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The plans also list phone numbers for people who no longer hold that particular job or office. The Seabrook plan, for example, lists Walter Randall as a selectman, although he has resigned. The Hampton plan lists Sister Honora Riordan as contact person for the Sacred Heart School, but she no longer works there. Similarly, plan references to population size are misleading, as in Hampton, which reflects a mean seasonal peak population of 61,000, when there can be 250,000 people on the beach in Hampton on a busy summer day.

NHLP - 2

The local emergency response plans for New Hampshire communities within the plume exposure emergency planning zone do not assure that "each principal response organization has staff to respond and to augment its initial response on a continuous basis," 10 C.F.R. § 50.47(b)(1), in the following respects:

a. The police forces for the towns surrounding Seabrook do not have sufficient personnel or resources to carry out their responsibilities under the plans.

Basis: Under the plans, the local police forces are responsible for access control on local roads, traffic control for an evacuation, possibly aiding the State Patrol by

controlling parts of state highways within the towns, and maintaining security for the emergency facilities and for the evacuated areas. Greenland has only three sworn officers not only to carry out these responsibilities, but to operate as the communications link until the EOC is activated and to conduct patrols to alert the public. New Castle has only two sworn officers and six auxiliary, limited officers. Newfields has only one full-time and four part-time officers. Rye has only seven sworn officers (10 in the summer) and seventeen part-time officers. North Hampton has only six full-time officers and five part-time. South Hampton has only seven part-time officers, including one who is also a selectman and therefore has other responsibilities, and another who is a school official in another town and will presumably have responsibilities for evacuation of students in that town. Moreover, none of South Hampton's police officers are on duty during the day, when the town relies upon the county sheriff's office, which is poorly staffed. Kensington has only six part-time officers; as in South Hampton, none of them are on duty during the day. Stratham has only four officers. East Kingston has only four part-time officers. Brentwood has only 10 part-time officers. Kingston, where the police are to assist in public notification and assist in emergency communications as well as performing the above tasks, has only two sworn officers and nine other personnel. Exeter has only

nineteen officers. These personnel resources are insufficient for the large number of tasks given to the police departments in the event of a nuclear emergency. In addition, according to the Voorhees Report, local officials have stated that there are not enough policemen to fulfill the tasks assigned to them. (at 10, 11)

b. There is no assurance that necessary police and fire department personnel will be reachable or capable of responding promptly in the event of a radiological emergency.

Basis: According to the Voorhees Report, at any given time much of the police force and fire department will be unreachable or out of the area, and thus incapable of responding promptly to an emergency. (at 11) In Kensington, for example, the Chief of Police works part time and lives two towns away, a fifteen minute drive under normal conditions. More important, he is a full time police officer--one of only three sworn officers--for the town of Stratham, and may have to serve in Stratham when an accident happens. In South Hampton, the Chief of Police lives in East Kingston and works a full shift in Plaistow, which is 1/2 hour away. Of the remaining officers, one is a selectman who will have other duties in an emergency, the others work in locations from fifteen minutes away to as far as Boston, more than an hour. And Boston is too



far away for contact by use of a tone pager. In Hampton, 16 out of 36 permanent fire department employees and 5 out of 20 on-call fire department employees live outside of Hampton. A number of these employees have told the Fire Chief that they would be reluctant to return to Hampton during a radiological emergency. For those who did return, the time necessary to return to Hampton could significantly delay the emergency response. Some of the Hampton fire department employees also work part-time at the Seabrook plant, driving ambulances. If an accident at the plant resulted in Seabrook employee injuries, those fire department personnel might not be available to assist the town of Hampton.

c. There is no assurance that emergency response personnel will respond according to the plan, rather than acting first to protect their families and then responding late or not at all.

Basis: According to the Voorhees Report, local officials believe that some, if not all policemen and firemen will evacuate their families rather than reporting to their posts. (at 10) This is particularly likely because so many police officers are not full-time, but work in other areas and would have to drive past their homes to reach the towns where they are on the police force. For example, Hampton fire department employees living outside the town of Hampton have told the Fire

Chief that their families come first, and that they would not return to Hampton during a radiological emergency. Similarly, selectmen and a junior high school principal have stated that their children and families are their top priorities, whose protection will be assured before they go to their posts.

d. The plans contain no demonstration that private companies or individuals who will be depended on to assist in an emergency will actually be willing to perform those functions.

Basis: The plans do not demonstrate any agreements between town governments and private individuals or companies to take responsibilities delegated to them in the plans. For example, there is no indication that school bus drivers are willing to enter or stay in the Emergency Planning Zone in order to transport students from the EPZ. As another example, there is no indication that wrecking companies, which will be depended upon to clear accidents and stalled cars from the evacuation routes, will actually perform this job. The owner of the only wrecking company on Hampton Beach told NECNP that he had not been consulted before his firm was listed as a resource in the Hampton emergency plan, and that he would not stay in the EPZ during an emergency or direct his employees to stay there unless prior arrangements were made for his insurance and

compensation by Public Service Company.

Evacuation of children in private schools and adults in private hospitals and nursing homes is expected to be carried out in large part by the private individuals and companies who run those institutions. The towns have obtained no assurance, however, that those individuals will not evacuate with their families.

e. All members of each emergency response organization should be surveyed to determine whether they intend to stay in the EPZ to implement the plan during an emergency.

Basis: The willingness of emergency response personnel to place their public responsibility before their responsibility to their families or their concern for their own safety was questioned in the Voorhees report. The issue has been raised by reluctant emergency response personnel in public meetings in the Seabrook area, and among fire department employees in the town of Hampton. The question of how many public employees will actually be available to assist the emergency response organization must be addressed before there can be a reasonable assurance that adequate protective measures can and will be taken in the event of an emergency.

f. Under the local plans, the highway departments are

responsible for assuring a successful, smooth evacuation by clearing roads of snow, stalled cars, and accidents and otherwise assuring that the roadways remain open for evacuation. The local highway departments do not have sufficient personnel or resources to fulfill these responsibilities, and the common arrangements for ad hoc assistance by private contractors are insufficient to assure that these responsibilities will be met.

Basis: Greenland has only one highway agent, with about seven hired on an "as needed" basis during winter storms and four personnel in the water department. Seabrook has only nine people in the highway department. New Castle has no highway department, but relies entirely upon a local contractor who serves as the town's road agent, but there is no description in the plan of number of personnel or towing services available to the contractor, nor is there any provision guaranteeing that the contractor will perform during a radiological emergency. The Hampton plan lists no highway agent at all, nor does it describe any responsibilities or procedures for the highway department. Newfields has only one person in the highway department, with others hired only on an as needed basis, with no assurance that any people who may be needed in the event of an accident will be available for impromptu hire. South Hampton has only one highway agent. Kensington has only one

person in the highway department. Stratham has only four full time highway workers, three additional when needed, and at most seven part time. East Kingston has no highway department and only a highway agent, but relies entirely upon contracting with private concerns. There is no assurance that the private firms will be available in the event of an emergency. Brentwood has only two personnel in the highway department. According to the Road Agent's inventory, Newton apparently has only a highway agent to perform the tasks required of a highway department. Kingston has only three people in the highway department, and the plan provides that one of those individuals is to be at the EOC during the emergency. North Hampton has only three people in the highway department, one of whom must be at the EOC during an emergency. On their face, these resources are inadequate to perform the tasks assigned to highway department personnel. In addition, all of the road agents are to report to the EOC during an emergency, so they may be delayed or unable to perform their evacuation route maintenance responsibilities. Moreover, virtually all of the highway departments rely for towing capability on private companies, but the plans give no indication that those companies will provide their equipment and services in an emergency.

g. Under the plans, the local fire departments are responsible for such tasks as assisting in monitoring the



evacuation, for decontamination of affected individuals, operating and maintaining the EOC or the public alert system (PAS), and assessing emergency transportation needs. The local fire departments do not have sufficient personnel or resources to fulfill these responsibilities.

Basis: The fire departments of Greenland, New Castle, Newfields, South Hampton, Stratham, East Kingston, and Brentwood operate largely on a volunteer basis. Seabrook has only twelve full time firemen, with 23 on call. Rye has only six full time fire department employees and relies on volunteers when more personnel are needed. To the extent that the plans rely upon volunteers, there is no assurance that the personnel will be reachable or available in the event of an emergency. Even if the volunteers respond, however, the personnel and resources will be inadequate to perform their tasks. Moreover, permanent employees who do not live in the EPZ or in the towns where they work may refuse to report to their jobs during an emergency at the plant. Hampton Fire Department employees living outside of Hampton, for example, have stated that they will not return to Hampton in a radiological emergency, but will attend to their families instead. Finally, the Voorhees Report indicates that officials have stated concern over the insufficient number of firemen.

(at 11)



h. There is no assurance that local emergency response personnel will be reachable or that they will be able to respond soon enough to assure protection of the public health and safety.

Basis: The Civil Defense Director (CDD) plays a major role in each emergency plan, yet many may not be available. In South Hampton, for example, the CDD is a commercial airline pilot who is often out of the area and on vacations in the Virgin Islands during much of the winter. His assistant runs a business that is one and a half hours away from South Hampton in Massachusetts. The CDD for Kensington is often out of town for days at a time, and he works in Manchester, which is an hour away. In Kensington, at least one of the three selectmen works half an hour away. Further, according to the Voorhees Report, local officials believe that the paging notification systems that will be relied upon to contact emergency response personnel are weak and unreliable. (at 10)

The plans list telephone numbers for various emergency response personnel, but they provide no assurance that someone will actually be there to answer the phone. In a number of cases, there is no receptionist or answering service. For example, NECNP tried to call the Seabrook highway department for several hours one morning, and the phone was not answered.

h. The local plans do not provide for adequate backups or alternates for important positions in the event that assigned personnel are not available.

Basis: In Seabrook, there are no alternates listed for any of the positions other than Police Chief. In South Hampton, there are no alternates listed for the positions of Transportation Coordinator and Highway Agent, both of which are crucial to effective protective action. In New Castle, Newfields, Rye, Kensington, Stratham, East Kingston, Brentwood, Newton, Exeter, Hampton, and North Hampton there are no alternates listed for most of the key officials. Unless alternates are specified, the emergency response may break down if any key personnel are unavailable. This is particularly true for those emergency response offices maintained by only one person, such as the highway departments for Greenland, South Hampton, and Kensington. If there is no one to even answer the phone in an emergency, it will be impossible even to make substitutions on an ad hoc basis. Moreover, alternates must be identified to assure that each organization is capable of providing 24-hour per day emergency response. NUREG-0654, Part II(A).

i. Many of the posts crucial to effective emergency

response have not yet been filled.

Basis: In Seabrook, the posts of Deputy Fire Chief-Transportation and EMS, and RADEF officer are vacant. In New Castle the post of Civil Defense Director is vacant. In Rye the posts of Transportation Coordinator and RADEF officer are vacant. In Stratham the position of Deputy Fire Chief - EMS is vacant, and in Stratham and Brentwood the position of RADEF officer is vacant. The Hampton plan does not name any office or individual such as a highway agent to be responsible for maintaining evacuation routes free of obstructions.

j. The emergency response personnel, both professional and volunteer, cannot be relied upon to respond to a radiological emergency at Seabrook.

Basis: During a town meeting with the state civil defense agency, several officers of the Hampton police force stated that they would not respond, but would first assure that their own families were protected even if that meant leaving the area. Similar statements have been made by fire department personnel in Hampton and a tow truck company official. Moreover, the likelihood that personnel will not respond is substantially greater when the plan relies upon volunteers since volunteers are more likely to refuse to respond and to

seek safety for their families. This is true of radiological emergencies to a greater extent than of other emergencies since the radiation is not visible and cannot be detected. Thus, the volunteer is not able to make a personal judgment as to the likely safety of his or her family or of his or her own participation in the emergency response effort.

NHLP - 3

The local emergency response plans for the New Hampshire towns surrounding Seabrook do not adequately provide for "notification, by the licensee, of State and local response organizations and for notification of emergency response personnel by all organizations, as required by 10 C.F.R. 50.47(b)(5), in the following respects:

a. Provision for notification and communication by Public Service Co. with the town emergency response organizations is inadequate in that it depends upon notification through the county dispatch and does not assure that the contact person will be available or can be reached in the event of a nuclear emergency. In each instance, there must be direct contact between the site and the town, and there must be a dedicated telephone line to a location where an individual will always be on duty to receive the communication and take further action.



Basis: For the towns of Stratham, Brentwood, East Kingston, New Castle, Newton, and Newfields, the plans provide that the contact between the licensee and the town shall be made through the Rockingham County Dispatch to the Fire or Police Dispatcher on duty or on call. This is inadequate during off-duty hours since at that time the contact person will be reachable only by pager or by telephone. Pagers have limited range, non-dedicated telephone lines are likely to be overloaded during an emergency, and there is no assurance that an off-duty official will be available when need be. The plans also provide for simultaneous pager contact with town selectmen and other officials. However, this contact is subject to the limitations of pager use discussed above, and it would result in confusion since there would be no one individual responsible for coordinating the town's emergency response. In addition most of the towns have no pagers.

North Hampton's plan asserts that it maintains "continuous dispatch operations," but there is no explanation of the meaning of this term or whether these operations employ communications equipment that is adequate to assure contact.

South Hampton has no full time employees, and there is no one to answer the telephone in the town hall on a regular basis. South Hampton's plan provides for notification of the town only by pager to the selectmen and Fire Department personnel. The first person to respond to the page must

telephone Rockingham Dispatch. When contact is made, that person becomes responsible for coordinating the response although he or she may not be in a suitable location, have the necessary information, or otherwise be capable of fulfilling that responsibility. Moreover, there is only one telephone number for South Hampton to call--it is apparently an undedicated line--and that line will probably be busy with other calls, preventing contact necessary to implement the emergency plan. If a loss of power or busy signal makes the telephone unusable, the contact person is expected to use a radio at the Emergency Operations Center, which may be impossible or time-consuming.. South Hampton's plan also asserts that the town has a police officer on duty who maintains "continuous" radio contact "strictly on a part-time basis." (at II-2). In fact, South Hampton police are on duty only in the late afternoon and evening, and are not available at all between approximately midnight and 4 p.m. This does not assure full time coverage, and it does not assure that the responsible person will be contacted.

Kensington's plan provides that the county will contact the Emergency Fire Department Dispatcher over an Emergency Fire Telephone, which the plan does not indicate is a dedicated line. Normally the Fire Chief's wife serves as the primary dispatcher, but when she is unavailable the responsibility goes to whoever picks up the telephone. Again, the splintered and



uncertain lines of authority do not assure prompt notification of the appropriate personnel. Two-channel voice pagers should be provided to the responsible personnel to assure prompt notification and response.

Finally, according to the Voorhees Report, local officials question the reliability of the notification and paging systems, and that do not trust the efficiency or trustworthiness of the utility, which they do not believe will promptly and accurately notify communities in the event of an accident, including an accident that may require evacuation. (at 12) This atmosphere of lack of trust would severely hamper an emergency response effort.

b. The means for notification of local governments that an emergency has occurred is unreliable because it calls for action by plant operators. Notification of any plant malfunction should be mechanically communicated to an offsite entity.

Basis: The failure of the utility at Three Mile Island to promptly notify offsite authorities of the plant malfunctions which led to the accident until it was well underway illustrates the unreliability of utility notification of emergency events. It is simply not in the utility's interest to report problems at the plant until the last moment when it

cannot be avoided. Therefore, the same mechanisms which notify the plant operators that plant technical specifications have been exceeded should also be made to notify offsite authorities. This will assure the earliest and most reliable notification to the local governments of accident conditions that may affect them.

b. Provision for notification of the town emergency response organizations and emergency response personnel is inadequate in that it does not assure that key personnel can be reached since in most cases key personnel are contacted by telephone, which will be unreliable in the event of an accident. Back-up provisions for radio contact are also insufficient because they cannot assure that the personnel can be reached. In each instance, there must be a dedicated telephone line from the initial contact point to locations where the relevant key personnel will definitely be available.

Basis: In Rye, most of the communications links are by undedicated telephone, with minimal radio back-up. In Seabrook, the only communications link between the Police Dispatcher and some key personnel is by undedicated telephone line. The same is true in New Castle, Newfields, Rockingham, Kensington, Stratham, East Kingston, Brentwood, Newton, Kingston, Exeter, Portsmouth, Hampton, and North Hampton, where

there is only a telephone link to key officials, including to school principals and many special facilities. The accident at Three Mile Island demonstrated that an emergency will very quickly result in jammed telephone lines such that non-dedicated lines cannot be relied upon for essential emergency response communication.

NHLP - 4

Procedures to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ, 10 C.F.R. 50.47(b)(5), are inadequate in that:

a. The primary means of notifying the public, the public alert system (PAS), which is to consist of sirens, mobile public address systems, and tone activated radios, has not yet been designed, so that it cannot possibly support a finding of compliance with this requirement. Among other things, it is impossible to determine the range or effectiveness of the equipment that will be employed, to determine whether the sirens will be installed in appropriate locations or provide adequate coverage under all conditions, including adverse weather. It is not even possible to determine whether the system will be properly activated since the activation procedures remain "To Be Added."

b. Sirens are ineffective in the winter or when the

wind is wrong, and they do not cover enough of the area. (See Voorhees Report at 11.)

c. There has been no attempt by any of the emergency response organizations to determine or establish the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ. NUREG-0654 at 45.

d. The plans for East Kingston, Exeter, and New Castle do not include prepared draft messages for public instruction meeting the requirements of NUREG-0654 at 46.

e. The plans do not provide for bilingual messages for the large numbers of French-speaking individuals who are often in the area in large numbers.

Basis: The basis for this contention is the nonexistence of the essential information in the local plans as well as the underlying requirement for an adequate notification system. Additional bases are (1) local official opinions that sirens will be inadequate to serve their purpose, as reflected in the Voorhees Report, and (2) local experience with the formidable language barrier, which is so serious that many people in the area cannot read a menu or order a meal, much less respond to an emergency notification.

NHLP - 5

The local plans do not adequately assure protection of the public health and safety in that they make no provision for dealing with the serious language barrier faced by the large numbers of non-English speaking people often in the area and the difficulties that arise from that language barrier. The language barrier creates behavior problems that would seriously hamper the emergency response, rendering an orderly and safe evacuation impossible.

At a minimum, all relevant communications and informational material must be in both English and French. Emergency response personnel who may have to deal with non-English speaking people must be fluent in French, and all such personnel must be trained in handling the behavioral difficulties that may arise as a result of the language barrier.

Basis: The influx of French speaking Canadian tourists to the Seabrook beaches during the summer is a substantial one, which is encouraged by the local businesses. According to the Hampton Chamber of Commerce, Canadians accounted for about a third of Hampton Beach's business this year. Canadian tourism is also encouraged by local businesses. The Hampton Beach precinct spent approximately \$75,000 in advertising this year, a substantial amount of it Canada.

In order to assure that people are adequately protected through sheltering, evacuation, or any other protective

measures that are found to be required, it is necessary to communicate with them and to obtain their cooperation. Experience with French speaking visitors indicates that many do not understand English well enough to understand communications in English, and that this difficulty often gives rise to fear and hostility that would seriously hamper an emergency response effort. This is particularly important since many French speaking visitors arrive in busses, which leave the area during the day, and have no independent means of transportation. Thus, they depend entirely upon guidance and actual transportation provided by the emergency response personnel. One example offered by a local resident was a French Canadian family that was unable to understand simple directions from a store to a campground, and had to be guided to the campground.

The failure to communicate effectively can also raise frustration levels to a point where reason and cooperation deteriorate. An example of such difficulty is an instance in which a French speaking family had some difficulties, which culminated in locking themselves out of their car, not a particularly unusual or stressful experience. They locked themselves in their hotel room and refused to come out until a French speaker was found to mediate for them.

NHLP - 6

The local plans fail to demonstrate the existence of adequate provisions for "prompt communications among principal



response organizations to emergency personnel and to the public," 10 C.F.R. § 50.47(b)(6), in that

1. The emergency communications development plan is not yet complete in Rye, Seabrook, Brentwood, Newton, Kensington, and Hampton.

2. Nondedicated telephone links relied upon for communication are inadequate.

3. Plans do not include adequate provisions for communication with non-English speaking people who may be in the area.

Basis: The basis of this contention is the fact that the plans state that the emergency communications plan is incomplete. In addition, many of the towns rely solely upon nondedicated telephone lines for crucial communications. Many of the towns have only nondedicated telephone links between the EOC and such crucial organizations as the schools, the Rockingham County Dispatch, the police department, and the New Hampshire State Patrol, and the Emergency Broadcast System. Finally, there are often large numbers of French speaking people in the area who cannot speak or can barely speak English.

NHLP - 7

The local emergency plans do not provide for an adequate range of protective actions, 10 C.F.R. § 50.47(b)(10), because they contain no means of relocation or other protection for those with special needs, those without private transportation, school children, or persons confined to institutions or elsewhere for health or other reasons. Moreover, the resources not available to the towns for these purposes are inadequate to provide a reasonable assurance that the public will be protected in the event of an accident.

Basis: The basis for this contention is the absence from the plans of any such provisions, coupled with the regulatory requirement to develop an adequate range of protective actions, as well as the basic requirement of § 50.47(a)(1) that the emergency plans provide adequate protection in the event of a radiological emergency. The plans contain no specifics concerning the actions that will be taken or the resources available for those actions. Rather, they simply state that internal procedures will eventually be developed to deal with this problem and that transportation deficiencies will be taken care of. In many cases there is a telephone number to call for those without private transportation who need relocation assistance. Such a provision is inadequate not only because of the vulnerability of telephone systems in the event of an

emergency, but because even if the telephone works there is no assurance that the assistance will be available to all who need it.

In addition, there are not enough school busses available to allow evacuation within a reasonable time. Kensington has access to two school busses, although they are not owned by the town. However, they are parked in Exeter, five miles from the school, and they would have to move against the evacuating traffic in order to pick up school children. They are not available during the day anyway because they are out on other trips. They also normally have to make two trips each way each day, and if they have to carry both the children and the teachers and staff, they will have to make even more. South Hampton's school busses are located in Amesbury, Mass., and it will take them a long time to return to the town. Seabrook children go to schools in several other towns. The school busses are provided by a private company in shifts, but there is no priority plan for use of the busses, or the number of shifts that will be needed in the event of an evacuation. Phillips Exeter Academy in Exeter, which has 1,000 students and over 400 faculty and staff, would need forty busses for an evacuation, and does not have access to a single bus.

(Testimony before the Licensing Board of August 23, 1983)

Moreover, the plans do not provide for transportation of individuals from special facilities such as convalescent home.

For example, there is no provision in any plan for protective actions for Rockingham County's 290-bed intermediate care facility in Brentwood. Between 75 and 80% of the nursing home residents have ambulatory problems, and another 15% are bedridden. Many of the residents require regular and frequent medication. To evacuate them, the county has 2 buses--only one with a wheelchair lift--and one station wagon. The Brentwood nursing home also has a medical day care facility for approximately 30 adults who are without independent transportation. According to one county commissioner, it would be logistically impossible to evacuate this facility safely. Yet, no analysis of the protective effects of sheltering is provided.

The county also has a 93-cell medium security jail in Brentwood, with no vehicles for transportation. Neither the nursing home nor the county's 93-cell jail appears on the Brentwood plans's list of special facilities to be notified in a site area or general emergency, when protective measures will be called for.

The lack of special transportation arrangements is particularly important because of the large numbers of elderly persons in the Seabrook area, particularly in adult mobile home parks in Seabrook, and the large numbers of one-car families where one spouse and children are at home without transportation during the day. Also without transportation are

the large numbers of tourists who are bussed to the beaches for summer day trips. These busses drop their passengers off during the day and return in the evening to retrieve them. The passengers have no means of transportation out of the EPZ during the day when the buses are elsewhere. There is no guarantee that the bus drivers will return to retrieve them during an emergency.

NHLP - 8

The plans do not contain adequate guidelines for the choice of protective actions or information on which the choice of protective actions could be based in the event of an emergency. 10 C.F.R. § 50.47(b)(10).

Basis: In general, the New Hampshire local plans rely on two alternative protective measures: evacuation and sheltering. Yet, none of the plans contains any information concerning the "bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions," including the degree of protection afforded by shelter or evacuation time estimates, as required by NUREG-0654, § II.J.10.m. There is, for example, no information concerning the ability of the various types of structures to provide shelter against radiation exposure, the conditions under which some structures would be acceptable and others



would not, or the conditions under which sheltering must be abandoned in favor of evacuation. There is also no assessment of the ability shelter those without easy access to any form of shelter, particularly transients in recreation areas and on the beaches.

A number of the plans state that evacuation time estimates are "bound separately." NECNP has not been served with any such estimates, and thus we are unable to file contentions on them. In the absence of ETES, the plans are incomplete and violate the Commission's regulations.

NHLP - 9

The local plans fail to meet the requirements of 10 C.F.R. § 50.47(b)(10) in that:

a. With the exception of Greenland, they contain no maps of evacuation routes, predictions of the time required for evacuation, location of relocation centers or shelter areas, all of which are essential for an adequate emergency plan.

b. They do not make adequate provision for notifying and providing follow-up information to those segments of the population that are in recreation areas or otherwise without easy access to television or radio.

c. There has been no attempt to estimate or project traffic capacities for different routes for evacuation under various conditions and in various seasons.

d. Except for Greenland's, the plans fail to designate any traffic or access points for traffic control. Thus, it is not possible to determine either whether the traffic control plan is sufficient, and it is not possible to determine the number of personnel needed to implement the plan.

e. The plans do not adequately provide for registering or monitoring of evacuees.

Basis: The basis for this contention is the underlying regulatory requirement, the provisions of NUREG-0654, particularly II. J-10, and the absence from the local plans of the information described in the contention.

NHLP - 10

The local plans do not adequately provide for requesting and effectively using assistance resources, including private resources as well as the resources of other governmental entities, to make up for the deficiencies in their own resources. 10 C.F.R. § 50.47(b)(3).

Basis: As reflected in the Voorhees Report, the greatest concern of town officials is the lack of adequate funding, material, and personnel to fulfill their responsibilities. (at 10). They feel that standing mutual aid agreements with surrounding communities are worthless since all of the communities will be struggling to fulfill their own needs in the event of an accident. (at 12) Although the plans provide that the towns may seek outside assistance for various purposes, including transportation and material deficiencies, there has been no assessment of the scope and extent of aid that may be needed, nor are there any explicit written agreements to confirm the arrangement and the availability of resources. Although the towns will rely upon the New Hampshire Civil Defense Agency to fulfill many of these needs, there are no specific agreements to that effect, and there has been no deliniation of how the agency will fulfill this role. According to the Voorhees Report, the local officials do not view reliance upon mutual aid agreements with surrounding localities to be of any use because all localities will be facing the same difficulties and will be unable to provide the requested assistance.

NHLP - 11

The local plans do not fulfill the requirements of 10 C.F.R. § 50.47(b)(7) in that some do not identify "the

principal points of contact with the news media for dissemination of information during an emergency," including the physical location or locations for such contact.

Basis: The basis for this contention is the regulatory provision and the fact that the points of contact have not yet been established, coupled with the fact that several plans, including Rye, Seabrook, New Castle, East Kingston, and Brentwood call for identifying these points during the emergency.

NHLP - 12

The current state of emergency planning and preparedness do not permit a finding of reasonable assurance that if an evacuation is necessary it can be carried out in a manner that will assure protection of the public health and safety in that:

a. The consequences of an accident at Seabrook are such that evacuation must be completed promptly in order to avoid unacceptable damage to the public health and safety.

Basis: The evacuation time estimates submitted for Seabrook to date vary widely, from about 3 hours for some sectors, to 12 hours for the entire EPZ as estimated by the NRC. A consequence study done on Seabrook by Sandia Laboratories shows that even at the lower estimated evacuation

times, unacceptable radiation exposure could result. The Sandia study found that for an accident involving large core melt and loss of most safety systems, even an evacuation delayed by only three hours could result in a mean of 13 and a peak of 6,880 acute fatalities; a mean of 226 and a peak of 26,700 acute injuries; and bone marrow radiation doses at a mean of 71.9 rems and a peak of 922 rems at 5 miles from the plant; and a mean of 23 rems and peak of 197 rems at 10 miles away from the plant. The results of the study also raise questions about the efficacy of sheltering and relocation. For the same type of accident, the study found that sheltering and relocation after 6 hours could result in a mean of 45 and a peak of 6,880 acute fatalities; a mean of 418 and a peak of 27,000 acute injuries; and bone marrow radiation doses at a mean of 137 rems and a peak of 1490 rems at 5 miles from the plant; and a mean of 47.7 rems and peak of 441 rems at 10 miles away from the plant. See computer data accompanying NUREG/CR-2239, SAND81-1549, Technical Guidance for Siting Criteria Development. The results of the study indicate that unacceptable accident consequences, including death, injury, and severe radiation exposure, could result unless evacuation could be conducted almost immediately.

b. Both local conditions and aspects of the emergency plans will result in families being scattered in various



areas. The families will clog the evacuation routes and disrupt the evacuation by attempting to reunite before proceeding to evacuate.

Basis: There are many different activities in the recreational areas, including staying on the beach, swimming, arcades, shops, and the like. Families often split up to pursue their separate interests, agreeing to rendezvous later. Parents will not depart without gathering their families together.

The local plans provide for parents and children in school to proceed separately to evacuation centers. This provision is unrealistic. Parents can be expected to return to the schools to retrieve their children instead of relying on others to protect them in such a serious situation. In addition, children from one family may attend different schools throughout the area, often with relocation centers different from those that their parents would be sent to. This may cause much confusion and panic. As reflected in the Voorhees Report, parents can reasonably be expected to attempt to pick up their children from the schools, or to return to the EPZ from the relocation center when their children do not show up, although this would disrupt an orderly evacuation.

c. There is no assurance that those responsible for

driving the various busses and other forms of mass transportation will actually do so, rather than first assuring the safety of their own families or leaving the area altogether.

Basis: The Voorhees Report indicates that local officials believe that "School bus drivers will refuse to enter or remain in the EPZ because of the radiation exposure danger." (at 10) The plans contain no demonstration that school bus drivers have made commitments to remain in or return to the Emergency Planning Zone during a radiological emergency and transport students, rather than evacuate with their own families. In the absence of any such commitments, there can be no reasonable assurance that they actually will perform this function.

d. Many of the primary potential evacuation routes are prone to serious flooding, which has not been taken into account in the local plans or in the evacuation time estimates contained within those plans.

Basis: Route 286 and Route 1A were recently closed near Brown's Fish Market in Hampton due to flooding. Parts of Route 51 and Ocean Boulevard are also subject to flooding.

e. The local plans do not adequately account for the

crowds at the Seabrook dog track.

Basis: There may be as many as 100,000 at an event at the Seabrook dog track at the same time as there is a large crowd at the beaches. The dog track crowd would hamper evacuation, particularly along Route 107, where it is often nearly impossible even to get out of a local driveway during heavy traffic.

f. Many of the evacuation routes are narrow and would be blocked by an accident or a stalled car, and those roads and the available traffic control personnel cannot handle both the traffic that will come from surrounding towns as well as the traffic generated by the town itself.

Basis: Where Ocean Boulevard joins Route 51, Route 51 is very narrow for several blocks. Route 286 is a two lane road where the shoulder is commonly used by traffic during busy periods. Since there is no place for a car to go if there is an accident or breakdown, it would clog either the shoulder or the roadway. The road also suffers from two serious bottlenecks at bridges where two or three lanes funnel into one. Police traffic control is necessary at the intersection of Routes 286 and 1A, along the shoulder of Route 286, and at the intersection of Route 286 and Washington Street. In

Exeter, Route 101 is extremely narrow for about 10 miles and could become extremely congested in an evacuation. These are only a few examples of serious physical impediments to evacuation which are not discussed or evaluated in the local plans. The congested condition of these roads may not only generally impede evacuation, but may prevent effective removal of accidents or stalled vehicles. For example, on a Sunday afternoon in July of 1983, it took a Hampton Beach wrecking company 3 hours to reach a disabled car a mile away from the gas station, and 2 hours to return with it to the gas station.

Finally, the Voorhees Report indicates that local officials believe that local roads and traffic personnel cannot handle the volume of traffic that may come from other towns in the event of an emergency.

g. Gasoline supplies and availability are limited such that many of the vehicles that run low can be expected to run out, thereby clogging the narrow evacuation routes and hindering the evacuation.

Basis: There are only three gas stations in Hampton Beach, which are often out of gas, and Route 51, a major evacuation route, does not have any gas stations on it all the way to Route 95.

h. In order to assure a safe, prompt, and orderly evacuation in case one is ultimately called for, the emergency plans must provide for notification of all emergency response personnel and implementation of traffic control measures before or coincident with any public announcement of an event at the reactor that falls into any of the emergency action levels.

Basis: The experience at Three Mile Island demonstrated that public evacuation will begin soon after an announcement of an unusual condition at the reactor, even when the utility and the Commission are attempting to assure the public that the reactor poses no danger. Because the local plans do not call for activation of the offsite emergency response organizations until the most serious emergency action levels are reached, and because there is a lag time between declaration of the emergency and activation of the emergency response organization, premature evacuation would occur before traffic controls measures were in place, clogging the evacuation routes and making it difficult for traffic control personnel to reach the control points and implement the controls, thereby delaying or preventing implementation of the controls and significantly hindering the evacuation. This problem is particularly serious since so many of the local police officers work outside their towns, sometimes as far away as Boston, and will take a long time to return, if they do so



at all.

i. With one exception, none of the towns have host communities, so that evacuees will have no idea where to go, no assurance that they will be able to rendezvous with their families and loved ones, and the evacuation will be chaotic.

Basis: Only Southampton has a host community, and that community does not have a facility to accomodate evacuees.

j. The emergency plans do not adequately account for poor driver behavior, which can be expected to hamper a safe and orderly evacuation.

Basis: Any orderly evacuation depends upon the public being willing to respond to traffic controls and other directions by public officials. Under ordinary circumstances, drivers consistently disobey such controls, with the result being gridlock in downtown rush hour situations and near collapse of automobile transportation networks. These driving habits arise from the determination of the driver to assure his or her own advantage regardless of the damage to others or to the good of all. The problem will be particularly serious at Seabrook since many of the drivers are likely to be from the

Boston area, which is notorious for such poor and selfish driving habits. The presence of only a few such drivers would seriously hamper an evacuation by disrupting traffic controls and increasing the likelihood of automobile accidents.

Poor driver behavior under crowded traffic conditions is common in the Seabrook area. The Hampton Fire Chief has observed people trying to make four lanes out of two-lane roads when the traffic gets bad, thus making the roads impassable for emergency traffic. He has also observed drivers who disregard traffic barriers; and especially in the evenings, drunk and rowdy drivers who are likely to cause more traffic accidents and are less apt to follow directions.

NHLP - 13

Contrary to 10 C.F.R. § 50.47(b)(8), the towns do not have adequate equipment to support an emergency response.

Basis: According to the Voorhees Report, "there is a long way to go in the area of securing resources." Since there appear to be no funds available from state, local, or other sources, the Voorhees Report found that the following resources would remain inadequate under a schedule that contemplated the opening of Seabrook Station in 1983: busses, ambulances, siren systems, mobile public address systems, and supplemental VHF radio equipment. Nothing has happened since the Voorhees

Report to indicates that adequate funding or support will be available to provide these resources regardless of when Seabrook Station begins operation.

To cite specific examples, Kensington relies on Exeter's towing equipment during emergencies, which would leave Exeter underequipped. Otherwise, the town's only emergency equipment is one police cruiser, minimal fire department equipment, and a sand truck with no engine. South Hampton has a garage and tow truck, but they are owned by the Fire Chief, who will be busy elsewhere during an emergency. Otherwise, the town has an old police cruiser that is in such poor shape that its public address system does not work (according to an officer, she yells out the window to make herself heard), and the state has refused to inspect it and, the town's traffic control devices consist of only six flares, which are in the cruiser. In the event of an emergency response at night or one in which full scale traffic control were required, the towns would be unable to respond adequately.

NHLP - 14

Emergency response personnel have not been adequately trained to fulfill their responsibilities, and there is no assurance that they will be adequately trained before the reactor goes into operation.

Basis: Although the selectmen, town employees, and others will have significant responsibilities and duties during an emergency, none has been trained to carry them out, and the plans contain no provision for such training. This is one of the concerns revealed in the Voorhees Report. Police and other emergency departments are unable to train their personnel or to determine whether they can do so adequately because the procedures of the state patrol and the county dispatch are not yet available.

NHLP - 15

The local plans do not contain adequate arrangements for medical services for contaminated injured individuals. 10 C.F.R. § 50.47(b)(12) in that:

1. In many instances the towns rely on hospitals that are either within the plume exposure emergency planning zone or in Boston.

Basis: The New Hampshire local plans generally rely on three hospitals to treat contaminated injured individuals. With the exception of one hospital in Boston, the rest lie inside the EPZ, in Exeter, Portsmouth, and Newburyport. If the EPZ is evacuated, these hospitals will not be staffed to assist accident victims.

NHLP - 16

The lack of any assured source of funding or support prevents effective emergency planning because the local officials, aware that they could not effectively implement a plan without such support, are frustrated and cannot take the planning process seriously.

Basis: This was a conclusion reached by the Voorhees Report.

NHLP - 17

Local officials are unable to focus upon, take seriously, or participate seriously in the emergency planning process in the absence of information such as detailed designation of evacuation routes and reception centers and operational procedures that speak to their interests in the process. Until this information is provided and the local officials are able to participate fully and effectively, there can be no assurance that the emergency planning and preparedness will be adequate to protect the public health and safety in the event of an accident.

Basis: This contention is based upon conclusions to this effect contained in the Voorhees Report at 4-9.



NHLP - 18

Local officials are frustrated and unable to plan effectively in the absence of guidance as to the routes that will be chosen for an evacuation, and establishment of reception centers. Until those planning elements are established, the planning will be inadequate.

Basis: This contention is based upon concerns of local officials as reflected in the Voorhees Report at 6.

NHLP-19

The New Hampshire local plans fail to take into consideration the effects of loss of offsite power on the ability of local governments to take adequate protective measures in the event of an emergency.

Basis: The basis for this contention is the high correlation of loss of offsite power with core melt accidents, as described in the testimony of Phillip B. Herr, submitted to the Licensing Board by the Commonwealth of Massachusetts on July 15, 1983. Loss of offsite power during an emergency could disable traffic lights; drawbridges; telephone equipment; lights, including street lights; gasoline pumps; sirens and other notification equipment, and thus could paralyze the emergency response. The plans must demonstrate consideration of the consequences of such a loss of offsite power; and

provide for alternative means of assuring the functioning of equipment, such as equipping it with batteries.

NHLP-20


With the exceptions of Greenland and Portsmouth, none of the New Hampshire local plans contain a cross-reference to the elements of NUREG-0654, as required by NUREG-0654, § II.P.8.

Basis: The basis is the requirement of NUREG-0654 that provides some assurance that plans will be presented in a reviewable format and will therefore be accessible to public scrutiny.

Respectfully submitted,

  
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