RELATED CORRESPONDENCE

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION DOLKETER

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

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PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al. Docket Nos. 50-443 OL 50-444 OL

(Seabrook Station, Units 1 and 2)

SAPL'S RESPONSES TO NRC STAFF INTERROGATORIES AND REQUESTS FOR DOCUMENT PRODUCTION TO SEACOAST ANTI-POLLUTION LEAGUE

S.3.a. The Staff has asked that SAPL "explain in detail all reasons underlying the statement that the Applicant's analysis of Class 9 accidents, contained in its environmental report, fails to satisfy the Commission's policy statement of June 13, 1980 at 45 F.R. 40101."

A. First, SAPL believes that its contention relates to the Staff's compliance with requirements of the National Environmental Policy Act, as specified in the Commission's Interim Policy Statement, and not to the Applicant's Environmental Report. However, in regard to the Environmental Report, SAPL believes that the analysis would fail to comply with the Commission's Policy Statement, if the Policy Statement in fact related to the Environmental Report, in the following respects:

1. The Commission's Policy Statement requires that "approximately equal attention shall be given" to the consequences of accidents and to the probability of their occurrence. In addition, the Commission's statement requires that accidents whose consequences be analyzed should "not be limited" to those that can reasonably be expected to occur.

2. The Environmental Report does not disclose the full consequences of a Class 9 accident. Throughout the discussion in Section 7.4, "Determination of Release Category Consequences", the Applicant discusses the consequences only in combination with the claimed low probability of the accident events.

3. The consequences are not presented on a worst case basis, contrary to the Policy Statements requirement that the accident sequences "not be" limited to those that can be reasonably expected to occur. For Example, the Applicant has chosen to use average wind speed, and to use weekday transient population concentrations. 4. Contrary to the requirements of the Interim Policy Statement, the Environmental Report does not discuss the extent to which events arising from causes external to the plant may be considered possible contributors to the risk.

5. The accident consequences are mitigated by the assumption of the "benefits of evacuation", again precluding the disclosure of the full consequences of a worst case accident.

S.3.b. State and explain in detail the steps, if any, that you believe must be taken to correct the deficiencies listed in the answer to question S.3(a).

A. The full and complete disclosure of the consquences of a worst case accident should be provided, and should include information available from such recent studies as NUREG/CR2239.

S.3.c. Describe in detail the site features, availability of sheltering, and population densities at Seabrook that you believe should affect the analysis of Class 9 accidents, and explain for each identified item how and why it would change the analysis.

A. Site Features - Limited roadway network, choke points on the bridges over the tidal rivers, and the harbor entrance. Proximity of the reactors to the at-risk population, including the beach population as described in FEMA Rep. 3:

"The behavior of drivers who are caught in congestion within direct sight of the Seabrook Station can only be guessed at this time. Any breakdown in orderly evacuation traffic flow will result in evacuation times greater than the ones estimated above. Total evacuation times could range from 10 hours 30 minutes to 14 hours 40 minutes for an evacuation in which traffic control is generally ineffective." <u>Dynamic Evacuation Analysis:</u> <u>Independent Assessments of Evacuation Times from the</u> <u>Plume Exposure Pathway Emergency Planning Zones of</u> <u>Twelve Nuclear Power Stations.</u> February 1981, p. 46

Availability of Sheltering -Resident and beach population outstrip available structures for sheltering. Most structures lack basements. Population Densities - According to the DES, 5-58, the majority of early fatalities would be expected to occur "within a 3.2 km. (2-mi.) radius." The population density at Seabrook, on a worst case basis, could well be very great within the 2 mile radius.

This Intervenor is unable to state, at this point the manner in which each of these factors would change the analysis, except to state that it would cause the analysis to show more adverse consequences than presently disclosed. S.3.d. Describe the consequences of a Class 9 accident that you feel would require that a license for the facility be denied or that the plant be modified and state and explain the technical or other bases for your belief.

A. The consequences are early fatalities, latent cancer fatalities, radiation illness, genetic damage, environmental contamination, and land interdection. The basis for this belief is the well-known adverse effect of radiation contamination on human health and the environment.

S.3.e. Describe and explain in detail the conditions that you feel must be attached to the issuance of an operating license; supply the basis or reasons for imposing such conditions; and describe and explain the plant modifications, if any, that you believe should be undertaken to satisfy these conditions.

A. SAPL feels that the operating license should not, be issued so long as a risk of severe accidents exists and the public health and safety cannot be assured through emergency preparedness. See DES 545, last paragraph of Section 5.9.4.4(3). However, should the operating license be issued, it must be recognized, in the words of Commissioner Gilinsky, with whom Commissioner Bradford agreed, that "Seabrook poses difficult, and perhaps unique, emergency planning problems." Recognition of these problems should require, at a minimum that plant operation not be permitted during the period from Memorial Day to Labor Tay, and at times when travel is restricted due to inclement weather and road conditions.

S.3.f. State the steps that you feel the Applicant must take to satisfy the requirements of 10 C.F.R. Sec. 50.40.

A. See Above.

S.3.g. State and explain the bases for your view that the Wash-1400 methodology for analyzing Class 9 accidents is discredited.

A. WASH-1400 has been the subject of numerous criticisms. These include not only the NUREG/CR-0400, but "the risks of nuclear power Reactors: A Review of the NRC Reactor Safety Study" published by the Union of Concerned Scientists, and the comments of Meyer Bender and Jeremiah J. Ray, ACRS members, attached to a letter from ACRS Chairman P. Shewmon to Chairman Pallodino dated September 15, 1982.

S.3.h State and Explain the method that you believe should be used in analyzing Class 9 accidents in lieu of that of WASH-1400.

A. SAPL believes that in lieu of a technically indefensible probability analysis, the possibility of a Class 9 accident should be acknowledged and assigned a probability of 1.

RESPONSE TO INTERROGATORY I - In responding to these issues SAPL intends to rely upon the following:

Dr. Richard Kaufman, University of New Eampshire Dr. Donald Herzberg, Dartmouth-Hitchcock Medical Center Dr. Jan Beyea, National Audubon Society

SAPL does not at this time have curriculum vitae for the above named individuals, but will forward these as soon as they are obtained. SAPL is unable at this time to identify all the witnesses and documents it will call in support of its contention. It cannot, accordingly, provide summaries of the views, positions, or proposed testimony on this contention.

Jane Ddughty

Field Director SEACOAST ANTI-POLLUTION LEAGUE

DATED: 12-13-82

3.00

State of New Hampshire County of Hillston -y

Personally appeared the above named Jane Doughty and made oath that the statements subscribed to by her are true to the best of her knowledge and belief.

Before me,

Justice of the Peace/Notary Public

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