



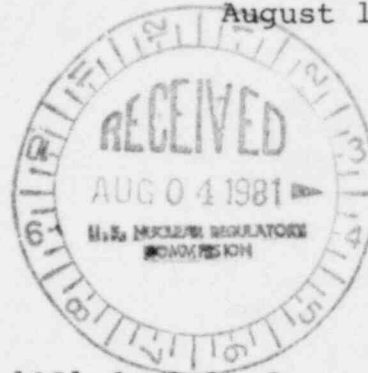
# SAPL

Seacoast Anti-Pollution League  
5 Market St., Portsmouth, N.H. 03801

(603) 431-5089

August 1, 1981

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



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Dear Director Denton:

SAPL has received your July 15, 1981 denial of our June 30, 1981 request for a hearing on evacuation feasibility for the Seabrook EPZ.

The SAPL Board of Directors asks that you reconsider your decision because it is based on inaccurate, invalid information.

On page nine of the decision, your staff writes that "the evacuation times estimated for the Seabrook site (provided by FEMA) ... are based only on currently available communications, notification systems and traffic management capabilities ...". This is incorrect.

Actually, the maximum time frame of 6.2 hours<sup>1</sup> upon which you base your decision that Seabrook's evacuation time estimates are "not so extraordinary" as to warrant a proceeding, is the estimated amount of time that it would take to evacuate the EPZ if "... an effective local preparedness plan is in operation".<sup>2</sup>

The "current" situation is that there is no effective plan. FEMA clearly states that "in the absence of effective preparedness planning, the evacuation time estimates given in this report are invalid".<sup>3</sup> Hence, the 6.2 hour time frame is invalid.

The valid maximum time frame according to FEMA for the "current" situation in which there is little or no traffic control secured by local plans is nearly fifteen hours. At both the beginning and the end of the FEMA study it is stated that "an evacuation in which traffic control is generally ineffective, total evacuation times will range from ten hours thirty minutes to fourteen hours forty minutes."<sup>4</sup>

Ten and a half hours to nearly fifteen hours are quite different time frames than the 5.2 to 6.2 hour time frames you cite in your decision.

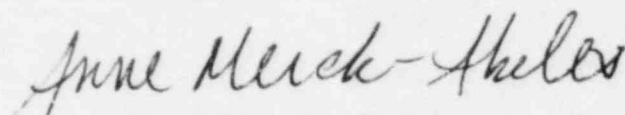
We consider the valid time frames most "extraordinary" and we ask

that you reassess the data when it is accurately applied and that you reconsider your decision.

To further assist your staff in understanding FEMA's study objectives and to further illustrate the differences between "currently available" and "effective local preparedness", we cite the following sections of the FEMA study on Seabrook:

page 7, lines 16-31  
page 8, lines 1-3  
page 68, lines 8 and 9  
          lines 21-24  
page 69, lines 14-16  
page 75, lines 13-16  
page 80, table #9

Respectfully submitted,



Anne Merck-Abeles  
President

1. Table 1 of July 15, 1981 Director's Decision Under 10 CFR 2.206 and Table 1 of Seabrook Station Evacuation Analysis: Draft Report Estimate of Evacuation Times prepared for FEMA by Alan M. Voorhees & Associates.
2. FEMA Draft Report, page 3.
3. Ibid, page 4.
4. Ibid, pages 7 and 74.

cc: NRC Commissioners  
Members of N.H. Congressional Delegation

**SAPL**

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