October 27, 1983

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Public Service Company of New Hampshire, et al.	)	Docket Nos. 50-443, -444
(Seabrook Station, Units 1 and 2)	)	

NEW ENGLAND COALITION ON NUCLEAR POLLUTION
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Pursuant to 10 C.F.R. § 2.754(a), NECNP submits its proposed findings of fact and conclusions of law on NECNP contentions I.B.2, III.1, and III.3, and New Hampshire Contention 21.

NECNP Contention I.B.2

1. NECNP Contention I.B.2 states that:

> The Applicant has not satisfied the requirement of GDC 4 that all equipment important to safety be environmentally qualified because it has not specified the time duration over which the equipment is qualified.

2. The regulatory requirements that govern this contention are 10 C.F.R. Part 50, Appendix A, General Design Criterion 4, and 10 C.F.R. § 50.49. GDC 4 requires that:

> Structures, systems, and components important to safety shall be designed to accomodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents.

In order to satisfy GDC 4, Applicants must demonstrate that equipment important to safety can be relied upon during its normal operating life to function during an accident, and that it will remain functional throughout the duration of an accident.

NRC regulations at 10 C.F.R. § 50.49(b) define the scope of the required environmental qualification program. It must include both "safety related" equipment relied on during an accident, and "non-safety related electric equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions..."

3. Applicants stated in their direct testimony that they applied the following environmental qualification time duration standard to Seabrook Station electrical equipment:

> As to pre-accident qualification duration, the equipment in question is qualified either to the life of the plant or some shorter period, and if a shorter period is specified, then the equipment must be replaced or requalified before the period elapses. As to post-accident qualification duration, all equipment is qualified to withstand accident environmental conditions for one year (the conditions being those set forth in "Service Environment Chart", Figure 3.11(B)-1, at FSAR § 3.11), and any equipment that cannot be qualified for one year is then reviewed on a case-by-case basis to determine whether, for the particular duration that equipment is required to remain operational in the case of an accident in order to perform its safety function, a shorter period is sufficient.

(Apps. Dir. Test. at 8-9, ff. Tr. 970)

4. As a standard for establishing the duration of qualification, this appears to be reasonable for the most

part. Applicants do not clearly state, however, how they will treat equipment that is unable to meet their standards. Will it be replaced? How will Applicants satisfy GDC 4 if the equipment cannot be replaced? The Applicants' program for environmental qualification is deficient in this respect.

5. On its face, Applicants' direct testimony, as quoted in paragraph 3, appears to state that Seabrook electrical equipment is in fact qualified to the specifications set by Applicants. On closer reading, however, the Applicants only present a standard, and do not represent that the equipment has actually been qualified. Moreover, as discussed below, Applicants were unable to state on cross-examination that the equipment has in fact been qualified.

6. With regard to establishing the post-accident qualification of equipment, Applicants testified that their review is only 80% complete. (Maidrand, Tr. at 978) The data packages which contain the specific information on duration of qualification and which must, according to 10 C.F.R. § 50.49(d), be assembled and kept on file, are not even 80% complete. (Id.) Moreover, Applicants did not represent that equipment had actually been qualified for a post-accident environment of a year; but stated only that "As far as our review has gone, we have found no equipment that cannot be qualified for a year." (Maidrand, Tr. at 979)(emphasis added) Representations on the amenability of equipment to qualification are not sufficient to demonstrate that the

equipment has in fact been qualified, as required by the rule.

8. With respect to pre-accident qualification, Applicants conceded that they had not established a pre-accident qualified life of 40 years for all equipment important to safety. (Maidrand, Tr. at 980) Applicants were unable to state what percentage of their equipment the unqualified equipment constituted. (Id.)

9. The Staff had not reviewed Applicants' recent environmental qualification submittal, and therefore did not offer any conclusions as to the adequacy of Applicants' environmental qualification program with regard to duration of environmental qualification. The Staff did find, however, that Applicants' definition of the scope of equipment that had to be qualified was inadequate on its face to satisfy Commission requirements at 10 C.F.R. § 50.49. (Tr. at 1001)

10. The Applicants have not demonstrated that they understand and have implemented the scope of the environmental qualification rule. As required by 10 C.F.R. §§ 50.49(a) and (b), Applicants' environmental qualification program must embrace all "safety related" electrical equipment (§ 50.49(b)(1)), and non-safety related equipment whose failure could prevent the satisfactory accomplishment of safety functions (§ 50.49(b)(2)). For the reasons described below, it is not clear whether Applicants have identified and qualified nonsafety related equipment whose failure could inhibit or prevent the completion of safety functions. In the absence of

documented qualification duration for this equipment, it cannot be assured that it will survive the duration of a normal pre-accident environment, or the duration of an accident.

11. In their direct testimony, Applicants stated that that they had used the terms "important to safety" and "safety related" interchangeably to identify "structures, systems, and components that perform a safety function." (Apps.' Dir. Test. at 9, ff. Tr. 970) Thus, Applicants apparently had not identified or qualified equipment that does not perform a safety function, but whose failure may prevent the accomplishment of safety functions, as required by 10 C.F.R. § 50.49(b)(2).

12. On cross-examination, Applicants stated that the scope of their qualification effort extends to the same scope of equipment as that covered by 10 C.F.R. § 50.49. This assertion was not credible, however, in view of Applicants' later statement that they relied on the IEEE Standard for Qualifying Class IE Equipment for Nuclear Power Generating Stations, IEEE-323-1974, to define the scope of their program:

> The design of the Seabrook safety systems have always been such that there is no failure that could affect the safe operation of the safety systems. So therefore, we called all those issues that perhaps were identified as "important to safety," "safety related," Class 1-E electrical equipment. Our contention is that the list of Class 1-E equipment includes all those things that were broadly scoped as important to safety in the rule. And I believe the premable to the IEEE 323 even has words to that effect, of things that could affect safety systems.

(Tr. at 985) We have reviewed IEEE-323-1974, to which the witness referred, and found no reference to a requirement for qualification of nonsafety systems that could affect safety systems. To the contrary, Class IE equipment is defined by the IEEE standard as:

> The safety classification of the electric equipment and systems that are essential to emergency reactor shutdown, containment isolation, reactor core cooling, and containment and reactor heat removal, or otherwise are essential in preventing significant release of radioactive material to the environment.

IEEE-323-1974, IEEE Standard for Qualifying Class IE Equipment for Nuclear Power Generating Stations. In fact, the environmental qualification rule equates "safety-related" equipment, as defined in 10 C.F.R. 50.49(b)(1) with Class IE equipment. (See footnote 3 to the Rule.)

13. We find that the most this record demonstrates is a great deal of confusion about the actual scope of Applicants' qualification program due to the use of terminology inconsistent with 10 C.F.R. § 50.49(a) and (b). For the most part, the Applicants have defined their equipment qualification program only in terms of equipment that "performs a safety function" or is "Class IE." Whether or not the program actually encompasses the additional category of nonsafety related equipment defined in § 50.49(b)(2) remains unclear. Thus, we are unable to find that Applicants have established duration times for environmental qualification for all equipment important to safety, because it is not clear that they have included in their qualification program the entire

scope of equipment important to safety.

14. We find the Applicants' credibility to have been seriously undermined by a series of contradictions in their testimony. When first questioned on the stand about whether duration of qualification had been established, Applicants' witness, Mr. Maidrand, stated that Applicants had submitted to the NRC Staff "a complete list of important-to-safety equipment that has to survive a harsh environment." (Tr. at 976)(emphasis added) According to Mr. Maidrand, if qualification life was not listed in the submittal, it could be found "in the data packages that the document summarizes." (Tr. at 977) Later, however, Mr. Maidrand testified that the review was not in fact complete. According to Mr. Maidrand,

> There's some Class 1-E equipment -- safety related electrical equipment -- that has not been purchased. Very few of those pieces of equipment. We could not do a review of the qualification documentation.

(Tr. at 978) According to Mr. Maidrand, the review was only 80% complete (Id.) and duration of post-accident qualification was known only "as far as we have gone with our review." (Tr. at 977). Mr. Maidrand further stated that the data "packages," which he had earlier stated contained the necessary qualification duration information, may not even have been 80% complete. (Tr. at 978) Upon further questioning, Mr. Maidrand revealed that the unreviewed equipment included not only unpurchased equipment, but equipment that was already in Applicants' possession. (Tr. at 979-980) Thus, Mr. Maidrand's

initial representation that Applicants had submitted a complete list of equipment important to safety, and that the proper qualification times were available in accompanying documents, deteriorated progressively during cross-examination until it became evident that the review was by no means complete, and that the circumstances were not entirely out of Applicants' control. We thus find no credible basis for accepting Applicants' testimony that they have submitted a complete list of equipment that must be qualified, and that documentation of qualification exists.

15. We find that Applicants have not met the requirements of GDC 4 and 10 C.F.R. § 50.49, and at this time we deny an operating license to Applicants on the basis of their noncompliance with this "fundamental" principle of reactor regulation. Petition for Emergency and Remedial Action, CLI-80-21, 11 NRC 707, 710 (1980). Applicants testified that they have recently submitted to the NRC Staff a draft environmental qualification summary which contains a list of equipment included in Applicants' qualification program. (Tr. at 973) Therefore they may wish to petition the Board to reopen the record at a later date to consider whether this new information demonstrates compliance with the standards.

NECNP Contention III.1,
New Hampshire Contention 21

16. NECNP Contention III.1 states that:

The emergency plan does not contain an adequate emergency

classification and action level scheme, as required by 10 C.F.R. § 50.47(b)(4) and NUREG-0654, in that

(a) No justification is given for the classification of various system failures as unusual events, alerts, site area emergencies, or general emergencies.

(b) The classification scheme minimizes the potential significance of transieints.

(c) The Applicants' classification scheme fails to include consideration of specific plant circumstances, such as the anticipated time lag for evacuation due to local problems.

(d) The classification scheme fails to provide a reasonable assurance that Seabrook onsite and offsite emergency response apparatus and personnel can be brought to an adequate state of readiness quickly enough to respond to an accident.

(e) The emergency action level scheme fails to identify emergency action levels or classify them according to the required responses.

(f) The scheme is incapable of being implemented effectively to protect the public health and safety because it provides no systematic means of identifying, monitoring, analyzing, and responding to the symptoms of transients and other indicators that transients may occur.

New Hampshire Contention 21 states that:

The accident at TMI demonstrated the inability of all parties involved to comprehend the nature of the accident as it unfolded; communicate the necessary information to one another, to the Federal, state and local governments and to the public in an accurate and timely fashion; and to decide in a timely manner what course to take to protect the health and safety of the public. The Applicant in these proceedings has not adequately demonstrated that it has developed and will be able to implement procedures necessary to assess the impact of an accident, classify it properly, and notify adequately its own personnel, the affected government bodies, and the public, all of which is required under 10 C.F.R. § 50.47 and Appendix E and NUREG-0654.

17. Applicants submitted testimony by a panel of

witnesses, and placed witnesses George S. Thomas and James A. McDonald on the stand. The Staff presented testimony by John R. Sears.

A. Emergency Action Levels

18. The Applicants submitted as Exhibit 1 to their testimony a new section of their Emergency Response Plan describing their Emergency Classification System. Although the framework of the emergency classification is essentially complete, many of the emergency action levels were incomplete with regard to the specific plant conditions that would trigger a particular EAL.

19. The information missing from the EALs included such plant-specific conditions as temperature, pressure, and radiation levels. Although the Footnotes for Critical Safety Function Status Trees found on the fifteenth page of Applicants' emergency classification submittal contained some of the information necessary to complete the EALs, they did not include plant-specific information necessary to complete the EALs. (Tr. at 1546) Moreover, they apply only to the four categories of events that are Critical Safety Functions, and not to emergency conditions.

20. The NRC Staff also testified that Applicants' emergency action levels were incomplete. Witness Sears noted the blanks in the EALs, and also stated that the NRC Staff wanted the Applicants to include more values of radiation monitoring instrumentation. (Tr. at 1717) The Staff

considered that radiation monitoring could be used in a number of instances in addition to those listed in the EALs. These include use of the letdown line monitor to indicate a fuel breach; and use of radiation monitoring instruments to detect steam generator tube rupture. (Tr. at 1719)

21. The reason that the emergency action levels have not been completed is unclear. From Applicants' letter of transmittal of the emergency classification system (pages 1 and 2 of Exhibit 1), it originally appeared that the EALs could not be completed until certain Westinghouse Emergency Response Guidelines had been completed. On cross-examination, however, Applicants' witness Thomas revealed that most of the information omitted from the EALs was not dependent on the guidelines, and indeed was already available to Applicants. (Tr. at 1523) Thomas also testified, however, that "instrument set points for tech specs, the technical specifications and other such instrument values that are Seabrook specific" were not complete because Applicants had not completed the transient or accident analyses necessary to obtain the information. (Tr. at 1545) To complete the EALs for critical safety functions, this information had to be added to the "judgments" reflected in the footnotes for the Critical Safety Function Status Trees. (Tr. at 1545-46)

22. The principle reason for the incompleteness of the EALs appears to be the absence of site and instrument-specific information required to insert the specific plant parameters

into the EALs. It has little or nothing to do with the fact that the Westinghouse generic Emergency Response Guidelines have not been complete. Therefore we are dismayed that the Applicants have attempted, in their letter of June 27, 1983, to mislead us into thinking that the EALs could not be completed until the Westinghouse ERGs have been completed. The Applicants would apparently have us believe that the incomplete state of their license application is due to circumstances beyond their control, when in fact they have not performed the fundamental task of gathering the Seabrook site and instrument-specific information necessary to develop EALs. The information that this Board would need to evaluate the emergency action levels as a basis for approving the issuance of an operating license is incomplete because the Applicants have failed to meet this responsibility.

23. We find that because their emergency classification scheme does not include a significant number of plant-specific conditions establishing emergency action levels, Applicants have not established the "facility system and effluent parameters" (10 C.F.R. § 50.47(b)(4)) or the "specific instruments, parameters or equipment status" (NUREG-0654, § II.D.1) necessary to meet Commission regulations and obtain an operating license.

B Emergency Classification System

24. The guidelines for establishment of an emergency classification scheme are contained in Appendix 1 to

NUREG-0654. The proper classification of emergency action levels according to their severity is extremely important, because the significance attributed by the Applicants to various irregular plant conditions will determine whether and when protective actions are implemented by the public.

25. The NRC Staff considers the Applicants' emergency classification scheme to be incomplete because the Applicants have not compared their EALs to the NUREG-0654 criteria. (Sears, Tr. at 1717)

26. The following discrepancies between the Applicants' classification system and the standard set by NUREG-0654 were also revealed in the hearing:

a. Applicants have classified the evacuation of the control room without control of the remote shutdown panel as a "site area emergency." (Exhibit 1, Table A.2, ff. Tr. 1483) According to NUREG-0654, however, loss of physical control of the facility is a "general emergency." (NUREG-0654 at 1-17, ¶ 3)

NRC witness Sears agreed that evacuation of the control room without control of the remote shutdown panel would constitute a loss of physical control of the facility. (Tr. at 1727) Mr. Sears considered such a hypothesis unlikely; however, since Applicants have anticipated such an event and classified it improperly, it should be corrected. Indeed, it is one purpose of the emergency classification system to permit a rapid and

rational response to unlikely and unanticipated events.

b. Applicants have also classified as an "alert" a controlled fire which affects only one train of safety related equipment with potential for affecting the other train. (Exhibit 1, Table A.2, ff. Tr. 1483) This classification is inconsistent with NUREG-0654, which classifies a fire compromising the functions of safety systems as a "site area emergency." (NUREG-0654 at 1-13, ¶ 11)

NRC Staff witness Sears stated that he considered a fire affecting one train of safety related equipment in a safety system, with a potential for affecting the other train in the system, to compromise the functions of the particular safety system. (Tr. at 1730) In our view, even if such a fire were controlled, the fact that it had already affected one safety train and had the potential to affect the other could result in the failure of the entire safety system. If the redundancy of a safety system is threatened, there can be no assurance that the plant can be safely rescued from an accident. Therefore, we consider this postulated condition to be severe enough to trigger a site area emergency.

27. We conclude that, in light of the demonstrated discrepancies between Applicants' emergency classification scheme and NUREG-0654, and the fact that the NRC Staff considers a comparison between the emergency classification scheme and NUREG-0654 to be necessary, the discrepancies must

be corrected and a complete comparison of the classification scheme and NUREG-0654 must be submitted before an operating license may issue.

C. Recommendations of Protective Measures

28. Under Appendix E to 10 C.F.R. Part 50, § IV.B., emergency action levels are to be used, inter alia, "for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety." No evidence has been presented regarding what protective measures the Applicants intend to take, or to recommend to offsite authorities, for each EAL. NRC Staff witness Sears confirmed on cross-examination that no information regarding the protective measures to be taken or recommended for each EAL have been submitted to the NRC. (Tr. at 1703)

29. The emergency action levels serve an important function in forming the basis for recommendations of protective actions. In this case, we find that Applicants have not taken the essential step of delineating the protective actions that they intend to implement or recommend for each emergency action level. Thus, the plan for the emergency response is not complete or usable. We conclude that Applicants have not sustained their burden of showing compliance with Appendix E to Part 50.

D. Training

30. Section IV.F. of Appendix E to 10 C.F.R. Part 50 contains the following detailed requirements for training:

> The program to provide for (1) the training of employees . . . and (2) the participation in the training . . . by other persons whose assistance may be needed in the event of a radiation emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel:
>
> a. Directors and/or coordinators of the plant emergency organization;
>
> b. Personnel responsible for assessment, including control room personnel
>
> * * *

In addition, Appendix E requires that all training shall provide for formal critiques in order to identify weak areas that need correction."

31. According to Applicants' FSAR, as confirmed by Applicants' witness McDonald, the emergency director, operations manager, shift superintendent, and unit shift supervisors are to receive training in "EAL/classification system." (Tr. at 1507) Mr. McDonald stated that no training has been provided as yet. (Tr. at 1508)

32. Mr. McDonald was not aware of any textual materials on training related to emergency classification and EALs. (Id.) He stated that Applicants "are in the process of developing that training program." (Id.)

33. NRC Staff witness Sears' testimony conflicted with Applicants'. According to Mr. Sears, all persons who will be responsible for emergency classification and notification once the Seabrook plant becomes operational have been trained. Mr. Sears stated that:

I would not say they have been trained fully, sir.

> The training program is ongoing, it will continue but they have been trained. I have met all the people. They have been trained up to this point.

(Tr. at 1711)

34. Mr. Sears based his conclusion on group interviews with six shift supervisors. (Tr. at 1712) He had not, however, interviewed the unit supervisors who are the backup personnel for the superintendents. (Id.)

35. According to Mr. Sears, training consists of familiarity with Applicants' emergency classification system as described in the June 27th letter [Exhibit 1 to Applicants' direct testimony, ff. Tr. 1483](Tr. at 1713). Mr. Sears stated that the NRC Staff did not require a written training program from Applicants.

36. No implementing procedures or emergency operating procedures have been submitted by Applicants to the Staff. (Tr. at 1514)

37. The evidence offered by Applicants and the NRC Staff is insufficient to demonstrate that Applicants are capable of carrying out emergency classification and notification of offsite authorities in the event of a radiological emergency. Other than conversations held by the NRC Staff with only part of the emergency response staff responsible for classification and notification, there is no demonstration that these individuals understand and can carry out their responsibilities. The June 27th submittal which forms the basis for the Staff's conclusion that emergency response

personnel have been trained is a skeletal document that contains no direction as to how classification and notification are to be carried out. For that information, the emergency response personnel must rely on the emergency operating procedures and the emergency implementing procedures, which are not avaialable yet. While some of Applicants' staff may have participated in their development, this is not a substitute for the systematic training of all key personnel.

38. We find the informal approach taken toward training by the NRC Staff to be appallingly lax, and inconsistent with NRC regulations requiring Applicants to describe a "specialized" program for emergency response training. We conclude that, before an operating license may issue, Applicants must submit a written, detailed training program to the Board and serve it on the parties for an opportunity to critique the training program for areas needing correction.

Evacuation Time Estimates

39. Contention III.12/13, as modified by the Board in its order of June 30, 1983, states that:

> The evacuation time estimates provided by Applicants in Appendix C of the Radiological Emergency Plan are deficient in failing to include an estimate of:
>
> 1. the time for evacuation during adverse weather conditions developing on a busy summer weekend; and
>
> 2. the times for simultaneous evacuaton of the beach areas lying NE to SSE of the Seabrook site.

40. Testimony was submitted by the Commonwealth of Massachusetts, the Applicants, and the NRC Staff.

41. With their direct testimony, Applicants submitted a revision of Appendix C to their Radiological Emergency Plan, containing preliminary evacuation clear time estimates of six hours and five minutes for the entire Emergency Planning Zone (EPZ) on a peak summer weekend under fair weather conditions; and nine hours and fifteen minutes for the entire EPZ on a peak summer weekend under adverse weather conditions.

42. The evacuation time estimates submitted by Applicants are preliminary in nature. They do not include consideration of any emergency plans or the evacuation routes that are eventually to be chosen by state and local emergency planners. (Tr. at 1326)

43. The evacuation time study conducted by Applicants assumes normal traffic controls. (Merlino, Tr. at 1076) NRC Staff reviewer Urbanik felt that the levels of traffic control assumed were higher than what occurs on a day-to-day basis. (Tr. at 1383)

44. Applicants' evacuation time study does not account for blockage of evacuation routes by accidents or vehicles running out of gasoline. (Merlino, Tr. at 1085-6) Mr. Merlino stated that the study did not include this consideration because of the uncertainty involved in assessing accidents. (Tr. at 1114) However, Mr. Merlino also stated that he had not consulted local officials about their experience with accidents in the area. (Id.)

45. The Applicants' evacuation time estimates do not include notification and preparation time, as required by NUREG-0654. They do not explicitly account for trips by employees to their homes, or attempts to reunite with family members prior to evacuation. (Merlino, Tr. at 1101)

46. While Mr. Merlino and Dr. Urbanik felt the effect of notification time would be minimal on the estimates, they could cite no research on how many people in the Seabrook area would require preparation time, and how much time they would take.

47. Applicants' evacuation time estimates did not account for poor driver behavior or disobedience of traffic controls during the lengthy queues predicted by Applicants. (Merlino, Tr. at 1098) Chief Robert Mark of the Hampton Police Department, however, testified to the emotional behavior of evacuees in an emergency, and described an instance during an evacuation in which an evacuee tried to break through a road barrier to re-enter the evacuated area and rescue a relative. (Mark, Dir. Test. at 7, ff. Tr. 1190)

48. Applicants' evacuation time estimates do not take into account the time needed to evacuate special facilities in the Seabrook EPZ, such as schools hospitals, and nursing homes. (Urbanik, Tr. at 1355-56)

49. In arriving at their evacuation time estimate for adverse weather, Applicants altered their model to reduce roadway capacity by 30%, based on literature regarding the effect of rainfall on roadway capacity. (Merlino, Tr. at

1071) The Applicants did not assess the effects of fog on an evacuation, although they agreed that coastal fog could have a greater than 30% reduction rate on roadway capacity. (Id.) Sudden episodes of dense fog are common in the seacoast area in summer, and can result in almost complete immobilization of traffic. (Herr, Dir. Test. at 3, ff. Tr. 1196)

50. Witnesses for Applicants and Staff discounted the significance of the adverse weather estimate, since they believed that most people would leave the beach once a storm began or fog set in. Their beliefs are not supported by factual experience, and are inconsistent with the observations made by the witness for the Commonwealth of Massachusetts, Philip B. Herr, who found crowded conditions on a foggy fourth of July weekend at the Seabrook area beaches. (Herr, Dir. Test. at 3, ff. Tr. 1196)

51. Applicants' evacuation time estimates for adverse weather conditions did not include consideration of flooding, which can make the beach area nearly impossible to evacuate during severe storms. (Mark, Dir. Test. at 8-9, ff. Tr. 1190)

52. We conclude that because Applicants' evacuation time estimates are not based on actual evacuation conditions, but on a simplified and optimistic set of assumptions, they are not reliable tools for aiding the realistic assessment of the options by planners or emergency response personnel. Accordingly, we find that they cannot have conclusive effect with respect to evacuation times for the Seabrook Emergency

Planning Zone, and they should not be relied upon by offsite planning authorities in evaluating and determining protective actions for the Seabrook EPZ.

Respectfully submitted,

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October 27, 1983

CERTIFICATE OF SERVICE

I certify that on October 27, 1983, copies of NEW ENGLAND COALITION ON NUCLEAR POLLUTION PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW were served on the following by first-class mail or as otherwise indicated:

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