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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'90 APR 21 P2:53

In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

Docket Nos.

50-443 OL
50-444 OL

(Seabrook Station, Units 1 and 2

SEACOAST ANTI-POLLUTION LEAGUE'S INTERROGATORIES
AND REQUESTS FOR DOCUMENTS TO THE STATE OF NEW
HAMPSHIRE ON EMERGENCY PLANNING FOR THE
STATE OF NEW HAMPSHIRE

INSTRUCTIONS FOR USE

The Seacoast Anti-Pollution League hereby requests that the State of New Hampshire, 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 their response to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents herein identified, the State 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-corporation 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.

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1. In the opinion of the State of New Hampshire, does the New Hampshire Radiological Emergency Response Plan adequately provide for continuous 24-hour radiological monitoring of the plume exposure pathway EPZ for a protracted period? Please state in detail the factual bases upon which the response rests, including answers, supported by appropriate documentation for the following:

- a) How many monitoring staff people are available?
- b) What are their ages and states of physical health?
- c) What educational qualifications do they have for this task?
- d) What additional training have they had?
- e) What specific methods will they employ?
- f) What specific survey instruments will they use?
- g) What are the specific detection capabilities of each of the survey instruments to be employed?
- h) What assurances are there that each staff person is committed to fulfill his/her functions?
- i) What contingency plans have been made to get radiological monitors to their sampling locations if they cannot make their way to designated sampling locations because of impairment of their progress into the EPZ due to an outgoing flow of evacuating vehicles?
- j) For how many days (24 hours per day) does the State anticipate that monitoring can be carried on on a continuous basis?
- k) How long does the State estimate it will take to deploy the radiological monitoring teams to the first monitoring location following a decision that monitoring is necessary?
- l) How long does the State estimate it will take to get the first samples to Concord for laboratory analysis?
- m) What specific provisions have been made for aerial monitoring of the plume?

n) How many State employees have been trained to do aerial monitoring? Please detail the nature of that training.

2. In the opinion of the State of New Hampshire, does the N.H.RERP adequately provide means for the radiological decontamination of emergency personnel, wounds, supplies and equipment? Please state in detail the factual bases upon which the response rests, including detailed citations to supporting documents and/or informational sources relied upon for the response and also including answers to the following:

- a) Where are emergency personnel to be decontaminated?
- b) How will emergency personnel be segregated from others at the decontamination locations to avoid the spread of contaminants?
- c) How many showers or other washing facilities are available at the decontamination locations for emergency personnel?
- d) Who will monitor the emergency personnel to be certain they have been completely decontaminated?
- e) What are the qualifications and training of those individuals who are to assess the adequacy of the decontamination of emergency personnel?
- f) How is the contaminated waste water, resulting from the decontamination of emergency personnel, to be isolated?
- g) What medical personnel will provide treatment for any wounds incurred by emergency personnel and at what medical facilities will this treatment take place?
- h) What decorporation agents will be employed if emergency personnel suffer excessive internal contamination?
- i) Have decorporation agents been stockpiled by the State of New Hampshire? Will they be?
- j) What supplies and equipment does the State of New Hampshire anticipate might become contaminated?

- k) What are the plans for decontamination of these supplies and equipment should that prove necessary?
 - l) How will any effluents resulting from decontamination of supplies and equipment be isolated?
3. In the opinion of the State of New Hampshire, does the N.H.RERP adequately provide means for the radiological decontamination of evacuees and their vehicles and belongings? Please state with particularity the detailed bases upon which the answer to the above rests, including citations to supporting documents and/or sources of information relied upon in the answer. Please also include answers to the following:
- a) How many showers are available in each of the decontamination facilities and how long does the State assume it will take to decontaminate each individual on the average?
 - b) Who will be available to instruct individuals as to the method of thorough washing and scrubbing needed to effect an adequate external decontamination?
 - c) How will contaminated individuals be segregated from the non-contaminated at reception centers in order to avoid the spread of contaminants?
 - d) Who will monitor the individuals concluding their showering to be certain that all surface contamination has been removed?
 - e) What are the qualifications and training of those "individuals who are to do the monitoring described in part d)?
 - f) How is the contaminated waste water resulting from the decontamination of evacuees to be isolated?
 - g) Who is to assess whether or not an evacuee is internally contaminated and to refer to appropriate medical facilities those who are so contaminated?
 - h) What personnel are to monitor the vehicles of evacuees for possible contamination?
 - i) What vehicle washing facilities are available at the reception centers for vehicle decontamination and how many vehicles can be handled per unit of time?

- j) What personnel will monitor the vehicles following the washing process to assure that no contamination remains?
 - k) How will effluents from vehicle washing activities be isolated?
 - l) Where will contaminated belongings be isolated until they can be disposed of?
4. In the opinion of the State of New Hampshire do adequate means and provisions for the disposal of wastes that would result from an adequate radiological emergency response to an accident on the more serious end of the spectrum of potential accidents, which would include decontamination of people and vehicles, exist? Please detail the factual basis upon which the State's response is founded and provide documented answers to the following:
- a) What is the name of the "local brokerage" noted at page 2.7-10 of the State plan which is to dispose of waste materials?
 - b) Where is the above-mentioned "local brokerage" located?
 - c) How much waste is this brokerage prepared to accept? Please provide this answer in terms of both volume and curie content.
 - d) What is the licensed status of this brokerage?
 - e) When was it first licensed?
 - f) Has the license ever been suspended for any reason?
 - g) What contractual arrangement does the State of New Hampshire have with this brokerage to ensure its acceptance of the wastes?
 - h) How are the wastes to be transported to the brokerage?
 - i) What entity will have responsibility for the transport of the wastes?
 - j) What contracts or agreements support the expectation that this transport of wastes will be effected and that the applicable Federal, state and local regulations affecting such transport will be complied with?
5. In the opinion of the State of New Hampshire, is there adequate manpower for a 24-hour per day emergency response for a protracted period, including 24-hour per day

manning of communications links? Please cite the bases supporting the State's response and provide answers, supported by the appropriate documentation, for the following:

- a) How many State Civil Defense employees are there in total?
 - b) Provide a description of how these employees are to be deployed during a general emergency at Seabrook Station (i.e. how many will remain at the State EOC, how many will be dispatched to the EOF/IFO, how many will be sent into the EPZ, etc.)
 - c) What is the total number of Division of Public Health Services employees?
 - d) Provide a description of how these DPHS employees are to be deployed during a general emergency at Seabrook Station (i.e. how many will be stationed at the State EOC, how many will be analyzing field samples in the laboratory, how many will report to reception centers to do monitoring of evacuees, etc.)
 - e) How many employees are there in the Department of Resources and Economic Development (DRED)?
 - f) Please state with particularity the location to which these DRED employees will be dispatched, including the number to each location, in the event of a general emergency at Seabrook Station.
 - g) How many State Police officers are there in Troop A?
 - h) Specifically, how does the State plan to assist the municipalities in which emergency response is impaired due to lack of manpower? What State personnel will be drawn upon to assist municipalities lacking personnel? Please answer in terms of numbers and the agencies from which the State personnel will be drawn.
6. In the opinion of the State of New Hampshire, are there adequate provisions for the sheltering of various segments of the populace in the plume exposure pathway EPZ? Please state with particularity the facts forming the bases of the State's opinion and provide answers, supported by appropriate documentation, for the following:

- a) Where does the State anticipate that beach populations will be able to take shelter in a radiological emergency if closing the beaches and/or evacuation cannot be implemented quickly enough to effect dose reductions for the populations?
 - b) Does the State plan to construct shelters at the beaches?
 - c) If the answer to part b. above is in the affirmative, at what specific locations does the State anticipate that such shelters would be constructed? Please provide any designs that may exist for beach shelters.
 - d) Are maps of shelter areas being developed by the State as NUREG-0654 II,J.10.a. requires?
 - e) Are expected levels of protection to be afforded in residential and other units (schools, nursing homes, etc.) for direct and inhalation exposure being evaluated as required by NUREG-0654 II. J.10.m.?
 - f) If the answer to part e. above is in the affirmative, what entity or entities are performing the evaluations?
 - g) What are the qualifications of the entity or entities, named in response to part f, to perform shelter evaluations?
7. Is it the opinion of the State of New Hampshire that the N.H. State and local plans make adequate provisions for prompt communications among principal response organizations to emergency personnel? Please relate in detail the factual bases for the State's position and provide answers, supported by appropriate documentation, for the following:
- a) How many phone lines are there serving each of the 17 New Hampshire local EOC's?
8. In the opinion of the State of New Hampshire, do the N.H. State and local radiological emergency response plans reasonably assure that those persons whose mobility is impaired due to institutional or other confinement will be adequately protected in the event of a radiological emergency? Please state with particularity the bases

for the State's response and include answers to the following questions with appropriate supporting documentation:

- a) How many "Special Emergency Help" surveys sent out to residents of the EPZ under cover letter of March 20, 1986 by Richard H. Strome, Director, N.H. CDA, were returned?
 - b) What percentage of the surveys sent out were returned?
 - c) Judging from the results of the survey, how many people does the State anticipate will need special transportation assistance?
 - d) What vehicles does the State assume will be available to transport those whose mobility is impaired who are not in institutions?
 - e) Does the State assume that the ambulance services for which letters of agreement are included in Volume 5 in the State plan will be able to provide assistance to the individuals described in part d. above?
 - f) If the answer to part e. is in the affirmative, how many people does the State estimate will be provided transportation by these ambulance services, and upon what basis is this assumption founded?
9. In the opinion of the State of New Hampshire, has sufficient funding been made available to the State for an effective emergency planning process and accompanying development of emergency planning documents? Please state in detail the factual basis for this response, supported by appropriate documentation, including answers to the following:
- a) Has the State ever been denied, for any reason(s), funds that it has requested for emergency planning purposes?
 - b) If the answer to part a. is in the affirmative, please detail in full the circumstances of the denial, including the scope of the request, the grounds for the denial and who authorized the denial.

- c) How much money has the State of New Hampshire spent on the emergency planning process for Seabrook Station?
- d) How much money did the State of New Hampshire spend over the course of 1985?
- e) How much money has the State of New Hampshire spent to date this year?
- f) Describe in detail the procedure by which funding requests are made and authorized.
- g) What consultants and/or consulting firms are or have been hired by the State for work related to the development of emergency plans and procedures for Seabrook Station? (Please indicate which are still involved in the planning process.)
- h) Were the hirings referred to in part g. the result of competitive bidding processes?

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE
By Its Attorney



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April 17, 1986

I hereby certify that copies of the foregoing have been sent to all persons on the attached service list.



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April 17, 1986

The above have been sent first-class, postage prepaid a copy of the enclosed.


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