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NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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BEFORE ADMINISTRATIVE JUDGES:
Helen F. Hoyt, Chairman
Dr. Emmeth A. Luebke
Dr. Jerry Harbour

In the Matter of)	Docket Nos.
)	59-443-OL
PUBLIC SERVICE COMPANY OF)	50-444-OL
NEW HAMPSHIRE, <u>et al.</u>)	
(Seabrook Station, Units 1 and 2))	September 29, 1983
)	
)	

ATTORNEY GENERAL BELLOTTI'S
INTERROGATORIES AND REQUESTS FOR DOCUMENTS
TO THE FEDERAL EMERGENCY MANAGEMENT AGENCY
ON EMERGENCY PLANNING FOR THE STATE OF NEW HAMPSHIRE

INSTRUCTIONS FOR USE

Attorney General Francis X. Bellotti hereby requests that the Federal Emergency Management Agency*, pursuant to 10 C.F.R. §§2.740(b) and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to

* These interrogatories and document requests have been directed to FEMA following discussions with FEMA counsel on the question of whether FEMA is a party to this proceeding for discovery purposes. If it is later determined that FEMA personnel are, instead, witnesses of the NRC Staff, this pleading will be conformed to the procedures applicable to discovery of the NRC Staff.

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interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, FEMA file supplemental responses and produce additional documents as required by 10 C.F.R. §2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

The term "document[s]" as used herein shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer printouts, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, maps, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

INTERROGATORIES

1. Please identify and produce all documents within the possession, custody, or control of the Federal Emergency Management Agency [hereinafter, "FEMA"] which contain or refer to any actual or potential revisions or additions to the draft New Hampshire Radiological Emergency Response Plan submitted to FEMA Region 1 on or about May 12, 1983 [hereinafter, "the RERP"], including but not limited to any documents relating or referring to evacuation routes, traffic access or control points, traffic management plans, reception centers, radiological monitoring locations, plans for evacuation of people in the beach areas dependent on public transportation, plans for decontamination of persons or vehicles exposed to radiation, provisions for the storage, distribution, or use of radioprotective drugs, or plans for sheltering the summer beach populations or those seasonal residents whose homes provide insufficient shielding from radiation.

2. Please identify and produce all documents within FEMA's possession, custody, or control which refer to the emergency response needs or resources of the State of New Hampshire [hereinafter, "the State"] or means for satisfying the State's resource requirements, or upon which FEMA relies in support of the State's capability to satisfy its resource requirements, in any of the following areas:

- a. emergency transportation for people in the beach areas without private transportation;
- b. emergency medical transportation;
- c. medical treatment for contaminated injured individuals;
- d. radiological monitoring and assessment equipment;
- e. dosimeters and respiratory equipment for emergency workers;
- f. manpower for traffic management and access control;
- g. manpower for emergency transportation and security operations;
- h. manpower for emergency maintenance for evacuation routes and response to abandoned vehicles, traffic accidents, and other obstructions to evacuating traffic flow;
- i. manpower for staffing of emergency response facilities.

3. In the opinion of FEMA, does the State currently have adequate resources within the State in each of the areas identified in subparagraphs 2a - 2i. above to implement its emergency plan? State the bases for your answer in detail, including your bases for determining what constitutes an adequate quantity or level of each such resource, and identify and produce all documents upon which you rely in support of your answers.

4. If your answer to question 3 was in the negative as regards any areas of emergency response capability, is it FEMA's position that the necessary additional resources can be procured on a timely basis from outside the State? If so, identify the types, quantities and sources of all such additional resources and specify the time within which they will be available to the State following its request therefor. Identify and produce all documents upon which you rely in support of your answers.

5. In the opinion of FEMA, what is the greatest number of "contaminated injured individuals" who could be in need of medical treatment in the event of a radiological emergency at Seabrook Station? State the bases for your answer in detail, describing the types of injuries and sources or levels of contamination for which your estimate accounts, and the type of medical treatment which would be required for each such injury or level of contamination. Include in your estimate all contaminated injured individuals who could be helped in any way by medical treatment. Identify and produce all documents upon which you rely for any portion of your answer.

6. In the opinion of FEMA, can the health care facilities identified in the RERP provide to the number of contaminated injured individuals specified in your answer to interrogatory 5 all medical treatment which could be of help to them? If not, can such treatment be provided by other health care facilities in New Hampshire and/or Massachusetts? State the bases for your answers in detail and identify and produce any documents upon which you rely. List all medical facilities other than those identified in the RERP which might be required to provide care to assure that the full number of persons specified in your answer to interrogatory 5 receive all treatment which could be of help to them.

7. In the opinion of FEMA, what percentage of the emergency response officials and personnel identified in the RERP will, in fact, report to their emergency posts and fulfill their designated responsibilities in the event of a radiological emergency at Seabrook Station? What percentage of such emergency response officials and personnel will first ensure that their families are being taken care of before reporting to duty and what will be the length of the delay in assumption of emergency responsibilities resulting therefrom? State the bases for your answers in detail and identify and produce any documents upon which you rely.

8. In the opinion of FEMA, will there be adequate personnel available on a timely basis to replace the local emergency workers removed from the emergency zone if workers are removed due to releases of radionuclides other than I-131 in amounts requiring protection? [See RERP, at 2.7-3] State the bases for your answer in detail, identifying the source and numbers of replacement workers and specifying the bases for assurance they will be available in a timely fashion. Identify and produce all documents upon which you rely in support of your answers.

9. In the opinion of FEMA, has the State established an emergency action level scheme consistent with that established by the Applicants? State the bases for your response in detail and identify and produce any documents upon which you rely in support of your answer.

10. In the opinion of FEMA, has the State established procedures for notification of all emergency personnel by each of the State emergency response organizations? If so, describe those procedures in detail. Identify and produce all documents within the State's possession, custody, or control which contain or refer to such procedures or upon which you rely in support of your answers.

11. In the opinion of FEMA, has the State developed the means to provide early notification and clear instruction to the public in the event of an emergency at Seabrook Station? If so, describe those means in detail and identify and produce all documents within FEMA's possession, custody, or control relating thereto, including any documents relating in any way to a siren or other audible alert system for the Seabrook vicinity.

12. In the opinion of FEMA, how will local emergency response organizations in New Hampshire be notified of an emergency at the Seabrook Station? State the bases for your answer in detail and identify and produce any documents upon which you rely.

13. Identify and produce any documents within FEMA's possession, custody, or control which refer or relate in any way to evacuation routing or traffic management in the event of a radiological emergency at Seabrook.

14. Identify and produce all documents within FEMA's possession, custody, or control which relate in any way to the capacity or building material of buildings in the coastal New Hampshire communities within ten miles of the Seabrook site, the number of such buildings which are insulated, the number of such buildings which have basements, the level or degree of protection afforded by such buildings against radionuclides, or the feasibility of sheltering the summer beach and seasonal populations within those communities in such buildings.

15. In the opinion of FEMA, do the provisions in the RERP for sequential notification by New Hampshire Civil Defense of all State response organizations following verification by DPH, and the provisions allowing a 15-minute lapse between an emergency classification by the licensee and notification of Civil Defense and requiring that notification of the State response organizations be completed before Civil Defense will activate the public alerting system ensure sufficiently prompt notification of response organizations and the public? State the bases for your answer in detail and identify and produce any documents upon which you rely.

16. In the opinion of FEMA, is the RERP adequate and capable of being implemented as required by 10 C.F.R. §50.47(a)(2)? Does it provide reasonable assurance that

adequate protective measures can and will be taken in the event of a radiological emergency at Seabrook Station as required by 10 C.F.R. §50.47(a)(1)? Does it satisfy all of the planning standards set forth at 10 C.F.R. §50.47(b)(1) - (16), as addressed by the criteria of NUREG-0654, Rev. 1? If your answer to any of these questions is anything other than an unqualified affirmative response, state in detail all respects in which the RERP fails to satisfy the stated requirement and describe the revisions or additions thereto which are necessary, in the opinion of FEMA, to achieve compliance. Identify and produce all documents upon which you rely for any of your answers.

17. In the opinion of FEMA, can the transient beach populations in the New Hampshire coastal communities within ten miles of the Seabrook site be protected from all adverse health effects potentially associated with radiation exposure by means of evacuation in the event of a radiological emergency at Seabrook Station? If your answer is in the negative, indicate what adverse health effects could be experienced by the beach population and the numbers of such persons who may potentially experience each such effect. Whether your answer is in the affirmative or negative, state the bases for it in detail and identify and produce all documents upon which you rely.

18. In the opinion of FEMA, can the seasonal residents in the beach areas within ten miles of the Seabrook site be protected from all adverse health effects potentially associated with radiation exposure by means of in-place sheltering? If your answer is in the negative, indicate what adverse health effects could be experienced by the seasonal population and the numbers of such persons who may potentially experience each such effect. Whether your answer is in the affirmative or negative, state the bases for it in detail and identify and produce all documents upon which you rely.

19. In the opinion of FEMA, what is the most efficient evacuation routing scheme for the seasonal and transient beach populations in the coastal New Hampshire communities within ten miles of the Seabrook site? State the bases for your answer in detail and identify and produce all documents upon which you rely. Do the routes which you have specified conform in all respects to those assumed by the Applicants in their evacuation time estimates as set forth in Appendix C to the FSAR? to those assumed by Costello, Lomasney & deNapoli/C.E Maguire in their "Final Draft of Appendix E Emergency Planning Zone Evacuation Time Study"? If the answer in both cases is no, will FEMA require revised evacuation time estimates based on the most efficient routing scheme? When will such estimates be required to be completed?

20. In the opinion of FEMA, what traffic management plans or traffic controls will lead to the most efficient evacuation of the seasonal and transient beach populations in the coastal New Hampshire communities within ten miles of the site? State the bases for your answer in detail and identify and produce any documents upon which you rely. Have these traffic controls and management plans been reflected in the evacuation time estimates prepared by the Applicants? those prepared by C. E. Maguire? If the answer in both cases is no, will FEMA require revised evacuation time estimates based on such plans and controls? When will such estimates be required to be completed?

21. In the opinion of FEMA, what will the effect be on evacuation times for the seasonal and beach populations in the coastal New Hampshire communities of directing vehicles to access control points for decontamination? What will be the health effects associated with allowing persons to evacuate to other than reception centers so that they (and the family members or friends with whom they stay) will continue to be exposed to contaminated vehicles?

22. What health effects will result from evacuation on a hot summer day with closed windows and ventilation systems? State the bases for your answer in detail and identify and produce any documents upon which you rely?

23. What assurance does the State have that it can obtain a sufficient quantity of radioprotective drugs early enough to use them for protection of emergency workers? [See RERP, at 1.3 - 10]

24. Identify each person whom FEMA expects to sponsor as a witness on any of the admitted contentions relative to the RERP, state his or her qualifications, and describe the subject matter on which he or she is expected to testify.