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RELATED CORRESPONDENCE

Filed: December 10, 1990
DOCKETED
NRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

'90 DEC 11 P6:30

OFFICE OF SECRETARY
STATE OF MASSACHUSETTS
10002

_____)
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
Off-site Emergency
Planning Issues

LICENSEES' FIRST SET OF INTERROGATORIES
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE
MASS AG REGARDING REMANDED MASSACHUSETTS TEACHER ISSUES

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Licensees hereby request that the Attorney General for The Commonwealth of Massachusetts respond to the following interrogatories and produce for inspection and copying the documents requested below. The production of the documents requested herein shall take place at the offices of Ropes & Gray, One International Place, Boston, Massachusetts at 10 a.m. on Friday, January 11, 1991.

DEFINITIONS AND INSTRUCTIONS

1. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of the term "documents and tangible things" in Federal Rule of Civil

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Procedure 34(a), and therefore shall include, without limitation, any written or otherwise recorded information.

2. To "identify" a document means to state its author, date, title, addressee(s), and subject matter.
3. To "identify" a person other than an expert witness means to state the person's full name, title, business address, affiliation, and professional qualifications (if any). To "identify" an expert witness means to state, in addition to the foregoing:
 - a. the profession or occupation and field(s) of expertise of the person;
 - b. the educational and specialized training history of the person, including date and granting institution of all degrees earned;
 - c. a list of publications by the person in the area(s) of expertise; and
 - d. the age of the person and the amount of time the person has worked in the field of expertise.
4. If any of the interrogatories or document production requests contained herein are claimed to be objectionable, then please identify the portion(s) to which objection is made and the portion(s) to which answer or production is made.

5. If it is claimed that any document responsive to any request is privileged, then please describe in detail the nature of and basis for the asserted privilege, and identify each allegedly privileged document.
6. If any document required to be identified or produced in these answers has been destroyed, please identify the document, state the date of its destruction, identify the person responsible for ordering destruction, state the purpose of destruction, and (if applicable) produce any document retention policy that governed or should have governed the retention or destruction of the document.
7. For the purposes of those interrogatories and requests:
 - a. "SPMC" means the most current version of the Seabrook Plan for Massachusetts Communities, and all appendices and attachments thereto;
 - b. "NHY-ORO" means the New Hampshire Yankee Off-site Response Organization;
 - c. "Massachusetts EPZ" refers to that portion of the Emergency Planning Zone for Seabrook Station which lies within the Commonwealth of Massachusetts;
 - d. "Holy Cross Ops Plan" means the Holy Cross Host Facility Activation and Operation plan, dated 12/26/89, Attachment C to the October 19, 1990 Affidavit of Anthony M. Callendrello;

- e. "School Host Facility Plan" means the Massachusetts School Host Facility Plan, College of the Holy Cross, Worcester, Massachusetts, dated 10/2/89, Attachment D to the October 19, 1990 Affidavit of Anthony M. Callendrello;
- f. "Mass AG" refers to the Attorney General for The Commonwealth of Massachusetts, all assistants to and employees and agents thereof, all witnesses offered or to be offered thereby in these proceedings, and all individuals and entities with respect to which the Attorney General for The Commonwealth of Massachusetts claims an attorney-client privilege with respect to litigation of the issues remanded in ALAB-937;
- g. "Teachers" means all public school personnel, private school personnel, and day care providers;
- h. "Schools" means all public schools, private schools, and day care facilities;
- i. "The Commonwealth" means the Commonwealth of Massachusetts and all officials, agencies, employees, agents, and political subdivisions thereof; and
- j. "SARA" means the Emergency Planning and Community Right to Know Act of 1986, 42 U.S.C. §§ 11001 et seq., and all federal, state, and local regulations, orders, and guidelines promulgated pursuant thereto.

INTERROGATORIES AND DOCUMENT REQUESTS

1. Please identify the person(s) assisting or substantially contributing to the answer of each of the following interrogatories, and produce a copy of each person's most recent resume.
2. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist (including, but not limited to, all possessed by The Commonwealth) as to how Teachers employed in the Massachusetts EPZ would respond in the event of a radiological emergency at Seabrook station, and produce all such documents within the possession or control of Mass AG.
3. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist (including, but not limited to, all possessed by The Commonwealth) as to how Teachers employed in the Massachusetts EPZ would respond to an emergency requiring evacuation of their School, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing request.
4. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist

(including, but not limited to, all possessed by The Commonwealth) as to how Massachusetts Teachers would respond to a radiological emergency, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.

5. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist (including, but not limited to, all possessed by The Commonwealth) as to how Massachusetts Teachers would respond to an emergency requiring evacuation of their School, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.
6. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist (including, but not limited to, all possessed by The Commonwealth) as to how Teachers have responded to radiological emergencies, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.
7. Please identify all analyses, surveys, studies and reports known or believed by Mass AG to exist (including, but not limited to, all possessed by The Commonwealth) as to how Teachers would respond to a

- radiological emergency, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.
8. Please identify all analyses, surveys studies and reports possessed known or believed by Mass AG to exist (including, but not limited to, all by The Commonwealth) as to how Teachers have responded to emergencies requiring evacuation of their School, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.
 9. Please identify all analyses, surveys, studies and reports possessed known or believed by Mass AG to exist (including, but not limited to, all by The Commonwealth) as to how Teachers would respond to an emergency requiring evacuation of their School, and produce all such documents within the possession or control of Mass AG other than those produced in response to the foregoing requests.
 10. Please identify and produce the most recent SARA plans for Amesbury, Merrimac, Newbury, Newburyport, Saliskury, and West Newbury.
 11. Does the Mass AG contend that any municipality located in the Massachusetts EPZ is not in compliance with the requirements of SARA as they relate to emergency

planning for Schools and school children? If your answer is anything other than an unqualified negative, then please identify each such municipality which Mass AG contends is not or may not be in compliance, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

12. Does the Mass AG contend that any School located in the Massachusetts EPZ is not in compliance with the responsibilities assigned to it by local SARA plans? If your answer is anything other than an unqualified negative, then please identify each such School which Mass AG contends is not or may not be in compliance, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.

(c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

13. Does the Mass AG contend that any School located in the Massachusetts EPZ would not, in the event of an emergency requiring evacuation of the School, comply with the responsibilities assigned to it and its personnel by local SARA plans? If your answer is anything other than an unqualified negative, then please identify each such School which Mass AG contends would not or may not comply, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG

does not rely upon the expertise of any person for the answer.

14. Please identify and produce all emergency plans for Massachusetts EPZ Schools.
15. Please identify and produce all regulations, executive orders, policy statements, guidelines, and other standards established by The Commonwealth which reflect or relate to the responsibilities of Teachers in the event of a radiological emergency.
16. Please identify all regulations, executive orders, policy statements, guidelines, and other standards established by The Commonwealth which reflect or relate to the responsibilities of Teachers in the event of an emergency at their School, and produce all such documents other than those produced in response to the foregoing request.
17. Does the Mass AG contend that any day care facility within the Massachusetts EPZ would not, in the event of a radiological emergency at Seabrook Station, comply with the requirements of 102 CMR § 7.06(29)(b)? If your answer is anything other than an unqualified negative, then please identify each such facility which Mass AG contends would not or may not comply, and:
 - (a) State each fact on which your answer is based.

- (b) Identify and produce each document which you contend reflects or supports your answer.
 - (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.
18. Does the Mass AG contend that any day care facility within the Massachusetts EPZ is not in compliance with the requirements of 102 CMR § 7.07(16)(d)? If your answer is a ~~word~~ other than an unqualified negative, then please identify each such facility which Mass AG contends is not or may not be in compliance, and:
- (a) State each fact on which your answer is based.
 - (b) Identify and produce each document which you contend reflects or supports your answer.
 - (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG

does not rely upon the expertise of any person for the answer.

19. Does the Mass AG contend that any day care facility within the Massachusetts EPZ is not in compliance with the requirements of 102 CMR § 7.11(8)? If your answer is anything other than an unqualified negative, then please identify each such facility which Mass AG contends is not or may not be in compliance, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

20. Does the Mass AG contend that any day care facility within the Massachusetts EPZ is not in compliance with the requirements of 102 CMR § 8.08(21)? If your answer is anything other than an unqualified negative, then please identify each such facility which Mass AG contends is not or may not be in compliance, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

21. Does the Mass AG contend that any day care facility within the Massachusetts EPZ would not, in the event of a radiological emergency at Seabrook Station, comply with the requirements of 102 CMR § 8.10? If your answer is anything other than an unqualified negative, then please identify each such facility which Mass AG contends would not or may not comply, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the

person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

22. Does the Mass AG contend that any day care facility within the Massachusetts EPZ is not in compliance with the requirements of 102 CMR § 7.07(18)(i)? If your answer is anything other than an unqualified negative, then please identify each such facility which Mass AG contends is not or may not be in compliance, and:

(a) State each fact on which your answer is based.

(b) Identify and produce each document which you contend reflects or supports your answer.

(c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

23. Does Mass AG agree that it is the policy or position of the Massachusetts Civil Defense Agency and/or the Massachusetts Executive Office of Public Safety, with respect to radiological emergencies, that "[i]n the

event of an evacuation, it is the responsibility of teachers, other school personnel, and day-care providers to accompany children to reception centers, until they can be discharged to their parents or guardians"? If your answer to anything other than an unqualified affirmative, then please describe in detail what Mass AG contends the policy or position of the Massachusetts Civil Defense Agency and the Massachusetts Executive Office of Public Safety to be with respect to the responsibilities of Teachers in the event of a radiological emergency, and:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document which you contend reflects or supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

24. Does Mass AG contend that, in the event of a radiological emergency at Seabrook Station, Teachers employed in the Massachusetts EPZ would not meet their

"responsibility . . . to accompany children to reception centers, until they can be discharged to their parents or guardians"? If your answer is anything other than an unqualified negative, then please:

- (a) Describe in detail each reason for your answer.
- (b) State what percentage of Teachers Mass AG contends would thus fail to meet their state-imposed responsibility to accompany the children.
- (c) State each fact upon which your answers to sub-parts (a) and (b) above are based.
- (d) Identify and produce each document which you contend supports your answers to sub-parts (a) through (c) above.
- (e) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answers, or state that Mass AG does not rely upon the expertise of any person for the answers.

25. Does Mass AG agree that the Memorandum of Charles V. Barry to Robert J. Boulay, April 24, 1989, Attachment B to the October 19, 1990 Affidavit of Anthony M.

Callendrello, correctly states the present policy or position of the Massachusetts Civil Defense Agency and the Massachusetts Executive Office of Public Safety? If your answer is anything other than an unqualified affirmative, then please describe in detail what Mass AG contends the policy or position of the Massachusetts Civil Defense Agency and the Massachusetts Executive Office of Public Safety to be with respect to orders from the Governor to Teachers in the event of a radiological emergency, and:

- (a) State each fact upon which your answer is based.
 - (b) Identify and produce each document which you contend supports your answer.
 - (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.
26. Does Mass AG contend that, in the event of a radiological emergency at Seabrook Station, Teachers employed in the Massachusetts EPZ would disobey an order from the Governor or his delegatee that they accompany

the children to reception centers until relieved? If your answer is anything other than an unqualified negative, then please:

- (a) Describe in detail each reason for your answer.
 - (b) State what percentage of Teachers Mass AG contends would thus disobey the Governor's emergency order.
 - (c) State each fact upon which your answers to sub-parts (a) and (b) above are based.
 - (d) Identify and produce each document which you contend supports your answers to sub-parts (a) through (c) above.
 - (e) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answers, or state that Mass AG does not rely upon the expertise of any person for the answers.
27. Please describe in detail, and identify and produce all documents that constitute, reflect or refer to, all communications, concerning the response of Teachers employed in the Massachusetts EPZ in the event of a

radiological emergency at Seabrook Station, between the Mass AG (as defined) and:

- (a) the Office for Children;
- (b) other Massachusetts governmental officials and entities, including, but not limited to city, town and school district officials;
- (c) Teachers;
- (d) Schools and administrators thereof;
- (e) Teachers' unions and officials thereof; and
- (f) all other persons and entities.

28. Please describe in detail, and identify and produce all documents that constitute, reflect or refer to, all communications, concerning School emergency planning in connection with Seabrook Station, between Massachusetts governmental officials and entities (including, but not limited to, the Mass AG as defined) and:

- (a) the Office for Children;
- (b) other Massachusetts governmental officials and entities, including, but not limited to city, town and school district officials;
- (c) Teachers;
- (d) Schools and administrators thereof;
- (e) Teachers' unions and officials thereof; and
- (f) all other persons and entities.

29. Please describe in detail, and identify and produce all documents that constitute, reflect or refer to, all communications, concerning the response of Teachers employed in the Massachusetts EPZ in the event of a radiological emergency at Seabrook Station, between Massachusetts governmental officials and entities other than the Mass AG (as defined) and:
- (a) the Office for Children;
 - (b) other Massachusetts governmental officials and entities, including, but not limited to city, town and school district officials;
 - (c) Teachers;
 - (d) Schools and administrators thereof;
 - (e) Teachers' unions and officials thereof; and
 - (f) all other persons and entities.
30. Does Mass AG contend that there is not "reasonable assurance that, in the event of a radiological emergency at Seabrook necessitating an evacuation of children in schools and day-care centers within the Massachusetts EPZ, a sufficient number of teachers and day-care center personnel will escort the children to the School Host Facility at Holy Cross College and remain with those children until relieved of that assignment"? If your answer is anything other than an unqualified negative, then please:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document (including, but limited to, each analysis, survey, study and report) which you contend supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.
- (d) Identify each witness whom Mass AG intends to call to testify in support of Mass AG's position.

31. Does Mass AG contend that Licensees have not "made satisfactory alternative arrangements for the care and supervision of the children both on the bus trip to Worcester and during their stay at the School Host Facility"? If your answer is anything other than an unqualified negative, then please:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document (including, but limited to, each analysis, survey, study and report) which you contend supports your answer.

- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.
 - (d) Identify each witness whom Mass AG intends to call to testify in support of Mass AG's position.
32. Please describe in detail each action which Mass AG contends must be taken in order to provide "reasonable assurance that, in the event of a radiological emergency at Seabrook necessitating an evacuation of children in schools and day-care centers within the Massachusetts EPZ, a sufficient number of teachers and day-care center personnel will escort the children to the School Host Facility at Holy Cross College and remain with those children until relieved of that assignment"? Please also:
- (a) State each fact on which your answer is based.
 - (b) Identify and produce each document which you contend supports your answer.

(c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

33. Please describe in detail each action which Mass AG contends must be taken in order that Licensees will have "made satisfactory alternative arrangements for the care and supervision of the children both on the bus trip to Worcester and during their stay at the School Host Facility"? If Mass AG contends that changes would be required to the SPMC, the Holy Cross Ops Plan, and/or the School Host Facility Plan, please describe in detail each such change. Please also:

(a) State each fact on which your answer is based.

(b) Identify and produce each document which you contend supports your answer.

(c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG

relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

34. Does Mass AG contend that Teachers are not generally relied upon to accompany evacuating children (i) from the emergency planning zones around other nuclear power plants, (ii) from the areas around facilities containing hazardous materials, and (iii) in other situations where evacuation of Schools is required? If your answer is anything other than an unqualified negative, then please:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document (including, but limited to, each analysis, survey, study and report) which you contend supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

35. Does Mass AG contend that the reliance on Teachers to accompany evacuating children (i) from the emergency

planning zones around other nuclear power plants, (ii) from the areas around facilities containing hazardous materials, and (iii) in other situations where evacuation of Schools is required, does not provide "reasonable assurance that adequate protective measures can and will be taken" for the supervision of the evacuating children? If your answer is anything other than an unqualified negative, then please:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document (including, but limited to, each analysis, survey, study and report) which you contend supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

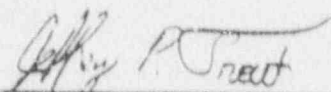
36. Does Mass AG contend that reliance upon Teachers to accompany evacuating children does provide "reasonable assurance that adequate protective measures can and will be taken" for the supervision of the evacuating children (i) from the emergency planning zones around other

nuclear power plants, (ii) from the areas around facilities containing hazardous materials, including and (iii) in other situations where evacuation of Schools is required, but such reliance does not provide "reasonable assurance" with respect to the Massachusetts EPZ?

Please state each reason for your answer, and, separately for each reason, please also:

- (a) State each fact on which your answer is based.
- (b) Identify and produce each document (including, but limited to, each analysis, survey, study and report) which you contend supports your answer.
- (c) Provide the technical qualifications (education, employment history, licenses and certificates, experience, or other information that Mass AG contends establishes the qualifications of the person) of any person on whose expertise Mass AG relies for the answer, or state that Mass AG does not rely upon the expertise of any person for the answer.

By their attorneys,



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'90 DEC 11 P6:30

CERTIFICATE OF SERVICE

I, Jeffrey P. Trout, one of the attorneys for the Licensees herein, hereby certify that on December 10, 1990, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

Administrative Judge Ivan W. Smith
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
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4350 East West Highway
Bethesda, MD 20814

Administrative Judge Richard F. Cole
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Washington, DC 20555

Adjudicatory File
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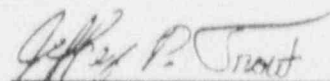
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Mr. Jack Dolan
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Agency - Region I
J.W. McCormack Post Office &
Courthouse Building, Room 442
Boston, MA 02109

George Iverson, Director
N.H. Office of Emergency
Management
State House Office Park
South
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Concord, NH 03301



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(*=Ordinary U.S. First Class Mail)