

STATEMENT OF FACTS AS TO WHICH
THERE IS NO GENUINE ISSUE

1. Contention NH-21 addresses certain emergency planning requirements applicable to the Applicants' emergency plans, which are contained in that portion of the FSAR entitled Seabrook Station Radiological Emergency Plan ("SS-REP"). The Applicants previously moved for summary disposition of this contention ("Applicants Seventh Motion for Summary Disposition," filed February 14, 1983), and on June 13, 1983, the Applicants withdrew the motion in part. On June 30, 1983, the Board granted the motion for summary disposition to the extent not withdrawn. Insofar as the contention was not dismissed, the Board reworded it thus:

"Applicants' Emergency Plan as it relates to on-site protective measures is deficient in the following respects:

- "a. Updated letters of agreement with local fire, hospital and ambulance services must be submitted to the NRC:
- "b. The Applicants must describe their capability for monitoring and decontamination of plant evacuees and their vehicles at the plant and at the off-site assembly area;
- "c. The Applicants must list equipment and its location for individuals remaining or arriving on-site for respiratory protection, protective clothing and radioprotective drugs; and
- "d. A further description of first aid facilities including supplies, layout, capacity and access to decontamination capabilities must be provided."

Public Service Company of New Hampshire (Seabrook Station, Units 1 and 2), LBP-82-32A, 17 NRC 1170, 1174 (1982).

2. On January 18, 1984 and February 13, 1984, the Applicants submitted amendments to the SS-REP addressing these four issues, by Seabrook Letter Nos. SBN-612 and SBN-624, respectively. Copies were simultaneously served upon each of the parties, and a copy is annexed to the affidavit of Mr. James A. MacDonald. A brief description of the changes effected by these amendments is as follows:

1. Revisions to Pages 10-4a and 10-5 describe the capability for monitoring and decontamination of plant evacuees and their vehicles at Seabrook Station and at the off-site assembly area.
 2. Revisions to Pages 10-6 and 10-7 provide a description of first aid facilities including supplies, layout, capacity and access to decontamination capabilities.
 3. Appendix D provides Letters of Agreement with local fire, hospital and ambulance services and for an off-site assembly area.
 4. Appendix F lists equipment and its location for individuals remaining or arriving on-site for respiratory protection, protective clothing and radioprotective drugs.
3. The amendments transmitted by SBN-612 and SBN-624 address all of the issues and supply all of the information required by the reworded Contention NH-21.

CERTIFICATE OF SERVICE

DOCKETED
USNRC

I, Robert K. Gad III, one of the attorneys for the
Applicants herein, hereby certify that on April 12,
1984, I made service of the within APPLICANTS' RENEWED
PETITION FOR SUMMARY DISPOSITION (CONTENTION NH-21) by
mailing copies thereof, postage prepaid, to:

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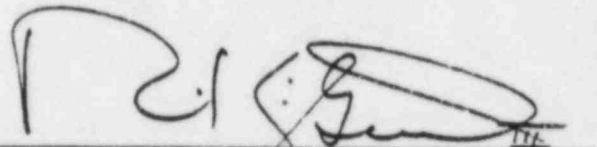
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A handwritten signature in dark ink, appearing to read "R. K. Gad III", written over a horizontal line.

Robert K. Gad III