

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 and 2)

}
Docket Nos. 50-443 OL
50-444 OL

}
(Offsite Emergency Planning)

AFFIDAVIT OF FALK KANTOR, REGARDING
INTERVENORS' MOTION TO ADMIT CONTENTIONS
ON ONSITE EXERCISE

1, Falk Kantor, being duly sworn, state as follows:

1. I am employed by the United States Nuclear Regulatory Commission as Section Chief, Emergency Preparedness Branch, Office of Nuclear Reactor Regulation. A copy of my professional qualifications is attached. I have read the Intervenor's motion and my conclusions are set forth below.

2. In their September 28, 1989 filing, the Intervenor's requested that the following contention be admitted:

The September 27, 1989 Seabrook Station onsite exercise was not a full-scale onsite exercise and did not test all or even a significant number of the major observable portions of the Seabrook Station (RERP) ("onsite plan" or "SSERP"). For this reason, the September exercise did not meet the regulatory requirements for the onsite exercise to take place within one year of licensing ("pre-licensing one-year onsite exercise") as required by 10 CFR Part 50, Appendix E, IV.F. 1. See also CLI-89-19. As a result, the September exercise provides no basis for the required finding of reasonable assurance as set forth in 10 CFR 50.47(a)(1) and (2), and that exercise is not in compliance with 10 CFR 50.47(b)(14). See also ALAB-900.

3. Section IV.F.1 of Appendix E to 10 CFR Part 50 provides that:

1. A full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located for which the first operating license for that site is issued after July 13, 1982. This exercise shall be conducted within two years before the issuance of the first operating license for full power (one authorizing operation above 5% of rated power) of the first reactor and shall include participation by each State and local government within the plume exposure pathway EPZ and each State within the ingestion exposure pathway EPZ. If the full participation exercise is conducted more than one year prior to issuance of an operating license for full power, an exercise which tests the licensee's onsite emergency plans shall be conducted within one year before issuance of an operating license for full power. This exercise need not have State or local government participation. (emphasis added)

4. The first part of §IV.F.1 addresses the "full participation" exercise which must be conducted prior to the issuance of an operating license for full power. As defined in FN 4 to §IV.F.1, a "full participation" exercise includes "...testing the major observable portions of the onsite and offsite emergency plans and mobilization of State, local, and licensee personnel and other resources in sufficient numbers to verify the capability to respond to the accident scenario" (emphasis added). On June 28 and 29, 1988, the Applicants conducted a full participation exercise in compliance with this requirement of the regulations.

5. The second part of §IV.F.1 addresses the exercise of the onsite emergency plan prior to the issuance of a full power operating license if the full participation exercise is conducted more than one year before full power licensing. In fulfillment of this requirement the Applicants conducted an exercise of the Seabrook Station Radiological Emergency Plan (SSRERP, the onsite plan) on September 27, 1989. ^{1/}

^{1/} The exercise was considered to have been a "partial participation" exercise in that the State of New Hampshire Incident Field Office and the Applicants' New Hampshire Yankee Offsite Response Organization participated on a limited basis to test the interface with the onsite emergency response organization.

6. The regulatory requirement to test the major observable portions of the onsite and offsite plans refers to the full-participation exercise conducted within two years of full power licensing and not to the exercise of the onsite emergency plan within one year before issuance of a full-power license.

7. As indicated in the NRC staff filing before the Commission on August 28, 1989, the purpose of the one year exercise requirement is to assure that adequate emergency response capability exists at the time of licensing. The Seabrook Station Emergency Response Organization (ERO), which implements the SSREP, the onsite emergency plan, was established in 1985. In addition to extensive training and drills, the ERO has participated in three emergency preparedness exercises in addition to the September 27, 1989 exercise. A joint exercise of the onsite plan and the New Hampshire Radiological Emergency Response Plan (NHRERP) was held in February 1986. An exercise of the onsite plan was held in December 1987. A full-participation exercise involving the onsite plan, the NHRERP, the Seabrook Plan for Massachusetts Communities, and the State of Maine Ingestion Pathway Plan was held on June 28 and 29, 1988. Each of these exercises involved the testing of the onsite emergency plan which was observed and evaluated by the NRC. These exercises included the activation of the control room, the technical support center, the operational support center, the emergency operations facility, and the media center. All major elements of the onsite plan were demonstrated during these exercises. In addition to the exercise of record, the NRC takes into account the performance demonstrated in previous drills and exercises as well as the adequacy of an applicant's training, procedures, facilities, and equipment in evaluating the adequacy of an applicant's emergency response capability.

8. The importance of annual onsite emergency planning exercises by a licensee's operational staff is recognized in the Commission's regulations, which now require that after a facility is licensed to operate there must be an annual onsite exercise (10 CFR 50, Appendix E, §IV.F.2). This annual emergency preparedness exercise ensures that the licensee's new personnel are adequately and promptly trained and that existing licensee personnel maintain their emergency response capability. The existing requirement of a pre-operational onsite exercise within one year prior to full-power license issuance is consistent with this philosophy. The guidance regarding the conduct of the onsite exercise is given in Inspection Procedure (IP) 82301 which is used by the NRC staff to evaluate the exercise.^{2/} This guidance states that licensee performance in the control room, the technical support center, the operational support center, and the emergency operations facility should be observed and evaluated. In addition, the NRC regional inspectors may adjust the extent of observation in each area, as needed, to concentrate on areas where past license performance was considered marginal or in need of observation.

9. Section IV.F.1 of Appendix E to 10 CFR Part 50 sets forth the pre-licensing requirements for a full-participation exercise. The Appeal Board in ALAB-900 concluded that this exercise must test "the major observable portions" of the offsite plans and mobilize sufficient numbers of personnel and resources to verify an integrated capability to respond to an accident scenario.

^{2/} The Intervenors in the Basis to their contention refer to IE Inspection Procedure 82301, dated July 1, 1983. This procedure has been revised. The revised procedure, IP 82301, was issued on August 21, 1989. IP 82301 was revised, in part, to reflect the flexibility in the requirements regarding the development of exercise scenarios.

An exercise of sufficient scope must test as many of the elements of the plan as are reasonably achievable without mandatory public participation. The requirements regarding the major observable portions of the plans refer to the full-participation exercise (sometimes referred to as the "initial" or "qualifying" exercise) and not to the exercise of the onsite plan conducted within one year of full power licensing. The exercise of the onsite plan within one year of licensing is considered to be akin to the annual exercise of the onsite plan specified in §IV.F.2 of Appendix E to 10 CFR Part 50. The regulations do not set forth specific requirements for the scope of an onsite exercise. However, the staff has formulated guidance in NRC Inspection Manual, IP 82302, for delineating the scope of an exercise. Each exercise is evaluated in accordance with the guidance in IP 82301, dated August 21, 1989.

10. 10 CFR 50.47(b)(14) is the planning standard which specifies that periodic exercises are to be conducted to evaluate major portions of emergency response capabilities. The evaluation criteria of NUREG-0654/FEMA-REP-1 supporting the planning standard are reflected in IPs 82301 and 82302.

11. The NRC staff reviewed the objectives and scenario for the 1989 onsite exercise. The staff utilized the guidance of IP 82302 in performing this evaluation, the same guidance used to evaluate other onsite emergency plan exercises. IP 82302 provides the major onsite elements that should be exercised each year. The NRC review of the objectives and scenario for the 1989 Seabrook onsite exercise indicated that the exercise was in conformance with the guidance of IP 82302 and all of the major onsite elements would be exercised.

12. The intervenors cite the fact that the September 27, 1989 onsite exercise did not advance beyond a declaration of site area emergency (SAE) as an exercise failure. NRC guidance to licensees and applicants on the conduct of "off-year exercises" of onsite emergency plans; i.e., exercises other than

the full-participation biennial exercises, specifies that the onsite exercises are not required to proceed to a general emergency condition. (See NRC Information Notice No. 87-54, attached.) As noted in the guidance, the flexibility within the requirements contained in the emergency planning rules allows for the development of realistic scenarios which can improve emergency response capability.

13. Intervenors also raise objections that the exercise did not involve a medical team from local support services, did not involve the dispatch of any field monitoring teams, and did not involve any monitoring and decontamination centers for onsite personnel. Field monitoring teams were in fact a part of the exercise scenario. (See Inspection Report No. 50-440/89-10.) The exercise of medical support teams and the monitoring and decontamination of onsite personnel are elements of the plan that need not be performed in conjunction with each onsite exercise. Medical support services have been satisfactorily demonstrated in previous exercises and drills. (See Findings and Determinations for the Seabrook Nuclear Power Station, FEMA, dated December 1988, at 39.) Monitoring and decontamination of onsite personnel are activities which are routinely performed as part of plant operation activities. The demonstration of this activity as part of an exercise is an element which can be tested over a 5-year period.

14. I conclude that the September 27, 1989 exercise of the Seabrook onsite plan was of sufficient scope to test the adequacy of the Applicants' emergency

response capability and was in conformance with 10 CFR 50.47 (b)(14) and 10 CFR 50, Appendix E, Section IV.F.1. Thus, the information brought forward by intervenors does not raise a significant safety issue.

Falk Kantor
Falk Kantor

Subscribed and sworn to before
this 16th day of October, 1989

Elizabeth Ann Tipton
Notary Public
My Commission expires: 7/1/90

FALK KANTOR
EMERGENCY PREPAREDNESS BRANCH
DIVISION OF RADIATION PROTECTION AND EMERGENCY PREPAREDNESS
OFFICE OF NUCLEAR REACTOR REGULATION

PROFESSIONAL QUALIFICATIONS

I am employed as a Section Chief in the Emergency Preparedness Branch, Division of Radiation Protection and Emergency Preparedness, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. I have responsibility for supervising the review and evaluation of radiological emergency plans submitted by reactor applicants and licensees to ensure proposed plans meet the regulatory requirements and guidance of the Commission. I also function as a team member on emergency preparedness inspection teams engaged in the observation and evaluation of nuclear power plant emergency drills and exercises. I have been involved in the assessment of emergency planning and preparedness for nuclear power plants since March 1981.

I have been a member of the NRC (AEC) Staff since January 1973. From that time until June 1980 I held the position of Site Analyst in the Accident Analysis Branch. My duties included the review and evaluation of the radiological consequences of postulated design basis accidents, the effectiveness of proposed engineered safety features, the population density and growth characteristics in the site environs, and the possible adverse effects on plant safety of nearby industrial, transportation and military facilities. From September 1980 until March 1981 I was a member of the NRC's onsite technical support section at the Three Mile Island facility. I have participated in the detailed review of over thirty nuclear power plant sites with the primary objective being to ensure public health and safety through the application of Commission regulatory requirements and guidance on reactor siting. I have presented testimony on siting and emergency preparedness issues at public hearings on the licensing of nuclear facilities, including Shoreham and Seabrook, and I have appeared before the Advisory Committee on Reactor Safeguards.

I entered graduate school in 1967 at the University of Pittsburgh on a U.S. Public Health Service Fellowship and received a MS degree in 1968 in Radiation Health (Health Physics). Following graduation I was employed by the NUS Corporation in Rockville, Maryland, and engineering and environmental consulting organization. At NUS I was involved in the environmental aspects of siting both nuclear and fossil power plants.

In 1963, I began employment with the Westinghouse Electric Corporation at the Bettis Atomic Power Laboratory in Pittsburgh, Pennsylvania. My duties included the design of radiation shielding for nuclear power reactors for both landbased and shipboard applicants. I participated in field tests at Federal reactor facilities to evaluate the effectiveness of shield design features on operating reactors.

I received a BS degree in Industrial Engineering in 1958 from the Pennsylvania State University. Upon graduation I entered the U.S. Air Force where I attended the Basic Meteorology Program at St. Louis University in St. Louis, Missouri. Following the completion of this program in 1959, I served as a weather officer in the U.S. Air Force.

In addition to my formal education, I have attended training courses sponsored by the NRC on reactor systems and operation and emergency preparedness. In May of 1979 I attended the course titled "Planning for Nuclear Emergencies" at Harvard University and in September 1980 I participated in the Radiological Emergency Response Operations Training course at the Nevada Test Site.

I am a member of the Health Physics Society. I was a member for 25 years of the National Guard and currently am a member of the U. S. Coast Guard Auxiliary.

I have contributed to the following NRC documents:

- "Emergency Planning Input for Shoreham Nuclear Power Station," NUREG-0420, Supplement No. 10, May 1989.
- "Director's Findings on Shoreham Emergency Planning Contentions," April 7, 1989.
- "Final Director's Decision Under 10 CFR 2.206," Pilgrim Nuclear Power Station, December 29, 1988.
- "Issuance of Extension to the Exemption to CFR Part 50, Appendix E, Section IV.F.3 for the Pilgrim Nuclear Power Station," May 11, 1988.
- "Issuance of Exemption to 10 CFR Part 50, Appendix E, Section IV.F.3 for the Pilgrim Nuclear Power Station," December 9, 1987.
- "Director's Decision Pursuant to 10 CFR 2.206 for the Perry Nuclear Power Plant," dated September 14, 1987.
- "Issuance of Exemption to 10 CFR Part 50, Appendix E, Section IV.F.2 for the North Anna Power Station," March 28, 1988. Exemption to conduct an exercise in 1987 granted based on licensee's response to SGTR event on July 15, 1987.
- "Emergency Planning Input for the Humboldt Bay Power Plant, Unit No. 3 Decommissioning Safety Evaluation Report," letter to J.D. Shiffer, VP Nuclear Power Generation, PGE, April 29, 1987.
- "Director's Decision Under 10 CFR 2.206 for San Onofre Nuclear Generating Station (Expansion of EPZ)," January 29, 1987.
- "Emergency Planning Input for Grand Gulf Safety Evaluation Report," December 12, 1986.
- "Issuance of Exemption to 10 CFR Part 50, Appendix E, Section IV.F.2, Wolf Creek Generating Station," November 14, 1986.
- "Issuance of Exemption to 10 CFR 50, Appendix E, Section IV.F.1 for the Perry Nuclear Power Plant," dated October 31, 1986.
- "Emergency Plan Input for the Nine Mile Point Nuclear Station, Unit No. 2, Safety Evaluation Report," NUREG-1047, dated February 1985. Supplement No. 3 dated July 1986.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555

October 23, 1987

NRC INFORMATION NOTICE NO. 87-54: EMERGENCY RESPONSE EXERCISES

Addressees:

All holders of operating licenses or construction permits for nuclear power reactors.

Purpose:

This information notice is being provided to remind addressees of flexibility that exists in certain requirements contained in emergency planning rules. It is expected that recipients will review the information for applicability to their program. However, suggestions contained in this information notice do not constitute NRC requirements; therefore, no specific action or written response is required.

Description of Circumstances:

To satisfy the current requirements of 10 CFR 50.47 and 10 CFR Part 50, Appendix E, each licensee must annually exercise its emergency plan. In addition, each licensee is required to exercise with offsite authorities such that the State and local government emergency plans are exercised biennially. Currently there are no specific requirements which address whether each exercise scenario must lead to the declaration of a General Emergency. However, perhaps as a carryover from the previous requirements for annual State and local exercises, almost all exercise scenarios are planned to progress to a General Emergency condition.

Discussion:

While it may be appropriate for biennial offsite exercises to proceed to a General Emergency declaration, exercises other than biennial offsite exercises (off-year exercises) are not required to proceed to severe core damage. Such exercises can provide an opportunity for more realistic emergency response training and evaluation of licensee staff. For example, before severe core damage would be expected to occur, the operating staff may be given the opportunity to diagnose and attempt to correct the problem through an interactive scenario. In addition, some exercise scenarios may be designed with initiating events at the Alert or Site Area Emergency classification. Since actual events may go directly to these higher level classifications without sequencing

through each emergency class, advance opportunity to activate response facilities may not occur. The flexibility within the requirements allows for the development of other realistic scenarios which, in turn, can improve emergency response capability.

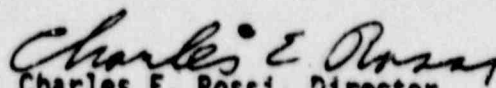
10 CFR Part 50, Appendix E, Section IV.F.3.f, states that "licensees shall enable any State or local government located within the plume exposure pathway EPZ to participate in annual exercises when requested by such State or local government." To satisfy this requirement, it may be necessary for licensees to develop an exercise scenario which provides opportunities to test the appropriate aspects of the offsite response plan. Such participation may need to be negotiated between the licensee and the offsite authorities.

Licensees that have conducted realistic and interactive exercises have identified and corrected weaknesses in their ability to respond to such simulated onsite events as fire, loss of electrical power, and equipment failure. The response of personnel and availability and utilization of alternate equipment to mitigate simulated severe off-normal plant conditions have been challenging and have led some licensees to conduct further training and provide added procedures and support equipment. In addition, interactive exercises can provide a training opportunity for personnel that would be called upon to make strategic decisions in areas that are not addressed by existing procedures.

Licensees and applicants may wish to consider incorporating these concepts in planning and conducting off-year emergency response exercises.

The revision to the exercise frequency requirements of 10 CFR Part 50, Appendix E has been previously discussed in IE Information Notice 85-55, "Revised Emergency Exercise Frequency Rule."

No specific action or written response is required by this information notice. If you have any questions about this matter, please contact the technical contact listed below or the Regional Administrator of the appropriate regional office.


Charles E. Rossi, Director
Division of Operational Events Assessment
Office of Nuclear Reactor Regulation

Technical Contact: Cheryl A. Sakenas, AFOD
(301) 492-9004

Attachment: List of Recently Issued NRC Information Notices

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF EDWIN F. FOX, JR. REGARDING ONSITE EXERCISE

I, Edwin F. Fox, Jr, being duly sworn, state as follows:

1. I am employed by the United States Nuclear Regulatory Commission as a Senior Emergency Preparedness Specialist, Emergency Preparedness Section, Facilities Radiation Safety and Safeguards Branch, Division of Radiation Safety and Safeguards, Region I, US Nuclear Regulatory Commission at 475 Allendale Road, King of Prussia, Pa. A copy of my professional qualifications is already on record in this proceeding following Tr. 24627.

2. I was the Team Leader of the NRC Inspection Team during the observation and evaluation of the September 28, 1989, partial participation exercise at the Seabrook Nuclear Power Station. The conclusions and findings of that inspection are documented in NRC Region I Inspection Report 50-443/89-10.

3. During the conduct of this inspection, the team had available for its use the evaluation criteria in NRC Inspection Manual Procedure 82301 ("IP 82301") dated July 1, 1983 and the final version of that procedure dated August 21, 1989. As Team Leader, I followed the guidance provided in the August 21, 1989 version of 82301 for the 1989 Seabrook Exercise. This procedure states

that the licensee's performance in the Control Room, the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility should be observed and evaluated. It further states, that NRC regional inspectors may adjust the extent of observation in each area, as needed, to concentrate on areas where past licensee performance was considered marginal or in need of observation.

4. Team member assignments were as shown on the Team Memorandum, dated August 31, 1989. I served as the leader of the NRC inspection team, responsible for observing and evaluating the adequacy of onsite activities of the Seabrook exercise. In this regard, I was responsible for the overall inspection effort, which included planning and operation, chairing entrance and exit interviews, consolidating the findings of individual inspection team members, preparing the inspection report and reporting the results of the exercise inspection to NRC Region I management. Individual team members were assigned to be present at the major emergency response facilities, and were to observe the licensee's emergency response and preparedness activities in accordance with the guidance of IP 82301. These locations included the Control Room, the Technical Support Center (TSC), and the Newington Emergency Operations Facility (EOF). Inspection team members were assigned to make detailed observations at their respective locations regarding the licensee's ability to perform various emergency response functions in such areas as: Recognition and Classification of Emergencies; Notification to Offsite Authorities; Activation of Facilities; Accident Assessment; Dose Assessment and Projection; Protective Action Recommendations; and Overall Command and Control. By analyzing the licensees' performance in these functional areas, the inspection team was able to determine that each of the exercise objectives was met.

5. Following the exercise, the NRC inspection team met in a debriefing session, which I chaired as team leader. The team members briefed me on their observations. As team leader, I then summarized the team members' observations and ascertained that the individual team members were in agreement with the inspection summary that would be presented to the licensee at the exit interview and incorporated into the inspection report.

6. In preparing for the inspection, I reviewed the objectives and scenario for the September 1989 exercise utilizing the guidance of NRC Inspection Procedure 82302, dated January 1, 1989. This procedure specifies the major onsite elements that should be exercised each year and other elements that should be exercised over a five-year period. The review I conducted of the objectives and scenario for the 1989 Seabrook onsite exercise indicated that the exercise would support an adequate demonstration of the major portions of the Seabrook response capability.

7. It is part of the intervenors' contention that: "This failure was due to the exercise design that did not: 1) advance beyond a declaration of site area emergency and, therefore, did not trigger sufficient offsite protective action decision-making." NRC Information Notice No. 87-54 states that:

While it may be appropriate for biennial offsite exercises to proceed to a General Emergency declaration, exercises other than biennial offsite exercises (off-year exercises) are not required to proceed to severe core damage. Such exercises provide an opportunity for more realistic emergency response training and evaluation of licensee staff. For example, before severe core damage would be expected to occur, the operating staff may be given the opportunity to diagnose and attempt to correct the problem through an interactive scenario. In addition, some exercise scenarios may be designed with initiating events at the Alert or Site Area Emergency classification. Since actual events may go directly to these higher level classifications without sequencing through each emergency class, advance opportunity to activate response facilities may not occur.

Licenses that have conducted realistic and interactive exercises have identified and corrected weaknesses in their ability to respond to such simulated onsite events as fire, loss of electrical power and equipment failure. The response of personnel and availability and utilization of alternate equipment to mitigate simulated severe off-normal plant conditions have been challenging and have led some licenses to conduct further training and provide added procedures and support equipment. In addition, interactive exercises can provide a training opportunity for personnel that would be called upon to make strategic decisions in areas that are not addressed by existing procedures.

8. It is not necessary for a scenario to reach the General Emergency classification as long as the major portions of the response plan can be tested. These major portions are specified in NRC Inspection Manual, Inspection ("IP 82302") Procedure 82302 as Accident Detection and Assessment; Emergency Classification; Notification of Onsite and Offsite Emergency Responders; Communications; Radiological Exposure Control; Protective Action Recommendations; Staff Augmentation; and Shift Staffing. These items are evaluated during each annual exercise. The other portions of the plan are considered to be of lesser significance and are observed and evaluated over a five-year period. Attached is the correlation of the major elements of an onsite plan with the objectives for the 1989 Seabrook exercise (Attachment A).

In Region I Inspection Report No. 50-443/89-10 (at 6), it is noted with respect to the TSC that "Discussions were held regarding the potential need for protective actions and at what point they would become necessary if conditions worsened." I also observed the Recovery Manager discuss with the designated representatives of the State of New Hampshire and the New Hampshire Emergency Response Organization (State of Massachusetts) on several occasions the need for protective actions. These discussions included those that had already been taken or recommended by the States and those that the utility would be

recommending if conditions degraded at the plant. The scenario events were sufficient to trigger meaningful offsite protective action decision making.

9. The intervenors' contention states that, "the exercise design...did not ... 2) involve a medical team from a local support services agency (the Seabrook Fire Department pursuant to the Seabrook RERP) or an offsite medical treatment facility (Exeter Hospital according to the SSRERP)." The Medical services/support aspect of a plan is not required to be performed in each onsite exercise. This aspect of the plan is performed by a licensee each year during drills that are periodically evaluated by NRC and FEMA observers or during biennial exercises. Conducting them coincident with an annual exercise is of little additional value. Further, the Applicants have demonstrated the effectiveness of the medical services aspect of the plan by utilizing it for actual emergencies that have occurred over past years.

10. The intervenors' contention asserts that "the exercise design...did not ... 3) involve the dispatch of any field monitoring teams and assessment activities." Section 4.0 of Inspection Report No. 50-443/89-10 reports that field monitoring teams arrived at the EOF and were promptly and effectively prepared for dispatch; were promptly dispatched (within 50 minutes of arrival at the EOF); communications between the EOF and the field teams were excellent; sample counting equipment was set-up promptly; and sample control and analysis including surveys and the use of anti-contamination clothing were effectively demonstrated. Also, this is a plan aspect that need only be demonstrated over a five-year period. (See ¶9 above). Field monitoring assessment was

demonstrated in accordance with Objectives Nos. 15 and 16 in the 1988 Seabrook Exercise.

11. The last part of the intervenors' contention states that "the exercise design... did not... 4) involve any onsite personnel monitoring and decontamination at the offsite locations planned for that purpose (the Seabrook Dog Track and the "Warehouse" on route 107)." As noted in paragraph 8 above, this is not a major portion of the Seabrook onsite plan. Monitoring and decontamination of personnel is a routine activity and portions or all of it is done daily at a nuclear power plant. Personnel leaving the plant are monitored for contamination automatically as they pass through portal monitors. The use of the Seabrook Dog Track would only be used under the situation in which a radioactive plume was blowing toward the security exit where the portal monitors are located, nullifying their effectiveness. The scenario did not provide for such a release so normal monitoring was in effect.

12. The intervenor's basis for the contention is the section from NRC's Inspection and Enforcement Manual ("IE Inspection Procedure 82301") with its attachment, NRC's Exercise Evaluation Criteria for onsite exercises, dated July 1, 1983, which states: "Sections 1, 2, and 3 [of the Evaluation Criteria] (control room, technical support center, and emergency operating facility) must be evaluated annually and the entire program must be evaluated in the initial exercise prior to escalation of power beyond 5%." (Emphasis added). The July 1, 1983 version of IP 82301 was superseded by the August 21, 1989 version utilized as guidance for the September 1989 Seabrook Exercise. The section quoted above is not in the current version of IP 82301.

13. The NRC evaluated the September 1989 Seabrook Exercise and published a summary of its exercise team findings concerning the adequacy of on-site emergency planning and preparedness in Inspection Report No. 50-443/89-10.

That report concludes, "No violations, deviations or unresolved items were identified. The licensee's response actions for this exercise demonstrated the ability to implement the emergency plan in a manner which would provide adequate protective measures for the health and safety of the public." The scope of the September 1989 exercise was sufficient to test the major elements of the Seabrook onsite emergency response plan. The information relied on by the intervenors does not show a deficiency in the scope of the onsite exercise and, thus does not raise a significant safety issue.

The foregoing is true and correct to the best of my knowledge and belief.

Edwin F. Fox

Subscribed and sworn to before
this ____ day of October, 1989

Notary Public
My Commission expires: _____

CORRELATION OF 1989 SEABROOK
PARTIAL PARTICIPATION EXERCISE OBJECTIVES
AND NRC INSPECTION PROCEDURE 82302

<u>ANNUAL REQUIREMENT</u>	<u>9/27/89 Exercise Objective Nos.</u>
A. Accident Assessment	3, 10, 14, 21
B. Emergency Classification	2
C. Notification of onsite and offsite Emergency Responders	5 (onsite), 6a - c, 9, 24 (offsite)
D. Communications	19, 25, 26
E. Radiological Exposure Control	12, 13
F. Protective Action Recommendations	10, 11, 27
G. Staff Augmentation	5, 6, 22
H. Shift Staffing	1, 4, 5, 8, 15, 20, 22

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'89 OCT 17 P1:45

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

in the Matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2)

OFFICE OF THE ATTORNEY GENERAL
DOCKETING SERVICE
Docket Nos. 50-443 OL
50-444 OL
Off-site Emergency Planning

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC RESPONSE TO INTERVENORS' MOTION TO ADMIT CONTENTIONS ON SEPTEMBER 27, 1989 EXERCISE, and AFFIDAVIT OF FALK KANTOR REGARDING INTERVENORS' MOTION TO ADMIT CONTENTIONS ON ONSITE EXERCISE and AFFIDAVIT OF EDWIN F. FOX REGARDING ONSITE EXERCISE" in the above captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, as indicated by double asterisks, by Express Mail, this 16th day of October 1989:

Ivan W. Smith, Chairman (2)*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Richard F. Cole*
Administrative Judge
Atomic Safety and Licensing Board
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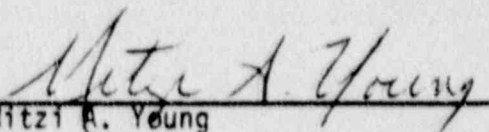
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Atomic Safety and Licensing
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Atomic Safety and Licensing
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