

Docketed  
USNR  
Dated: March 9, 1983

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

SECRETARY  
& SERVICE  
BRANCH

\_\_\_\_\_  
In the Matter of )  
 )  
 )  
PUBLIC SERVICE COMPANY OF NEW )  
HAMPSHIRE, et al. )  
 )  
(Seabrook Station, Units 1 & 2) )  
\_\_\_\_\_ )

Docket Nos. 50-443  
50-444

APPLICANTS' RESPONSE TO SEACOAST  
ANTI-POLLUTION LEAGUE'S MOTION FOR  
SUMMARY DISPOSITION (CONTENTION SAPL SUPP. III)

Under date of February 11, 1983, SAPL has filed a motion for summary disposition of SAPL Contention Supp. III. The Applicants have also moved for summary disposition of this contention in their favor. Applicants' Nineteenth Motion for Summary Disposition (Feb. 11, 1983). The filing of both of these motions makes clear that the contending parties are agreed as to two matters.

- a) The contention is in order for summary disposition, and
- b) The sole issue is whether the FES as it now stands complies with the


directives set out in the NRC Policy  
Statement of June 13, 1980.

For the reasons set out in the Applicants' motion, we believe that the FES fully complies with the NRC directive. SAPL's argument accompanying its motion is not grounded upon the language of the NRC Policy Statement; rather, it is grounded upon language which SAPL wishes were in fact in the Policy Statement. The "straightforward statement" (presumably of death and destruction) SAPL claims is mandated, simply is not. What is required is an analysis of probability vs. consequences which is what the charts and graphs in fact are. SAPL's discussion of the evacuation model says more about SAPL's apparent inability to understand the language of Appendix F to the FES than it does about supposed faults in the assumptions. SAPL's concern about sabotage is equally irrelevant. The Policy Statement requires a "discussion", not a "conclusion" and if something is beyond the state of the art, so stating is a complete "discussion" of the problem. In addition, as noted in the FES, the consequences at Seabrook from accidents caused by external events would not be different in kind from those resulting from the "internal" events treated. SAPL does not (indeed cannot) quarrel with that assessment.

CONCLUSION

Summary disposition in favor of the Applicants and against SAPL should be granted with respect to SAPL Contention III.

Respectfully submitted



*R. K. Gad III*

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CERTIFICATE OF SERVICE

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