

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF NEW)	Docket Nos. 50-443 OL
HAMPSHIRE, et al.)	50-444 OL
)	
(Seabrook Station, Units 1 & 2))	
)	

APPLICANTS' ANSWERS TO
"ATTORNEY GENERAL BELLOTTI'S
INTERROGATORIES AND REQUESTS FOR DOCUMENTS
TO APPLICANTS ON EMERGENCY PLANNING
FOR THE STATE OF NEW HAMPSHIRE"

Pursuant to 10 CFR § 2.740b, the Applicants hereby
respond to the "Attorney General Bellotti's
Interrogatories and Requests for Documents to
Applicants on Emergency Planning for the State of New
Hampshire."

ANSWERS TO INTERROGATORIES

Interrogatory No. 1

Question

Please identify and produce all documents within the Applicants' possession, custody, or control which contain or refer to any actual or potential revisions or additions to the draft New Hampshire Radiological Emergency Response Plan submitted to FEMA Region 1 on or about May 12, 1983 [hereinafter, "the RERP"], including but not limited to any documents relating or referring to evacuation routes, traffic access or control points, traffic management plans, reception centers, radiological monitoring locations, plans for evacuation of people in the beach areas dependent on public transportation, plans for decontamination of persons or vehicles exposed to radiation, provisions for the storage, distribution, or use of radioprotective drugs, or plans for sheltering the summer beach populations or those seasonal residents whose homes provide insufficient shielding from radiation.

Answer

- a) Controlled copies of NH State Plan
- b) C.E. Maguire evacuation time studies
- c) Voorhees evacuation time study
- d) HMM reports:
 - i) evacuation estimates
 - ii) traffic management plan
- e) Comments on CE Maguire report (letter Yankee to NH CDS, dated May 3, 1983)
- f) FEMA preliminary comments on State Plan (letter FEMA to NHCDA, dated June 23, 1983)

Interrogatory No. 2

Question

Please identify and produce all documents within the Applicants' possession, custody, or control which refer to the emergency response needs or resources of the State of New Hampshire or means for satisfying the State's resource requirements, or upon which the Applicants rely in support of the State's capability to satisfy its resource requirements, in any of the following areas:

- a. emergency transportation for people in the beach areas without private transportation;
- b. emergency medical transportation;
- c. medical treatment for contaminated injured individuals;
- d. radiological monitoring and assessment equipment;
- e. dosimeters and respiratory equipment for emergency workers;
- f. manpower for traffic management and access control;
- g. manpower for emergency transportation and security operations;
- h. manpower for emergency maintenance for evacuation routes and response to abandoned vehicles, traffic accidents, and other obstructions to evacuating traffic flow;
- i. manpower for staffing of emergency response facilities.

Answer

Except as is stated herein and in response to the prior interrogatory, this interrogatory is objected to on the ground that, as phrased, it is too broad to be susceptible of any meaningful answer. For example, documents which "refer to the emergency response needs or resources of the State of New Hampshire" could include various statements of contentions made in this proceeding. Furthermore, we do not understand what is meant by documents "upon which the Applicants rely in support of the State's capability."

Interrogatory No. 3

Question

In the opinion of the Applicants, does the State of New Hampshire currently have adequate resources within the State in each of the areas identified in subparagraphs 2a - 2i. above to implement its emergency plan? State the bases for your answer in detail, including your bases for determining what constitutes an adequate quantity or level of each such resource, and identify and produce all documents upon which you rely in support of your answers.

Answer

The Applicants believe that the New Hampshire emergency plans, while they are presently in draft versions and while there obviously remain details to be worked out, demonstrate the State's commitment to

provide and to support adequate emergency response activities related to the operation of Seabrook Station. The Applicants believe that the services and resources required by the State either are presently or can when desired be within the capability of the State. In the Applicants' view, the State has demonstrated the capability to preform adequately during exercises of emergency preparedness in connection with the Vermont Yankee Nuclear Power Station.

Interrogatory No. 4

Question

If your answer to question 3 was in the negative as regards any areas of emergency response capability, is it the Applicants' position that the necessary additional resources can be procured on a timely basis from outside the State? If so, identify the types, quantities and sources of all such additional resources and specify the time within which they will be available to the State following its request therefor. Identify and produce all documents upon which you rely in support of your answers.

Answer

Not applicable.

Interrogatory No. 5

Question

In the opinion of the Applicants, what is the greatest number of "contaminated injured individuals" who could be in need of medical treatment in the event of a radiological emergency at Seabrook Station? State

the bases for your answer in detail, describing the types of injuries and sources or levels of contamination for which your estimate accounts, and the type of medical treatment which would be required for each such injury or level of contamination. Include in your estimate all contaminated injured individuals who could be helped in any way by medical treatment. Identify and produce all documents upon which you rely for any portion of your answer.

Answer

The interrogatory is objected to. Absent a description of the specific "radiological emergency" one is interrogating about, no rational opinion can be formulated. Obviously, the number of individuals who could reasonably be foreseen to become contaminated and injured will vary with the specific scenario presented as a result of the specific assumed event.

Without waiving this objection, the Applicants believe that the maximum number of persons who could become both contaminated and injured as a result of any credible (albeit improbable) nuclear emergency at Seabrook Station is three. The basis for this opinion is the nature of the work performed on nuclear power plants and the manner in which it is controlled. Because of the need and desire to minimize occupational radiation exposure levels of workers, it is the practice of nuclear power plant radiation protection

programs to limit the number of workers in the radiation controlled areas of a plant to the minimum necessary to accomplish the task. Seabrook Station is no exception. Given this practice and the judgment that any credible accident scenario would involve sufficient time to move, protect, or evacuate all but necessary workers, the Applicants' opinion as to the maximum number of workers who could become both injured and contaminated to the degree that would require off-site medical treatment while in a contaminated state (i.e., they could not be decontaminated on-site first) is three. The most likely number, in the Applicants' opinion, for the range of credible (albeit improbable) accidents is one.

Interrogatory No. 6

Question

In the opinion of the Applicants, can the health care facilities identified in the RERP provide to the number of contaminated injured individuals specified in your answer to interrogatory 5 all medical treatment which could be of help to them? If not, can such treatment be provided by other health care facilities in New Hampshire and/or Massachusetts? State the bases for your answers in detail and identify and produce any documents upon which you rely. List all medical facilities other than those identified in the RERP which might be required to provide care to assure that the full number of persons specified in your answer to

interrogatory 5 receive all treatment which could be of help to them.

Answer

To the extent that Interrogatory No 5 is susceptible of an answer: Yes; not applicable; the small number of persons involved; none.

In light of the fact that Interrogatory No. 5 is not in a form susceptible of an answer, Interrogatory No. 6 must also be objected to.

The Applicants' further object to this interrogatory to the extent (which is not clear from the interrogatory) that it is addressed to "all medical facilities other than those identified in the RERP which might be required . . . all treatment which could be of help to [the injured person]," on the ground that 10 CFR § 50.47(b)(12) is limited to the facilities necessary to respond to the immediate medical injuries of contaminated injured persons while they remain contaminated.

Interrogatory No. 7

Question

In the opinion of the Applicants, what percentage of the emergency response officials and personnel identified in the RERP will, in fact, report to their emergency posts and fulfill their designated

responsibilities in the event of a radiological emergency at Seabrook Station? What percentage of such emergency response officials and personnel will first ensure that their families are being taken care of before reporting to duty and what will be the length of the delay in assumption of emergency responsibilities resulting therefrom? State the bases for your answers in detail and identify and produce any documents upon which you rely.

Answer:

The interrogatory is objected to. There is no requirement in the regulations that the psyche of every individual who may have responsibilities and the emergency plan be explored. Without waiving this objection, it is the Applicants' view that the vast majority, if not all, elected and appointed officials will do their duty as assumed by the law. Our basis for this opinion is that society at large has been able to rely on public officials in times of emergency in the past and we see no reason to assume otherwise in the future. This view is supported by Evacuation Risks - An Evaluation EPA-520/6-74-002 (1974).

Interrogatory No. 8

Question

In the opinion of the Applicants, will there be adequate personnel available on a timely basis to replace the local emergency workers removed from the emergency zone if workers are removed due to releases of radionuclides other than I-131 in amounts requiring

protection? [See RERP, at 2.7-3] State the bases for your answer in detail, identifying the source and numbers of replacement workers and specifying the bases for assurance they will be available in a timely fashion. Identify and produce all documents upon which you rely in support of your answers.

Answer

There is no need to plan for emergency worker replacements on the basis of potential exposure to particulate radionuclides other than I-131, because such material would not be released in an accident condition at Seabrook Station in quantities that required consideration for emergency worker protection. This opinion is based on the analysis of the behavior of particulate radioactive material at Three Mile Island following the accident that has been reported in the literature and on the identification of the natural processes that are available for the removal of such material from that available for release to the environment that has also been reported in the literature.

Interrogatory No. 9

Question

In the opinion of the Applicants, has the State of New Hampshire established an emergency action level scheme consistent with that established by the Applicants? State the bases for your response in

detail and identify and produce any documents upon which you rely in support of your answer.

Answer

Both the Applicants and the State of New Hampshire have adopted the same four-level emergency classification system; i.e. Unusual Event, Alert, Site Area Emergency and General Emergency. This is shown by comparing Section 5 of the Applicants' Radiological Emergency Plan with Section 1.5 of the State of New Hampshire Radiological Emergency Response Plan. Not only are the systems consistent - they are identical.

Interrogatory No. 10

Question

In the opinion of the Applicants, has the State of New Hampshire established procedures for notification of all emergency personnel by each of the state emergency response organizations? If so, describe those procedures in detail. Identify and produce all documents within the Applicants' possession, custody, or control which contain or refer to such procedures or upon which you rely in support of your answers.

Answer

The Applicants have not reviewed notification procedures for state agency personnel but we have the information that describes this process in the form of Sections 2.1 and 2.2 of the State of New Hampshire Radiological Emergency Response Plan. That information

combined with the fact that a representative of the Applicants observed the New Hampshire actions in connection with the September 21, 1983, emergency plan exercise at Vermont Yankee allows us to offer the opinion that the State of New Hampshire has established procedures for the notification of the agencies that have a radiological emergency response role for the state.

The same state agencies observed for the Vermont Yankee exercise are involved in Seabrook Station radiological response.

Interrogatory No. 11

Question

In the opinion of the Applicants, has the State of New Hampshire developed the means to provide early notification and clear instruction to the public in the event of an emergency at Seabrook Station? If so, describe those means in detail and identify and produce all documents within the Applicants' possession, custody, or control relating thereto, including any documents relating in any way to a siren or other audible alert system for the Seabrook vicinity.

Answer

Yes. Applicants have the responsibility to design, install and maintain a system to provide early notification to the public within the Seabrook Station plume exposure emergency planning zone. The design

work is presently underway and it is anticipated that the system will consist of sirens (with a capability to transmit a verbal message on the beaches) and alerting radio receivers for some locations. This system will alert the public to tune to one of the Emergency Broadcast System stations for information about the emergency condition.

The design effort has only recently been initiated by the contractor and a final design report is not yet available. It is expected by approximately December, 1983. A preliminary design has been completed and the design information transmitted to Public Service Company of New Hampshire by letter dated October 12, 1983. The preliminary design information includes lists of organizations to receive emergency alerting radio receivers and proposed siren sites in each town within the plume exposure EPZ. A map showing the proposed siren locations is included in the preliminary design information package.

Interrogatory No. 12

Question

In the opinion of the Applicants, how will local emergency response organizations in New Hampshire be notified of an emergency at the Seabrook Station?

State the bases for your answer in detail and identify and produce any documents upon which you rely.

Answer

Local New Hampshire communities in the Seabrook Station plume Emergency Planning Zone would be notified by the method specified in Section 2.1.2 of the State of New Hampshire RERT (specifically see pp. 2.1-5 and 2.1-7).

Interrogatory No. 13

Question

Identify and produce any documents within the possession, custody, or control of the Applicants which refer or relate in any way to evacuation routing or traffic management in the event of a radiological emergency at Seabrook.

Answer

- a) C.E. Maguire report
- b) HMM report
- C) Voorhees report

Interrogatory No. 14

Question

Identify and produce all documents within the Applicants' possession, custody, or control which relate in any way to the capacity or building material of buildings in the coastal New Hampshire communities within ten miles of the Seabrook site, the number of such buildings which are insulated, the number of such buildings which have basements, the level or degree of protection afforded by such buildings against

radionuclides, or the feasibility of sheltering the summer beach and seasonal populations within those communities in such buildings.

Answer

The Applicants have no documents that describe the sheltering characteristics of the buildings in the area around Seabrook. Documents that provide general information on sheltering effectiveness include two publications by the United States Environmental Protection Agency:

Protective Action Evaluation - Part I:

The Effectiveness of Sheltering as a Protective action against Nuclear Accidents Involving Gaseous Releases

April, 1978

and

Protective Action Evaluation - Part II:

The Effectiveness of Sheltering as a Protective action against Nuclear Accidents Involving Gaseous Releases

April, 1978 (Revised 8/78)

Interrogatory No. 15

Question

In Applicants' opinion, can sheltering be relied upon as a protective option for the transient beach populations in the coastal New Hampshire communities? for the seasonal population in those communities? State the bases for your answer in detail and identify and produce any documents upon which you rely.

Answer

The interrogatory is objected to. All sheltering provides some protection; the protection afforded by any sheltering is relative (both to the protection afforded by other forms of sheltering and to the protection afforded by other protective actions). Without a particular scenario having been specified, no one can opine upon what amounts to the best choice of protective measures to be utilized.

Interrogatory No. 16

Question

Identify each person whom Applicants expect to call as a witness on any of the admitted contentions relative to the RERP, state his or her qualifications, and describe the subject matter on which he or she is expected to testify.

Answer

The applicants have not selected any witnesses with respect to these matters as yet. Without limitation

the applicants can say that they may call the following individuals with respect to one or all of the contentions:

Robert J. Merlino

James A. MacDonald

Peter S. Littlefield

In addition, others may also be called.

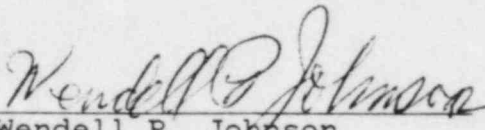
RESPONSE TO REQUEST FOR PRODUCTION

The Applicants will produce the documents identified herein at the offices of Public Service Company of New Hampshire, 1000 Elm Street, Manchester, New Hampshire, on a date and at an hour to be mutually agreed upon by counsel for the Applicants and the Massachusetts Attorney General.

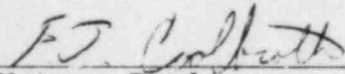
Signatures

As to Answers:

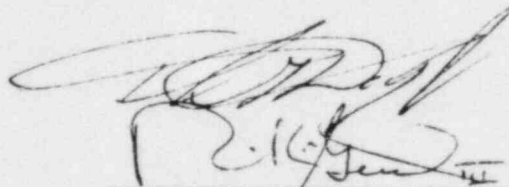
I, Wendell P. Johnson, being first duly sworn, do depose and say that the foregoing answers are true, except insofar as they are based on information that is available to the Applicants but not within my personal knowledge, as to which I, based on such information, believe them to be true.


Wendell P. Johnson

Sworn to before me this
day of October, 1983:


Notary Public
My Commission Expires: 10/14/85

As to Objections:


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CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on October 13, 1983, I made service of the within Applicants' Answers to "Attorney General Bellotti's Interrogatories and Requests for Documents to Applicants on Emergency Planning for the State of New Hampshire" by mailing copies thereof, postage prepaid, to:

Helen Hoyt, Chairperson
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* By facsimile on 10/13/83, followed by U.S. mail.

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By Hand on 10/13/83 -21-

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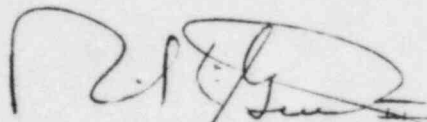
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