AFFIDAVIT OF JAMES A. MACDONALD ON CCCNH-7 AND NH-9

JAMES A. MACDONALD, being on oath, deposes and says as follows:

- 1. I am Manager of the Radiological Protection Group, employed by Yankee Atomic Electric Company. My professional qualifications appear in the Operating License Application (FSAR Chapter 13).
- 2. The contention has no basis for the reasons given below.

General Design Criterion 63 requires monitoring of the spent fuel storage area to detect excessive radiation levels and to initiate appropriate safety actions.

As noted in Table 12.3-13 of the FSAR, the spent fuel storage area is provided with area monitors. The normal monitor has a range of 10^{-1} to 10^4 mR/hr. The accident monitor (Amendment 48) has a range of 10^{-2} to 10^4 R/hr.

Additionally, the Fuel Storage Building exhaust monitor (FSAR Section 12.3.4.2.4.(b)) is located in the Fuel Storage Building ventilation exhaust duct downstream of the fans. This detector measures the gross activity vented from the Fuel Storage Building to the plant vent. Indication and alarm is available locally and in the main Control Room. The effluent is monitored again at the plant vent.

General design Criterion 64 requires monitoring of the reactor containment atmosphere, spaces containing components for recirculation of loss-of-coolant accident fluids, effluent discharge paths and the plant environs for radioactivity.

Monitoring of process and effluent streams is discussed extensively in Section 11.5 of the FSAR. Section 12.3 presents a detailed description of the airborne radioactivity monitors including the containment atmosphere monitors as well as the plant vent.

In Applicant's letter to the NRC, dated February 12, 1932, commitments were made concerning the requirements of NUREG-0737. The plant vent monitors have provisions for monitoring up to $10^5~\text{uCi/cm}^3$. There are also provisions for taking samples of particulates and iodines from the vent. The steam lines are monitored (Amendment 44) for releases of noble gas through the safety valves in the event of a tube rupture accident.

The RHR vault area and other selected PAB areas are monitored by detectors with an upper range of 10^4 R/hr (Amendment 48). These detectors ensure adequate monitoring of spaces containing recirculated loss-of-coolant accident fluids.

The Seabrook Station Environmental Report in Sections 6.1.5 and 6.2.1 presents details of the environmental radiological monitoring program. Section 6.2 of the Seabrook Station Emergency Plan presents information concerning assessment capabilities including provisions for off-site monitoring in the event of an accident.

Finally, the design of the process and effluent Radiological Monitoring Instrumentation and Sampling Systems meets the requirements of NUREG-0800, Section 11.5 because this document serves as a reference for the review of the entire RDMS specification by YNSD.

Based on the above, I feel there is no issue relative to CCCNH-7 or NH-9 on which factual hearings are warranted.

Japes A. MacDonald

COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss

February 11, 1983

Then appeared before me the above suscribed James A. MacDonald and made oath that he was the author of the foregoing affidavit and the statements set forth therein are true to the best of his knowledge.

Allen L. Legendre, Jr. Notary Public My Commission Expires August 5, 1988

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on February 11, 1983, I made service of the within "Applicants' Fifth Motion for Summary Disposition (Contentions NH-9 and CCCNH-7)" by mailing copies thereof, postage prepaid, to:

Helen Hoyt, Chairperson Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Hampton, NH 03842 Washington, DC 20555

Dr. Emmeth A. Luebke Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Dr. Jerry Harbour Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Rep. Beverly Hollingworth Coastal Chamber of Commerce 209 Winnacunnet Road

William S. Jordan, III, Esquire Harmon & Weiss 1725 I Street, N.W. Suite 506 Washington, DC 20006

E. Tupper Kinder, Esquire Assistant Attorney General Office of the Attorney General 208 State House Annex Concord, NH 03301

Roy P. Lessy, Jr., Esquire Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, DC 20555

Robert A. Backus, Esquire 116 Lowell Street P.O. Box 516 Manchester, NH 03105

Philip Ahrens, Esquire Assistant Attorney General Department of the Attorney General Augusta, ME 04333

David L. Lewis
Atomic Safety and Licensing
Board Panel
U.S. Nuclea: Regulatory Commission
Rm. E/W-439
Washington, DC 20555

Mr. John B. Tanzer
Designated Representative of
 the Town of Hampton
5 Morningside Drive
Hampton, NH 03842

Roberta C. Pevear
Designated Representative of
the Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844

Mrs. Sandra Gavutis
Designated Representative of
the Town of Kensington
RFD 1
East Kingston, NH 03827

Edward J. McDermott, Esquire Sanders and McDermott Professional Association 408 Lafayette Road Hampton, NH 03842

Jo Ann Shotwell, Esquire Assistant Attorney General Environmental Protection Bureau Department of the Attorney General One Ashburton Place, 19th Floor Boston, MA 02108

Ms. Olive L. Tash
Designated Representative of
the Town of Brentwood
R.F.D. 1, Dalton Road
Brentwood, NH 03833

Edward F. Meany
Designated Representative of
the Town of Rye
155 Washington Road
Rye, NH 03870

Thomas G. Dignan, Jr.