

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

REBUTTAL TESTIMONY OF DR. THOMAS URBANIK II ON  
TESTIMONY OF PHILIP B. HERR ON NECNP CONTENTIONS III.12 AND III.13

Q.1. Have you reviewed the testimony of Philip B. Herr dated July 15, 1983 concerning restated NECNP Contentions III.12 and III.13?

A.1. Yes.

Q.2. Do you have any comments?

A.2. Yes. Herr questions eight through twelve are technically outside the scope of Contention NECNP III.12 and III.13, as restated by the Licensing Board. However, I will respond to all of Mr. Herr's issues in the event the Board nevertheless determines to examine these other issues.

Q.3. Is Mr. Herr correct in implying there are no estimates of simultaneous beach evacuation for the 10 mile EPZ?

A.3. No. Item 2 listed in Mr. Herr's responses to Q.3 of his testimony contains, on page 12 of 13, evacuation time estimates for a 360° evacuation. A 360° evacuation includes simultaneous evacuation of the beach.

Q.4. Has the Licensee prepared an estimate for an adverse weather scenario with a summer weekend peak population?

A.4. Yes. The Licensee has recently prepared another estimate (Scenario 14) for a peak summer weekend under adverse weather conditions. The results are presented in a report entitled "Evacuation Clear Time Estimates for Areas Near Seabrook Station", updated 1981, revised July 1983 prepared by HMM Associates, Inc. for Yankee Atomic Electric Company.

Q.5. Are there any unresolved issues concerning evacuation time estimates for Seabrook Station?

A.5. No.

Q.6. Are evacuation time estimates intended to cover every conceivable type of adverse occurrence?

A.6. No. The estimates are a planning and decision making tool. Emergency planners would have to make decisions concerning actual conditions if an accident were to occur. The planning process is intended to develop a sufficient data base upon which informed decisions can be made.

Q.7. What is the significance of two traffic accidents during an evacuation?

A.7. A traffic accident or incident would delay an evacuation at most by the amount of time to clear the accident. In most cases, an incident involving a passenger car could be cleared by passing motorists in a few minutes. A larger vehicle or more severe accident might require 15 minutes to clear. Again, the planning process is intended to provide the resources, in this case tow trucks, necessary to insure a smooth evacuation.

Q.8. Should an evacuation time estimate be made sufficiently large, say twice what has been estimated, in order to be extremely conservative?

A.8. No. An excessively long evacuation time estimate could lead to decision not to evacuate when evacuation was actually feasible.

Q.9. Does the "ripple effect" cited by Mr. Herr (Herr Testimony, p. 10, A.9) apply to the Seabrook evacuation?

A.9. Not in the way he implies. An evacuation at Seabrook will result in vehicle demand exceeding capacity. This will in fact result in a "ripple effect" as traffic queues. In other words, the evacuation already accounts for the "ripple effect".

Q.10. What is the effect of non-evacuating traffic (Herr Testimony, p. 11)?

A.10. Roadways, for the most part, will be operating in two directions. Capacity, therefore, exists to accommodate vehicles returning home or to cottages. Pedestrians in the beach area may impede traffic somewhat, but this area is not the bottleneck to an evacuation. Delays in the beach area should not contribute to evacuation delays.

Q.11. What is the importance of transit-dependent evacuation time estimates (Herr Testimony, pp. 11-12)?

A.11. The transit-dependent planning involves determining the number of buses necessary. Even if two trips are required, the second trip only adds a small increment (15-30 minutes) to the evacuation time.

Q.12. Does the variability among estimates made by different groups reflect the uncertainty of the estimates?

A.12. No. The estimates were made using different assumptions. The estimates made by the State of New Hampshire are noteworthy because they were developed as a part of their planning process.