

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

23 APR 24 1983

Before the  
ATOMIC SAFETY AND LICENSING BOARD

\_\_\_\_\_)  
In the matter of: )  
 )  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE) Docket Nos.: 50-443  
ET AL. ) and  
 ) 50-444  
(Seabrook Station, Units 1 and 2) )  
\_\_\_\_\_) March 23, 1983

Affidavit of Stephen S. T. Fan

I, Stephen S. T. Fan, being duly sworn, state as follows:

1. I am currently Professor of Chemical Engineering and Chairman of the Department of Chemical Engineering at the University of New Hampshire, and consultant to the New Hampshire Office of the Attorney General. My professional qualifications are outlined in my curriculum vitae attached as Attachment A to New Hampshire's January 12, 1983 Response to Applicant's Interrogatories.
2. In light of the uncertainty bounds on the quantitative assessment of environmental and health impact ranging from a factor of 10 to 100 and given the potential consequences of a Class 9 accident, possible measures to interdict the transport of radioactive contaminants through air or liquid pathways should be studied now, and not after an accident occurs.
3. Until the Staff has properly considered this issue and identified "additional features or other actions which

would prevent or mitigate" the consequences of a serious accident, it will not have fully complied with the June 13, 1980 NRC Policy Statement, 45 Fed. Reg. at 40103.

*Stephen S.T. Fan*

---

Dr. Stephen S. T. Fan  
Chairman and Professor  
College of Engineering and  
Physical Sciences  
Department of Chemical Engineering  
Kingsbury Hall  
University of New Hampshire  
Durham, New Hampshire 03824

THE STATE OF NEW HAMPSHIRE  
STRAFFORD, SS.

Personally appeared this 23rd day of March, 1983, Dr. Stephen S.T. Fan, before me, the undersigned officer, and made oath that the foregoing statements are true to the best of his knowledge and belief.

TERRY L. RUSSELL, Notary Public  
My Commission Expires April 22, 1985

*Terry L. Russell*

---

Notary Public/Justice of the Peace