

October 5, 1983

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UNITED STATES OF AMERICA  
OFFICE OF SECRETARY  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Public Service Company of New  
Hampshire, et al.

(Seabrook Station, Units 1 and 2)

)  
)  
) Docket Nos.  
) 50-443, -444  
)  
)

NECNP FIRST SET OF INTERROGATORIES TO THE  
FEDERAL EMERGENCY MANAGEMENT AGENCY ON  
NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN

With the understanding and approval of both counsel for the NRC Staff and the Federal Emergency Management Agency, NECNP serves these interrogatories directly on FEMA, as we have been informed is the current practice in NRC offsite emergency planning proceedings. If, for any reason, the Board should not wish us to proceed in this manner, we will make the necessary changes and direct these interrogatories to the NRC Staff.

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of FEMA with personal knowledge of the facts or information requested in each interrogatory.

The following definitions shall apply to these interrogatories:

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1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer printouts, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" with respect to any document shall mean to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or

proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

1. With respect to NECNP Contentions 1, 2, 3, 4, 5, 7, 9, 10, 12, and 13 on the New Hampshire RERP, please provide the following information:

a. What is FEMA's position with respect to this contention? Describe in detail the reasons for your position.

b. Identify and provide access to all documents on which you rely during this proceeding to support your position on this contention. This includes all documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

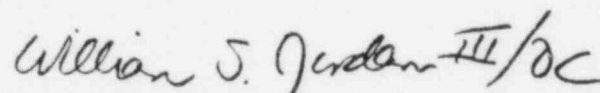
c. Identify all persons you may call as witnesses on these contentions during these proceedings, and describe any documents and the portions thereof that they may rely on for their testimony.

2. Identify and provide access to all documents in your

possession in any way relating to or mentioning the New  
Hampshire Radiological Emergency Response Plan.

Respectfully submitted,

  
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