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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'83 APR 11 P1:54

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'S SUPPLEMENTAL PETITION FOR LEAVE TO INTERVENE

Pursuant to 10 C.F.R. 2.714(b), the Seacoast Anti-Pollution League (SAPL) submits the following contentions for litigation in this proceeding. The contentions are based on the draft Radiological Emergency Response Plan for Newburyport, Massachusetts, as submitted to the Atomic Safety and Licensing Board on February 28, 1983.

It is SAPL's position that the Newburyport plan fails to meet all of the standards set forth in 10 C.F.R. 50.47. In many instances, SAPL has relied on the standards and regulatory criteria of NUREG-0654 in clarifying these contentions which provide a benchmark against which the Board may judge compliance with the regulations. This is an appropriate use of NUREG-0654 given its specific citation in the Commission's regulations, and the deference it has been afforded by previous Boards in assessing the adequacy of radiological emergency response plans. See 10 C.F.R. §50.47(b), and In the Matter of Southern California Edison Company, et al., (San Onofre Nuclear Generating Station, Units 2 and 3), 15 NRC 1163, May 14, 1982.

In San Onofre, the Board held that the language and plain import of NUREG-0654 was the appropriate standard for judging the adequacy

of submitted emergency plans. SAPL asserts that NUREG-0654 should also be strictly construed with respect to the Newburyport plan.

I. EMERGENCY PLANNING CONTENTIONS ON THE NEWBURYPORT RADIOLOGICAL RESPONSE PLAN.

1. The Newburyport emergency plan does not contain any information concerning the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. Consequently, the plan does not meet the requirements of 10 C.F.R. §50.47(a)(1), §50.47(b)(6) and NUREG-0654,E.6.

Basis: The regulations specifically require that provisions must exist for prompt communications among principal response organizations to emergency personnel and to the public. This regulation is clarified by NUREG-0654,E.6., which specifically requires that the local emergency plans include information as to the time required for notifying and providing prompt instructions to the public. An indication of the level of information required to satisfy this requirement is available in Appendix 3 of that document.

The Newburyport plan does not contain information concerning time requirements. It merely states that:

The Public Alerting System (consisting of sirens, tone-activated radios, and mobile public-address units) will be used to initiate "Public Notification". (See page II-3, Newburyport Emergency Plan.)

It is clear that this information is grossly inadequate to meet the standards referred to above. Inclusion of this information and its assessment are of crucial importance in determining the adequacy

of this emergency plan. The time it will take to notify the general public concerning evacuation will have a significant impact upon the ability of emergency response personnel to evacuate the general public in a timely manner. Since the Applicant has avoided the issue of the time requirements involved for public notification in its FSAR Radiological Emergency Response Plan, it is especially important that the individual state and local plans include this required information.

2. The Newburyport emergency plan does not provide draft written statements intended for the public, consistent with the licensee's classification scheme as required by 10 C.F.R. §50.47(b)7 and NUREG-0654,E.7.

Basis: The Newburyport emergency plan does not include draft messages for the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas in the event of a radiological emergency. This requirement is plainly spelled out in NUREG-0654,E.7., page 46, and is entirely consistent with 10 C.F.R. §50.47(b)7, which requires that "procedures for coordinated dissemination of information to the public" must be established.

Nowhere in the plan are the required draft messages included. The messages must be provided to promote consistency in information dissemination should a radiological emergency occur. They must also be included to satisfy the regulatory and criteria requirements set forth above.

3. The Newburyport emergency plan does not provide for off-site radiological monitoring equipment as required by 10 C.F.R. §50.47(b)8 and NUREG-0654,H.7.

Basis: NUREG-0654 requires that:

Each organization, where appropriate, shall provide for off-site radiological monitoring equipment in the vicinity of the nuclear plant (See NUREG-0654,H.7.)

This requirement is consistent with 10 C.F.R. §50.47(b)8. Clearly, the availability and adequacy of radiological monitoring equipment is of crucial importance in order to provide an accurate assessment of impending danger to Newburyport residents in the event of a radiological emergency. The emergency plan does not state with sufficient specificity the adequacy of the town's radiological monitoring capability.

The Newburyport plan provides that the Civil Defense RADEF officer must inventory and check all radiological monitoring instruments quarterly and after each use. (See Newburyport plan, page III-8.) Nowhere in the plan is there an adequate indication of how many radiological monitoring instruments will be required to make an accurate assessment of danger to the general public. Similarly, there is no information with respect to the make or type of instruments to be used. Merely stating that the RADEF officer must "insure that there are sufficient quantities in service" does not provide the required information. The plan must state, up front, exactly what the town's capabilities are in this area, when and how appropriate equipment will be obtained, etc.

4. The Newburyport emergency plan does not establish a central point for the receipt and analysis of all field monitoring data and

coordination of sample media, as required by 10 C.F.R. §50.47(b)9 and NUREG-0654, H.12.

Basis: The Newburyport plan clearly does not indicate where field monitoring data and sample media will be collected for rapid analysis. If emergency personnel are to assess levels of radiological danger to the general public, and recommend appropriate protective response measures, then incoming data must be quickly and efficiently analyzed. Failure on the part of the plan to include information as to where and how this data will be analyzed conflicts with the regulatory requirements and must be remedied.

5. The Newburyport emergency plan does not adequately provide for methods, equipment and expertise to make rapid assessments of the magnitude and locations of any radiological hazards through liquid or gaseous release pathways, as required by 10 C.F.R. §50.47(b)9, and NUREG-0654, I.8.

The Newburyport plan does not describe the particulars of a radiological monitoring effort that would be required in the event of an emergency. Specifically, there is no information concerning

"...activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times." (See NUREG-0654, I.8., page 58.)

Again, SAPL wishes to emphasize its concern that merely indicating possession of some radiological monitoring equipment does not provide an accurate basis for determining whether emergency personnel in the Town of Newburyport will have the capability to accurately assess health related affects to the general public in the event of a radiological emergency. The above criteria provided for in NUREG-0654 specifically require detailed analysis as to how

radiological monitoring will be performed under emergency conditions. Implicit in those requirements is also a concern about how long radiological monitoring will take. Failure on the part of the plan to address these crucial issues raises serious questions about the ability of Newburyport officials to recommend appropriate protective response measures in the event of a radiological emergency.

6. The Newburyport emergency plan fails to identify specific evacuation routes to be used in the event of a radiological emergency. This is in violation of 10 C.F.R. §50.47(a)1, and contradicts the plain requirements of NUREG-0654, J.10a.

Basis: The primary regulatory requirement with respect to emergency plans is that they must provide a "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency." 10 C.F.R. §50.47(a)1. Clearly, an adequate protective measure of prime importance in the event of a serious accident is full evacuation of the 10 mile EPZ. Consequently, the Newburyport plan must provide reasonable assurance that an evacuation can be carried out under emergency conditions.

Consistent with this requirement are the criteria set forth in NUREG-0654, J.10.a.:

The organization's plans to implement protective measures for the plume exposure pathway shall include: maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas. (See NUREG-0654, page 61.)(emphasis added).

In addition, the criteria require that identification of radiological sampling and monitoring points must include the designators in Table



J-1 of that document or an equivalent uniform system described in the plan. NUREG-0654,J.10.a.

In complete disregard of this plainly worded mandate, the drafters of the Newburyport plan have failed to satisfy a single one of its requirements. Consequently, SAPL can only conclude that the planners have not identified evacuation routes, evacuation areas, preselected monitoring points, or the specific relocation centers in the Town of Peabody. The same is true with respect to shelter areas. SAPL regards each of these requirements as critically important in the development of any state or local plan. With such glaring omissions, the Newburyport plan would be completely incapable of being implemented, and would not provide any assurance that adequate measures could be taken to protect the health and safety of the public in the event of a radiological emergency.

7. The Newburyport emergency plan provides no indication whatsoever of the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement as required by 10 C.F.R. §50.47(a)(1), and NUREG-0654,J.10.d.

Basis: The Newburyport plan disregards entirely any provision for evacuation of persons whose mobility may be impaired due to institutional or other confinement. Specific identification of the means for protecting such individuals is specifically required in NUREG-0654,J.10.d. Apparently, the drafters of this plan recognize that fact and include a reference to "Newburyport's Special Facilities' Emergency Response Plans" as Appendix D in their Table of Contents. (See draft Newburyport Radiological Response Plan,

page viii.) However, Appendix D of the plan confusingly refers to a cross-reference to NUREG-0654, which is also notably absent.

Again, the drafters of the plan have overlooked an area of crucial importance. Moreover, it is an area which has been similarly ignored in the Applicants' Radiological Response Plan. Failure on the part of the drafters to address the issues associated with institutional evacuation cannot and must not be avoided any further if this plan is to comply with the regulatory standards and supporting criteria. The specific means for protecting institutionalized persons must be identified and explained in all stages and levels of emergency planning.

8. The Newburyport emergency plan has failed to identify key elements of evacuation as an appropriate protective response to a severe radiological emergency. Specifically, the plan fails to identify and address: 1) Means of relocation; 2) Relocation centers in host areas which are least five miles and preferably ten miles beyond the boundaries of the plume exposure emergency planning zone; 3) Projected traffic capacities of evacuation routes for emergency conditions; 4) Control of access to evacuated areas and organization responsibilities for such control; 5) Identification of means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes and contingency measures; and 6) Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone. Failure to address and identify these issues is in violation of 10



C.F.R. §50.47(a)1, 50.47(b)(10), and NUREG-0654, J.10.(g) (h) (i) (j) (k) and (l).

Basis: As stated in NUREG-0654, each of these areas must and should be addressed in detail for the development of an emergency plan that will adequately protect the health and safety of the public.

First, with respect to the means of relocation, it is clear that the plan does not answer the question of how town residents and transient visitors will be evacuated to host areas. Specific determination of these means is required under the appropriate criteria and is essential to any reasonable assessment of the plan's adequacy. If the drafters are assuming that all residents, transients, and institutionalized persons will be evacuated by private automobile, then they must so state. Otherwise, they must address with specificity exactly how all persons within the EPZ will be evacuated to host areas.

Similarly, the plan fails to identify the location and relative capacities of relocation centers in host areas. The only information in this regard indicates that the Town of Peabody will receive evacuated persons. Such references are vague and do not contribute to the development of a workable plan. Moreover, specific identification of these centers is required by the appropriate criteria. (See NUREG-0654, J.10.(h).) Thus, the drafters should be required to state with specificity the location and capabilities of host area relocation centers.

The drafters have also ignored not only identification of the evacuation routes, but also their projected traffic capacities. Variations in traffic capacities can have significant impact on

evacuation capabilities and the time required to complete evacuation measures. It is impossible to know how long an evacuation will take unless specific traffic capacities of identified routes are clearly identified and analyzed.

Also omitted are the required identification of and means for dealing with potential impediments to use of evacuation routes, and contingency measures. Impediments to evacuation travel on identified evacuation routes will also have great impact on the time required to complete evacuation of the EPZ. NUREG-0654 requires identification of these potential impediments along with feasible contingency measures, and the plan must, therefore, address these issues in detail. To date it has not done so.

Finally, the plan does not contain time estimates for evacuation of various sectors and distance based on a dynamic analysis. Again, this is a glaring omission of great significance and time estimates must be included for an accurate assessment of evacuation capability as an appropriate response to particular emergency situations.

9. The Newburyport plan does not describe the means (i.e., personnel and equipment) for registering and monitoring of evacuees at relocation centers within twelve-hours of their evacuation from the plume exposure EPZ. Provision for this capability is consistent with 10 C.F.R. §50.47(12), and §50.47(a)(1), and is required by NUREG-0654, J.12.

Basis: Again, the drafters have failed to provide for monitoring of relocated persons potentially suffering from dangerous levels of radioactive exposure. Having this capability is crucial to providing appropriate medical services to injured persons, and must be included

in state and local emergency plans. Without a demonstration of this capability, it would be entirely possible for numerous persons to remain at the shelter for extended periods of time without the slightest idea of how much radiation they had received, and its potential effect on their health.

10. The plan does not insure that dosimeters issued to emergency personnel will be read at appropriate frequencies and does not provide for the maintenance of dose records for emergency workers involved in any nuclear accident. This is contrary to the specific requirements of NUREG-0654.K.3.b, and violates 10 C.F.R. §50.47(a)1, 50.47(8), and especially 50.47(11).

Basis: Federal regulations specifically require that means be established for controlling emergency workers' radiological exposures. See 10 C.F.R. §50.47(11). The Newburyport plan fails to provide for control in this area, and does not meet the requirements of NUREG-0654:

Each organization shall insure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident. NUREG-0654K.3.b. (page 67)

Provision for timely reading of dosimeters issued to emergency personnel is a crucial part of controlling their radiological exposure, and must be provided for in the plans to insure satisfaction of regulatory and criteria requirements.

11. The plan does not provide for the establishment of a decision making chain for authorizing emergency workers and personnel to incur exposures in excess of the EPA General Public Protective

Action Guides. This is also a violation of 10 C.F.R. §50.47(11), and is directly at odds with the specific requirements of NUREG-0654.K.4.

Basis: The Newburyport emergency plan states at page II-21, 22 that: "All Newburyport emergency response personnel and equipment will be monitored at the Newburyport EOC or at an area designated by the civil defense director. Emergency Response personnel will be decontaminated at the high school." This statement is without basis. There is no explanation of any decontamination capability at the Newburyport High School. Moreover, the plan does not meet the requirement of NUREG-0654 that there be an established decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides. Such a determination would be a very serious matter, and responsibility for it must be determined in advance in accordance with the established regulatory criteria.

12. Similarly, the Newburyport plan does not provide for specific action levels for determining the need for decontamination either for injured members of the public, or for emergency personnel. This is in clear violation of 10 C.F.R. §50.47(a)1, 50.47(11), and 50.47(12).

Basis: NUREG-0654 provides that:

Each organization as appropriate, shall specify action levels for determining the need for decontamination. (See NUREG-0654,K.5.a., page 67.)

It is SAPL's position that specifying action levels at this time is entirely appropriate and mandatory for the Town of Newburyport. This is because drafters of the plan have made absolutely no provision or definitive statement as to precisely what the

decontamination capabilities of listed hospitals are. An assumption that that capability even exists is without basis given this flagrant lack of information. On that basis, SAPI contends that the plan must conform to the appropriate NUREG-0654 provision, and that specific action levels for decontamination should be identified in advance.

13. Similarly, the Newburyport emergency plan does not establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal. This is in violation of 10 C.F.R. §50.47(a)1, 50.47(8), and 50.47(11). In addition, failure to include this information is in direct conflict with NUREG-0654.K.5.b.

Basis: As stated above, the drafters' reference to emergency personnel and equipment decontamination at pages II-21 and II-22 do not meet the appropriate regulatory standards and criteria set forth in the contention. If equipment is impounded by the Public Works Director, then it will not be available for use in the community, and may have a serious detrimental affect on ongoing monitoring capabilities. Similarly, there is absolutely no provision for decontamination capability at the Newburyport High School, or anywhere else. This is a serious flaw, and must be addressed as per the regulations and criteria.

14. The Newburyport radiological response plans do not establish arrangements for local and back-up hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are



adequately prepared to handle contaminated individuals. This is a direct violation of 10 C.F.R. §50.47(12),(a)(1) and NUREG-0654 L.1.

Basis: The Newburyport emergency plan's treatment of public health issues and medical facility requirements is grossly inadequate, and complies with neither the regulations nor the NRC criteria.

At page 2-24 of the RERP, the drafters state that:

If individuals who are ill or injured are suspected or known to be contaminated, they will require special considerations for transport and medical treatment. Whenever practical, they will be transported to one of the following hospitals prepared to treat such individuals: Anna Jacque Hospital, Newburyport, Mass.; Brigham & Womens' Hospital, Boston, Mass.

That is the extent of the plan's "arrangements made" for medical services for contaminated, injured individuals. The plan does not specify the capabilities of these two hospitals to assess and treat radiation contamination injuries, and does not state the number of patients that either of these facilities would be able to handle at any one time. Furthermore, the drafters do not state how they would accomodate the "special considerations" for transport of radiation contaminated individuals, and do not state what they consider to be a "practical" situation that would enable them to transport injured individuals to the hospital specified.

It is SAPL's position that this cursory and incomplete examination of medical service adequacy is a serious flaw in the plan and entirely inconsistent with established standards and regulations. Consequently, it is our view that a detailed analysis of medical response capability be done and appended to the draft for further review in these proceedings. The drafters' treatment of



this issue raises grave concerns as to the existence of adequate medical facilities to meet the requirements of the federal regulations.

15. The Newburyport radiological emergency response plan does not provide for sufficient periodic exercises and drills to assess: 1)The function and maintenance of communication systems for state and local governments within the plume exposure pathway EPZ on a monthly basis; 2)The capability of local emergency teams to transport a simulated contaminated individual to a medical facility with adequate capability for decontamination on an annual basis; 3)Annual drills concerning radiological monitoring; and 4)An accurate explanation and description of each drill beyond a mere citation to the Final Safety Analysis Report. Failure to plan for and provide information with respect to these drills and exercises is a direct violation of 50.47(14), 50.47(a)(1), 50.47(11), 50.47(10), 50.47(9), 50.47(8), 50.47(6), in addition to NUREG-0654.N.1.a, N.2.a., N.1.b., N.2.c., N.2.d., N.3.a, N.3.b., N.3.c., N.3.d., N.3.e., N.3.f., N.4., and N.5.

Basis: NRC regulations provide for periodic exercises to be conducted to evaluate major portions of emergency response capabilities. See 10 C.F.R. §50.47(14). That mandate has been interpreted in specific detail at NUREG-0654 N., et seq. (page 73.) Specifically, those requirements call for detailed drill and exercise planning with respect to communications, emergency medical capabilities, radiological monitoring, and the specific requirements for each drill. These requirements include the basic objectives of each drill, the dates, time periods, places and participating

organizations in the drill, the simulated events, the time schedule of real and simulated initiating events, narrative summaries describing the proposed exercises and drills, provision for official observers from federal, state or local governments, and the specific means for each organization to evaluate observer and participant comments on areas needing improvement. Commenters should recommend favorable emergency plan procedural changes, and assign responsibility for implementing corrective actions. The Newburyport emergency plan's response to the specific requirements can be found at page II-26 of the plan

Exercises and drills are the methods by which plans and procedures are tested. Exercises are realistic, planned simulations of accidents, designed and conducted to simulate actual emergency conditions as closely as possible. Drills are preplanned simulations in which the participants are "walked" or "talked" through one or more procedures, or aspects of the Plan. The primary purpose of drills is to train individuals in a controlled situation. Information on exercises and drills can be found in the Seabrook Area Emergency Response Plan.

This response is entirely inadequate in light of the specific requirements of the regulations and criteria. A vague and baseless description of both drills and exercises is entirely inconsistent with the thrust of the criteria and regulations, and should be disregarded and stricken from the plan. In its place should be substituted specific proposals and plans for both drills and exercises that will meet the appropriate criteria. Failure to do so will prevent the level of readiness for emergency response clearly envisioned in both the regulations and the NRC criteria.

In addition, SAPL wishes to note that the plan's reference to drills and exercises found in the Seabrook Area Emergency Response

Plan is inappropriate because NUREG-0654 specifically requires the above noted criteria for state and local plans in addition to those of the licensee.

16. The Newburyport plan fails to provide for the specific training of directors or coordinators of the response organizations, personnel responsible for accident assessment, radiological monitoring teams and radiological analysis personnel, police, security and fire fighting personnel, first aid and rescue personnel, local support services personnel including Civil Defense/emergency service personnel, medical support personnel, and personnel responsible for transmission of emergency information and instructions. Failure to provide for the specific training of all the above-named individuals is in violation of 10 C.F.R. §50.47(a)1, 50.47(6), and 50.47(15). In addition, this lack of specific information with respect to training the above-named individuals is also in direct violation of NUREG-0654 O.4.(a), (b), (c), (d), (f), (g), (h), and (j).

Basis: The Newburyport plan's response to the requirements for training information can be found at page II-27 of the plan. References found at that page are vague and provide no basis for confidence that the emergency personnel specified in NUREG-0654 will, in fact, be given appropriate training. Merely stating that "all emergency response personnel and the public" will be given "comprehensive" training does not meet the required specificity plainly stated in NUREG-0654. It is SAPL's position that such specificity is necessary to meet the regulatory requirements of 10 C.F.R. §50.47(15).

In addition, SAPL again points out that the drafters' reference to the Seabrook Area Emergency Response Plan regarding "information on training" is entirely inappropriate because the specific information required by NUREG-0654 is required of state and local emergency plans, in addition to those of the Licensee.

17. The Newburyport plan fails to provide for the annual retraining of all of the personnel noted with respect to Contention 16 (above) and therefore fails to comply with 10 C.F.R. §50.47(15) as supported by NUREG-0654 O.5.

Basis: As stated above, the plan's sole reference to training is included at page II-27. The provisions indicated on that page make no reference whatsoever to retraining of personnel on an annual basis or otherwise. For that reason it is in direct conflict with the requirements stated at page 77 of NUREG-0654 as it supports the mandate of 10 C.F.R. §50.47(15). For that reason, the plan must be amended to include specific retraining schedules on an annual basis for all persons identified as requiring training under the appropriate NUREG-0654 criteria.

18. The Newburyport emergency response plan is inadequate because it fails to provide a cross reference of the plan provisions to NUREG-0654. This is in violation of 10 C.F.R. §50.47(a)1, 50.47(b)1, et seq. as interpreted in NUREG-0654 P.8.

Basis: The drafters of the Newburyport plan have failed to provide the necessary cross reference to appropriate NUREG-0654 criteria as required by that document. This has made it exceedingly difficult for SAPL to cross reference the plans to the appropriate criteria and analyze them accordingly. Failure on the part of the

drafters to include this cross reference is made even more confusing by the fact that such a cross reference is provided for in the plan's table of contents at page viii. Nevertheless, the cross reference has not been included.

It is surely in the interests of all parties to this proceeding that this cross reference be provided for the Newburyport plan, as well as all subsequent plans to be submitted for review and possible litigation.

Respectfully submitted,  
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'83 APR 11 P1:54

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