

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

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Before Administrative Judges:
Ivan W. Smith, Chairperson
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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In the Matter of)

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2))

) Docket Nos. 50-443-OL
) 50-444-OL

) Off-site Emergency Planning

) January 22, 1988
)
)

REBUTTAL TESTIMONY OF THOMAS F. MOUGHAN
ON BEHALF OF THE ATTORNEY GENERAL FOR
THE COMMONWEALTH OF MASSACHUSETTS
REGARDING THE PRESENCE OF HIDDEN PARKING SPACES
IN SALISBURY BEACH AND ON PLUM ISLAND

Q. Would you please state your name and current address?

A. My name is Thomas F. Moughan, and I reside at 91 Lake
Attitash in Amesbury, Massachusetts.

Q. Mr. Moughan, a prior witness in these proceedings, Mr.
Gordon Derman, has stated that there are not many garages,
carports, or under-building parking spaces in the beach areas
of the Seabrook EPZ. Would you agree that this is true for
Salisbury Beach and Plum Island?

A. No, I would not. I have recently conducted a field
survey to determine the number of garages, carports, and other
under-building parking spaces in Salisbury Beach and on Plum

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Island, and I have also counted the parking spaces which exist in these structures. A summary of my findings is as follows:

	<u>Parking Spaces Observed In Garages Carports and Under-Buildings</u>
Salisbury Beach	95
Plum Island	<u>253</u>
	TOTAL 58

Q. When did you conduct your field survey, and how was it conducted?

A. The Salisbury Beach survey was conducted on Sunday, January 10, 1988. I was assisted by Mr. William Lord. We drove along each street in Salisbury Beach and recorded on paper the street address of each building which contained a garage, carport, or other under-building parking spaces. Next to the address we noted the total number of parking spaces by category of structure (garage, carport, or under-building). In cases where a street number was not visible, an estimate was made from the nearest property having a visible number. Garages included both detached structures and those built in or beneath dwellings. Carports included both the typical carport structure as well as clearly-used parking spaces beneath decks and porches. The area surveyed included all streets from the New Hampshire line on the north to the Salisbury Beach State Park on the south. The western boundary was the marsh except that in counting west along Route 1A (Beach Road) coming out of the Salisbury amusement park area, we stopped at the entrance road to the State Beach.

The Plum Island survey was conducted the next day, Monday, January 11, 1988. The same procedure was followed, however, I was unassisted. I recorded the count by street, rather than building by building using street addresses, because very few of the structures on Plum Island have street addresses which are visible.

Q. Have you kept your records of these counts?

Yes. I would be happy to make them available to anyone who is interested.