

## TOWN OF WEST NEWBURY

MASSACHUSETTS 01885

BOARD OF SELECTMEN

June 15, 1983

Mr. Martin Lomasney  
 Costello, Lomasney & deNapoli, Inc.  
 115 Middle Street  
 Manchester, New Hampshire 03100

Re: Draft Emergency Planning Document  
 for West Newbury, Massachusetts

Dear Mr. Lomasney:

I am writing on behalf of the Town of West Newbury regarding your draft emergency response plan for our Town. We wish to notify you that we have very serious concerns about the draft plan submitted to us. That draft does not accurately reflect or address the emergency response needs of West Newbury and there will need to be a great deal of work done on it before we will be in a position to submit the plan to federal authorities as even a draft plan of this community. We are committed to working with you and with other interested parties to help develop a satisfactory emergency plan for our Town.

The following address our major concerns regarding the draft:

1. Emergency Response Support & Resources: The draft submitted to us does not include any evaluation of our emergency response resource requirements. Without such an assessment, we cannot adequately prepare for an emergency, and also cannot evaluate our Town's ability to respond to a nuclear accident. It is, therefore, necessary that a redraft specifically identify the type and quantity of emergency equipment, personnel, provision, vehicles and other resources West Newbury is likely to need in the event of an emergency, and also evaluate how West Newbury can be expected to meet those needs. In this regard, we know that our own resources are limited and that it will be necessary to look to outside sources for much of our support and equipment. The redraft must identify exactly what support and resources we will need to secure from outside the Town, and precisely where that assistance will be coming from. It should also include the necessary commitments from those organizations to provide such resources.



5  
2. Emergency Personnel: We need more information concerning the number of emergency personnel we will need for the various emergency response tasks. We are also concerned that, in the event of a nuclear emergency requiring evacuation, a number of our people may not show up. We would like a study done to assess the attitudes of our personnel in this respect, similar to the one we understand was prepared for the Shoreham plant on Long Island, so that we may have a better indication of the number of emergency personnel we can depend upon to respond.

3. Emergency Notification: We need assurance that we will get notified immediately of any accident at Seabrook. The draft plan does not contain sufficient information regarding the emergency conditions at the plant which will trigger notification.

4. Notification of Key Response Personnel: The draft plan fails to provide reliable back-up means for quickly notifying all of the key emergency personnel in the event they cannot be reached by phone. Also, the primary notification system (whereby the police dispatcher telephones all key persons and department heads) does not appear to be sufficiently time-efficient in the case of a fast-developing accident. We would like to see if better primary and back-up methods can be devised for rapid notification of these people.

5. Notification of Support Personnel: The draft does not provide for notification of our support personnel. We need your help in developing procedures to ensure that all support personnel can be quickly mobilized.

6. Public Alerting System: We are very concerned about our ability to quickly notify and instruct the public. We know that our fire stations' airhorns are inadequate in this respect; that we cannot depend on their being audible to all segments of our population. The redraft must evaluate our present alerting system, assess precisely what additional sirens and equipment we will need, and indicate where such equipment should be placed. The draft must also address means for notifying those with special needs.

7. Protective Action Guidelines: We have not seen guidelines for determining the appropriate protective response to be taken in an emergency. Although we understand that during an emergency the Governor of our state will make the final decision regarding which protective actions we shall take, we need to be certain that the appropriate guidelines are in place which will enable the Governor to make the necessary safety

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decisions both promptly and intelligently. In this respect, we will also need to see some data on the projected consequences (number of expected fatalities, injuries, etc.) of the different protective response actions (i.e., sheltering or evacuation) under various conditions. Until we receive such information, we cannot form any opinion as to the effectiveness of the proposed emergency plan or guidelines for taking various actions.

8. Evacuation: The draft plan states that under certain emergency conditions our Town will be evacuated to Peabody. However, we have not seen any information regarding proposed evacuation routes, evacuation time estimates, traffic management, or the emergency conditions which will precipitate evacuation. Without such information, we are not only unable to prepare for evacuation, but we are unable to evaluate the feasibility or effectiveness of this emergency response measure. We have definite concerns, as mentioned above, concerning an evacuation route to Peabody. The evacuation route or routes have not been identified. It is somewhat assumed we would proceed to Peabody by way of Route 95, but not having seen evacuation plans for other towns, we don't know what the status of Route 95 will be; i.e., how many other towns will be traveling south on Route 95.

In addition to the above, we need to see plans for evacuating those with special needs, schools, and persons without cars. We are also concerned about our ability to provide transportation for all these people. The redraft must contain information concerning the number and types of vehicles we will require, indicate where our own transportation resources are lacking, and how we can expect to obtain any additionally needed vehicles. We need your assistance, too, in devising efficient procedures for ensuring that anyone requiring transportation during an emergency will be taken care of. Further, with respect to any plans for evacuating school children, we think it unrealistic to expect, as the draft provides, that parents will not try to pick their children up from school, regardless of any instructions to the contrary. A new draft must therefore account for this.

9. Sheltering: We have not seen any evaluation of West Newbury's sheltering capabilities. We need your assistance in evaluating the effectiveness of our present sheltering and in assessing what additional sheltering we shall require. We know that in case of a fast-developing accident, sheltering may be our only alternative, so the plan must make definite provisions for this.

10. Radiological Exposure Control: We have heard that the Massachusetts Department of Public Health opposes the use of

June 15, 1983

radioprotective drugs. We would like to receive more information on the reasons for their position, and also would like to know under what circumstances, if any, these drugs will be administered. Furthermore, we have noticed that the draft makes no mention of protective clothing or breathing equipment for our emergency personnel. We should like to be able to take all possible protective measures to ensure the safety of these people. We also fear that failing to provide our emergency workers with adequate protective equipment, will, understandably, only compound the problem of their not showing up to work.

11. Medical Support: The draft plan contains no data that would help us assess our emergency medical needs. At a minimum, we expect that we shall need additional ambulance service. The redraft must more precisely evaluate our medical requirements and indicate where and how we shall obtain any additional medical support. Also, we need assurance that the hospitals mentioned in the draft have sufficient resources to meet our medical needs and are prepared to accept and treat contaminated persons.

12. Reception Facilities: We have no information on where in Peabody we shall go in case of evacuation. We need assurance that appropriate facilities will be available for us in Peabody, that they will have procedures in place for registering evacuees upon arrival, and that they will have appropriate equipment for determining radiological exposure and performing any decontamination.

13. Radiological Decontamination: The draft plan does not include any procedures for decontamination. We need to see guidelines for decontaminating emergency workers, and also need to know what procedures will be used to decontaminate our Town prior to our return. We also would like some information on the effectiveness of any of these decontamination procedures.

14. Training: We need a description of the type of training which will be available for our emergency personnel. Once we know more about the training which is available, we will be in a better position to assess our needs for it.

The above represents our major areas of concern regarding the draft. In addition, we are concerned because our Town has very limited resources and we know we cannot afford the cost of much of the necessary emergency equipment. Therefore, we need to know in advance how such equipment and other needed resources will be paid for.

We offer our help in any way necessary in revising and/or updating the emergency plan for the Town of West Newbury. We are

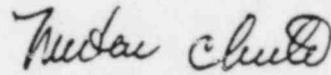
June 15, 1983

very much concerned that the plan does not have local input as we feel it should have.

We are in the process of forming a citizens group to review the total issue and report back to the Selectmen their thoughts and wishes on the proposed plan.

Hopefully within a thirty to forty-five day period, the Town will be in a position to sit down with your Company and state officials to resolve issues of concern to the Town of West Newbury.

Very truly yours,



Merton Chute, Chairman

x.c.: Jack Dolan  
Massachusetts Civil Defense

Edward Thomas  
Federal Emergency Management  
Agency

Ann Shotwell  
Assistant Attorney General

Board and Parties to the  
NRC Proceeding

Clifford Wallace, Director  
West Newbury Civil Defense