DC 20555

Docketing and Service Sec.
Office of the Secretary
U. S. NRC
Washington, DC 20555

Sen. Gordon Humphrey
Attn: Herb Boynton
1 Pillsbury Street
Concord, NH 03301

Roy P. Lessy, Jr., Esq.
Office of Executive
Legal Director
U.S. NRC
Washington, DC 20555

Robert L. Chiesa, Esq.
95 Market Street
Manchester, NH 03101

Maynard B. Pearson
Rep. Amesbury, MA
40 Monroe St.
Amesbury, MA 01913

Phillip Ahrens, Esq.
Asst. Atty. General
State House, Station #6
Augusta, ME 04333

Jane Doughty
Field Director
SAPL
5 Market Street
Portsmouth, NH 03801

Donald E. Chick
Town Manager
10 Front Street
Exeter, NH 03833

Anne Verge, Chairperson
Board of Selectmen
Town Hall
So. Hampton, NH 03842

Dana Bisbee
Attorney General's Office
State of New Hampshire
Concord, NH 03301

Office of Selectmen
Town of North Hampton
North Hampton, NH 03862

Dr. Emmeth A. Luebke
Admin. Judge
Atomic Safety & Lic.
Board - U.S. NRC
Washington, DC 20555

David R. Lewis
Atomic Safety & Lic. Brd.
U.S. NRC - Rm. E/W-439
Washington, DC 20555

Anne Verge, Chm.
Board of Selectmen
Town Hall
South Hampton, NH 03842

Jo Ann Shotwell, Asst. AG
One Ashburton Place, 19th
Floor
Boston, MA 02108

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

John B. Tanzer
Town of Hampton
5 Morningside Drive
Hampton, NH 03842

William S. Jordan, II, Esq.
Ellyn R. Weiss, Esq.
1725 I Street, N.W.
Suite 506
Washington, DC 20006

Mr. Angie Machiros, Chrmn.
Board of Selectmen
Town of Newbury
Newbury, MA 09150

Edward Meany
Town of Rye
155 Washington Road
Rye, NH 03870

Dr. Muray Tye, President
Sun Valley Assoc.
280 Haverhill Street
Lawrence, MA 01840

Sandra Gauvutis
Town of Kinsington
RFD 1
East Kensington, NH 03827

Alfred Sargent, Chm.
Board of Selectmen
Town of Salisbury, MA 01950

Letty Hett, Selectman
Town of Brentwood
RFD Dalton Road
Brentwood, NH 03833

Richard E. Sullivan, Mayor
City Hall
Newburyport, MA 01950