

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'83 SEP -9 P3:47

In the Matter of)
)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
)
(Seabrook Station, Units 1 and 2)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKET NUMBER 50-443,444
PROD. & UTIL. FAC.

Hampton Beach Area Chamber of Commerce
Request to be heard on Participation
by a person, not a party for Licensing
Proceedings Pursuant to 2.715-43FR17798C.

The Hampton Beach Area Chamber of Commerce was dismissed as a party to the licensing proceedings due to inability of its representative to meet the demands of the process, and not because of a failure of its contentions. At the time of dismissal the Licensing Board assured the Hampton Area Chamber of Commerce that its contentions would be represented by the Attorney General's Office of the State of New Hampshire; thus the H.B.C.C. did not appeal the dismissal to the Atomic Safety and Licensing Appeal Board. The H.B.C.C. believed the State of New Hampshire could and would represent their concerns.

In view of the fact that the Attorney General's Office of the State of New Hampshire has not filed contentions on either the State Emergency Plan or the Municipality Emergency Plan, the Hampton Beach Area Chamber of Commerce now requests the opportunity to participate in the limited area of evacuation. This is crucial to the safety and economic future of this agency.

DS03

NUCLEAR REGULATORY COMMISSION
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
50-444

CONTENTIONS OF THE HAMPTON BEACH AREA
CHAMBER OF COMMERCE RELATIVE TO EMER-
GENCY PLANNING FOR THE STATE OF N.H.

CONTENTION I:

The plan submitted by the State of N.H. is not the Hampton Area Plan and cannot meet the requirements of NURCO 65404 e-4.

BASES:

The emergency plan was not prepared or submitted by Hampton and is totally unacceptable as it cannot provide for protection and a safe emergency evacuation in the event of a crisis at Seabrook I, II.

CONTENTION II:

The plan submitted by the State of N.H. relative to Hampton and Hampton Precinct would not provide for notification of the populace as required by FR50-47 (b) (5)

BASES:

The Hampton area has no adequate method of notification.

CONTENTION III

The plan submitted by the State of N.H. cannot prove town officials, personnel or citizens can or are willing to perform duties required by that plan

during a crisis, therefore NUREGO 654A-4 and Appx. 0 IV NUREGJ-10j cannot be met.

BASES:

Town officials, personnel and citizens cannot be required to perform duties for a utility, if those duties are not so ordered by the town. The town would have to accept liability of those town officials and personnel if they were unable to adequately perform those duties. The town would have to compensate those officials and personnel if they so order them to place themselves at risk during a crisis situation.

Those private citizens cannot be required to perform duties that no contract has been entered into and no compensation has been paid and liability is covered by either of those parties.

CONTENTION IV:

The plan submitted by the State of N.H. cannot show adequate range of protection action developed for plume exposure in the EPZ pathway for emergency workers and the public as required by FR.50.47 (b) (10)

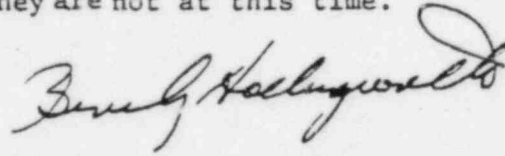
BASES:

- (a) No evacuation plan for Hampton
- (b) No shelter, cannot meet requirements of NUREG J-9 II-18
- (c) Relocation centers have not been established. Host town cannot be ordered to take those from the exposed areas NUREG J-10 (a) (h)
- (d) There is no method of notifying the public in the beach area where most do not have radio, television or telephones NUREG J-10 C II-2
- (e) There is no reason to assume that the Public Works Director can be required to accept responsibility of developing internal procedures for transportation of those without auto or those with special needs. Nor is there reason to believe that the town of Hampton would ever require the Public

Works Director to accept those responsibilities without the direct order of Hampton's citizens NUREC J-10.q.

(f) There is no reason to assume that Hampton's Building Inspector is willing or able to accept coordinating of state, local and volunteer organization regarding medical care. This is not what the citizens of Hampton require as a job relative to the Building Inspector FR.50.47 (b) (12).

(g) Private citizens cannot be required to perform duties relative to this plan unless contracted to do so and they are not at this time.



Beverly Hollingsworth
Representative for the
Hampton Beach Area Chamber of Commerce

Dated: September 8, 1983

*Signed on the Sealed List
on this date*