

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

before the  
ATOMIC SAFETY AND LICENSING BOARD

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- 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.

#### Introductory Response

The State of New Hampshire Civil Defense Agency has been given the responsibility for developing offsite radiological emergency response plans for the Seabrook Station Emergency Planning Zone. In conjunction with the Division of Public Health Services, other State agencies, and local municipalities, the Civil Defense Agency has been discharging this responsibility.

For purposes of the licensing proceeding, however, the State opts not to put on a case on the plan's adequacy. Consequently, the State of New Hampshire does not intend at this time to call any witnesses on these contentions, and does not plan to rely on any documents "during this proceeding to support [the State's] position on [these] contention[s]." The State reserves the right, of course, to cross examine witnesses. The State has not determined which, if any, documents it may rely on during cross examination of any witnesses on these contentions.

As to NECNP's requests for document production in this General Interrogatory and in specific ones to follow, the State identifies, and will produce, relevant documents from various state agencies involved in emergency planning for Seabrook. Other documents falling within the work product privilege, attorney-client privilege, or the governmental - deliberative process privilege (see Kaiser Aluminum and Chemical Corp. v. United States, 157 F. Supp. 939, 946 (Ct. Cl. 1958); see also EPA v. Mink, 410 U.S. 73, 87-88 (1973)) have not been identified and will not be produced.

#### Specific Response

- Contention 1.
- a) Section 7.2 of the NHRERP lists the New Hampshire agencies involved with off site emergency response at Seabrook Station. A separate volume of the NHRERP will include a procedural checklist for each agency. A description of the functional responsibilities of each of the agencies is provided in section 1.3 of the NHRERP. The State believes that while work on these procedures is not yet complete, this information will meet the intent of the regulations listed in NECNP Contention 1.
  - b) and (c) See Introductory Response to General Interrogatory.
  - d) None

- Contention 2.    a)    Local plans do exist and they have been submitted to FIMA (with the exception of a local plan for Hampton Falls).
- b)    and (c) See Introductory Response to General Interrogatory.
- d)    None
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- Contention 3.    a)    Areas in which federal assistance is required are identified in NHRERP Section 1.4.4. Estimated response times are lacking from this section. They will be added to the plan.
- b)    and (c) See Introductory Response to General Interrogatory.
- d)    None
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- Contention 4.    a)    Section 2.2 of the NHRERP describe the communications systems the State expects to have available for its emergency response organization. The State feels these systems are adequate for emergency response. To date major portions of these systems have not been ordered or installed.
- b)    and (c) See Introductory Response to General Interrogatory.
- d)    None

- Contention 5.
- a) Since the NHRERP was filed in May 1982, NHCDA has selected reception center locations. They are Salem, Nashua, Manchester, Durham, Dover, and Rochester.
  - b) and (c) See Introductory Response to General Interrogatory.
  - d) None

- Contention 7.
- a) Means for prompt notification of the public are not currently provided by the NHRERP. The State understands, however, that the Applicant has retained a contractor to design the required system. When the system design has been reviewed and approved by NHCDA its description will be added to the NHRERP.
  - b) and (c) See Introductory Response to General Interrogatory.
  - d) Preliminary Report on the Public Alerting System for Seabrook Station Emergency Planning Zone.

- Contention 9.
- a) It is the State's understanding that the Applicant will provide the facilities for a Media Center to be located off Route 107 approximately 1.5-2 miles from the Seabrook site. It is also understood that an alternate Media Center will be provided in

Manchester should one be necessary. The State also understands that procedures for the activation and use of these facilities are being developed.

The State has not yet taken a position on the Applicant's plans for the Media Center, and will probably not take such a position until the final plans and procedures are in place.

- b) and (c) See Introductory Response to General Interrogatory.
- d) None

Contention 10. a) See Answer relative to NECMP Contention No. 1.

- b) and (c) See Introductory Response to General Interrogatory.
- d) None

Contention 12. a) The State has described its methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of an emergency in Section 2.5 and Appendix B of the NHRERP. The State feels that improvements to these accident assessment capabilities are warranted. Funds will be requested to obtain resources for this capability and additional staff will be identified for training.



- b) and (c) See Introductory Response to General Interrogatory.
- d) None

- Contention 13.
- a) DPHS is surveying hospitals cited in that section to obtain more detailed descriptions of their capabilities and to seek an acknowledgement of their willingness to make their facilities available in the event of an emergency. The State cannot make a final determination until this information is received and reviewed.
  - b) and (c) See Introductory Response to General Interrogatory.
  - d) Hospital survey letter from Dr. William Wallace to hospital administrators and emergency department directors, and responses thereto.

Interrogatory No. 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.

Response

Yes. A date for submission has not been selected at this time. Submission will follow major revisions to DPHS procedures and minor revisions to procedures for several other agencies.

Interrogatory No. 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.

Response

The State objects to the breadth of this question in asking for information about "all individuals who participated in the preparation of" the NHRERP, and their contribution to the plan. The State, nevertheless, identifies below these persons who have had a substantial role in the development of the state plan.

A. Civil Defense Agency:

Richard Strome, Director, General Oversight and Policy guidance.

Eileen Foley, Former Director, General Oversight and Policy guidance.

Michael Nawoj, Radiological Energy Planning Director, Direct Oversight, development and review of the NHRERP.

David Deans, Field Representative: Review and Coordination of State Agency procedures, Liaison for Vermont Yankee RERP.

Norman Hobbs, Former Communication and Warning Officer, Development of State plan, and procedures.



B. Division Public Health Services:

Dr. William F. Wallace, Director: General Oversight and policy guidance.

Jack Stanton, Chief, Bureau of Environmental Health: development of Radiological Health portion of the NHRERP.

Diane Tefft, Bureau of Environment Health, development of Radiological Health portion of the NHRERP.

John D. Bonds, Assistant Director for Planning. Review and development of DPHS portions of the NHRERP.

C. Other State Agencies: See NHRERP, §7.2 for list of agency liaison personnel; development and review of Agency procedure.

D. HMM Associates:

Scott McCandless, Assist NHCDA in development of the State portion of the NHRERP for Seabrook.

E. Costello, Lomasney and De Napoli:

Martin Lomasney, assist NHCDA in the development of the local portion of the NHRERP for Seabrook.

Interrogatory No. 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.

Response

Draft procedures for each agency has been compiled. Most are in useable form and have been approved for use by the agencies responsible for implementing them. Six lack the concurrence of the agency for whom they are designed. These six are:

DPHS: Bureau of Emergency Medical Services and Bureau of Environmental Health

U.S. Coast Guard

American Red Cross

Rockingham County Dispatch

N. H. State Police

Department of Safety, Boating Safety

Each of these agencies wishes to undertake some level of revision to its procedures. The State feels that only the revisions to the DPHS procedures will require a substantial effort; other revisions will be editorial in nature.

No schedule has been set for completing the revisions. A preliminary estimate is that the revisions currently expected would be made no later than the first quarter of 1984.

Interrogatory No. 5

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

Response

No formal criteria were used by the State in compiling the procedures. They reflect (but are not limited to) the requirements of 10 C.F.R. Part 50 and NUREG-0654.

Interrogatory No. 6

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

Response

The agency procedures have been made available to the Emergency Planning Coordinator (EPC) for each agency included in the State's emergency response organization. A listing of these persons is included in Section 7.2 of the NHRERP. Distribution of the procedures within each agency has been left to the discretion of the EPC. In addition, the Civil Defense Agency ensures that a complete set of procedures is available for reference at both the EOC and IFO.

Interrogatory No. 7

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

Response

The implementing procedures are contained in a separate volume of the NHRERP (see answer to NECNP General Interrogatory on Contention 1). The State has not yet indexed these procedures to the NHRERP.

Interrogatory No. 8

Describe the purpose of the New Hampshire emergency response procedures.

Response

The purpose of the procedures is to provide agency specific checklists of actions required to implement the NHRERP.

Interrogatory No. 9

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

Response

The plan could probably be implemented adequately without the procedures. The State feels, however, that the procedures enhance the ability of the various agencies to meet their responsibilities. This is the case since the procedures focus on the duties of individuals rather than the State wide responsibilities addressed in the plan. This helps the individual do his job without necessarily being familiar with the content of the whole plan.

Interrogatory No. 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.

Response

See response to Interrogatory No. 9.

Because the procedures provide operational details for the emergency response agencies, they will be helpful to a reviewer in determining whether adequate protective measures can and will be taken in the event of a radiological emergency at Seabrook Station.

Interrogatory No. 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, [sic], identify all assessments, studies, and calculations of the resources and capability of the local governments to supplement the State's emergency response.

Interrogatory No. 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 of which supplementation is needed.

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

Response To Interrogatories 11 and 13

The State's planned response in the event of a radiological emergency is documented in and guided by its RERP. The New Hampshire local plans are appended to the State RERP. The totality of these plans and appendixes thereto must be viewed in identifying the planned role of the state and local governments in the event of a radiological emergency at Seabrook.

The State's primary responsibilities are outlined in section 1.3 of the NHRERP, and the local responsibilities are contained in the local plans.

In addition to the plans themselves, the following documents come within the scope of Interrogatory No. 11(c):

- (1) Undated document entitled, "DPHS Staffing Assignments - RERP"
- (2) Undated two page EMS training summary working paper

Interrogatory No. 14

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

Response

Volume # 1 of the NHRERP was distributed to all New Hampshire municipalities within the EPZ as well as to Host municipalities. Each municipality within the EPZ has been



approached with respect to procedures and resources. Each has also been supplied with a draft local plan and each has been or will be consulted with respect to this draft. Typically, Selectmen, Civil Defense Director, Fire and Police Chiefs, Road Agents and other local officials are involved in this process.

Interrogatory No. 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.

Response

There are none with respect to volume 1 of the NHRERP itself.

Interrogatory No. 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.

Response

Town officials have provided information with respect to local resources and capabilities.

Contention NHRERP-3 - Federal Assistance

Interrogatory No. 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.

Response

See State's answer to the General Interrogatory regarding Contention #3.

Interrogatory No. 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.

Response

No specific commitments of federal aid have been documented in written agreements. Section 1.4.4. of the NHRERP outlines the anticipated federal support.

The State's request for federal support does not specify personnel and equipment characteristics. Instead, it requests the general resources to supplement State response activities in areas in which the State's resources are limited.

Interrogatory No. 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.

Response

The federal support requested by the State may be needed in a variety of locations. Aerial monitoring support may be required within the EPZ.

Other support may be requested for the State EOC, for the IFO and for other locations depending on the nature, extent and duration of an emergency.

No time estimates for federal response have been prepared to date.

Interrogatory No. 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.

Response

See response to Interrogatory No.18.

Contention NHRERP-4 - Communication

Interrogatory No. 21

Identify the means of communication that are relied on in the NHRERP.

Response

See §2.2 of the NHRERP.

Interrogatory No. 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.

Response

- a) As to whether the lines are commercial or dedicated, this information is outlined in section 2.2 of the NHRERP. The number of users expected for dedicated lines is also in §2.2. The State does not know the number of users on commercial lines.
  
- b) Radio sets are provided with primary and redundant power sources which include batteries, AC power and auxillary generators. Section 2.2 of the NHRERP outlines the radio frequencies to be used. The system design provides for retransmission of signals to ensure coverage of the entire Emergency Planning Zone and host areas, as well as communications with State facilities in Concord. The messages relayed can be monitored by local governments and the general public.

Interrogatory No. 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.

Response

All the communications systems described in section 2.2 of the NHRERP are intended to have backup sources of electrical power. Operational communications centers cited in the plan are or will be provided with auxiliary power sources. (i.e., NHCDA has

emergency generators available for EOCs not already equipped with them). Also note that there are redundant communications systems for each communications path.

Interrogatory No. 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.

Response

The State objects to the breadth of the request to "identify all factors known to affect the reliability of the communications systems." (emphasis added)

Without waiving this objection the State offers the following response. The State has no statistics on the reliability of the communications systems described in Section 2.2 of the NHRERP. Most of the equipment described, however, is used daily by emergency response agencies for fire, police, and civil defense duties. The equipment has proven to be highly reliable under a variety of conditions. The equipment has functioned during adverse weather, during power outages, and during different times of day and year.

Contention NHRERP-5 - Relocation Centers

Interrogatory No. 25

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

Response

Portions of the contract between the State of New Hampshire and Costello, Lomasney & deNapoli, Inc., dated October 20, 1981 consider relocation centers for the Seabrook Station EPZ. Draft Host Municipality Plans have been developed by this firm under the above-mentioned contract.

Interrogatory No. 26

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

Response

Informal criteria used in reception center location included municipal population, proximity to the EPZ, and likely availability of public facilities.

Contention NHRERP-7 - Notification

Interrogatory No. 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.

Interrogatory No. 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.



Interrogatory No. 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.

Interrogatory No. 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.

Interrogatory No. 31

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

Interrogatory No. 32

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

Interrogatory No. 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?

Interrogatory No. 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?

Interrogatory No. 35

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

Interrogatory No. 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).

Interrogatory No. 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.

Interrogatory No. 38

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

Interrogatory No. 39

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

Interrogatory No. 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.

Interrogatory No. 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.

Interrogatory No. 42

From what location will the alert be broadcast?

Interrogatory No. 43

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

Interrogatory No. 44

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

Interrogatory No. 45

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

Interrogatory No. 46

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

Interrogatory No. 47

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

Interrogatory No. 48

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

Interrogatory No. 49

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

Interrogatory No. 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?

Interrogatory No. 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?

#### Responses to Interrogatories 27-51

Answers to these interrogatories are contained in the Preliminary Report on the Public Alerting System for Seabrook Station Emergency Planning zone, submitted to the State by Costello, Lomasney, and deNapoli, Inc. on July 11, 1983.

The State understands that the Applicant has retained a consultant to undertake the final design of the audible alert system for Seabrook Station, and that this design report will be available in December, 1983.

#### Contention NHRERP-10 - Sheltering

##### Interrogatory No. 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?

##### Response

Population distribution data for Seabrook Station are provided in Section 2.6 of the NHRERP. The number of people who would require sheltering would depend upon the area for which sheltering was determined to be the appropriate protective action.

##### Interrogatory No. 53

How was the figure given in answer to Question 47 [sic] arrived at?

Response

The population data cited in the previous response were compiled by PSNH. These data were derived from U. S. Census data and field studies sponsored by the utility. This work is documented in the Seabrook Station FSAR.

Interrogatory No. 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.

Response

To date the State has done no shelter classification specific to the Seabrook Station EPZ.

Interrogatory No. 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.

Response

No such work has been done by the State to date.

Interrogatory No. 56

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



Response

No.

Interrogatory No. 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.

Response

The State is considering sponsoring a survey to identify potential public shelters in the Seabrook Station EPZ. No decision has been made as to the extent of this survey or as to whether to designate any specific buildings as shelters to be used in a radiological emergency at Seabrook Station.

Interrogatory No. 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.

Response

Not applicable.

Interrogatory No. 59

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

Response

As to public shelter, see answer to Interrogatory No. 57. The State has not studied the location of other shelters, and, therefore, cannot describe or map them.



Interrogatory No. 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.

Response

The State has reviewed the following documents on the effectiveness of sheltering as a protective action in the event of a radiological emergency:

- (1) THE EFFECTIVENESS OF SHELTERING AS A PROTECTIVE ACTION AGAINST NUCLEAR ACCIDENTS INVOLVING GASEOUS RELEASES,  
(PARTS I AND II); (EPA 520/1-78J01A AND B)
- (2) 1980 U.S. CENSUS DATA, (Including Data on Housing Characteristics)

Contention NHRERP-12 - Radiological Monitoring

Interrogatory No. 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?

Response

The State is not aware of any statement in the NHRERP saying that it "...does not have the capacity to monitor the location or movement of a radioactive plume from Seabrook." (It does state, on page 1.4-4 that "State resources do not allow for

aerial monitoring". (Emphasis added.) The plan states that support in this area would be requested through FEMA. The State can also track the plume by dispersion calculations and ground level monitoring. Decisions to deploy the State monitoring teams will be based upon results of DPHS and utility plume dispersion calculations. Both sets of dispersion calculations will be based upon source term and meteorological data provided by the onsite emergency response organization.

Interrogatory No. 62

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

Response

The draft DPHS procedures call for mobilizing monitoring teams upon declaration of an ALERT at the plant. Mobilization includes initiating calls to the monitoring teams, assembling the monitoring teams in Concord and preparing equipment and personnel for departure to the EPZ. Upon declaration of a SITE AREA EMERGENCY the monitoring teams are sent to the IFO in Brentwood. At any subsequent time DPHS may deploy the field monitoring teams when there is a potential for release or any evidence of a release.

Interrogatory No. 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.

Response

The State objects to the vagueness and breadth of this question insofar as it asks for information about "radiological emergency personnel", generally, and does not ask about specific personnel.

As to monitoring teams specifically, see answer to Interrogatory No. 64.

Interrogatory No. 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)?

Response

The State estimates that initial mobilization of monitoring teams might take between half an hour and two and one half hours depending upon the time of day and day of the week. Travel times to Brentwood would be about an hour. Deployment of monitoring teams from Brentwood can be accomplished in a matter of 15-30 minutes.

Typically field monitoring procedures at a given monitoring point would require 10-15 minutes and field results could be reported immediately via radio or other means either to the IFO or EOC. The basis for this answer is the State's knowledge of distances and driving time in the Seabrook area.

Interrogatory No. 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.

Response

Criteria for selecting protective actions for direct exposure within the plume exposure EPZ are outlined in Section 2.7.6 and Appendix B of the NHRERP.

Contention NHRERP-13 - Medical Services

Interrogatory No. 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.

Response

The State objects to this interrogatory on the grounds that it is vague and overbroad.

Interrogatory No. 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?

Interrogatory No. 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.

Response to Interrogatories 67 and 68.

The State objects to the form and breadth of these interrogatories.

The State, without waiving its objection, provides the following response to this interrogatory as it pertains to hospitals and decontamination centers.

A. Hospitals

The State has not compiled information on how the existing use of hospitals would be affected by an influx of contaminated injured individuals. Medical service facilities capable of providing care for radiologically exposed persons are discussed in Section 2.8.4 of the NHRERP. Detailed data for these facilities is not currently available. DPHS, however, recently initiated a survey to obtain this information. A copy of the survey form and all responses thereto are available.

B. Decontamination Centers

Decontamination centers are available for potentially contaminated individuals at or near each reception center. Use of these decontamination centers would be short-term and would not likely cause a significant effect on the existing use of the facilities.

Interrogatory No. 69

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

Response

New Hampshire presently has 281 registered ambulances in the State. It will draw upon these ambulances and those of adjacent states as necessary in the event of an emergency.

Interrogatory No. 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.

Response

Sections 2.8.6 and 2.2.8 of the NHRERP describe the emergency medical communications systems.

Interrogatory No. 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.



Response

Hospital survey letter from Dr. William Wallace to hospital administrators and emergency department directors, and responses thereto.

II. REQUEST FOR PRODUCTION OF DOCUMENTS

All documents or references identified in the answers to these interrogatories are available for inspection at:

New Hampshire Civil Defense Agency  
1 Airport Road  
Concord, New Hampshire 03301

III. MOTION FOR PROTECTIVE ORDER

The State of New Hampshire hereby moves this Board for a Protective Order that no further answers to certain of NECNP's Interrogatories to the State are required. As grounds therefore the State asserts as follows:

Interrogatory No. 3

This Interrogatory asks the State to identify "all individuals who participated in the preparation of the New Hampshire Radiological Emergency Response Plan" (emphasis added). The State has identified all persons who had a substantial role in the development of the State Plan,

but objects to having to identify every single individual who had anything to do with its preparation, on the grounds that such a request is overly broad and therefore, unduly burdensome.

Interrogatory No. 63

This Interrogatory request certain information regarding "radiological emergency personnel". The quoted phrase is overly vague. The State of New Hampshire cannot determine from the term which particular individuals the question concerns. The term, furthermore, is overly broad if it is intended to include any person who may be performing an emergency response function in the event of a radiological emergency at Seabrook.

Interrogatory No. 66

NECNP asks in this Interrogatory for information relating to medical services for contaminated, or injured and contaminated individuals. This interrogatory is objected to on the basis of the vagueness of the term "contaminated or injured and contaminated individuals". The interrogatory, furthermore, is overbroad in that it asks about the need for medical services in the event of "a radiological emergency". The State can make no quantitative estimate of demand for medical services without a specific description of a particular radiological emergency. Without refining a definition of injured and/or contaminated individuals and without specifying particular accident scenarios, this Interrogatory cannot be answered.

Interrogatories Nos. 67 and 68

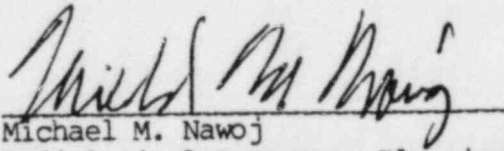
These Interrogatories inquire into the "facilities available for care and decontamination of individuals". They are objectionable insofar as the above-quoted phrase is overly vague, and that the reference to "patients" in the subquestions seems to limit the question only to health care facilities. The Interrogatories are also overly broad in that they would require an unduly burdensome effort to provide information including precise pieces of equipment and the identity of personnel at the facilities in question.

For the above reasons, the State requests that the Board issue a protective order providing that no further responses to the above Interrogatories are necessary.

Signatures

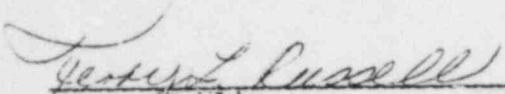
As to Answers:

I, Michael M. Nawoj, 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 State but not within my personal knowledge, as to which I, based on such information, believe them to be true.



Michael M. Nawoj  
Radiological Emergency Planning Director  
New Hampshire Civil Defense Agency

Sworn to before me this 8th  
day\_\_\_ of December 1983:

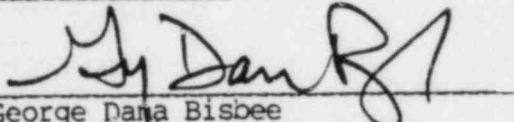


Notary Public

My Commission Expires:

TERRY L. RUSSELL, Notary Public  
My Commission Expires April 22, 1986

As to Objections and Motion for Protective Order:



George Dana Bisbee  
Assistant Attorney General  
Environmental Protection Division  
Office of Attorney General  
State House Annex  
Concord, NH 03301  
Telephone (603) 271-3679