

November 23, 1982

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

NRC STAFF RESPONSE TO FIRST SET OF  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS OF THE SEACOAST ANTI-POLLUTION LEAGUE

I. INTRODUCTION

The NRC Staff herein responds to the First Set of Interrogatories and Request for Production of Documents from the Seacoast Anti-Pollution League (SAPL). In providing this response, the Staff notes that SAPL has not followed the procedures for submitting interrogatories to the NRC Staff set forth in 10 C.F.R. § 2.720(h)(2)(ii). Basically, the Staff is not required to answer interrogatories unless it is demonstrated both that the answer to any given interrogatory is necessary to a proper decision and that the answer is not reasonably obtainable from any other source. Although the Staff has nonetheless voluntarily answered SAPL's interrogatories in the interest of expedition, the Staff does not waive its right to object to any future interrogatories for the reasons set forth above.

## II. RESPONSES

SAPL-1. The Seabrook site features considered by the Staff in accident section of the FES are discussed in FES Section 5.9.4.4(2). As stated on page 5-50, the Staff has used Seabrook site specific data on population, meteorology and land characteristics for the evaluation of accident risks. As to a comparison of the Seabrook site features with other sites, this is discussed by the Staff in SECY-81-25, which is attached.

SAPL-2. The Staff has no such study.

SAPL-3. The Commission's Interim Statement of Policy defines the scope of the reasoned consideration as consisting of analysis and discussion of environmental risks attributable to postulated accidents giving approximately equal attention to the probability of occurrence of the releases and to the probability of occurrence of environmental consequences of releases of radioactive materials entering air, water, and groundwater.

The Staff analysis presented in FES Section 5.9.4.4 meets the requirements as outlined in the Commission's Interim Policy Statement of June 13, 1980.

SAPL-4. The unique circumstances of Clinch River Breeder Reactor Plant and the Perryman site prompted the need for evaluation of the risks of Class 9 accidents for those sites. Those analyses, however, may not have been as rigorous as the analyses that have subsequently been performed as a part of the Reactor Safety Study (RSS) and the associated follow-up programs. The Staff's current methodologies used to analyze the risks from accidents at the Seabrook site are based upon RSS methodologies

updated and modified to account for the comments received on RSS and to account for the plant and site specific features of the Seabrook facility and site. (See FES Section 5.9.4.4).

It is the Staff's judgment that the Seabrook plant and site circumstances are similar to some other plants and sites (e.g. San Onofre) evaluated under the Commission's Statement of Interim Policy, and that the Staff's analysis presented in the FES further confirms that there are no special or unique circumstances about the Seabrook site and environs that would warrant special mitigation features for Seabrook plant.

SAPL-5. See above response to Interrogatory No. 4.