

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

DOCKETED
USNRC

'83 OCT -3 P3:35

BEFORE ADMINISTRATIVE JUDGES:
Helen F. Hoyt, Chairman
Dr. Emmeth A. Luebke
Dr. Jerry Harbour

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	Docket Nos.
)	50-443-OL
PUBLIC SERVICE COMPANY OF)	50-444-OL
NEW HAMPSHIRE, <u>et al.</u>)	
(Seabrook Station, Units 1 and 2))	September 29, 1983
)	
)	

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

INSTRUCTIONS FOR USE

Attorney General Francis X. Bellotti hereby requests that the Applicants, pursuant to 10 C.F.R. §§2.740(b) and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, the Applicants file supplemental responses and produce additional documents as required by 10 C.F.R. §2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

The term "document[s]" as used herein 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, maps, 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.

INTERROGATORIES

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

CERTIFICATE OF SERVICE

DOCKETED
USNRC

83-807-33:35
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

I, Jo Ann Shotwell, Esquire, counsel for Massachusetts Attorney General Francis X. Bellotti, hereby certify that on September 29, 1983, I made service of Attorney General Bellotti's Interrogatories and Requests For Documents To Applicants On Emergency Planning For The State Of New Hampshire, Attorney General Francis X. Bellotti's Notice Of Deposition Of Witnesses On Emergency Planning For State of New Hampshire, Attorney General Francis X. Bellotti's Interrogatories And Requests For Documents To The State Of New Hampshire On Emergency Planning For The State Of New Hampshire, and Attorney General Francis X. Bellotti's Interrogatories And Requests For Documents To The Federal Emergency Management Agency On Emergency Planning For The State of New Hampshire, by mailing copies thereof, postage prepaid, to the parties named below:

Helen Hoyt, Chairperson*
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Rep. Beverly Hollingworth
Coastal Chamber of Commerce
209 Winnacunnet Road
Hampton, NH 03842

Dr. Emmeth A. Luebke*
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

William S. Jordan, III, Esquire
Diane Curran
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, DC 20006

Dr. Jerry Harbour*
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Edward L. Cross, Jr., Esquire
Assistant Attorney General
Dana Bisbee, Esquire
Assistant Attorney General
Office of the Attorney General
208 State House Annex
Concord, NH 03301

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D C 20555

Roy P. Lessy, Jr., Esquire*
David A. Repka, Esquire*
Robert G. Perlis, Esquire*
Office of the Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

* By Express Mail

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

David R. Lewis*
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Rm. E/W-439
Washington, DC 20555

Charles Cross, Esquire
Shaines, Madrigan, & McEachern
25 Maplewood Avenue
P.O. Box 366
Portsmouth, NH 03801

Roberta C. Pevear
Designated Representative of
the Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844

Mrs. Sandra Gavutis
Designated Representative of
the Town of Kensington
RFD 1
East Kingston, NH 03827

Patrick J. McKeon
Selectmen's Office
10 Central Road
Rye, NH 03870

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

Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Dr. Mauray Tye
Sun Valley Association
209 Summer Street
Haverhill, MA 01830

Thomas G. Dignan, Jr., Esquire**
Robert K. Gad, III, Esquire**
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Ms. Olive L. Tash
Designated Representative of
the Town of Brentwood
R.F.D. 1, Dalton Road
Brentwood, NH 03833

Edward F. Meany
Designated Representative of
the Town of Rye
155 Washington Road
Rye, NH 03870

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

Jane Doughty
Field Director
Seacoast Anti-Pollution League
Market Street
Portsmouth, NH 03801

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

* By Express Mail

**By Hand Delivery on 9/30/83

Brian P. Cassidy
Regional Counsel
FEMA Region 1
John W. McCormack Post Office
& Courthouse
Boston, MA 02109

Mr. Angie Machiros, Chairman
Newbury Board of Selectmen
Town of Newbury, MA 01950

Patrick J. McKeon
Chairman of Selectmen, Rye,
New Hampshire
10 Central Road
Pye, NH 03870

Donald E. Chick
Town Manager
Town of Exeter
10 Front Street
New Hampshire 03833

Selectmen of North Hampton
Town of North Hampton
New Hampshire 03862

Senator Gordon J. Humphrey
1 Pillsbury Street
Concord, NH 03302
(Attn: Herb Boynton)

Representative Nicholas J. Costello
1st Essex District
Whitehall Road
Amesbury, MA 01913

Diana P. Randall
70 Collins Street
Seabrook, NH 03874


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

Maynard B. Pearson
Board of Selectmen
40 Monroe Street
Amesbury, MA 01913

Mr. Daniel Girard
Civil Defense Director
25 Washington Street
Salisbury, MA 01930

Senator Gordon J. Humphrey
U.S. Senate
Washington, D.C. 20510
(Attn: Tom Burack)

Signed under the pains and penalties of perjury, this 29th day of
September, 1983.


Ann Shotwell
Assistant Attorney General
Environmental Protection Division
Public Protection Bureau
One Ashburton Place
Boston, MA 02108