



State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

Drinkwater Road
Hampton Falls, N.H.
03844

May 10, 1982

Nuclear Regulatory Commission
Secretary of the Commission
Washington, D.C.
20555

Attention: Docketing and Service Branch -
"Proposed Safety Goals"

Gentlemen:

On April 29, 1982, I attended a public hearing in Boston and made the following statement on the NRC "Proposed Safety Goals for Nuclear Power Plants":

"My name is Roberta Pevear, and I am in the N.H. House of Representatives (R), representing the Towns of Hampton and Hampton Falls, two of the towns closest to the Seabrook nuclear plant. I am, also, the Civil Defense Director for the town of Hampton Falls.

During the past five years, I have vigorously studied the problems facing the people of the Seacoast caused by the placing of a nuclear plant in our midst.

From its very inception a cruel hoax has been perpetrated on us: from telling the people of the area this was to be a 'generating' plant, and not that it was to be a 'nuclear' generating plant; from counting the population in the Low Population Zone, finding there were too many of us, and - then - because the builders were determined to build and they did not want to limit access to the beach, they simply made the LPZ smaller and did not count us all; and on - and on - to the present time. The people are being led to believe that the area can be 'safely' evacuated, or, that they can be 'sheltered' safely. I can assure you, people do not take kindly to being deceived or duped.

We are asked to make statements on a list of questions -- on the tradeoffs on 'mortality risk reduction benefits', 'risks of economic loss due to plant damage and contamination outside

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the plant', 'containment function, given a large-scale core melt', 'quantifying earthquakes, sabotage, human errors and design errors', and 'applying guidelines on the basis of protecting individuals' -- 'individuals at greatest risk' versus 'average risk to individuals in the region nearest the plant'.

Let me tell you, I live two miles from the nuclear plant. I have taken radiation treatment for a health problem. My husband has received his lifetime dose of radiation at the Portsmouth Naval Shipyard, as have many others in the vicinity of the plant. Within a mile or so of the plant you will find the Hampton Falls School, the Seabrook School and our Regional High School, as well as the schools of Hampton. Are we the most at risk? Is this acceptable??

It is the opinion of the majority of the people that this plant should never have been put here -- and that, if it is allowed to be licensed and an accident occurs -- the people who live here, 83,000 within 10 miles in N.H. - and those who come here as tourists and visitors - 125,000 to 200,000 on a hot summer's day - could never be gotten out in a safe and timely manner.

To tell the people that: 1. there is no danger from contamination/radiation to those who live closest to the plant; 2. that they can be protected either by evacuation or sheltering; and 3. that they have insurance coverage, is, in my opinion inexcusable, and those employees of Government, who are paid by those very people being endangered, must not allow this hoax to continue.

Those plants now in operation are accidents waiting to happen -- the steam generator tubes in the pressurized water reactors - is a prime example. Seabrook is just such a plant and yet they continue to build. Must we have an area of our country totally devastated before we admit we have made a mistake and stop building and licensing further plants? I hope and pray we are smarter than that!!

To compare the deaths from a nuclear plant to any other means of death is totally incomprehensible to me. My ancestors, my husband's ancestors, and those of many, many of the people living in the area, came here in the 1600's. We did not choose to have a nuclear plant built, literally, on top of us. We do not accept that it is necessary 'for the good of others' that this injustice be done to us!! We do not believe that any pri-

May 10, 1982

vate industry nor any government body has the right to take away those rights given us by birth and by our Constitution!!

While you are making your decisions on this or that means of quantifying and qualifying how many of us will die from nuclear power, remember that we are not numbers on a piece of paper, we are living, breathing human beings, with children of flesh and blood. I know the names and faces of hundreds of them. To me, the death of even one of them 'for the good' so-called of others is not acceptable. Are their deaths acceptable to you?"

I am sending in written comments because I cannot stress too strongly the sentiments here in the Seacoast of N.H. against the Seabrook nuclear plant. In addition to being in the N.H. House and Civil Defense Director for Hampton Falls, I am on the Executive Board of Rockingham County (the fastest growing area in New England - possibly one of the fastest growing in the country), and am a representative in the Southeastern New Hampshire Regional Commission and the Strafford-Rockingham Regional Council. I know what the people in this area are thinking and I know how they feel. My position is also supported by 64 other elected Selectmen and Legislators in the 17 towns/cities within the 10 mile radius of the Seabrook nuclear plant, as well as many others State-wide.

I feel it is time that those of you on the Federal level came to grips with the fact that you have lost touch with those of us in the "real" world. The thought that it was somehow "un-American" to be against a nuclear plant in your back yard is as extinct as the dodo bird. We, the people of the United States, do not wish to become extinct, also!!

If I can give you any further information, or put you in touch with the residents and taxpayers of the N.H. Seacoast, please feel free to contact me.

Meanwhile, I trust we will not be subjected to "acceptable risks" for the benefit of a highly subsidized, privately-owned, outdated industry.

cc: President Ronald Reagan
Governor Hugh Gallen
Executive Council
Legislative Delegation
Public Utilities Commission
County Commissioners
Selectmen/Council
Media

Sincerely yours,

Rep. Roberta C. Pevear (R)
Rockingham District #12

Enc.



State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

Drinkwater Road
Hampton Falls, N.H.
03844

May 10, 1982

Nuclear Regulatory Commission
Secretary of the Commission
Washington, D.C.
20555

Attention: Docketing and Service Branch

In Re: 10CFR Parts 50 and 70
Docket No. PRM-50-31

Gentlemen:

With reference to the above, Citizens' Task Force; Filing of Petition for rulemaking, this is to advise you that, as a member of the N.H. House of Representatives from Hampton/Hampton Falls, and the Civil Defense Director for Hampton Falls, I concur with the petition filed on 12/21/81 by the Citizens' Task Force.

In response to a request for public comment on the NRC "Proposed Safety Goals for Nuclear Power Plants" I submitted a letter, copy of which is enclosed. I wish this to be made a part of this response.

As you well know, at Three Mile Island 10-mile evacuation was not considered sufficient, and people evacuated in areas much further removed from the plant than that, also. We, here on the Seacoast of N.H., with 83,000 residents in our state within ten miles of the Seabrook nuclear plant, and visitors/tourists of from 125,000 to 200,000, would encounter those residents outside the 10-mile radius fleeing before us, in addition to the same condition in Massachusetts. We must not condone this lack of planning for a condition which we know from experience will exist.

Monitoring prior to the operation of nuclear plants to set standards, and after the plants are built to protect the public are sorely lacking and are indispensable for the protection of the public.

V. PE
FOR

~~CONFIDENTIAL~~

May 10, 1982

Evacuation planning and implementation should, obviously, have been made a part of the Construction License process, and not left to the Operating License process, as is borne out in the areas surrounding the Seabrook nuclear plant. (I liken the present concept to building and moving into a home here in N.H., and then determining if water can be found for a well, and if the land, here at sealevel, will sustain a septic system!) The whole concept is backwards, brought on by the assurances of the industry and utilities that "accidents don't happen".

The nuclear industry should be made to bear the costs of financing monitoring equipment, evacuation planning and implementation, as well as the cost of decommissioning, waste storage/disposal, insurance for the public, and the cost of the Nuclear Regulatory Commission, itself. No other industry in history has been allowed to blatantly live off of the health and wealth of the public as has the nuclear industry. It is like a cancer in our midst, feeding on us and our children. In good conscience we can no longer remain silent and allow this to continue.

I understand the NRC has 7 buildings in Washington, filled with people working for nuclear power. This cost should be made public, and should be borne by the industry which it sustains, not by the taxpayers.

If I can give you any further information, please feel free to contact me.

Sincerely yours,

Enc.

cc: President Ronald Reagan
Governor Hugh Gallen
Executive Council
Legislative Delegation
Public Utilities Commission
County Commissioners
Selectmen/Council
Media

Rep. Roberta C. Pevear (R)
Rockingham District #12

Town of Hampton Falls



New Hampshire 03844

OFFICE OF SELECTMEN

January 8, 1982

Secretary of the Commission
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Sir:

We wish to register our objections to the proposed amendments to Appendix E of Part 50 of the Commission's regulations, wherein the successful completion of an emergency preparedness exercise would not be required before an Atomic Safety and Licensing Board or an Atomic Safety and Licensing Appeal Board could issue a decision on issues involving full power operation of a plant.

Since the Seabrook nuclear power plant, now under construction, lies on the border of Seabrook and Hampton Falls, our entire town lies within a little over 5 miles of the plant, with at least half within 2 miles. The population of permanent residents in N.H. (not counting Massachusetts) within 10 miles of the site is 83,000, with an additional 125,000 to 200,000 tourists/transients during the summer months.

It is, and has been, the contention of many of the elected officials, both local and state, that evacuation of the population at this site cannot be done in a timely fashion.

To suggest, now, that the rules be amended to further complicate matters is not in the best interest of the safety of our people.

Very truly yours,

cc: State Representatives
State Senator
Washington Delegation
Gov. Gallen
PUC
N.H. Attorney General

William Marston
William Marston, Chairman
Board of Selectmen

Jerome Healey
Jerome Healey

Harrison A. Biggi
Harrison A. Biggi

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State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

November 19, 1981

Public Utilities Commission - Docket DE 81-304

Recent information concerning nuclear safety problems at reactors, such as at Indian Point, 24 miles north of Manhattan Island, is causing concern in many States, such as Texas, Washington, Illinois and California. The Baily plant ... "30 miles from Chicago's Loop and 6½ miles from Gary, Ind. (is) closer to major population centers than anyone now thinks wise.", states one report. (1) Potassium iodide pills to fend off thyroid cancer are being distributed to the 7,000 families within 5 miles of the Sequoyah nuclear plant in Tennessee because they may not have sufficient time to flee in case of a nuclear accident, states another report. (2) An NRC Commissioner has stated it may be necessary to "close the beaches", as was suggested in a Hearing in the House of Representatives in Washington in July, 1979. (3)

Since, in the original siting plan, the true population within the LPZ (Low Population Zone) was not counted, and the current Federal Policy calls for speeding up nuclear plant construction, responsibility for public safety now rests directly on elected local and State officials.

This type of information stresses the great need for the three safety requirements requested by representatives of the 17 Seacoast communities within a 10-mile radius of the Seabrook nuclear plant.

Recognizing their responsibilities for public safety, as well as the economic well-being of N.H., 64 Legislators from all over the State have joined the 23 Legislators and 27 Selectmen (and the Coastal Chamber of Commerce) from the Seacoast communities to support their request that these evacuation standards be in place before any money is authorized for evacuation planning.

The legitimate safety concerns of the Seacoast, and State-wide, should not be construed as a position for or against nuclear power or the Seabrook nuclear plants.

In view of the fact that the Public Utilities Commission has been entrusted with the regulation of the utility, we request that:

1. Time limits within which those in the area surrounding the nuclear power plant can be safely evacuated be set;
2. A feasibility study be done using these time limits, in order to ascertain whether or not an evacuation could in fact be carried out within that time frame; and
3. Provision be made for State and Seacoast area review and final approval of any evacuation plan before it is to be used by the utility in its application for an operating license from the NRC,

prior to allocating these moneys.

Rep. Roberta C. Pevear, and

Rep. Beverly A. Hollingworth
Rockingham District #12
Hampton/Hampton Falls

- (1) "Radiation Sickness", TIME, October 26, 1981
- (2) "Nuclear Accident? Tennessee officials say take 14 pills", THE BOSTON GLOBE, November 4, 1981
- (3) "Emergency Planning Around U.S. Nuclear Powerplants: Nuclear Regulatory Commission Oversight", Fourth Report by the Committee on Government Operations, House Report No. 96-413.

Attachments:

Letter signed by Legislators and Elected Town Officials within 10 mile of Seabrook nuclear plant - 10/26/81, etc.
Letter signed by Legislators - State-wide - 11/17/81
Letter signed by Gov. Gallen to Nunzio Palladino, Chairman, NRC - 10/15/81
Chamber of Commerce Resolution - 4/20/81



AREA CHAMBER of COMMERCE

P.O. BOX 526 • HAMPTON, NEW HAMPSHIRE 03842/(603)926-8717

RESOLUTION

HAMPTON BEACH AREA CHAMBER OF COMMERCE

WHEREAS, the Seabrook nuclear power plant now under construction is located on the Seacoast of New Hampshire adjacent to Hampton Beach; and

WHEREAS, this is not only a highly populated area, which contains approximately 83,000 people in New Hampshire within ten miles of the plant, but, during the summer months, also contains well over 100,000 tourists; and

WHEREAS, it is imperative that the potential tourist population can be assured of its safety in order to maintain our reputation as "New England's One Stop Family Resort"; and

WHEREAS, the State of New Hampshire derives a large portion of its rooms and meals tax from this seacoast area; and

WHEREAS, the ten-mile area of the plant, in New Hampshire, contains approximately \$1.3 Billion of privately-owned property which would not be covered by insurance in the event of an accident at the nuclear plant; and

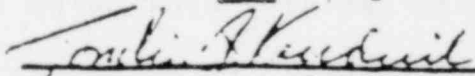
WHEREAS, there has been no final determination by the United States Nuclear Regulatory Commission that an emergency evacuation of the Seabrook Area can be carried out in a safe and timely manner in the event of an accident at the nuclear plant; and

WHEREAS, there is a possibility that the United States Nuclear Regulatory Commission will issue an operating license for the Seabrook nuclear power plant before a final determination has been made regarding safe evacuation procedures for the Seabrook area;

NOW, THEREFORE, BE IT RESOLVED by the Hampton Beach Area Chamber of Commerce;

THAT no operating license, temporary or permanent, should be issued to the Seabrook Nuclear Power Plant by the United States Nuclear Regulatory Commission unless and until a final determination is made that evacuation of all persons, permanent residents or transients, within the emergency planning zone can be carried out in a manner to protect the public health and welfare in the event of a nuclear accident involving a major release of radioactivity.

Signed and dated this 20th day of April 1981.


Executive Director



State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

Public Utilities Commission

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November 17, 1981

We support the position of the elected officials of the 17 towns surrounding the Seabrook nuclear plant requesting time limits, a feasibility study, and State and Seacoast review prior to expending funds for evacuation planning:

Edward Smith	Hills 34	Manchester
Milton Meyers	Hills 8	Manchester
Barbara Underwood	Merr 18	Concord
Ashton Welch	Merr 8	Epsom
Marilee Rouillard	Ches 12	Keene
Eleanor H. Stark	Merr 16	Concord
Joan Espinola	Rock 5	Salem
*J. Leo Appel, Jr.	Rock 17	Rye
L. J. Boucher	Merr 6	Hooksett
*Thomas Gage	Rock 13	Exeter
*Robert R. Blaisdell	Rock 13	Exeter
*Robert P. Read, Jr.	Rock 23	Portsmouth
Gary Casinghino	Hills 29	Manchester
Barbara Hanus	Merr 21	Concord
Ronald R. Chagnon	Straf 2	Farmington
Marianne H. Thompson	Hills 15	Pelham
Margaret L. McGlynn	Hills 21	Nashua
Chryse Katsiaficas	Hills 23	Nashua
Teresa DeNafio	Straf 19	Dover
William Kincaid	Straf 18	Dover
Phyllis DeNafio	Straf 19	Dover
Edward Wojnowski	Rock 14	Newmarket
Donald Pageotte	Straf 9	Somersworth
*Beverly Hollingworth	Rock 12	Hampton
William A. Riley	Ches.10	Marlborough
Maura Carroll	Merr 19	Concord
Cecelia Winn	Hills 19	Nashua
Elizabeth Crory	Graf 13	Hanover
Marion Copenhaver	Graf 13	Hanover
Joan Schreiber	Straf 4	Madbury
Theodora Nardi	Hills 27	Manchester
Nancy Proctor	Ches 14	Keene
Chris Wood	Rock 22	Portsmouth

*Also signed letter to Gov. Gallen and Council



State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

Public Utilities Commission

-2-

November 17, 1981

We support the position of the elected officials of the 17 towns surrounding the Seabrook nuclear plant requesting time limits, a feasibility study, and State and Seacoast review prior to expending funds for evacuation planning:

Josephine Mayhew	Coos 2	Northumberland
Richard Rand	Rock 6	Hampstead
Earle Hardy	Belk 1	Meredith
Leander Burdick	Rock 4	Derry
Kenneth Gould	Rock 6	Derry
Virginia Lovejoy	Rock 4	Derry
Glenden Kelley	Rock 4	Derry
Joseph Bowes	Merr 10	Boscawen
Betty Hall	Hills 12	Brookline
Leonard Smith	Hills 14	Hudson
Don Smith	Straf 3	Barrington
Barbara Bowler	Belk 3	Lochmere
Anita Flynn	Straf 6	Somersworth
Ralph Pearson	Belk 2	Gilford
Mary Ann Lewis	Merr 4	Contoocook
Wilfred Burkush	Hills 33	Manchester
Nelson Chamberlin	Graf 2	Woodsville
Jody Mooradian	Straf 4	Durham
Mary Whitehead	Straf 8	Somersworth
Norman Brideau	Coos 6	Berlin
Harry Flanders	Rock 2	Auburn
Robert Wheeler	Hills 8	Goffstown
George Kizala	Hills 22	Nashua
Myrl Eaton	Graf 8	Enfield
William Driscoll	Graf 11	Plymouth
Stanley Zajdel	Hills 29	Manchester
Ed Bellerose	Merr 7	Suncook
John Hoar, Jr.	Rock 8	Epping
Roland Lemire	Hills 35	Manchester
Denise Raiche	Hills 31	Manchester
Eugene Daniell, Jr.	Merr 13	Franklin
Holly Abrams	Hills 8	Goffstown
Ray Wood	Rock 5	Salem
Roland Lefebvre	Hills 21	Nashua
*Mary Cotton	Rock 20	Portsmouth
Gregory Ahlgren	Hills 28	Manchester
Maureen Raiche	Hills 31	Manchester

Drinkwater Road
Hampton Falls, N. H.
03844

August 22, 1980

Dr. Stephen N. Salomon
Project Officer
Radiological Emergency Preparedness Div.
Federal Emergency Management Agency
Washington, D.C. 20472

Re: Kulash Report
Seabrook Nuclear Power Plant

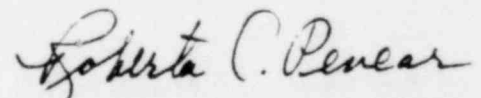
Dear Dr. Salomon:

Enclosed are Hampton Falls' Comments on the 20 questions submitted concerning the above report, together with some Remarks made from a page-by-page review of this report.

Also, enclosed is our estimated initial and annual cost for equipment, training, etc., for warning, communication, monitoring and annual exercises.

Please advise if there is anything further you require from Hampton Falls. If you should wish to call, my number is 603-926-6230.

Sincerely yours,



Roberta C. Pevear (Rep.)
Civil Defense Director,
Hampton Falls, N. H.

Enc. (13)

HAMPTON FALLS, N.H., COMMENTS ON "TOPICS FOR REVIEW - METHODOLOGY AND ASSUMPTIONS" - KULASH STUDY - SEABROOK NUCLEAR POWER PLANT - (No input from Hampton Falls Allowed in study):

Q. 1. Do you believe that the methodology used by the contractor is adequate. This includes assumptions, such as road capacity and auto occupancy. In what ways can the methodology be improved?

Answer: We do not know complete "methodology" used, but do know the officials of most of the 22 towns, including Hampton Falls and Seabrook (2 towns closest to the problem) were not consulted.

Also, as stated in the enclosed remarks, assumptions made are false. You do, in fact, in many places (pgs. 7 & 8 are prime examples), state that, if your assumption is not true -- the whole "plan" would fail.

Methodology should be based on real, live, flesh-and-blood people, with real live children, being placed in a life and death situation -- not a "computerstudy". (Also, this is dairy farm, horse farm, and apple country -- none of which is addressed at any time.)

Q. 2. Do you view the boundaries selected for the plume exposure pathway EPZ as reasonable? If not, what are your suggestions?

Answer: NO. Portsmouth and Haverhill should be included (Pages 4 and 15) (See enclosed remarks). Portions of each are within 10-mile area and the residents know this. It is hard to believe they would sit by calmly, while portions of those cities, as well as the other cities and towns around them, evacuate. (Trying to avoid the problem of Portsmouth & Haverhill is comparable to what was done when the plant was approved in the first place, when the EPZ was made smaller so as not to count all the people -- and thus allow the plant to be placed here!)

There has been nothing done by the State, apparently, concerning "Plume exposure pathway", either because they do not understand what it is, or lack of interest. The questions we ask are answered as though all contamination would halt either at town/state boundaries, or at the 10-mile circle!! This "Report" appears to take the same view.

Q. 3. Do you agree with the estimates of the population numbers and compositions? Please explain any disagreement.

Answer: If Hampton Falls is an example of how you count the people, we disagree with population numbers and compositions (See enclosed remarks). No input was allowed from Hampton Falls, none of our seasonal 3,000 people were counted, no consideration given to non-auto owning population, no consideration given to fact that many non-auto owning are also elderly/handicapped in a rural area, and unable to "walk to collection locations", no consideration given to Rockingham County Home (where residents of towns now live), no con

sideration given to number of residents working out of area (and thus trying to get back into the area with the family car), no consideration given to non -english-speaking seasonal people, etc., etc., etc.

Q. 4. Is the description of the current alerting and notification system adequate? Please elaborate where there are inadequacies.

Answer: Hampton Falls has one siren which carries approx. 3,700 ft., one police car, and a totally volunteer fire department. Other towns in 10-mile radius are in similar positions. Alerting/notification of public is totally inadequate for a nuclear plant disaster, and, since "present assets" were to be used in the study, do not feel study is realistic. (See enclosed remarks).

Q. 5. Please explain your reaction to the change in the evacuation time estimates under the 15-minute alert and notification assumption.

Answer: Our reaction is one of disbelief!! To say that not notifying the public at once of the need to evacuate, when time could be of the utmost importance is, in our estimation, bordering on criminal action!!

If we are to believe that buses and ambulances are to come rushing to our aid on a "timely" basis, it should follow that the residents, themselves, need to be warned immediately, in order that they may be prepared to leave.

(Trying to negate the problem of too many people leaving an area at one time on totally inadequate roads by not telling them of the problem -- is unbelievable!!) (See enclosed remarks.)

Q. 6. Do the definitions of the ideal and adverse conditions appear reasonable to you? Please explain.

Answer: It would appear to those of us who live here that people from Virginia and Washington have not been in this area during "adverse" weather conditions "N. H. Seacoast style". We, here on the coast, have a weather condition called "a Northeaster", during which it is quite possible and probable that things come to a standstill, and nothing moves, until some hours have passed.

We are subject to wind, rain, sleet, snow and fog. There are times when you literally cannot see your hand in front of your face during some of our blizzards and fogs.

If you are "assuming" these conditions would in no way affect an evacuation, you are, we believe, quite wrong. Also, what happens to the "assumption" of non-auto owning people "walking to collection points" under these conditions? (See enclosed remarks.)

Q. 7. Do the sub-areas appear to be reasonably defined in view of population distributions and meteorology.

Answer: If, by "sub-areas", you are addressing page 20, figure 6, it is our contention that this is not in accordance with NUREG-0654, which calls for evacuation on the basis of 22-1/2-degree-sectors, emanating from the center (the power plant, itself) in a full 360° circle, out to 10 miles; this being the "plume-exposure"-concept, and possibly being used for selective evacuation procedures, which would consider wind direction and the downwind probability of any sectors. (See enclosed remarks.)

Q. 8. How well is the impact of meteorology taken into account? Please explain.

Answer: We would presume you refer to the same conditions mentioned in item 6, in which case, the same comments apply. (See remarks.)

Q. 9. In what ways are previous evacuation time assessments used? What impact, if any, did such use have on the objective of producing an independent estimate?

Answer: The three studies which we have been given to date, generally have shown the same time frame for an evacuation; however, we feel this is because you are dealing strictly with the estimated numbers of vehicles which would be moving on a road system capable of handling a certain number of vehicles per hour.

(We could have a thousand different "studies" and we would get the same results -- unless these studies make allowances for the local problems (non-auto population, road network, adverse weather conditions, lack of personnel and equipment, etc.) as has been recommended by all local officials -- and evidently ignored!) (See enclosed remarks.)

Q. 10. Do you believe that the evacuation and time estimates for the school population were adequately described?

Answer: The evacuation and time estimates for school population are based on invalid assumptions and procedures, completely ignoring the actual situation, which could have been made known to the individuals conducting the study, if local input had been considered. (See enclosed remarks.)

Q. 11. Is the treatment of confirmation of evacuation and its time estimate adequately treated? Please elaborate.

Answer: In our estimation, this study does not address the question of confirmation of evacuation time estimates. That section of the survey outlines methods of confirmation of evacuation, but no time estimates are mentioned. Please explain!!

Q. 12. Where sheltering as an alternative protective action is described, do you agree with the treatment? Please explain.

Answer: Sheltering is only mentioned for those persons at the beach area as a method of reducing the number of vehicles attempting to enter the road system; then the sheltered population evacuates as congestion diminishes.

It is our contention that no one, including those in the medical profession, has the expertise to say to those people they should remain sheltered in their homes, rather than to evacuate. Who can give assurance to the public that this is a safe procedure? Who is to choose who is to go and who is to stay? Who can control such decisions? Who can assure the discipline that would be required in this condition? Who can assure that, if they remain in their homes and the particulate contamination is heavy, they will ever be able to come out safely?

Q. 13. Is the treatment of evacuation time for the special facilities adequate? If not, please explain.

Answer: This "draft report" states on page 69, in paragraph 3: "A bus (and ambulance) fleet large enough to evacuate the population in institutions in two and three trips, respectively, is critical to achieving the total evacuation times estimated above. If a sufficiently large bus and ambulance fleet could not be mobilized, and additional trips out of the EPZ were needed (even if only by a few vehicles), the total evacuation time for the population in institutions would increase and could become the critical (i.e., determining) factor in evacuation times."

Therefore, again, it is our contention that the obvious problems are not being addressed. We feel that a sufficiently large bus and ambulance fleet could not be mobilized. (See remarks.)

Q. 14. Do you agree that most all roads in the network should be utilized in order to minimize evacuation times? Please explain.

Answer: See Remarks concerning pages 43 and 51, relative to the totally inadequate road system in the area.

Q. 15. Which recommendations do you agree with and which ones do you disagree? Do you have additional ones? Please explain.

Answer: A. Sequential evacuation of any area would appear to be unrealistic due to notification and information problems, and one other problem not realistically approached in this report; i.e., human nature and the instinct for self-preservation. (See enclosed remarks.)

B. See remarks concerning page 74, Question #12.

C. In our estimation, the North-South layout of I-95 is not conducive to improving evacuation times, due to traffic congestion at the Portsmouth traffic circle, or in the city of Portsmouth, itself.

Also, the subject of destination is questioned, due to the conflict in the evacuation routes as depicted in Figure 10, page 51, and Figure 11, page 52, compared with the State of N. H. recommended routings to individual town registration centers. (When will the question of "Contiguous-Jurisdiction Governmental Emergency Planning", as outlined in NUREG-0654, FEMA REP-1, pages 16, 17, and 18, be addressed? Example: Amesbury, Mass., Basic Plan calls for no one entering town boundaries -- South Hampton, N.H., evacuation route leads through portions of Amesbury.)

RESULTS

Q. 16. Do you believe that the estimates of the evacuation times of the population within the plume exposure pathway EPZ are reasonable? Please explain.

Answer: No. (See enclosed remarks.)

Q. 17. In what way is this assessment useful to State and local government decisionmakers?

Answer: We are at a loss to understand the intent of the use of the word, "assessment", and in what context it is used. Please explain!!

Q. 18. How useful are the assessments of evacuation times as a planning tool? Would you like to see FEMA continue to sponsor such assessments? Please elaborate.

Answer: This "Report", because of all of its inaccuracies and use of invalid assumptions, cannot be considered a useful planning tool, in its present form.

Example: Page 4, states: "It is assumed that, by the projected start-up of Seabrook Station in 1983, local preparedness planning will be developed to a level comparable to that now observed at operating plants with similar EPZ populations. In the absence of effective preparedness planning, the evacuation time estimates given in this report are invalid".

(The FEMA Report to the President does not, in our estimation, indicate that the 12 problem plants are any further ahead than we are -- either those operating or under construction. Also, it is a matter of record that the State of N.H. is unable to meet NRC guidelines with only 5 or 6 towns involved (a few thousand people) at the Vernon, Vt., Plant!!)

Q. 19. Do you believe that there was sufficient interaction among the contractor, State (of N.H.) and local government officials and the operator of the nuclear power station? In what ways could the interaction be improved to enhance such evacuation time assessments?

Answer: It is unknown to us what interaction was accomplished among the contractor, State (of N.H.) and local government officials and Public Service Co. of N.H.

As one of the two towns which lie in the 2-5-mile-area surrounding the Seabrook Nuclear Plant (at many points practically on site), Hampton Falls was assured by N. H. Governor Hugh J. Gallen (3 months ago, along with the surrounding town officials) that we would provide input into any studies pertaining to evacuation time estimates.

A meeting was set up for July 23rd with Mr. Kulash to meet with the selectmen, police officer, C.D. Director and Assistant C.D. Director, at the Hampton Falls town hall. (This meeting was set up two weeks earlier.) On the morning of July 23rd, the Boston office of FEMA called the Hampton Falls town hall (and just happened to catch a selectman who had stopped in) and advised our selectman that Mr. Kulash was in Washington and the meeting was cancelled. (All town officials, with the exception of the police officer are part-time people.)

We had no number to contact in Boston, so we contacted the NRC in Washington. They had Dr. Salomon call our C.D. Director, at which point, the C.D. Director was told that, not only was it strange that appointments were made and not kept (Seabrook and Kensington, at least, were treated the same way), but, even more strange, was the fact that the Kulash "Report" was on Dr. Salomon's desk on the 21st, two days before the meeting was to have taken place.

After the protests were made that there was a lack of local input, (apparently only 4 or 5, out of 22 towns were allowed any input), this "Final Report" was stamped "Draft", and Mr. Kulash was to return to the area to consult with the remaining towns. (We got two cover sheets with ours -- one with the "Draft" stamp, and one without.)

On August 6th, at a meeting in Exeter, N.H., paid for by FEMA, and set up by the N.H.C.D.A., which Mr. Kulash attended, no contact was made with the Hampton Falls C.D. Director, who was present.

After the meeting, the volunteer Hampton Falls Assistant C.D. Director, in a conversation with Mr. Kulash, and others, was told that any input from the remaining towns would not make any substantive changes in the "Draft" Report.

He, at that time, made arrangements to meet the Hampton Falls Assistant C.D. Director for lunch the next day, 8/7/80. The Hampton Falls Assistant C.D. Director went to the appointed restaurant, at the appointed time. He waited twenty (20) minutes for Mr. Kulash, who did not appear during that twenty minutes, at which time, the Hampton Falls Assistant Civil Defense Director left.

To date, we still have had no input in this life and death issue, other than the opportunity to play "20 questions". As the Hampton Falls C.D. Director told Dr. Salomon when advised that this report would be sent out with these questions, we, nor do the other towns and cities, do not have a battery of paid secretaries waiting to answer questions of this type -- life and death though it may be to us. It is unconscionable that we are being put in this position!!

The only contact Hampton Falls has had with Public Service Company of N.H. was on June 18th, when, at their invitation, we, along with the other towns involved, attended a meeting, at which time we were given the HMM study, stating we could evacuate in 6 hours. We were also told, in answer to questions, "not to worry" about the 15 minute warning requirement, as "they were working to get that changed".

Also, in answer to questions concerning funding, we were told "If we can get the taxpayers or ratepayers to pay for the evacuation, fine, but Public Service Company of N.H. was not planning to pay for it."

We have been "meeting" at the request of the N.H.C.D.A. since May of 1979. (All without pay, and at great inconvenience to all of us, I might add) To date, we are no further ahead with the problems forced on us that we were then. (We have met 3 times with Governor Gallen. We have demanded, at last, that he come over here to the seacoast and talk to the towns, but have not received any reply.)

There, apparently, is no commitment from anyone -- either elected officials, or paid employees of our governments -- to see that a "safe", "timely" evacuation plan will be in place before the Seabrook plant is licensed to operate and goes on line in 1983.

Q. 20. Please make any additional comments that you wish.

Answer: This is quite obviously no longer the "land of the free". We are, quite obviously, no longer guaranteed the right to "life, liberty and the pursuit of happiness", and the "quiet enjoyment of our own homes". We find it difficult to explain to people whose ancestors came here 350 years ago, why this situation now exists!

- | <u>Page</u> | <u>Remarks</u> |
|-------------|--|
| 3 | Local preparedness plans are not in place at the present time and we cannot judge when these plans will be in place. |
| 4 | The EPZ boundary should either include all of Haverhill, Mass., and Portsmouth, N. H., or eliminate them altogether, as indicated on page 15. |
| 6 | At the very minimum, it would take at least four (4) hours to notify Hampton Falls at the present time. |
| 7 | Local plans are being formalized at present asset levels; therefore, your survey should be with present assets also, because we have not received any information on these assets being improved. |
| 15 | See Page 4 comment. |
| 16 | See Page 4 and 15 comment in relation to EPZ boundary. |
| 23 | Hampton Falls seasonal increase is by about 3,000 persons in campgrounds, motels and applepickers (many non-english speaking and without transportation.) |
| 26 | Seasonal and transient population is not 100 percent automobile owning. These seasonal residents come to the beach areas for vacation, but the husband or wife may still continue working in Boston, Nashua, Haverhill, Lawrence, Lowell or other towns. They probably have the only family vehicle with them and their family at the beach would have no transportation. Some members of families at campground could be at beach with the vehicle, while other family members stayed at campground -- those at beach would be evacuating with beach population, leaving those at campground with no means of transportation. Applepickers are mostly Jamaicans with no transportation. Some percentage of the transient seasonal population must be considered "non-automobile owning" households for this report!!! |
| 27 | Due to earlier erroneous assumption, the non-auto owning population should be higher figure than 7 percent. |
| 28 | Again relates to Pages 26 and 27. |
| 29 | Last sentence is wrong because, again, not all these people have access to automobiles. |
| 30 | First paragraph: During the school day, the school busses are driven by women (many of them mothers). Out of sixty-six (66) drivers employed by Berry Transportation Co., fifty-eight (58) are women. The drivers keep the busses at their own homes during the day, or are driving other routes to other schools. They may be located in Seabrook, Hampton, Hampton Falls, Rye, North Hampton, Stratham or Greenland. Some drivers have made it known that they will not drive in the EPZ during a declared emergency. They feel their first duty is to their own families. |

Second Paragraph: A large number of non-auto owning households are made up of elderly persons, and some are handicapped persons. To ask them to walk to a collection location (either summer or winter, or night or day) is not realistic! (also, this is a rural area).

Third Paragraph: The Rockingham County Home in Brentwood houses mothers and fathers of people living in the seacoast contemplated to be evacuated. There are 400 employees and well over 200 residents. There is no plan to evacuate these people -- and no busses or ambulances available! Question: are people going to be willing to leave their loved ones in the Home while they escape?? Question: are these employees going to be willing to stay with the residents of the Home, rather than evacuating their own families?? Question: where will these busses or ambulances come from -- where will these people be taken -- where will their medications come from, etc.?

- 31 "Daytime on a Summer Weekend": Families are not more likely to be at the same location weekends for these reasons: During the summer, families are spread all over the seacoast. The children could be at a theater in Portsmouth or Newington, at the beaches, visiting friends, etc., while the parents are shopping elsewhere or busy with other activities. Again, we feel consideration should be given to the fact that many families will not be together on a summer weekend.
- 32 Again, we are distressed with the school evacuation and the normal dispersal of school busses during the day, as well as plans for non-auto owning households and the "collection points".
- 33 Again, we do not feel that the statement about families being already assembled is entirely true.
- 35 Fourth Paragraph: The assumption that backup systems such as mentioned will be available is not valid. We have had no indication that such systems will be in place or even being considered.
- 36 Work-to-Home Travel: Second Paragraph -- The level of congestion is bound to be higher if we have evacuees on the highways during the time we have people returning from work; therefore, some method must be inserted in the time estimates to show this! In addition, we have residents who work in the Boston, Lynn, Haverhill, Andover and other areas in Massachusetts, as well as Manchester, Nashua, Merrimack, Newington, Exeter and Portsmouth, N.H., and also in Maine, as well as at beach areas. This inbound traffic is certain to cause problems and additional delays. (See Page 64 - first paragraph.) This must be addressed in some fashion so as to realistically apply this possibility to the evacuation times!
- 37 Last Paragraph: We question the assumption that traffic signals will continue to function. If they are manually controlled to allow a continuous flow in the evacuation direction, it would be more valid. The people necessary to control these traffic signals must be added to the total manning requirements!

- 38 Evacuate School Population in Busses: In addition to the problems already mentioned about the local school busses, another factor must be considered. The High School students located at the High School in Hampton are made up of students from Hampton, Seabrook, Hampton Falls and North Hampton. The same applies for the Sacred Heart Parochial School. If these students are evacuated to the Hampton population reception center, then the students will be located at a different town than their parents -- in the case of Hampton Falls and Seabrook.
- Therefore, some method must be proposed to take all students to a location out of the EPZ where the students of each town can then be transported to the same reception center as their parents. This additional need for busses must be added to the total bus requirements.
- 39 Assemble at Collection Points: Second Paragraph -- Again, the distances to be traveled in a rural area, especially during the winter, makes it necessary to develop some other system, with its added resources of vehicles and drivers. Have these resources been counted?
- Third Paragraph -- Have these vehicles been counted in the total vehicle resource count?
- 41 First Paragraph -- We question the numbers of ambulances normally based within the EPZ as being adequate to fulfill this requirement (See Page 30, 3rd Par.).
- 43 There is no mention about the evacuation direction of Seabrook or Hampton Falls, the two towns located the closest to the plant, itself. This should be addressed, also. We feel that Hampton Falls would be evacuated via routes 84 and 88, to relieve the traffic on route 1. It is difficult to enter route 1 from routes 88 or 84 during normal times, without considering an emergency situation. There are no traffic signals at these locations. (Routes 84 and 88 are hilly, winding, narrow roads -- in places barely two lanes wide -- typical of the rural sea-coast area.)
- 51- The evacuation route for Hampton Falls appears to move our
52 population to the most congested area. We feel we would be proceeding out routes 88 and 84 and route 107, which appear to be less congested. (Both Hampton Falls and Seabrook lie in the 2-5 mile area (at many points practically "on-site") and thus in most danger to their populations!)
- 61 Again, because of the indicated traffic congestion on route 51, we feel we should evacuate to the west and northwest!
- 62 These delay times cause us to have a concern about behavior of the evacuees located at Hampton, Seabrook and Salisbury beaches. On page 74, last paragraph, you indicate that "However, available information suggests that exposure risk is high for persons in vehicles". Therefore, this aspect of the evacuation should have some weight when considering the behavior. It is difficult to assume that the evacuees will remain calm and discipl-

lined while in visual contact with the plant and knowing that they may be being bombarded with radiation while sitting in that traffic jam.

64 First Paragraph: This will directly affect those who may be desiring to enter the area to pick up family members. This must be considered to happen and a factor attached to it in determining total evacuation time.

65 Running out of fuel: Running out of fuel and abandoning vehicles must have a factor attached to them for determining evacuation times.

Attempting to re-enter: This could reduce capacity, but this is the system you recommend to gather up family members. Again, some factor must be used to determine evacuation time because of this problem.

Last Paragraph: See above!

70 The bottom two diagrams appear to be reversed. Wind direction is stated in the direction the wind is coming from not going to!

71 Same comment as above for description of selective evacuation combinations.

Last Paragraph: A 15-minute notification would certainly make a difference to Hampton Falls, if, as previously stated, busses, etc., will need to be brought in from outside to remove non-automobile owning residents, and to mobilize residents as well as seasonal and transient populations from the immediate area of the plant.

72 Second Paragraph: During winter snow/sleet storms of any magnitude, lanes of roads in the area are reduced by about 20% to 30%, or completely impassable. In the seacoast area, fog should be a factor which is considered, also, not only for travel, but for holding the radiation/contamination over the population next to the plant!

76 Vehicle/Manpower Requirements: Due to comments earlier about busses and drivers, the figures should be adjusted to indicate the anticipated increase in the number of busses and drivers required.

78 Manpower Requirements: Again, an increase in bus drivers should be indicated. Also, was County Home included in bus and/or ambulance drivers?

80 Indicate increases when needed (See all comments previously made.) Also, we question the total manpower references, because we estimate that Hampton Falls will require 85 people to operate for a 24-hour protracted period.

ESTIMATED INITIAL AND ANNUAL COSTS FOR TOWN OF HAMPTON FALLS,
 N.H., TO COMPLY WITH NUREG-0654:

8/80

2. Regulation states that operator must notify local authorities if there is a "potential" problem, rather than an actual release

4.		<u>INITIAL</u>	<u>ANNUALLY</u>
	Warning System	\$ 25,000.	\$ 500.
	Communications System	15,000.	500.
	Wages for 24-Hr. manning		49,150.
	Emergency OPS Center	3,000.	500.
	Auxiliary Power	Unknown	Unknown
	Auxiliary Police		
	12 members - training	7,200.	3,000.
	12 vehicles @ \$4,500.	54,000.	Unknown
	Road Signs for Evacuation	1,500.	"
	Other Equipment	2,000.	"
	Protective Clothing	1,000.	"
	Fire Department		
	Breathing Apparatus	20,000.	"
	Other Equipment	2,000.	"
	Offsite Radiological Monitoring Equip.	Unknown	Unknown
	Field Monitoring Teams	Unknown	Unknown
	Decontamination Teams	*Unknown	Unknown
	Decontamination Equipment	*Unknown	Unknown
	Provide and Maintain Emergency Kits (Protective Clothing - Comm. Equip.)	10,000.	1,000.
	Publish Emergency Plan	3,000.	500.
	Train All Personnel	30,000.	2,000.

*It is our understanding that only one small hospital in Boston is able to treat seriously exposed victims.

HAMPTON FALLS, N.H., -2-

ESTIMATED COSTS

	<u>INITIAL</u>	<u>ANNUALLY</u>
Annual Exercises	Unknown	\$ 5,000.
Totals	\$173,700.	\$64,150.
Added to Tax Rate	\$ 6.94	\$ 2.56
" " " "on \$55,000		
Home =	\$ 381.	\$ 140.80

** Total Number of Personnel for Projected OPS - 85

**See Enclosed Remarks - concerning Page 80 of "Kulash Report".