



Testimony of Roger J. Shaheen  
before the Atomic Safety and Licensing Board  
in the matter of Public Service Company of New Hampshire, et al.,  
(Seabrook Station, Units 1 and 2), Docket Nos. 50-443 OL and 50-444 OL

RE: NECNP Contentions III.12 and III.13

July 15, 1983

8307190254 830715  
PDR ADOCK 05000443  
Q PDR

Testimony of Roger J. Shaheen

Q. 1) Please state your name and business address.

A. My name is Roger J. Shaheen. My address is 26F Ocean Front, Salisbury Beach, Massachusetts.

Q. 2) Please state your occupation and give all other background relevant to this testimony.

A. I am the owner and President of Shaheen Enterprises, in which capacity I own and operate the Amusement Park at Salisbury Beach. I started working at Salisbury Beach, parking cars, in 1935. I have owned the amusement park since approximately 1950.

Q. 3) As owner of the amusement park, what observations have you made with regard to the night life at Salisbury Beach?

A. The bulk of Salisbury Beach's business is done after 6:00 at night. Business is heaviest from 7:00 p.m. to midnight. The amusement park, for example, does approximately two-thirds of its business at night. The shops at the beach are open until midnight; the clubs and bars are active until 1:00 a.m., at which time they legally must close; and food establishments remain open until 2:00 a.m.

The night life at Salisbury Beach is extremely active during the summer months, with people coming into the beach area to visit the clubs, bars, amusement park, shops and restaurants. The heaviest nights are typically Friday and Saturday nights. Every Friday night in the summer there is a fireworks display. On these two nights, especially, the beach area is packed with people and all available parking is taken. I can look down from my second-floor office and be unable to see the pavement on the sidewalks because the crowds are so thick. On a typical Friday or Saturday night the cars leaving the beach will be bumper-to-bumper until approximately 11:00 p.m., and the traffic can remain heavy until after 1:00 a.m.

CERTIFICATE OF SERVICE

I, Jo Ann Shotwell, Esquire, counsel for Massachusetts Attorney General Francis X. Bellotti, hereby certify that on July 15, 1983, I made service of the following documents, by mailing copies thereof, postage prepaid, to the parties named below: Petition of Attorney General Francis X. Bellotti for Directed Certification of ASLB Decision on Applicants' Twenty-First Motion for Summary Disposition; Answer of Attorney General Francis X. Bellotti to the "Applicants' Response to Contentions of Attorney General Francis X. Bellotti Relative to Emergency Planning for the State of New Hampshire"; Testimony of Philip B. Herr; Testimony of Anthony Kuncho; Contention of Attorney General Francis X. Bellotti Relative to Applicants' Evacuation Time Estimates for Beach Areas; Testimony of Robert Mark; and Testimony of Roger Shaheen:

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\*  
Diane Curran  
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

Edward L. Cross, Jr., Esquire  
Assistant Attorney General  
Dana Bisbee, Esquire  
Assistant Attorney General  
Office of the Attorney General  
208 State House Annex  
Concord, NH 03301

Atomic Safety and Licensing Appeal  
Board Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, D C 20555

Roy P. Lessy, Jr., Esquire\*  
David A. Repka, Esquire\*  
Robert G. Perlis, Esquire\*  
Office of the Executive Legal  
Director  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

\* By Express Mail

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

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

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

Dr. Mauray Tye  
Sun Valley Association  
209 Summer Street  
Haverhill, MA 01830

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

Thomas G. Dignan, Jr., Esquire\*\*  
Robert K. Gad, III, Esquire\*\*  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

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

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

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

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

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

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

Patrick J. McKeon  
Selectmen's Office  
10 Central Road  
Rye, NH 03870

Jane Doughty  
Field Director  
Seacoast Anti-Pollution League  
5 Market Street  
Portsmouth, NH 03801

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

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

\* By Express

\*\*By Hand Delivery 7/18

Brian P. Cassidy  
Regional Counsel  
FEMA Region 1  
John W. McCormack Post Office  
& Courthouse  
Boston, MA 02109

Mr. Angie Machiros, Chairman  
Newbury Board of Selectmen  
Town of Newbury, MA 01950

Patrick J. McKeon  
Chairman of Selectmen, Rye,  
New Hampshire  
10 Central Road  
Rye, NH 03870

Donald E. Chick  
Town Manager  
Town of Exeter  
10 Front Street  
New Hampshire 03833

Selectmen of North Hampton  
Town of North Hampton  
New Hampshire 03862

Senator Gordon J. Humphrey  
1 Pillsbury Street  
Concord, NH 03302  
(Attn: Herb Boynton)

Representative Nicholas J. Costello  
1st Essex District  
Whitehall Road  
Amesbury, MA 01913

Diana P. Randall  
70 Collins Street  
Seabrook, NH 03874


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

Maynard B. Pearson  
Board of Selectmen  
40 Monroe Street  
Amesbury, MA 01913

Mr. Daniel Girard  
Civil Defense Director  
25 Washington Street  
Salisbury, MA 01930

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, D.C. 20510  
(Attn: Tom Burack)

Signed under the pains and penalties of perjury, this 15th day of  
July, 1983.

  
Jo Ann Shotwell  
Assistant Attorney General  
Environmental Protection Division  
Public Protection Bureau  
One Ashburton Place  
Boston, MA 02108