

April 19, 1991

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

_____)	
In the Matter of)	
)	Docket Nos. 50-443-OL
PUBLIC SERVICE COMPANY)	50-444-OL
OF NEW HAMPSHIRE, <u>et al.</u>)	
)	(Offsite Emergency
(Seabrook Station, Units 1)	Planning Issues)
and 2))	
_____)	

AFFIDAVIT OF JEFFREY HAUSNER

I, Jeffrey Hausner, being on oath, depose and say as follows:

1. I am a self-employed emergency planning consultant with offices in Arlington, Massachusetts. I am recognized as a qualified professional in the field of off-site radiological emergency planning, having served as director of the Commonwealth of Massachusetts' Nuclear Safety Emergency Preparedness Program for more than three years and as the principal consultant to the Massachusetts Civil Defense Agency on radiological emergency response planning for three years prior. My total, continuous service in these capacities ran from January, 1985 to April, 1991. I have also had significant education, training, and other professional experience in the field of emergency preparedness and response. My professional resume appears as "Attachment A" to this affidavit.
2. I have reviewed documents relevant to this matter, including: the Official Transcript of Proceedings (docket No. 50-443-OL and 50-444-OL) pages 28453 to 28499, the statements of the New Hampshire Attorney General in this matter, the statements of Director George Iverson of the New Hampshire Office of Emergency Management in this matter, staff comments of the U.S. Nuclear Regulatory Commission and the Federal Emergency Management Agency in this matter, and the licensee's documents relevant to this matter, including "Licensee's Response to Memorandum and Order of January 24, 1991". I am familiar with sheltering procedures of the New Hampshire Radiological Emergency Response Plan (NHRERP).

3. It is understood and accepted that an incident at a commercial nuclear power facility requiring off-site protective action is highly unlikely. Yet a severe accident at a commercial nuclear facility has such dire possible consequences that development of emergency plans and procedures to protect the public from radiological exposure and contamination as a result of such an event is a federal licensing requirement.
4. The purpose of protective action is to reduce the radiological dose which members of the public might sustain in a radiological accident. Emergency plans and procedures should be developed to implement all anticipated protective actions without regard to the likelihood that any one of those actions would be recommended.
5. Ad hoc emergency response is the taking of a protective action in the absence of plans and procedures for its implementation. While in any emergency unanticipated actions may have to be taken which would require ad hoc response, I find no basis for reliance on ad hoc implementation of an emergency action when recommendation of that emergency action can be anticipated. Because implementation of one protective action is less likely than implementation of another action does not relieve emergency planners of their obligation to prepare as well as possible to implement that anticipated protective action.
6. If a dose reduction can be achieved by sheltering the resident and transient population in the beach areas of ERPA-A of the Seabrook Station plume exposure emergency planning zone (EPZ), as opposed to any other protective action, it is essential that emergency plans and procedures be developed to implement the shelter option, regardless of the likelihood that it will be ordered.
7. It appears that the State of New Hampshire does anticipate implementing shelter as a protective action recommendation for the population in beach areas of ERPA-A under certain conditions. While the probability of these date, time of day, weather, and accident conditions occurring in combination are extremely remote, they are nonetheless conceivable, and ordering shelter to achieve the greatest dose reduction for the beach population remains possible.
8. It appears that the NHRERP procedures only provide that all of ERPA-A, which includes beach areas proximate to Seabrook Station, will be ordered to evacuate if shelter is the recommended protective action in a rapidly escalating accident at Seabrook Station. This may be inconsistent with implementation of "keyhole" protective actions recommended in NUREG 0654/FEMA REP 1. The NHRERP does not contain procedures for ERPA-A sheltering.

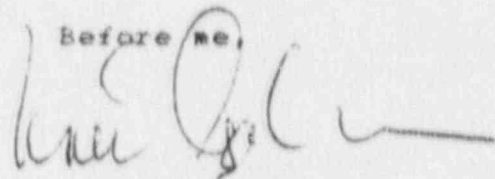
9. It is my conclusion that plans and procedures should be developed to implement any and all anticipated actions to protect the permanent and transient populations of the beach areas of ERPA-A in the EPZ of Seabrook Station. Thus, since the State of New Hampshire may use shelter as a protective action under certain conditions, no matter how likely, plans and procedures to implement the shelter option should be developed as a part of the NHRERP.
10. Therefore, since it appears that in the NHRERP shelter is anticipated as an action to protect the resident and transient beach populations of ERPA-A of the Seabrook EPZ, I believe that plans and procedures should be developed to implement shelter as a protective action to reduce the radiological dose that members of these populations could sustain due to an accident at Seabrook Station.


Affiant

Suffolk County, Massachusetts

April 19, 1991

The above subscribed Mr. Jeffrey Hausner appeared before me and made oath that he had read the forgoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,


Notary Public
My Commission Expires: 4/25/97

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before the Administrative Judges:

Ivan W. Smith, Chairman
Dr. Richard F. Cole
Kenneth A. McCollom

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OFFICE OF SECRETARY
DOCKETING & SERVICE
DIVISION

In the Matter of)

PUBLIC SERVICE COMPANY)
OF NEW HAMPSHIRE, ET AL.)

(Seabrook Station, Units 1 and 2))

) Docket Nos. 50-443-OL
) 50-444-OL

) April 22, 1991

CERTIFICATE OF SERVICE

I, Matthew Brock, hereby certify that on April 22, 1991, I made service of the within Intervenor's Opposition to Licensees Motion for Summary Disposition by Federal Express as indicated by (*), by hand as indicated by (**), and by first class mail to:

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^{1/} Hand delivery was made on April 23, 1991 by 10:00am

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DATED: April 22, 1991