

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

ATOMIC SAFETY AND LICENSING BOARD

'83 SEP 12 P4:14

Before Administrative Judges:
Helen F. Hoyt, Chairperson
Emmeth A. Luebke
Jerry Harbour

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

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

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

CONTENTIONS OF TOWN OF KENSINGTON
RELATIVE TO EMERGENCY PLANNING FOR
TOWN OF KENSINGTON

CONTENTION I: The Kensington Emergency Response Plan does 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 Kensington police force does not have sufficient personnel or resources to carry out their responsibilities under the plan.

Basis: Under the plan, the Kensington police force is responsible for access control on local roads, traffic control for an evacuation, possibly aiding the State Police by controlling parts of state highways within the town, and maintaining security for the emergency facilities and for the evacuated areas. Kensington has only five part-time officers, none of whom are on duty during the day. Police officials in Kensington

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have stated that their resources are insufficient to fulfill their responsibilities under this plan.

b. There is absolutely 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: In Kensington, 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 for the town of Stratham, and may have to serve in Stratham when an accident happens. Thus, the possibility exists that the Chief of Police will be unavailable to fulfill his responsibilities under the plan. The volunteer fire department is served mostly by residents who work out of town.

c. Under the Kensington plan, the highway department is 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. Kensington's highway department does 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: Kensington has only one highway agent, and relies on local contractors hired as needed during winter storms. The highway agent is also a volunteer fireman and medic and may be needed to perform other duties during an evacuation.

d. There is certainly 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 has a major responsibility in the emergency plan, yet may not be available. The Kensington CDD works

in Manchester, an hour away, and is out of town several days at a time. One of the three selectmen works half an hour away. The health officer is a surgeon at an out of town hospital.

CONTENTION 2. The Kensington emergency response plan does not provide for adequate "notification, by the licensee, of State and local response organizations and for notification of emergency response personnel by all organizations, 10 C.F.R. 50.47 (b) (5), in the following respects:

a. Provision for notification of the town emergency response organization is inadequate in that it depends upon notification through the Rockingham 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 then take action.

Basis: The notification sequence is from the County dispatch to the Kensington Fire dispatch, however there is no explanation of who this dispatcher will be. The fire chief or his wife might be the dispatcher, or if not available, it will be whoever picks up one of the five emergency phones. This is absolutely inadequate, as no one has clear responsibility for the essential task of notification. There is no assurance that the person will know the proper notification sequence. There should be a clear delegation of duty to someone to function as the notification link for the Town of Kensington.

Respectfully submitted,

Sandra Gavutis

Sandra Gavutis
Town of Kensington
RFD # 1
E. Kingston, N H 03327

Dated: September 7, 1983

CERTIFICATE OF SERVICE

I certify that on September 7, 1983 copies of TOWN OF KENSINGTON CONTENTIONS ON EMERGENCY PLANNING FOR THE TOWN OF KENSINGTON were served by first-class mail or as otherwise indicated to the following:

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