

FILED: September 9, 1983  
RECEIVED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'83 SEP 12 A11:27

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the matter of:

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

Docket Nos.

50-443 OL  
50-444 OL

(Seabrook Station, Units 1 and 2)

SEACOAST ANTI-POLLUTION LEAGUE'S SUPPLEMENTAL PETITION  
FOR LEAVE TO INTERVENE

Pursuant to 10 C.F.R. §2.714(b), the Seacoast Anti-Pollution League (SAPL) submits the following contentions for litigation in this proceeding. The contentions are based on the submitted Radiological Emergency Response Plans for the Towns of Seabrook, Newfields, Portsmouth, Kingston, Hampton, South Hampton, North Hampton, Newcastle, Newton, Exeter, Brentwood, Rye, Stratham, Kensington, and East Kingston, New Hampshire.

It is SAPL's position that the submitted plans fail to meet the standards set forth in 10 C.F.R. §50.47. In many instances, SAPL has relied on the standards and regulatory criteria of NUREG-0654 Rev. 1 which provide a benchmark against which the Board may judge compliance with the regulations.

This is an appropriate function of NUREG-0654 Rev. 1 given its specific citation in the Commission's regulations, and the deference it has been afforded by this and other boards as well as the Appeals Board for this case. See 10 C.F.R. §50.47 (b), and In the Matter of Southern California Edison Company, et al (San Onofre Nuclear Generating Station, Units 2 & 3), 15 N.R.C. 1163, May 14, 1982, as

8309130349 830909  
PDR ADOCK 05000443  
G PDR

DS02

well as the recent decision In the Matter of Public Service Company of New Hampshire, et al. (Seabrook Station Units 1 & 2), ALAB-737, Slip Op.-August 26, 1983.

The following contentions apply to all fifteen of the submitted plans except where noted (hereinafter referred to as "The Plans").  
SAPL LP-1.

The plans contain no specific information concerning the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. Therefore, the plans do not meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(6) and NUREG-0654, E.6. (All references to NUREG-0654 hereafter refer to that document published in November, 1980 by the U.S. N.R.C. as NUREG-0654, FEMA-REP-1, Rev. 1.)

Basis:

The regulations state that provisions must exist for prompt communications from principal response organizations to emergency personnel and the public. This requirements is clarified by NUREG-0654, E.6, which specifically requires that local emergency plans include information as to the time required for notifying and providing prompt instructions to the public. A clear indication of the level of information necessary to satisfy this requirement is set forth in Appendix 3 of that document.

The submitted plans do not contain information concerning time requirements. There are references to public notification (stated generally at page II-2), stating that:

The Public Alerting System (consisting of sirens, tone-activated radios, and mobile public address units) will be used to initiate "Public Notification".

This level of information contained in the plans is inadequate with respect to the standards referred to above. Inclusion of this information and its assessment are of crucial importance in determining the adequacy of the plans.

The time required to notify the public in the event of an evacuation will have a tremendous impact upon the abilities of emergency response personnel to evacuate the public in a timely and safe manner. The Applicant has, to date, avoided the issue of time requirements involved with public notification both in its FSAR emergency response plan, and in these hearings generally.

In addition, the recent decision of the Atomic Safety and Licensing Appeals Board supports SAPL's position that careful scrutiny of notification times is an important component of overall evacuation time estimates. See ALAB-737, Memorandum and Order issued August 26, 1983, at page 11. Consequently, it is appropriate for the Applicant to fully comply with the applicable regulatory standards.

#### SAPL LP-2

The plans fail to specify the personnel responsible for notifying the public through the use of mobile public address units.

#### Basis:

Since many persons may not have access to radio or television due to their location in recreation areas or due to power outages, instructions must be given through local PA units or other means. This requires time and personnel. If the plans contemplate the use

of police, fire, or other emergency personnel for this function, they must specifically so state, since engagement and notification will preclude performance of other pressing duties such as traffic control, medical response, communications coordination, monitoring radiation, or any number of other duties assigned by the plans.

SAPL LP-3

The plans do not provide for adequate, off-site radiological monitoring capability as required by 10 C.F.R. §50.47(b)(9) and NUREG-0654, H.7. Specifically, the independent monitoring cross-referenced to the Department of Public Health Services in the state plan cannot be implemented as stated in the plans.

Basis:

The plans state that local officials have no responsibility for accident assessment. That responsibility lies with the Department of Public Health Services in Concord.

As stated in the state plan, three 2-person monitoring teams would be sent via civil aviation to Pease Air Force Base from Concord. Those teams would proceed to the EPZ. How those teams would be transported against the evacuation flow is unclear, and no specific monitoring locations have been designated in any of the plans. Further, no letter or other specifics of any agreement between DPHS and the U.S. Air Force has been detailed in any of the plans.

The lack of specificity regarding accident assessment in general and radioactive monitoring in particular is contrary to the regulatory requirements.

SAPL LP-4



The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 C.F.R. §50.47(a)(1) in that the plans are incomplete. Specifically, the plans make no provisions for an evacuation of persons institutionally confined.

Basis:

Virtually all of the plans disregard the evacuation of persons whose mobility may be impaired to institutional or other confinement. Identification of the means for protecting such individuals is required by 10 C.F.R. §50.47(a)(1) as set forth in NUREG-0654 J.10.d.

The drafters of the plans include references to special facilities' emergency response plans in their tables of contents. Those plans are not complete. Without the special facilities' plans, the documents fail to meet the appropriate regulatory criteria.

SAPL LP-5

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 C.F.R. §50.47(a)(1) in that the plans are incomplete. Specifically, with the exception of the Greenland, New Hampshire plan, the plans do not include maps showing evacuation routes, evacuation areas, or preselected radiological sampling and monitoring points.

Basis:

The requirements for detailing town specific evacuation routes, host reception centers, and preselected radiological sampling and monitoring points are clearly set forth in NUREG-0654 J.10.a. The

plans submitted do not include maps detailing these areas and are therefore not in compliance with the regulations.

SAPL LP-6

The plans fail to comply with the requirements of 10 C.F.R. §50.47(b)(10), and (b)(12), as well as NUREG-0654 J.12 as they include no description of the means of registering and monitoring evacuees at relocation centers. Specifically, the plans should include a description of the equipment and personnel required to monitor the radioactive contamination levels of evacuees as they arrive at the centers.

Basis:

Without the means to determine which evacuees have received radioactive contamination, it would be impossible to determine which evacuees require transportation to medical facilities for decontamination.

The regulations clearly provide that arrangements must be made for medical services for contaminated individuals. NUREG-0654 states specifically that:

Each organization shall describe the means for registering and monitoring of evacuees at relocation centers and host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers. (NUREG-0654, J.12.)

Without a demonstration of this capability, it would be entirely possible for numerous persons to remain at the shelters for extended periods of time without the slightest idea of how much radiation they had received, and its potential effect on their health. This requirement relates directly to the capability of reception center

personnel to respond to the medical needs of contaminated individuals. The plans contain no information on this point. Given that this Board has expressed its willingness to construe the regulations in light of NUREG-0654 absent any showing to the contrary, it is appropriate that the Applicants comply with J.10 in all fifteen plans.

SAPL LP-7

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 C.F.R. §50.47(a)(1) in that no relocation centers have been identified. This is contrary to NUREG-0654 J.h which requires identification of relocation centers in host areas which are at least five miles and preferably ten miles beyond the boundaries of the plume exposure EPZ. (Note: This Contention applies to all towns with the specific exemption of Greenland.)

Basis:

The establishment of relocation centers to receive large numbers of evacuees is fundamental to the successful evacuation of the EPZ. The plans must include not only identification of the centers, but also a description of their capabilities for feeding and safely sheltering evacuees.

Although the local Red Cross chapters are designated to provide food and shelter, the plans include no letters of agreement to that effect. Such letters are specifically required under NUREG-0654 A.3 as the Red Cross is clearly a support organization having an emergency response role. To the extent that these plans continue to lack

appropriate identification of relocation centers, they remain incomplete and cannot meet the appropriate standards.

SAPL LP-8

The plans fail to meet the requirements of 10 C.F.R. §50.47(b)(11) and NUREG-0654 K.5.b. because there has been no showing that the means for radiological decontamination of emergency personnel, wounds, supplies, instruments, and equipment have been established. Further, there has been no showing that a means for waste disposal exists.

Basis:

The decontamination facilities for emergency personnel described in the plans are inadequate for their intended purpose. Either they are not specified at all, or local fire stations are not equipped with decontamination showers. Provisions for safe internment of contaminated equipment and instruments are non-existent. The sole reference in this regard is to the person responsible for the internment. In Seabrook and other towns, for example, impoundment of contaminated equipment is the responsibility of the road agent. That person's expertise in the area of low level radioactive waste storage is non-existent.

SAPL LP-9

The hospitals responsible for treating ill or injured persons suspected or known to be contaminated are not sufficiently equipped or staffed to handle the numbers of persons that would require such attention in a serious radiological emergency. Further, no provisions are made for the transport of radiological accident victims to the



designated hospitals. This violates 10 C.F.R. §50.47(b)(11), (b)(12) and NUREG-0654 L.1 and L.4.

Basis:

The regulations mandate arrangements for treatment of contaminated, injured individuals. NUREG-0654 L.1 states that:

Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals. (Emphasis added.

NUREG-0654 L.4. also provides that:

Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

The plans submitted do not provide the assurance that contaminated, injured persons will receive adequate treatment.

For example, Brigham & Women's Hospital in Boston, Massachusetts has a total emergency room capacity of only twenty (20) persons. It can only handle four (4) trauma patients at one time. Available staff trained in the management of ionizing radiation injury and decontamination procedures numbers four (4) doctors, four (4) nurses, and ten (10) others. It boasts one decontamination shower.

Other hospitals have lesser capabilities. Of the medical facilities which have yet to respond to a SAPL survey, Brigham & Women's Hospital tops the list in terms of capacity and qualified personnel.

The extremely limited capacity of hospitals to cope with contaminated, injured persons is significant due to the potential for large numbers of people requiring precisely that type of

specialized medical attention. It is entirely reasonable to expect that thousands of persons may require immediate treatment.

Then there is the question of transportation. What vehicles will be used to transport contaminated, injured victims to hospitals? Who will provide qualified medical personnel to staff those vehicles? What impact will impeded traffic flows due to evacuation have on medical transportation? These questions are either ignored or insufficiently addressed in the plans.

SAPL LP-10

The plans are inadequately drafted in that they do not include a cross-reference to NUREG-0654. This is in violation of 10 C.F.R. §50.47(a)(1), 50.47(b)(1) et seq. as interpreted in NUREG-0654 P.8.

Basis:

The drafters of the plans have failed to provide the necessary cross-referencing to the NUREG-0654 criteria as required by that document. This has made it difficult and time consuming for all intervenors to analyze the plans in light of appropriate criteria. Despite a listing of the cross-references in the plans' tables of contents, no cross-referencing has been included. It is in the best interests of all parties to this proceeding that the referencing be provided immediately.

SAPL LP-11

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Specifically, the plans neither discuss nor analyze an account for behavioral variations among members of the public in the event of a radiological emergency. Such behavioral

variations would include evacuee disregard of evacuation instructions resulting from panic.

Basis:

Implicit in all of the plans submitted is the assumption that the public will respond rationally and obediently to emergency notification. This assumption is false and disregards the potential for panic and its impact upon an orderly evacuation.

In sworn testimony presented on behalf of Suffolk County, New York, Susan Saegert, Professor at the Center for Human Environments, City University of New York, concludes that:

Existing psychological research suggests that a number of psychological factors may interfere with successful management of a radiological emergency. Various studies report a large discrepancy between lay opinion concerning the danger of nuclear power and expert opinion. The public tends to see the occurrence of a radiological emergency that kills large numbers of people as relatively likely. This fear is likely to influence response to an emergency in the direction of leading to either defensive avoidance of information and emergency preparedness or in the direction of a tendency to overreact. Both responses could occur simultaneously. This state of affairs is made more difficult to remedy by a history of expert underestimation of the dangers related to nuclear energy and by the technical complexity and expert disagreement about probabilities and dangers. The danger of nuclear power presents problems of risk evaluation to both the public and the experts because of its complexity and the uncertain state of scientific knowledge. The problem of traffic congestion further complicates an evacuation. The experience of traffic congestion will add to the likelihood that people will not be able to effectively comprehend the relative advantages and disadvantages of various courses of action. It increases the likelihood of frustration and irrational behavior, including possible aggressive behavior.

Similar conclusions have also been reached in detailed studies of Long Island, New York residents living in proximity to the Shoreham Nuclear Power facility. A report prepared by James H. Johnson, Jr., Ph.D., Department of Geography, University of California, and Donald J. Zeigler, Ph.D., Department of Geography and Political Science, Old Dominion University, Norfolk, Virginia, for Suffolk County, New York, also concludes that nuclear accidents are likely to give rise to higher levels of extreme behavior than has been reported in studies of non-radiological emergencies. In general, the Ziegler and Johnson study concludes that people tend to ignore official instructions and "spontaneously evacuate" in the event of a radiological emergency.

The research of Professors Saegert, Ziegler and Johnson into the area of psychological issues related to radiological emergency planning raises serious questions about the desirability of any plan that fails to even discuss and account for behavioral variation. This is particularly true with regard to Seabrook and its proximity to extremely high population densities.

Of additional importance in this proceeding is the nature of the beaches as recreational areas. Families often split up to pursue separate interests, agreeing to rendezvous later. In the event of a sudden public notification of a radiological emergency, it is entirely reasonable that parents would not depart the area without first gathering their families together. The confusion and panic resulting from such a situation would be catastrophic to the efforts of police and other emergency personnel to initiate and maintain an orderly evacuation.

Also, resident children attend schools throughout the area, often with relocation centers different from those assigned to their parents. Confusion and panic could foreseeably result from this situation as well. Parents would be reasonably expected to attempt to pick up their children from school, or to return to the EPZ from their assigned relocation centers when their children do not show up. All reasonably foreseeable scenarios of this type would seriously disrupt the evacuation process.

Due to the extent of the available literature on the subject to psychological issues and radiological emergency planning, it is crucial that the plans address the issues of behavioral response directly. Failure to do so is to ignore what lay persons and psychological experts agree is a reasonably foreseeable result of emergency notification: panic and its negative impacts on protective response.

#### SAPL LP-12

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Specifically, the plans neither discuss nor account for behavioral variations among designated emergency personnel that would impair or extinguish their ability to carry out assigned duties.

#### Basis:

There is no reason to assume, as the plans implicitly do, that emergency personnel would disregard considerations of their own personal safety and the safety of their families in a radiological emergency.



An extensive study of emergency personnel responses to an accident at Shoreham in New York raises serious questions about the reliability of such personnel in a nuclear emergency. That study, conducted by Social Data Analysts, Inc., for Suffolk County, New York, examined the response potential for such key emergency personnel as school bus drivers and firemen. The study concludes that a radiological emergency would create serious role conflicts among emergency personnel, and large numbers of individuals would see first to the safety and relocation of their families before responding to official duty.

There is no evidence to support an assumption that emergency personnel in New Hampshire would react differently, or that the role conflicts stemming from an accident would be limited to school bus drivers and firemen. Therefore, the failure of the plans to investigate and discuss response factors among emergency personnel is a serious flaw that must be addressed to meet the standard of 10 C.F.R. §50.47(a)(1).

SAPL LP-13

The plans are inadequate because there are insufficient personnel available in the fire and police departments within the EPZ to fulfill designated obligations at the local level.

Basis:

An example is the Town of Hampton. In his recent comments submitted to the NRC concerning the adequacy of the Town of Hampton RERP, Mr. John Tanzer, Civil Defense Director for the Town of Hampton, states that

The requirement to control an evacuation of up to 100,000 people is awesome. Even that of evacuating the "beach" is confounding. Without repeating previous paragraphs, it is apparent that the Hampton Police Force is far outweighed by the magnitude of the problem. The same holds for Public Works, and the Fire Department must hold in place for its primary mission. There are easily ten times more duties for these personnel described in the plan than there are personnel to do them.

As Civil Defense Director for the Town of Hampton, Mr. Tanzer's comments should be considered carefully by this Board. His observations are based on first-hand knowledge of the Seacoast area, the size of the crowds that may need to be evacuated, and the specific response capabilities of Hampton emergency response personnel. Consequently, his comments establish a solid basis upon which to submit this contention.

#### SAPL LP-14

The plans submitted are inadequate because they purport to provide for a feasible protective response, including evacuation, absent a declaration of assumptions.

#### Basis:

Planning for any type of emergency by definition requires the making of assumptions to anticipate the emergency itself. Such assumptions should be explicit, not implicit, both the public and emergency response personnel must have a reasonable framework of assumptions upon which to operate. The plans are loaded with implicit assumptions (i.e., that there will be minimal panic interfering with an orderly evacuation), but devoid of explicit assumptions which may be subject to criticism by local officials and planners who live in the EPZ and have a first-hand, realistic view of their capabilities.

Explicit, stated assumptions lay bare the fundamental precepts upon which the plans are based. This is essential if the plans are to receive a meaningful and realistic evaluation by all parties concerned, particularly the general public.

SAPL LP-15

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

Local experience in the Seacoast area, particularly in the summer months, indicates serious language barrier problems with French-Canadian visitors. These people are known to visit the EPZ area in large numbers and would be unable to respond to any emergency notifications provided in English.

At a minimum, all relevant communications and informational material presented to the public 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.

SAPL LP-16

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.

Basis:

None of the plans contains any information concerning the effectiveness of various protective actions in potential accident situations. In particular, none provides any basis for judging the effectiveness of sheltering as a protective action. There is 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 to shelter those without easy access to any form of shelter, particularly the transient and recreation areas and on the beaches.

Because of the plan's failure in this regard, they do not meet the requisite standards of 10 C.F.R. §50.47(a)(1), as interpreted in NUREG-0654 J., et seq.

SAPL LP-17

The plans are inadequate because they do not contain maps of evacuation routes, predictions of the time required for evacuation, or the impact of inclement weather during evacuation procedures, and the need for alternative routes. (This contention does not apply to the Greenland RERP.)

Basis:

The basis for the 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.

SAPL LP-18

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. This is in violation of 10 C.F.R. §50.47(b)(3). In particular, the plans do not set forth requisite letters of agreement detailing how assistance resources will be provided as required under NUREG-0654 A.3.

Basis:

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 delineation of how the agency will fulfill this role.

Further, NUREG-0654 explicitly requires written agreements referring to the emergency measures to be provided and the mutually acceptable criteria for their implementation as well as the arrangements for exchange of information. To date, none of these letter agreements are in place with respect to any of the personnel or equipment support mechanisms established under the local plans.

SAPL LP-19

The plans are inadequate because they fail to address the impacts of egress route flooding upon an orderly evacuation. The plans cannot reasonably assure that adequate measures can and will be taken



in the event of a radiological emergency without addressing the flooding issue.

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, as they were during severe winter storms during the winter of 1978-79.

SAPL LP-20

The plans fail to assure that adequate measures can and will be taken to protect the health and safety of the public in the event of a radiological emergency. Specifically, they fail to address the impact of limited gasoline supplies within the EPZ upon an orderly evacuation.

Basis:

The plans do not account for a limited gasoline supply available to the general public should a full evacuation be ordered. Such supplies are limited, and it is reasonably foreseeable that numerous vehicles would stall out due to lack of fuel while sitting in an evacuation traffic jam. The potential for this happening to large numbers of automobiles along egress routes has not been addressed in the plans. Consequently, local officials have no way of knowing the extent to which stalled vehicles may impede evacuation progress and precisely how many tow trucks might be needed in order to maintain the flow of outgoing evacuation traffic. This is particularly crucial in areas such as Hampton Beach, where tiny bottlenecks such as where Route 51 meets Ocean Boulevard can be entirely choked off with the stalling and abandonment of only one or two cars.

SAPL LP-21

The local plans are inadequate to protect the health and safety of the public because they make no provision for radiological emergency notification of response personnel in advance of news releases to the public. This allows for no lead time allowing emergency response personnel to initiate designated procedures, and will result in non-dedicated telephone lines to county dispatchers, fire, and police departments being tied up with public inquiries concerning the incident.

Basis:

A simultaneous notification of emergency response personnel and the general public would seriously impair response capabilities. Throughout the local plans, primary communications links depend upon non-dedicated telephone lines. Those lines would become instantly jammed and unusable due to public inquiry, and the local plans do not provide for sufficient backup communications to fill the gap. Consequently, local emergency response personnel would have their efforts seriously hampered if not neutralized by the breakdown in communications, particularly with state officials.

SAPL LP-22

The local RERP's fail to make an adequate showing that 24-hour per day capabilities exist to determine the doses received by emergency personnel and hence fail to comply with 10 C.F.R. §50.47 (b)(11) and NUREG-0654 K.3. There has been no discussion of what equipment will be provided at the reception centers for Division of Welfare and Red Cross workers monitoring evacuees. Exposures of the numbers of emergency workers that will need to be in the proximity

of contaminated evacuees cannot be handled by the small amount of equipment described in the local plans. The local road agents and water department employees responsible for clearing the roadways, the State Police and all others involved in the EPZ will require dosimeters. There are too few dosimeters, and of those there are, too few have the capacity to measure exposures beyond the 20 Range. DPH staff will be overburdened with other responsibilities such as analysis of environmental media, estimation of the total population dose and locating and tracking the plume. There has been no showing that DPH has adequate staff to monitor and evaluate worker exposure records, too.

#### SAPL LP-23

The plans are inadequate to protect the health and safety of the public because they fail to assess the time it will take to evacuate permanent residents and transient populations from the respective localities within the EPZ. An analysis of these evacuation times is crucial if local officials and emergency personnel are to plan adequately for an effective evacuation should one be necessary.

#### Basis:

The basis for this contention lies in the fact that local emergency planners must know the duration of their expected duties in the event of an evacuation. State and federal planners should know how long the particular towns will take to evacuate in order to effectively focus equipment and personnel resources in a radiological emergency. Some areas within the EPZ may take much longer to evacuate than others, to the extent that federal, state

and local officials are aware of the differences in local evacuation times, and will be able to plan accordingly.

Respectfully submitted,  
Seacoast Anti-Pollution League  
By its attorneys,  
BACKUS, SHEA & MEYER

By: 

Robert A. Backus  
116 Lowell St., Box 516  
Manchester, N.H. 03105  
Tel: (603) 668-7272

September 9, 1983

# CERTIFICATE OF SERVICE

Brian Cassidy  
Fed. Emerg. Mgmt. Agcy.  
Region I  
J.W.McCormack POCH  
Boston, MA 02109

Sen. Gordon Humphrey  
Attn: Tom Burack  
U.S. Senate  
Washington, DC 20510

Sen. Gordon Humphrey  
Attn: Herb Boynton  
1 Pillsbury Street  
Concord, NH 03301

Town Manager's Office  
Town Hall - Friend St.  
Amesbury, MA 01913

Donald E. Chick  
Town Manager  
10 Front Street  
Exeter, NH 03833

Office of Selectmen  
Town of North Hampton  
North Hampton, NH 03862

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

John B. Tanzer  
Town of Hampton  
5 Morningside Drive  
Hampton, NH 03842

Edward Meany  
Town of Rye  
155 Washington Road  
Rye, NH 03870

Alfred Sargent, Chm.  
Board of Selectmen  
Town of Salisbury, MA 01950

Helen Hoyt, Chm.  
Admin. Judge  
Atomic Safety & Lic.  
Board - U.S. NRC  
Washington, DC 20555

Dr. Jerry Harbour  
Admin. Judge.  
Atomic Safety & Lic.  
Board - U.S. NRC  
Washington, DC 20555

Roy P. Lessy, Jr., Esq.  
Office of Executive  
Legal Director  
U.S. NRC  
Washington, DC 20555

Phillip Ahrens, Esq.  
Asst. Atty. General  
State House, Station #6  
Augusta, ME 04333

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

Dr. Emmeth A. Luebke  
Admin. Judge  
Atomic Safety & Lic.  
Board - U.S. NRC  
Washington, DC 20555

Jo Ann Shotwell, Asst. AG  
One Ashburton Place, 19th  
Floor  
Boston, MA 02108

William S. Jordan, II, Esq.  
Ellyn R. Weiss, Esq.  
1725 I Street, N.W.  
Suite 506  
Washington, DC 20006

Dr. Muray Tye, President  
Sun Valley Assoc.  
280 Haverhill Street  
Lawrence, MA 01840

Brentwood Board of Selectmen  
RFD Dalton Road  
Brentwood, NH 03833

Thomas G. Dignan, Esq.  
Ropes and Gray  
225 Franklin Street  
Boston, MA 02110

Docketing and Service Sec.  
Office of the Secretary  
U. S. NRC  
Washington, DC 20555

Robert L. Chiesa, Esq.  
95 Market Street  
Manchester, NH 03101

Jane Doughty  
Field Director  
SAPL  
5 Market Street  
Portsmouth, NH 03801

Dana Bisbee  
Attorney General's Office  
State of New Hampshire  
Concord, NH 03301

David R. Lewis  
Atomic Safety & Lic. Brd.  
U.S. NRC - Rm. E/W-439  
Washington, DC 20555

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

Mr. Angie Machiros, Chrmn.  
Board of Selectmen  
Town of Newbury  
Newbury, MA 09150

Sandra Gauvutis  
Town of Kinsington  
RFD 1  
East Kensington, NH 03827

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