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NUCLEAR REGULATORY COMMISSION
OFFICE OF SECRETARY
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 STATE OF NEW HAMPSHIRE ON
NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN

INSTRUCTIONS FOR USE

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

The following definitions shall apply to these interrogatories:

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,

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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.

General Interrogatory

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 the State's position with respect to this contention? Describe in detail the reasons for your position. Ifd the position of the Attorney General differs from that of the State Civil Defesne Agency or any other agency, please describe the difference and state the reasons for the different positions.

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.

d. Identify and provide access to all documents in your possession containing comments or questions on the adequacy or completeness of the New Hampshire RERP.

Contention NHRERP-1 - Emergency Response Procedures

2. Does the State of New Hampshire intend to submit its emergency response procedures to the Federal Emergency Management Agency (FEMA) for review?

a. If the answer to Question 2 is yes, what is the expected date of submission?

b. If the answer to Question 2 is no, state the reasons why the procedures will not be submitted.

3. Identify by name and title all individuals who participated in the preparation of the New Hampshire Radiological Emergency Response Plan, and the specific contribution of each individual to the plan.

4. Have the Radiological Emergency Response Procedures for Seabrook been completed?

a. If the answer is no, identify all areas in which the procedures are incomplete; state the reason for the incompleteness and what remains to be done; and state the expected date of completion.

5. Identify and describe the criteria used in the preparation of the emergency response procedures.

6. Identify all those individuals by title who will have possession of the emergency response procedures during a radiological emergency at Seabrook.

7. For each section of the New Hampshire RERP, identify the procedures that are to be followed to implement it.

8. Describe the purpose of the New Hampshire emergency response procedures.

9. In your opinion, are the procedures necessary for the implementation of the New Hampshire RERP? State the basis for your opinion.

10. In your opinion, are the procedures necessary for a determination as to whether the New Hampshire RERP provides a reasonable assurance that adequate protective measures can and will be taken by the State of New Hampshire in a radiological emergency at Seabrook? State the basis for your opinion.

Contention NHRERP-2 - State and Local Coordination

11. Identify all aspects of the planned response to a radiological emergency at Seabrook for which the State expects to take primary responsibility.

a. Identify all assessments, studies, and calculations of the resources and capability of the state government to carry out an emergency response in these areas.

b. Identify all areas where the State expects supplementation of its resources by local governments, and the degree to which supplementation is needed.

c. For those areas identified in response to Question 8.b, identify all assessments, studies, and calculations of the resources and capability of the local governments to supplement the State's emergency response.

13. Identify all aspects of the planned response to a radiological emergency at Seabrook for which the State expects local governments to take primary responsibility.

a. Identify all assessments, studies, and calculations of the resources and capability of the local governments to carry out an emergency response in these areas.

b. Identify all areas where the State expects to supplement the emergency response effort by local governments, and the degree to which supplementation is needed.

c. For those areas identified in response to Question 8.b, identify all assessments, studies, and calculations of the resources and capability of the State to supplement the emergency response effort by the local governments.

14. Identify all local governments and their officials who were consulted in drafting the New Hampshire RERP, and describe the substance of the consultation.

15. Identify and provide access to any and all documents reflecting consultations between the New Hampshire state government and local governments regarding the preparation of the NHRERP.

16. Identify all sources of information that were used in assessing the capability of local governments to either supplement or take primary responsibility for the emergency response measures outlined in the NHRERP.

Contention NHRERP-3 - Federal Assistance

17. Identify and describe all aspects in which the state of New Hampshire will depend on federal assistance to respond to a radiological emergency at Seabrook.

18. Identify and describe those aspects of the planned emergency response for which federal aid has been secured or committed and describe the specific Federal resource expected, including number of personnel and their training, types and amount of equipment.

19. For all federal resources identified and described in answer to Question 14, describe the location at which the resource will be needed and its expected time of arrival at the location.

20. Identify and provide access to all documents relating to existing or proposed arrangements for federal aid to the State of New Hampshire for the purpose of implementing the NHRERP.

Contention NHRERP-4 - Communication

21. Identify the means of communication that are relied on in the NH RERP.

22. For each means of communication relied on in the NHRERP, describe the following:

a. If a telephone line, whether it is commercial or dedicated; and how many users are expected to rely on each channel;

b. If a radio, its power source, frequency, and range. For each radio, state whether the message relayed can be monitored by local governments or the general public.

23. For all means of communication that do not have an independent source of power such as a battery, identify the source of electricity, and provide access to all data on the reliability of that source.

24. Identify all factors known to affect the reliability of the communication systems relied on in the NHRERP, such as adverse weather, interference and loss of offsite power.

a. For each factor identified above, demonstrate how each has been considered in the development of a communication system for the NHRERP.

Contention NHRERP-5 - Relocation Centers

25. Identify and provide access to all documents in your possession regarding the consideration or choice of relocation centers contemplated by the NHRERP.

26. Identify and describe all criteria used by the State of New Hampshire in selecting relocation centers.

Contention NHRERP-7 - Notification

27. Identify and provide access to all documents in your possession relating to the Audible Alert System for the Seabrook EPZ, including drafts of the design of the Audible Alert System.

28. Describe the manufacture and design of the sirens to be used; the location of sirens in the EPZ; and whether they are monodirectional or omnidirectional.

29. Are the sirens to be used in the Seabrook EPZ qualified to withstand 40 years of harsh weather conditions, including the corrosive effects of salt and high atmospheric moisture content? If so, provide the basis for your answer. If not, please describe your program to inspect and maintain sirens in operating condition throughout the life of the Seabrook plant.

30. Identify the range of each siren in terms of decibel level as related to distance from the siren. If a siren cannot be heard equally well in all directions, describe the limitations or variations in the effectiveness of the sound.

31. Identify the meteorological conditions that impede the effectiveness of siren warnings. For each such condition, quantify the reduction in effectiveness of the sirens.

32. What is the power source for each siren in the EPZ?

33. Upon what alternative means of alerting the public does the State rely in the event that power is not available to run the sirens?

34. Does the State rely on alerting by vehicles with public address systems if primary notification is inoperable? If so,

a. How is it carried out?

b. What resources are necessary to carry it out?

c. What is the capability of the State to carry it out?

d. What routes will be taken to alert the public, and how will it be assured that the alerting vehicles can pass through traffic?

e. How long does it take to notify the population of the EPZ by this form of alerting?

35. Who is responsible for activating the sirens in a radiological emergency?

36. How has the effectiveness of the NHRERP's proposed notification system been evaluated? Please identify and provide access to all assessments, studies, and calculations supporting your evaluation(s).

37. Are the sirens used for an alert of a radiological emergency also to be used for other purposes? If so, is the type of sound generated recognizably different for each purpose for which the sirens are activated? Describe the difference.

38. What provision has the State made for notification of the population on the beaches, in campgrounds, public parks, hospitals, schools, and factories?

39. What is the message intended to be conveyed by a siren alert?

40. Please describe in detail the measures that will be taken by the State to assure that the public, including transients, will understand the meaning of the sirens and what they should do when they hear them.

41. Please identify and describe in detail the type and manufacture of tone alert radios that are to be used for initial alerting of a radiological emergency at Seabrook.

42. From what location will the alert be broadcast?

43. What is the power source of the tone alert radios? During a power failure, what backup notification system is provided?

44. Identify the segments of the EPZ population that are expected to rely for primary notification on tone alert radios.

45. How many tone alert radios will be needed in the EPZ?

46. What agency is responsible for distribution of the tone alert radios?

47. How is the need for tone alert radios assessed? How will it be assessed on a continuing basis?

48. What percentage of the EPZ population are expected to receive emergency instructions via radio and television? How was this assessment arrived at?

49. How does the plan provide for instruction of non-English-speaking people in the EPZ via radio and television?

50. In the event of a loss of power to radio and television, by what alternative means does the State intend to instruct the public in responding to a radiological emergency?

51. How will people without access to radio or television, i.e. people who have none in their homes or offices; people on

the beaches or campgrounds; people walking without rapid access to a car; people in buses; or others, receive instruction as to the protective actions they should take during a radiological emergency?

Contention NHRERP-10 - Sheltering

52. If sheltering is chosen as the appropriate protective action in a radiological emergency, how many people must be sheltered in the EPZ under peak summer population conditions?

53. How was the figure give in answer to Question 47 arrived at?

54. Has the State classified shelters according to their construction type? If so, please describe the classification scheme, and the numbers, locations and capacities of buildings that meet each classification.

55. Has the State classified shelters according to their capacity to shield from radiation? If so, please describe the classification scheme, and the numbers, locations, and capacities of the buildings that meet each classification.

56. Does the State have minimum criteria for the acceptability of shelters for use in a radiological emergency? If so, please describe them.

57. Does the State intend to designate specific buildings as shelters to be used in a radiological emergency? If so, identify those buildings, their capacities, and their locations, and describe your reasons for designating those buildings as shelters.

58. If your answer to Question 57 was yes, describe how the public will be notified that these shelters should be used in a radiological emergency.

59. Describe or map the location of shelters in relation to the spatial distribution of the population in winter and summer.

60. Identify and provide access to all documents in your possession relating to the State's assessment of the adequacy of sheltering as a protective measure in the event of a radiological emergency in the Seabrook EPZ.

Contention NHRERP-12 - Radiological Monitoring

61. The NHRERP states that the state does not have the capacity to monitor the location or movement of a radioactive plume from Seabrook. Under those circumstances, by what criteria will decisions be made regarding where to send the three radiological monitoring teams described in the NHRERP in a radiological emergency?

62. By what criteria will decisions be made regarding at what stage of an emergency to send radiological monitoring teams into the field?

63. Describe and estimate the time required to carry out each of the steps by which radiological emergency personnel will be contacted and deployed following a decision to use them.

64. For each type of information to be gathered or test to be performed by the radiological monitoring teams, estimate the amount of time that will pass between the moment that radiological monitoring personnel are notified and the results

of their monitoring tests are communicated to decisionmaking authorities. What is the basis for your estimate(s)?

65. Describe in detail the criteria by which monitoring results will be interpreted and used to make decisions regarding appropriate emergency responses. Identify and provide access to any and all documents relating to these criteria.

Contention NHRERP-13 - Medical Services

66. What is the maximum projected need for medical services to contaminated or injured and contaminated individuals in the Seabrook EPZ in the event of a radiological emergency? Describe the criteria by which this calculation was made.

67. Identify the facilities available for care and decontamination of individuals in a radiological emergency.

- a. What is the location of each facility?
- b. What is the capacity of each facility, including equipment, personnel, and number of patients that can be handled, to treat injured individuals?
- c. What is the capacity of each facility, including equipment, personnel, and number of patients that can be handled, to treat contaminated individuals?
- d. What is the capacity of each facility, including equipment, personnel, and number of patients that can be handled, to treat individuals who are both injured and contaminated?

68. Do your answers to Questions 59(a) through (d) describe facility capacity in addition to the demands on the facility posed by normal use? If not, state by percentage the extent to which each facility is occupied or used on an average day in summer and winter, and describe how existing use of the facilities would be affected by an influx of contaminated injured individuals from the Seabrook EPZ.

69. How many ambulances will be available during an emergency to transport injured and contaminated individuals?

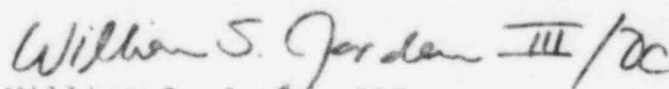
70. Describe the means by which ambulance drivers will be able to communicate with care facilities in order to determine where to transport their passengers.

71. Identify and provide access to all documents in your possession relating to the State's assessment of the adequacy of medical services during a radiological emergency at Seabrook.

Respectfully submitted,



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October 5, 1983

CERTIFICATE OF SERVICE

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I certify that on October 5, 1983 copies of NECNP FIRST SET OF INTERROGATORIES TO THE FEDERAL EMERGENCY MANAGEMENT AGENCY ON NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN, NECNP FIRST SET OF INTERROGATORIES TO APPLICANTS ON NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN, NECNP OBJECTION TO IMPROPER BOARD CONDUCT, RESPONSE TO APPLICANTS' POSITION AS TO SCHEDULING OF EMERGENCY PLLANNING ISSUES, AND REQUEST FOR HEARING ON LICENSING SCHEDULE AND NECNP FIRST SET OF INTERROGATORIES TO THE STATE OF NEW HAMPSHIRE ON NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN were served on the following by first-class mail, or as otherwise indicated below:

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