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USNRC

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

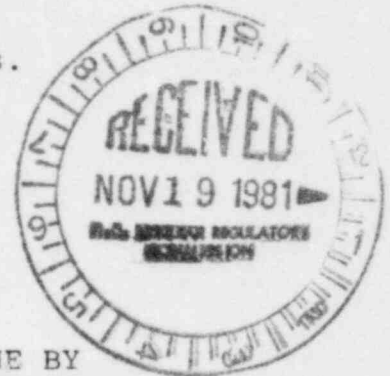
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)
	)
PUBLIC SERVICE COMPANY OF	)
NEW HAMPSHIRE, <u>et al.</u> ,	)
	)
(Seabrook Station Units 1	)
and 2)	)
	)
	)

Docket Nos.

50-443 OL  
50-444 OL



PETITION FOR LEAVE TO INTERVENE BY  
THE NEW ENGLAND COALITION ON NUCLEAR  
POLLUTION

1. The New England Coalition on Nuclear Pollution, Petitioner, on behalf of its approximately 500 individual members, hereby petitions the Nuclear Regulatory Commission (NRC) for leave to intervene in proceedings for the issuance of an operating license in the above-captioned matter, pursuant to Section 2.714 of the NRC's Rules of Practice and Procedure, 10 C.F.R. 2.714, and the Commission's Order of October 19, 1981 (46 Fed. Reg. 51330).

2. Petitioner is an incorporated non-profit organization with members, trustees, science advisors, and supporting groups in the New England states and New York. The Coalition is concerned about the dangers of nuclear energy and advocates the development of safe energy alternatives. Its major activities and goals are education of the public concerning nuclear hazards, energy conservation, and alternative energy

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sources. The Coalition has been an active intervenor in the construction permit proceeding concerning the Seabrook plant.

3. Section 189(a) of the Atomic Energy Act, 42 U.S.C. §2239(a), requires that the Commission admit as a party "any person whose interest may be affected by the proceeding." The Coalition requests leave to intervene in order to protect its own interests as an organization and the interests of its members. Many members of the Coalition live, work, shop, and pursue leisure activities in the area of the Seabrook nuclear facility and would be adversely affected by any accident or serious problems in its operation. The members of the Coalition are concerned that the quality of their lives, including their personal health and safety, property and leasehold values, and business and employment interests may be jeopardized by a mishap at the facility. For these reasons the following individuals have authorized the Coalition to intervene on their behalf and request a hearing on the issuance of an operating license for Seabrook Units 1 and 2:

Laura C. Crooks  
6 Parker Street  
Newbury, Massachusetts

James F. Fallon  
131 Ocean Boulevard  
Hampton, New Hampshire 03842

Eugene D. Finch  
South Road  
East Kingston, New Hampshire 03827

Stuart Meiklejohn  
563 Exeter Road  
Hampton, New Hampshire

Elizabeth Meiklejohn  
563 Exeter Road  
Hampton, New Hampshire

John W. Parker  
South Road  
Rt. 84  
Hampton Falls, New Hampshire

Sara A. Parker  
South Road  
Rt. 84  
Hampton Falls, New Hampshire

All of the above-mentioned individuals live within 8 miles of the Seabrook facility. Their affidavits are attached.

Petitioner and the members named above believe that their ability to litigate the issues raised below is critical to the health, safety and property interests of the Coalition and its members.

4. As required by 10 C.F.R. 2.714(a)(2), the aspects of the subject matter of the proceeding as to which NECNP wishes to intervene are set out below:

1. Risks caused by potentially adverse interactions between safety and non-safety systems.
2. The effects of a hydrogen burn or explosion on equipment important to safety.
3. All other aspects of the issue of hydrogen control.
4. The requirement for consideration of accidents that are beyond the design basis of the plant (Class 9 accidents) in the Environmental Impact Statement, including the need for specific consideration of the consequences of such accidents without reference to probabilities, and the fact that the consequences of a Class 9 accident are so severe that the plant should not be licensed for operation. Depending upon what is addressed in the EIS, NECNP may challenge the projected consequences as well.


5. Seismic hazards at Seabrook which render the plant unsafe in its current design (particularly since this issue has not been resolved at the CP stage).
6. Emergency Planning.
7. Safety problems that arise as a result of the aging of the plant and equipment, including particularly steam generator tube degradation, pressure vessel rupture, and the failure to adequately consider aging in qualifying safety-related equipment.
8. The inadequacy of shutdown heat removal capability.
9. The reliability of onsite and offsite electrical power to operate heat removal equipment and other equipment important to safety.
10. The environmental, seismic, and dynamic qualification of electrical and mechanical components important to safety.
11. Reactor vessel embrittlement (pressurized thermal shock).
12. Steam generator rupture.
13. Failures in Quality Assurance/Quality Control during construction.
14. Faulty construction work, including poor workmanship and the use of unqualified workers, particularly in the area of concrete work.
15. Inadequacy of Quality Assurance for the operation of the facility.
16. Welding failures and inadequacies.
17. Hazards of excessive pressures in the reactor vessel.
18. The Licensee's lack of managerial competence and character to operate the reactors.

19. The Licensee's lack of technical competence to operate the reactors.

20. The Licensee's lack of financial qualifications to operate a nuclear power plant.

5. For these reasons, the Coalition respectfully seeks leave to intervene in the above-captioned proceeding.

Respectfully submitted,

  
\_\_\_\_\_  
William S. Jordan, III  
Ellyn R. Weiss

HARMON & WEISS  
1725 I Street, N.W.  
Suite 506  
Washington, D.C. 20006  
(202) 833-9070

Dated: November 18, 1981

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. )

Docket Nos. 50-443 OL  
 50-444 OL

(Seabrook Station, Units 1 and 2) )  
 )

AFFIDAVIT OF

1. My name is Laura C. Crests. I live at 1 Parker St,  
Newbury Mass., which is 7 miles Southwest  
 from the proposed Seabrook nuclear power plant. My home is down-  
 wind of the plant much of the time, particularly during the  
winter.

2. My family and I have lived at this address for 19 years and in  
 the general area of the Seabrook plant for 65 years.

3. My family and I use the beaches near the Seabrook plant for  
 recreational activities from time to time during the year, and we  
 engage in other leisure pursuits of various types within a few  
 miles of the plant approximately 100 days each year.

4. I work at retired, which is \_\_\_ miles  
 \_\_\_\_\_ of the plant, and I am required to travel near the  
 plant on my way to work and at other times for business purposes.

There are many times we travel by  
 & near to the plant on our way to visit our daughter  
 & family who live in Kittery. We also go to ship.

5. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power, and particularly by the Seabrook nuclear power plant, to my own health and safety and that of my family.

6. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

Lawrence C. Crockett

Sworn and subscribed to before me this 12 day of November 1981.

Richard A. Eaton  
Notary Public

My commission expires

Nov 21, 1983

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

Docket Nos. 50-443 OL  
50-444 OL

(Seabrook Station, Units 1 and 2)

AFFIDAVIT OF JAMES F. FALLON

1. My names is James F. Fallon. I live at 131 Ocean Boulevard, Hampton Beach (within the Town of Hampton), New Hampshire. My home is about five miles northeast of the Seabrook nuclear power plant under construction, and thus downwind of this plant much of the time, particularly on hot days during the Spring, Summer and Fall.

2. I am the President and General Manager of Donovan & Fallon Corporation, a New Hampshire business corporation wholly owned by my mother, who lives at the same address, which operates a retail store at the same address catering to Summer vacationers and tourists from May to September every year.

3. My family and I have lived at this address and carried on our business at this address for fifty-five years.

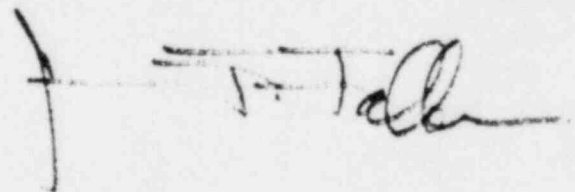
4. I have been a Selectman of the Town of Hampton, Chairman of



the Hampton Municipal Budget Committee, Chairman of the Republican Town Committee of Hampton, President of the Hampton Beach Chamber of Commerce, and President of the Kiwanis Club of the Hamptons. I have many friends in my neighborhood and throughout Hampton about whose safety I care.

5. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power generation, and particularly by the Seabrook nuclear power plant, to my own health and safety and those of my family, friends and customers, and to my family's business and property.

6. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

A handwritten signature in dark ink, appearing to be "J. J. [unclear]", written over a horizontal line.

STATE OF NEW HAMPSHIRE

ROCKINGHAM, ss.

Subscribed and sworn to before me this thirteenth day of November, 1981.

Notary Public

5. Seismic hazards at Seabrook which render the plant unsafe in its current design (particularly since this issue has not been resolved at the CP stage).
6. Emergency Planning.
7. Safety problems that arise as a result of the aging of the plant and equipment, including particularly steam generator tube degradation, pressure vessel rupture, and the failure to adequately consider aging in qualifying safety-related equipment.
8. The inadequacy of shutdown heat removal capability.
9. The reliability of onsite and offsite electrical power to operate heat removal equipment and other equipment important to safety.
10. The environmental, seismic, and dynamic qualification of electrical and mechanical components important to safety.
11. Reactor vessel embrittlement (pressurized thermal shock).
12. Steam generator rupture.
13. Failures in Quality Assurance/Quality Control during construction.
14. Faulty construction work, including poor workmanship and the use of unqualified workers, particularly in the area of concrete work.
15. Inadequacy of Quality Assurance for the operation of the facility.
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18. The Licensee's lack of managerial competence and character to operate the reactors.

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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 and 2)

Docket Nos. 50-443 OL  
50-444 OL

AFFIDAVIT OF EUGENE D. FINCH

1. My name is Eugene Davis Finch. I live on South Road, East Kingston, about eight miles west of the proposed Seabrook nuclear power plant. My home is downwind of the plant much of the time.
2. My family and I have lived at this address for thirteen years and in the general area of the Seabrook plant since 1933.
3. My family and I use the beaches near the Seabrook plant for recreational activities from time to time during the year, and we shop and drive in Seabrook within a few miles of the plant approximately fifty days each year.
4. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power, and particularly by the Seabrook nuclear power plant, to my own health and safety and that of my family.
5. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

Eugene Davis Finch

Sworn and subscribed to before me this 12<sup>th</sup> day of \_\_\_\_\_ 1981

My commission expires \_\_\_\_\_

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

Docket Nos. 50-443 G  
50-444 OL

Seabrook Station, Units 1 and 2

Affadavit of Stuart Heiklejohn

My name is Stuart Heiklejohn. I live at 563 Exeter Road, Hampton New Hampshire, which is 7-8 miles from the proposed nuclear power plant. My home is often downwind of the plant. My wife and I have lived at this address for thirteen years.

Members of our family use the beaches near the Seabrook plant for recreational activities from time to time, and nearly all our daily outdoor activities, of which there are many, are within a few miles of the plant. I am retired.

I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by the Seabrook nuclear power plant to my own health and safety and that of my family.

I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related matters.

*Stuart Heiklejohn*

Sworn to and subscribe to before me this 11 day of Nov 1981.

*Robert R. [Signature]*  
\_\_\_\_\_  
Notary Public

My commission expires

1-3-85

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

AFFIDAVIT OF

1. My name is Elizabeth H. Meiklejohn I live at 563 Exeter Rd  
Hampton, N. H., which is 7.5 miles NNW

from the proposed Seabrook nuclear power plant. My home is down-  
wind of the plant much of the time, particularly during the

2. My family and I have lived at this address for 13 years and in  
the general area of the Seabrook plant for      years.

3. My family and I use the beaches near the Seabrook plant for  
recreational activities from time to time during the year, and we  
engage in other leisure pursuits of various types within a few  
miles of the plant approximately      days each year.

4. I ~~work~~ at Dan's housewife <sup>my husband is retired</sup>, which is      miles  
     of the plant, and I am required to travel near the  
plant on my way to <sup>shop</sup> ~~work~~ and at other times for <sup>our day to day</sup> ~~business purposes~~.  
activities. We are in this area all year long  
and feel strongly that in case of any form of  
accident at the plant, it would affect us and  
doubt any proper means of evacuation is ~~likely~~ <sup>likely</sup> to  
~~be implemented~~

5. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power, and particularly by the Seabrook nuclear power plant, to my own health and safety and that of my family.

6. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

Elizabeth H. Mickley

Sworn and subscribed to before me this 11 day of Nov 1981.

Robert R. [Signature]  
Notary Public

My commission expires  
1-30-85



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
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)

PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, et al. )

Docket Nos. 50-443 OL  
50-444 OL

(Seabrook Station, Units 1 and 2) )  
)

AFFIDAVIT OF JOHN W PARKER

1. My name is JOHN W PARKER. I live at RTE 84  
HAMPTON FALLS, which is 3.6 miles\* south

from the proposed Seabrook nuclear power plant. My home is down-  
wind of the plant much of the time, particularly during the

winter season. \* = by crow, 1.75 miles

2. My family and I have lived at this address for 22 years and in  
the general area of the Seabrook plant for 22 years.

3. My family and I use the beaches near the Seabrook plant for  
recreational activities from time to time during the year, and we  
engage in other leisure pursuits of various types within a few  
miles of the plant approximately 300 days each year. - mostly as a  
jogger.

4. I work at (not applicable), which is \_\_\_ miles  
\_\_\_\_\_ of the plant, and [I am required to travel near the  
plant on my way to work and at other times for business purposes.]

[ this is applicable ]

5. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power, and particularly by the Seabrook nuclear power plant, to my own health and safety and that of my family.

6. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

John W. Parker

Sworn and subscribed to before me this 16th day of November 1981.

Shirley J. Tasso  
Notary Public

My commission expires

April 21, 1982.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
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PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, et al. )

Docket Nos. 50-443 OL  
50-444 OL

(Seabrook Station, Units 1 and 2) )  
)

AFFIDAVIT OF

SARA F. LUKER

1. My name is Sara F. Luker. I live at South Road,  
424 Hamster Falls, which is 2 <sup>air</sup> miles South

from the proposed Seabrook nuclear power plant. My home is down-  
wind of the plant much of the time, particularly during the  
winter.

2. My family and I have lived at this address for 22 years and in  
the general area of the Seabrook plant for 22 years.

3. My family and I use the beaches near the Seabrook plant for  
recreational activities from time to time during the year, and we  
engage in other leisure pursuits of various types within a few  
miles of the plant approximately 15 days each year. As an artist

4. I work at \_\_\_\_\_, which is \_\_\_\_\_ miles  
\_\_\_\_\_ of the plant, and I am required to travel near the  
plant on my way to work and at other times for business purposes.

5. I am a member of the New England Coalition on Nuclear Pollution because I am concerned about the hazards posed by nuclear power, and particularly by the Seabrook nuclear power plant, to my own health and safety and that of my family.

6. I authorize the New England Coalition on Nuclear Pollution to represent my interests in operating license hearings before the Nuclear Regulatory Commission concerning the Seabrook plant and in related proceedings.

Shirley J. Foster

Sworn and subscribed to before me this 16<sup>th</sup> day of November 1981.

Shirley J. Foster  
Notary Public

My commission expires  
April 21, 1982.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of PETITION FOR LEAVE TO INTERVENE BY THE NEW ENGLAND COALITION ON NUCLEAR POLLUTION have been served on the following by deposit in the United States mail, first class, postage prepaid this 18th day of November, 1981.

Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Thomas G. Dignan, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, Massachusetts 02110

William S. Jordan, III

HARMON & WEISS  
1725 I Street, N.W.  
Suite 506  
Washington, D.C. 20006