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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Nuclear Regulatory Commission

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	Docket Nos. 50-443-OL
	)	and
PUBLIC SERVICE COMPANY OF	)	50-444-OL
NEW HAMPSHIRE	)	(Off-Site Emergency
(Seabrook Station, Units 1 and 2	)	Planning Issues)
	)	March 24, 1988

THE STATE OF NEW HAMPSHIRE'S RESPONSES TO  
NECNP INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Identify as specifically as possible the "limited range of conditions" as to which sheltering of the beach population "is not without benefits." (Enclosure 1, p. 1).

Response to Interrogatory No. 1

The limited range of conditions is described specifically in the "New Hampshire Response to FEMA Supplemental Testimony" ("NH Response") beginning in the last full paragraph on page 5 and continuing through the third point on page 6.

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2. The following statement appears on page 2 of Enclosure 1:  
Third, the state feels that if a release of radiation warranted movement of the public, they are much more likely to be afforded meaningful dose reductions by moving out of the EPZ than by moving to a shelter within the EPZ.

Please provide any documents the state has which evaluate, assess or discuss in any way the dose reductions to the beach population from evacuation as compared to sheltering to any accident scenario.

Response to Interrogatory No. 2

The statement cited is explained in the balance of the paragraph from which the quote is taken, on pages 2-3 of the NH Response. That same statement is also supported by the following statement on page 50 of EPA 520/1-78-001B, Evacuation and Sheltering Protective Actions Against Nuclear Accidents Involving Gaseous Releases:

In summary, for emergency planning purposes, evacuation potentially provides the greatest margin of protection and should be the primary means of protective emergency action in the event of a gaseous fission-product release. p. 56.

In the event of an emergency, the State will evaluate the specific conditions that exist and determine the appropriate protective action using the procedure contained in NHRERP, Volume 4, Appendix F; and Volume 4A, Appendix U.

3. The following sentence appears on page 3 of enclosure 1 (emphasis added):

Such considerations dissuade the state from considering the movement of large numbers of people to public shelters as a primary protective action for beach transients given that evacuation is seen as providing dose savings in nearly all accident scenarios.

Please identify those accident scenarios for which evacuation does not provide dose savings.

Response to Interrogatory No. 3

The State has no particular accident scenarios in mind. The quoted portion of the NH Response acknowledges that in some possible scenarios a portion of the evacuation population may be exposed to radiation. However, exposure to some segment of the evacuating population does not negate those dose savings afforded to the entire population by the protective action of evacuation.

4. On page 4 of Enclosure 1, the state quotes from the RAC review of NHRERP Rev. 2, as follows:

According to the State response and the plan revisions, the use of public shelters is not proposed during a Seabrook Station emergency. The only exception is the possible use of public buildings for shelters for transients without transportation.

Does the quoted material accurately describe the current version of the NHRERP? Are there any circumstances where the state might order sheltering of the general beach population beyond transients without transportation? If so, describe those circumstances as specifically as possible.

Response to Interrogatory No. 4

Yes, the quoted material is a reasonable interpretation of page 2.6-6 of the NHRERP, Rev. 2. Note, however, that while the NHRERP does not specifically propose the use of public buildings for the beach population, neither is such an option precluded. The purpose of the NH Response was to clarify the State's position on sheltering as a protective action. See NH Response p. 5 , paragraph 2. With regard to circumstances where the State might order sheltering of the general beach population beyond transients without transportation, see State's response to Interrogatory No. 1, above.

5. The following statement appears on page 4 of Enclosure 1:  
These precautionary actions and the state emphasis on getting the population out early are consistent with actions planned at other nuclear power plant sites with transient populations.

Identify the "other nuclear power plant sites" referred to in that statement.

Response to Interrogatory No. 5

It is the State's understanding that the following nuclear facility sites employ precautionary actions similar to those proposed in the NHRERP:

Surry - Virginia	San Onofre - California
Zion - Illinois	Palisades - Michigan
Brunswick - South Carolina	D.C. Cook - Michigan
Millstone - Connecticut	Pilgrim - Massachusetts
Perry - Ohio	St. Lucie - Florida
Davis Basse - Ohio	Indian Point - New York

6. The following statement appears on page 5 of Enclosure 1:  
...the protective action of sheltering may be preferable to evacuation in only a very limited number of accident scenarios.

Identify with specificity the accident scenarios for which sheltering of the general beach population (beyond those without transportation) is preferable to evacuation and provide all documents, assessments, evaluations or other data which support the State's conclusion that sheltering is preferable to evacuation for these scenarios.

Response to Interrogatory No. 6

These conditions were developed without reference to any particular accident scenarios. See the response to Interrogatory No. 4 above.

7. The following statement appears on page 7 of Enclosure 1 referring to the Stone and Webster shelter study:  
It identified a large number of shelters that may serve as a pool from which shelter choices will be made. Based upon its review of the [Stone and Webster] Shelter Study, the State is confident that unforeseen demand for shelter can be met provided that the limits of usefulness inherent in any shelter (e.g., sheltering factors, weatherization, capacity, etc.) are considered in the decision-making process.

a. Has the state identified specific shelters that would be used if the decision is made to shelter the beach population? If so, identify.

b. What is the sheltering factor, weatherization and capacity of each such shelter?

c. Describe specifically how the state will "consider in the decision-making process" the "limits of usefulness" inherent in sheltering?

d. Identify what section(s) of the NHRERP, attachments or worksheets will be used by the decision-maker in considering whether to order the general beach population (beyond transients without transportation) to shelter.

Response to Interrogatory No. 7

a-b The State has not identified any specific shelters at this time and cannot, therefore, provide the information requested in subpart b of the interrogatory.

c. The NHRERP, Rev. 2, Vol. 1, Section 2.6.7 (at 2.6-24) describes the decision-making process. The discussion at pages 2.6-31 and 2.6-32 relative to Blocks #4, #5, #6, and the summary paragraph at the bottom of the latter page describe how the limits of usefulness are factored into the decision-making process. Vol. 4, Appendix F, and Vol. 4A, Appendix U of the NHRERP provide additional information on the protective action decision criteria. The NH Response proposes a modification to those appendices and contains an explanation of their use.

d. No other sections of the NHRERP, other than those cited, the role-specific procedures in Vols. 4 and 4A, and other appendices referenced therein, will be used by the decision-makers.

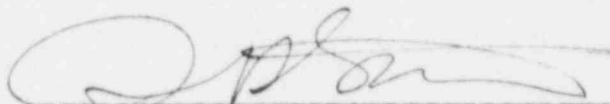
8. Does the NHRERP include an EBS message directing the general beach population (beyond transients without transportation) to shelter? If not, does the state intend to amend the plan to include such a message?

Response to Interrogatory No. 8

No, the NHRERP, Rev 2, does not include an EBS message directing the general beach population to shelter. Sample messages were included, as Attachment 3, in the Applicants' Prefiled Testimony #6. The State continues to review these messages and has not selected any messages pertaining to sheltering the general beach population for inclusion in the NHRERP.

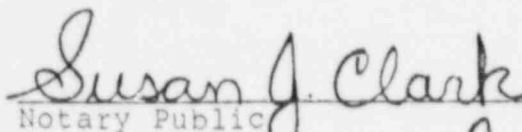
SIGNATURES

I, Richard H. Strome, being first duly sworn, do depose and say that the foregoing answers are true, except insofar as they are based on information that is available to the State but not within my personal knowledge, as to which I, based on such information, believe them to be true.



Richard Strome, Director  
Radiological Emergency Planning  
Director  
Office of Emergency Management

Sworn to before me this 25<sup>th</sup>  
day of March, 1988:



Notary Public

My Commission Expires: July 7, 1991