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

In the Matter of)
)
PUBLIC SERVICE COMPANY OF NEW)
HAMPSHIRE, et al.)
)
(Seabrook Station, Units 1 & 2))
)

Docket Nos. 50-443 OL
50-444 OL

AFFIDAVIT OF JAMES A. MacDONALD
(Contention NH-21)

James A. MacDonald, being first duly sworn, does
depose and say as follows:

1. I am employed by Public Service Company of New
Hampshire as Radiological Assessment Manager. My
qualifications are contained in the FSAR at Chapter 13,
Appendix C, and I am the same James A. MacDonald who
testified in hearings before this Board on several
topics in August, 1983. I make this affidavit in

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support of the Applicants' Renewed Motion for Summary Disposition with respect to Contention NH-21.

2. 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 2/14/83), 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 On June 30, 1983, the Board granted the motion for summary disposition to the extent not withdrawn.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).

3. 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 copies are annexed to this affidavit as Exhibits A and B. 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.
4. 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:

James A. MacDonald
James A. MacDonald

State of New Hampshire)
County of Rockingham)

Then personally appeared James A. MacDonald, before and personally known to me, who, being first duly sworn, made oath that the foregoing statements are true, this 6 day of April, 1984.

Lynn A. Beaver
Notary Public
My Commission expires: _____
LYNN A. BEAVER, Notary Public
My Commission Expires December 9, 1986