



# Amesbury

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Mr. Jeremy Susco  
Environmental Project Manager  
Division of License Renewal  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D.C. 20555  
[jeremy.susco@nrc.gov](mailto:jeremy.susco@nrc.gov)

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RULES AND DIRECTIVES  
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**Re: Nuclear Regulatory Commission - Environmental Impact & Mitigation Scoping for Relicensing of the Seabrook Nuclear Plant - Docket NRC-2010-0206 Renewal of Operating License No NPF-86, Nextera Energy Seabrook LLC, Docket No. 50-443.**

Dear Mr. Susco,

As you are well aware, MassDOT is preparing to replace the Whittier Bridge which crosses the Merrimack River between Amesbury and Newburyport, MA along Interstate I-95. The Whittier Bridge represents a key bottleneck and vulnerability point between the two communities and the estimated 75,000 vehicle trips per day that move between New Hampshire and Massachusetts. As part of the licensing requirements in 1990 when the Plant was originally permitted, evacuation capabilities for the resident population largely depend upon Route 110 in Amesbury and Salisbury as well as I-95 southbound across the Whittier Bridge. As such, recent advances in the US DOT "intelligent transportation" technologies provide significant opportunities for automated traffic signal synchronization -- using remotely signaled algorithms for contra flow evacuations, and for changes in red/green ratios for other highway connectors. Thus, there are opportunities to now model arterial vehicular networks, and identify and eliminate bottlenecks for evacuation.

Given the significant traffic flows and transportation-related improvements being designed for the arterial backbone of Seabrook's evacuation plan we are requesting that the re-licensing hearing consider new environmental and safety impacts. This is first real opportunity for federal re-evaluation of Evacuation Plans for communities within 10 miles of the Plant since 1990, when Massachusetts Governor Dukakis refused to accept the evacuation plan because it was inadequate and impractical. Beach populations in summer are roughly double what they were in year 1990. As a result, we are requesting that the regional communities participate in a Demonstration Program, sponsored by USDOT, that would:

- Incorporate emergency traffic modeling on a regional basis. Some of these modeling and traffic signalization capabilities have the added benefit of improving regional traffic flow during summer peaking and weekend peaking demand for vehicular travel in the region -- while also improving emergency management;
- Our region has near-saturation of coastal roadways, and at times total saturation during "beach" visitation surges. See the Whittier Bridge traffic projections, increasing from about 77,000 trips per day in coming decades. MassDOT's draft EIR is pending for this project which will provide additional baseline data for modeling;

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Add = J. Susco (5551)

- Incorporate improved near-real-time "plume analysis" for radiation contingencies as considered generically in NUREG-1555, Section V (pp 513 - 547);
- Harness improved, declassified plume modeling techniques of the Defense Threat Reduction Agency, which that agency would make available to the NRC or the Department of Homeland Security in an emergency, for selection of evacuation zones by stages and non-evacuation zones under an Incident Commander;
- Augment the existing 18 (Geiger Counter) sensor and reporting system in northeastern Massachusetts communities, including the Town of Amesbury. Supplement the 18 existing sites with about 32 additional sites, mainly in southern New Hampshire, thereby improving near-real-time radiation monitoring and most likely reducing the zones requiring evacuation, making the evacuation plan more realistic and less likely to expose evacuees in stalled vehicles to radiation without building protection for occupants;
- Improve the reliability of regional radiation monitoring capabilities by identifying low-cost redundant capabilities (e.g. backup batteries for each of the 18 existing sensor sites) and redundant data links so an incident commander could obtain near-real-time radiation monitoring reports even if Seabrook produces no net electrical power and if the regional electric grid is temporarily inoperable;
- Improve emergency coordination between Northern Massachusetts and Southern New Hampshire, both at the state-to-state level and through a Demonstration Program involving the local municipalities in the region of the Seabrook station. Utilize the U.S. Dept of Transportation Modeling Capabilities (Office of Emergency Operations in US DOT) and use the "lessons learned" from Hurricane contra flow operations; and
- Supporting Regional planning whereby utilizing expansion of I-95 from 3 to 4 lanes to the New Hampshire border (8 or 9 lanes of contra flow compared to 5 or 6 now) will induce further growth pressures and traffic congestion. The study should harness the existing technologies for synchronized traffic signalization for all Merrimack River crossings, for Highways 110 and 286, and ramp improvements for I-95 and I-495 at the Highway 110 connectors now under modernization. The same technologies -- using solar panel rechargeable LED signals with remotely re-programmable software -- could assure more effective contra flow evacuation and save lives of law enforcement personnel --who need not be exposed to direct traffic that can be done by synchronized signals in most hot spots along the corridor. Signal synchronization software also reduce vehicle congestion stops, fuel usage, air pollution, and economic losses due to regional transportation congestion.

In closing, we are seeking to lay out a proposal that will meet the federal "requirements" for relicensing and we are providing a foundation for Regional Traffic Congestion & Emergency Evacuation Grant opportunities for our community and the surrounding region. In designating our Region a "Model Evacuation Demonstration Grant Area", we are seeking U.S. DOT support to use state-of-the-art traffic management support, build upon our regional planning capabilities, and fund this regional transportation mitigation and management effort.

I thank you in advance for your consideration of this request and please feel free to contact me at your earliest convenience if you have any questions regarding this request.

Respectfully,



Joseph W. Fahey, Director  
Office of Community and Economic Development

cc: Mayor Thatcher W. Kezer III  
Richard Plasse, Safety Project Manager - Division of License Renewal [richard.plasse@nrc.gov](mailto:richard.plasse@nrc.gov)