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by the Staff. Upon receipt of the DCRDR, the Staff will review the Seabrook control room design.

INTERROGATORY 13.1

Does the Staff believe that the Applicant is in full compliance with NUREG-0737, Item I.A.1.1? If not, explain in what ways the Applicant has failed to comply with this NUREG-0737 requirement.

RESPONSE

No, the Applicant does not at present fully comply with NUREG-0737, Item I.A.1.1 in that:

1. The Applicant has not committed to provide a separate Shift Technical Advisor (STA) onshift while in Modes 1-4. However, the Applicant has committed to train and qualify the Shift Superintendents as STA's. For shifts where the Shift Superintendent is not STA-qualified, the Applicant has committed to provide a separate STA;

2. The Applicant has not committed to meet the degree guidelines for STA's, however, Shift Superintendent and Unit Shift Supervisors have received or will receive approximately 60 hours of college level instruction in engineering-related subjects. In addition, Applicant has committed to provide the training called for in NUREG-0737, Appendix C, Sect. 6; and

3. The Applicant has presently not described a training program for non-licensed STA's.

INTERROGATORY 13.2

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG-0737, Item I.A.1.1.

RESPONSE

Documentation of the Staff's findings will be contained in Section 13.1.2 and 13.2.2 of the Safety Evaluation Report. Additionally, letters dated December 17, 1981 and December 22, 1981 from F. J. Miraglia, NRR, to W. C. Tallman, PSNH, regarding FSAR Chapter 13 reviews address this issue. These letters are available in the Local Public Document Room.

INTERROGATORY 13.3

Does the Staff believe that the Applicant is in full compliance with NUREG-0737, Item II.B.4? If not, explain in what ways the Applicant has failed to comply with this NUREG-0737 requirement.

RESPONSE

Yes.

INTERROGATORY 13.4

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG-0737, Item II.B.4.

RESPONSE

Documentation of the Staff's findings will be contained in Section 13.2.2. of the SER. Additionally, a letter dated December 22, 1981 from F. J. Miraglia, NRR, to W. C. Tallman, PSNH, regarding FSAR Chapter 13 review addresses this issue. This letter is available in the Local Public Document Room.

INTERROGATORY 13.5

Does the Staff believe that the Applicant is in full compliance with NUREG-0737, Item I.A.2.3? If not, explain in what ways the Applicant has failed to comply with this NUREG-0737 requirement.

RESPONSE

Yes.

INTERROGATORY 13.6

Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff addressing the Applicant's compliance with NUREG-0737, Item 1.A.2.3.

RESPONSE

This evaluation will be contained in Section 13.2.1.3 of the SER.

INTERROGATORY 13.7

Explain the Staff's position regarding the adequacy of the FSAR in providing for training to Reactor Operators and Senior Reactor Operators in the following areas:

- (a) recognition of emergency conditions;
- (b) classification of observed emergency conditions in accordance with the Emergency Classification System;
- (c) notification of emergencies to off-site authorities;
- (d) recommendation of protective actions to off-site authorities; and
- (e) direction of station staff to take protective actions.

Please identify all documents prepared by the Staff which discuss the Staff's review of training in the above-mentioned areas.

RESPONSE

The Applicant has indicated in the FSAR that:

1. As part of the initial operator license training program, all license candidates are required to participate in a simulator training program. Major program emphasis is placed on obtaining complete familiarity with the plant's operating, emergency and surveillance procedures.

2. As part of the operator requalification training program, all licensed operators are provided with simulator training. The simulator requalification training program emphasizes such areas as infrequently accomplished procedures, required responses to abnormal and emergency procedures and significant operating events.

In addition, a complete review of all emergency operating procedures is conducted by each licensee at least annually.

The above cited procedures provide guidance to Reactor Operators and Senior Reactor Operators in the following areas:

- (a) recognition of emergency conditions;
- (b) classification of observed emergency conditions in accordance with the Emergency Classification System;
- (c) notification of emergencies to off-site authorities;
- (d) recommendation of protective actions to off-site authorities;
and
- (e) direction of station staff to take protective actions.

In addition to the training identified above, the Operator Licensing Branch ensures the adequacy of training through its three part examination of the ROs and SROs. The examination is focused on those actions ROs and SROs should perform under abnormal/emergency conditions, typically following EOP guidelines and plant technical specifications. This examination mechanism has proven, historically, to be an excellent measure of the licensed operator's competence to respond to upset conditions.

Based on its review of the Applicant's FSAR the Staff finds the training program for licensed operators to be acceptable. The Staff's position in this regard will be documented in the SER.

INTERROGATORY 20.1

Please identify all persons who were or are responsible in a supervisory capacity for the Staff review of the Seabrook Station Radiological Emergency Plan generally, submitted as a separate volume of the Final Safety Analysis Report. Also identify those persons who were or are responsible in a supervisory capacity for the review of each of the following specific sections of the emergency plan:

§ 6.0 "Emergency Facility and Equipment;"

§ 7.0 "Communications;"

§ 8.0 "Organization;"

§ 11.0 "Emergency Notification and Public Information;" and

§ 12.0 "Maintaining Emergency Preparedness."

RESPONSE

The principal Staff reviewer in this area is John Sears, a Senior Reactor Safety Engineer in the Emergency Preparedness Licensing Branch. The Section Chief is David Matthews.

INTERROGATORY 20.2

Has the Staff approved of the Applicant's Emergency Action Levels, referenced in Appendix A of the Emergency Plan, as required by 10 C.F.R. Part 50, Appendix E, Section IV.B? If not, please explain why not.

INTERROGATORY 20.3

Is it the Staff's understanding that a classifiable event will be declared whenever the Emergency Action Levels indicate that such a declaration is in order, or will the emergency director have the discretion not to declare an emergency even though it is indicated by the applicable EAL? If the latter, describe the factors upon which the emergency director must make this determination.

INTERROGATORY 20.4

What is the Staff's position with regard to the adequacy of the Emergency Plan to ensure that the shift superintendent, unit supervisor, or other personnel will properly and promptly recognize emergency conditions and classify the observed conditions in accordance with the emergency classification system. Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents which have been prepared for the purpose of studying, reviewing or critiquing the ability of the Applicant to recognize and classify emergency conditions when they arise.

INTERROGATORY 20.5

What is the Staff's position with regard to the adequacy of the Emergency Plan to ensure that the appropriate State of New Hampshire authorities will be notified within fifteen (15) minutes of a classifiable event? Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents which have been prepared for the purpose of studying, reviewing, or critiquing the Applicant's ability to notify State of New Hampshire authorities in the proper, prompt fashion.

INTERROGATORY 20.6

Please explain the Staff's position regarding the adequacy of the emergency response organization and procedures as described in Section 8.2 of the Applicant's Emergency Plan. Identify and produce pursuant to 10 C.F.R. Section 2.741 all documents relating to the review and critique of this section of the Emergency Plan.

INTERROGATORY 20.7

What is the Staff's position regarding the adequacy of the Emergency Plan with respect to the primary and backup communication systems for use between:

- (a) the Emergency Operations Facility and the Media Center;
- (b) the Technical Support Center and the Emergency Operations Facility;
- (c) the Technical Support Center and the New Hampshire Incident Field Office for Seabrook; and
- (d) all the emergency response centers described in Section 6.0 of the Emergency Plan and the New Hampshire Emergency Operations Center in Concord.

Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents pertaining to the study, review or critique of the communication systems described in the answer to this Interrogatory.

INTERROGATORY 20.8

Does the Staff believe that a data transmission system is required to communicate necessary amounts of information to the New Hampshire Emergency Operation Center? If so, please explain why; if not, explain why not.

INTERROGATORY 20.9

What is the Staff's position with regard to the adequacy of the proposed location of Seabrook Station's Emergency Operations Facility and Media Center? Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents relating to the review and critique of the proposed locations of these two emergency center.

RESPONSE

The Staff review of these matters is not completed. When the review is completed, the Staff will respond to Interrogatories 20.2-20.9.

INTERROGATORY 21.1

Please identify all the persons who were or are responsible in a supervisory capacity for the Staff review and evaluation following sections of the Emergency Plan:

§ 9.0 "Emergency Response," and

§ 10.0 "Emergency Measures".

RESPONSE

See answer to Interrogatory 20.1 supra.

INTERROGATORY 21.2

Has the Applicant submitted to the NRC what the Staff considers to be an "on-site radiological emergency response plan"? If so, please identify it. If not, does the Staff expect the Applicant to submit one?

INTERROGATORY 21.3

Please explain the Staff's position on the adequacy of the emergency plan as submitted by the Applicant with respect to protecting people in the zone of danger around the Seabrook plant, identifying and describing in detail all aspects of the Emergency Plan which the Staff feels is deficient in this regard. Please identify and produce pursuant to 10 C.F.R. Section 2.741 all documents prepared by the Staff concerning the review and/or critique of this aspect of the Emergency Plan.

INTERROGATORY 21.4

Explain the Staff's position respecting the adequacy of the emergency plan concerning arrangements which have been made for transportation of and medical treatment for injured personnel, identifying and producing pursuant to 10 C.F.R. Section 2.741 all the documents prepared by the Staff concerning the Staff's review and/or critique of this part of the Emergency Plan.

INTERROGATORY 21.5

Please explain the Staff's position regarding the measures which will be taken to minimize personnel exposures from external and or internal sources of radiation, as referenced in Section 10 3.3, P. 10-3 of the Emergency Plan.

INTERROGATORY 21.6

What is the Staff's understanding of the term "emergency radiological protection programs"? Please explain the Staff's position on the adequacy of any such programs.

RESPONSE

The Staff review of these matters is not completed. When the review is completed, the Staff will respond to Interrogatories 21.2-21.6.

INTERROGATORY SAPL Supp. 3.20

Explain whether the Applicant has complied with the requirements of NUREG-0737 I.C.1. which requires an analysis of transients and accidents postulating multiple failures and operator errors. If the Applicant has complied, please identify and produce, pursuant to 10 C.F.R. Section 2.741, the documents which demonstrate compliance. If the Applicant has not complied, please indicate the Staff's position on what documentation will be required for compliance.

INTERROGATORY SAPL Supp. 3.21

Referring to State's previous Interrogatory 3.14, Staff interpreted it as referring to documents other than those prepared for Seabrook. This was not the State's intention. We request only that the Staff identify all documents prepared by the Staff for review of Seabrook which relate to an analysis of transients and accidents which postulate multiple failures including operator errors. By this Interrogatory, we do not seek a massive number of documents but rather specific documents which were prepared by the Staff to satisfy its obligations under the provisions of 45 Fed. Reg. 40101 or to review the Applicant's compliance with NUREG-0737 I.C.1.

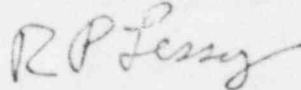
INTERROGATORY SAPL Supp. 3.22

Explain the reasons why the Staff chose not to consider the economic impact on the Seacoast area in particular and on the State generally in the event of a significant release of radioactivity to groundwater at the Seabrook facility.

RESPONSE

Due to reviewer's illness, the Staff was unable to answer these interrogatories. Responses will be provided as soon as possible.

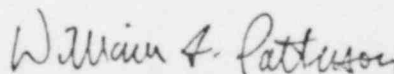
Respectfully submitted,



Roy P. Lessy
Deputy Assistant Chief Hearing Counsel



Robert G. Perlis
Counsel for NRC Staff



William F. Patterson
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 21st day of January, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF)	Docket Nos. 50-443 OL
NEW HAMPSHIRE, <u>et al.</u>)	50-444 OL
)	
(Seabrook Station, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF RESPONSE TO "THE STATE OF NEW HAMPSHIRE'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE NUCLEAR REGULATORY COMMISSION STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by a double asterisk, served by Express Mail, or, as indicated by a triple asterisk, hand-delivered by messenger, this 21st day of January, 1983:

Helen Hoyt, Esq., Chairman*
Administrative Judge
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry Harbour
Administrative Judge
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Beverly Hollingworth
7 A Street
Hampton Beach, NH 03842

E. Tupper Kinder, Esq.**
Assistant Attorney General
Environmental Protection Division
Office of the Attorney General
State House Annex
Concord, NH 03301

Edward F. Meany
Town of Rye, New Hampshire
155 Washington Road
Rye, NH 03870

Dr. Emmeth A. Luebke*
Administrative Judge
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jo Ann Shotwell, Asst. Attorney
Office of the Attorney General
Environmental Protection Division
One Ashburton Place, 19th Floor
Boston, MA 02108

Nicholas J. Costello
1st Essex District
Whitehall Road
Amesbury, MA 01913

Robert L. Chiesa, Esq.
Wadleigh, Starr, Peters, Dunn
& Kohls
95 Market Street
Manchester, NH 03101

Roberta C. Pevear
Town of Hampton Falls, New Hampshire
Drinkwater Road
Hampton Falls, NH 03844

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

Brian P. Cassidy
Regional Counsel
FEMA, Region I
John W. McCormack Post Office &
Courthouse
Boston, MA 02109

David R. Lewis*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Wilfred L. Sanders, Esq.
Lawrence M. Edelman, Esq.
Sanders and McDermott
408 Lafayette Road
Hampton, NH 03842

Thomas G. Dignan, Jr., Esq.**
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Atomic Safety and Licensing
Appeal Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jane Doughty
Field Director
Seacoast Anti-Pollution League
5 Market Street
Portsmouth, NH 03801

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

William S. Jordan, III, Esq.***
Ellyn R. Weiss, Esq.
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Phillip Ahrens, Esq.
Assistant Attorney General
State House Station #6
Augusta, ME 04333

Donald L. Herzberger, MD
Hitchcock Hospital
Hanover, NH 03755

Edward J. McDermott, Esq.
Ann C. Thompson, Esq.
Sanders and McDermott
408 Lafayette Road
Hampton, NH 03842

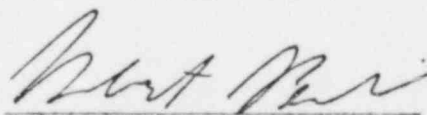
Sen. Robert L. Preston
State of New Hampshire Senate
Concord, NH 03301

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

John B. Tanzer
Town of Hampton, New Hampshire
5 Morningside Drive
Hampton, NH 03842

Letty Hett
Town of Brentwood
RFD Dalton Road
Brentwood, NH 03833

Sandra Gavutis
Town of Kensington, New Hampshire
RFD 1
East Kingston, NH 03827


Robert G. Perlis
Counsel for NRC Staff