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RELATED CORRESPONDENCE

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March 28, 1988

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

before the

ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' RESPONSE TO ATTORNEY GENERAL
JAMES M. SHANNON'S OFF-SITE EP INTERROGATORIES
AND REQUEST FOR THE PRODUCTION OF DOCUMENTS
TO THE APPLICANTS (SET NO. 3)

INTERROGATORY NO. 1

Question:

Identify all documents on which you will rely to support your position on the sheltering contentions, and produce all such documents not previously produced. Identify the information in each document on which you will rely and the specific subpart of each contention which that information concerns.

Response:

As of this time, Applicants may rely upon some or all of the following and reserve the right to rely on additional documents as the need arises.

8804050045 880328
PDR ADOCK 05000443
G PDR

DS03

1. NHRERP, Volume 4, Appendix F and Volume 4A, Appendix U, Protective Action Decision Criteria. Protective Action Decision Making for Seasonal Beach Populations, Protective Action Recommendation Worksheet, and Attachment C. As to all sheltering contentions and subparts thereof.
2. NHRERP, Volume 1, Section 2.6.7, Figure 2.6-7, Decision Criteria for Selecting Between Evacuation and Sheltering Recommendations for the Governor. Description in Section 2.6.7 Criteria for Sheltering Protective Actions for Direct Exposure Within the Plume Exposure EPZ (p. 2.6-24). As to all sheltering contentions and subparts thereof.
3. Protective Action Evaluation, Part 1, The Effectiveness of Sheltering as a Protective Action Against Nuclear Accidents Involving Gaseous Releases, EPA-520/1-78-001A, April, 1978. Shelter structure model and fallout gamma source attenuation. As to all sheltering contentions and subparts thereof.
4. Protective Action Evaluation, Part II, Evacuation and Sheltering as Protective Actions Against Nuclear Accidents Involving Gaseous Releases, EPA 520/1-78-001B, Revised 8/78. As to all sheltering contentions and subparts thereof.
5. NUREG-0654, FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and

- Preparedness in Support of Nuclear Power Plants, Evaluation Criteria J and Appendix 1, Emergency Action Level Guidelines for Nuclear Power Plants. As to all sheltering contentions and subparts thereof.
6. Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, EPA-520/1-75-001, Revised June, 1980. As to all sheltering contentions and subparts thereof.
 7. NHRERP, Volume 1, Section 2.6.5, Protective Actions for Direct Exposure Within the Plume Exposure EPZ. As to all sheltering contentions and subparts thereof.
 8. A Study to Identify Potential Shelters in the Beach Areas Near Seabrook Station, Stone & Webster Engineering Corporation, August 1987. As to all sheltering contentions and subparts thereof.
 9. NHRERP, Volume 6, Seabrook Station Evacuation Time Study. Evacuation Time Estimates for the general population. As to all contentions and subparts thereof.
 10. Federal Emergency Management Agency, Radiation Safety in Shelters, CPG 2-6.4, September 23, 1983. (Estimate shelter capacity by dividing total available space by 10, p. 4-9.) As to all contentions and subparts thereof.
 11. Aldrich, et al., Public Protection Strategies in the Event of a Nuclear Reactor Accident: Multicompartment

- Ventilation Model for Shelters, SAND 77-1555. As to all contentions and subparts thereof.
12. Aldrich, et al., Public Protection Strategies for Potential Nuclear Reactor Accidents: Sheltering Concepts with Existing Public and Private Structures, SAND-77-1725. As to all contentions and subparts thereof.
 13. Structure Shielding from Cloud and Fallout Gamma Ray Sources for Assessing the Consequences of Reactor Accidents, EG&G, Inc., Las Vegas, Nevada, EGG-1183-1670 (1975). As to all contentions and subparts thereof.
 14. NFPA 101, Code for Safety to Life from Fire in Buildings and Structures (Life Safety Code) 1985 Edition. As to all contentions and subparts thereof.
 15. American Society of Heating, Refrigeration Engineers Standard (ASHRAD) 062-1981. As to all contentions and subparts thereof.
 16. State of New Hampshire response to FEMA Supplemental Testimony dated February 11, 1988, Enclosure 1 and Attachments 1 and 2. As to all contentions and subparts thereof.
 17. Applicants' Direct Testimony No. 7, with attachments.
 18. Applicants' Direct Testimony No. 6, with attachments.
 19. Applicants' Supplemental Analysis of the Stone & Webster Shelter Study transmitted by letter from Terry L. Harpster to Richard H. Strome dated February 11, 1988.

20. Testimony of Dr. Joan Hock, Joseph H. Keller and William R. Cumming on behalf of the Federal Emergency Management Agency on sheltering/beach population issues, dated March 14, 1988.

INTERROGATORY NO. 2

Question:

State whether you have relied, do rely, or will rely on any study, calculation, or analysis to support your position on the sheltering contentions. If so, to the extent you have not already done so, please:

- a. Describe the nature of the study, calculation or analysis and identify any documents that discuss or describe the study, calculation or analysis;
- b. Identify the persons who performed the study, calculation or analysis;
- c. State when and where the study, calculation or analysis was performed;
- d. Describe in detail the information or data that was studied, calculated or analyzed;
- e. Describe the results of the study, calculation or analysis;
- f. Explain how such study, calculation, or analysis provides support for your position on each of these contentions.

Response:

As of this time, Applicants may rely upon some or all of the following and reserve the right to rely on additional documents as the need arises.

- a. 1. A Study to Identify Potential Shelters in the Beach Areas Near Seabrook Station, Stone & Webster Engineering Corporation, August 1987 as described

in Applicants' Direct Testimony No. 6 dated January 6, 1988.

2. A visual inspection of 78 of 205 potential public shelters in Hampton Beach as described in Applicants' Direct Testimony No. 6 dated January 6, 1988.
3. Structure Shielding from Cloud and Fallout Gamma Sources for Assessing the Consequences of Reactor Accidents, EG&G, Inc., Las Vegas, Nevada, EGG-1183-1670 (1975) as described in Applicants' Direct Testimony No. 6 dated January 6, 1988.
4. Protective Action Evaluation, Part 1, The Effectiveness of Sheltering as a Protective Action Against Nuclear Accidents Involving Gaseous Releases, EPA-520/1-78-001A, April 1978, Table 2 which supports an assumption of an air exchange rate of 2 changes per hour as the maximum air exchange for a structure without ventilation, weatherstripping or storm sashes.
 - b. 1. Donald W. Bell, Senior Nuclear Technology Engineer, Stone & Webster Engineering Corporation.
 2. NHY contractor personnel under the direction of Anthony M. Callendrello, Manager, Emergency Planning, New Hampshire Yankee.
 3. Z.G. Burson and A.E. Profio, EG&G, Las Vegas.

4. George H. Anno and Michael A. Dore, U.S. Environmental Protection Agency.
- c.
1. August, 1987 at Town Offices of Towns of Hampton and Seabrook.
 2. June, 1987 at Hampton Beach.
 3. March, 1975; location unknown.
 4. April, 1978; location unknown.
- d.
1. The information and data studied is described in detail in Applicants' Direct Testimony No. 6 dated January 6, 1988.
 2. The information and data studied is described in detail in Applicants' Direct Testimony No. 6 dated January 6, 1988.
 3. Radiation sheltering provided by transportation vehicles and structures typical of where people live and work were estimated for ~~the~~ and fallout gamma ray sources resulting from a hypothetical reactor accident.
 4. The general characteristics of small and large categories of shelter structures available to the public were studied. The basis shelter model characteristics considered were gamma ray attenuation, source geometry, gaseous fission-product ingress, and air change rate.
- e.
1. The results are described in Applicants' Direct Testimony No. 6.

2. The results are described in Applicants' Direct Testimony No. 6.
 3. Wood frame structures without basements were assigned a dose reduction factor of 0.9.
 4. Rooms or buildings with windows or exterior doors on three sides that have no weatherstripping or storm sashes were assigned infiltration estimates of 2 air changes per hour.
- f. The results of each of the studies described supports the position that shelter as a protective measure for the beach population is not precluded.

INTERROGATORY NO. 3

Question:

Do you intend to offer the testimony of any expert witness with respect to sheltering contentions? If so, please:

- a. Identify each expert witness who you intend to present with respect to each subpart of each such contention;
- b. State the substance of the facts to which each expert witness is expected to testify;
- c. State the substance of the opinion or opinions to which each expert witness is expected to testify;
- d. Provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- e. State whether the facts and opinions listed in response to the foregoing are contained in any document;
- f. State whether the opinion of any expert witness is based in whole or in part on any scientific rule or

principle, and, if so, set forth such rule or principle;

- g. State whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- h. State whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

Response:

As of this time, subject to possible later revision, Applicants would offer the testimony and the basis for it of the panel of expert witnesses identified in Applicants' Direct Testimony No. 6 as is presented in that document, along with an exhibit, attachments and the qualification of the witnesses, all of which has been served on the Board and parties.

INTERROGATORY NO. 4

Question:

Do you intend to offer the testimony of any non-expert witness with respect to the sheltering contentions to be litigated by the Attorney General? If so, please:

- a. Identify each non-expert witness who you intend to present with respect to each subpart of each such contention;
- b. State the substance of the facts to which each non-expert witness is expected to testify; and
- c. State whether the facts listed in response to the foregoing are contained in any document, and produce the same.

Response:

Applicants object to the interrogatory as stated as inquiring into the work product and legal theory of counsel and further object on grounds that there is no provision in the Rules of Practice for requiring the listing of "fact" witnesses.

INTERROGATORY NO. 5

Question:

Identify, as defined in Paragraph 4, all experts and other persons you have retained to prepare testimony on the sheltering contentions and all experts and other persons with whom you have consulted in preparation of any testimony on the sheltering contentions, whether or not you have decided to introduce such testimony, and for each such person, please:

- a. Identify the contention or subpart of the contention on which he was consulted, or on which he has or is preparing testimony;
- b. State the substance of the facts to which each expert may testify;
- c. State the substance of the opinion or opinions to which each expert may testify;
- d. Provide a summary of the grounds for each opinion to which each expert may testify;
- e. State whether the facts and opinions listed in response to the foregoing are contained in any document;
- f. State whether the opinion of any expert is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- g. State whether the opinion of any expert is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

- h. State whether the opinion of any expert is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

Response:

Applicants object to the interrogatory as stated for the reason that Mass. AG seeks trial preparation materials of the Applicants' counsel without a showing of exceptional circumstances and a substantial need of the materials, and that he is unable without undue hardship to obtain a substantial equivalent.

INTERROGATORY NO. 6

Question:

In accordance with 10 C.F.R. § 2.740(e), please supplement your answers with respect to sheltering contentions to Massachusetts Attorney General's Interrogatories and Requests for Production of Documents, filed March 5, 1987 and May 19, 1987.

Response:

1. Supplement to Applicants' response to Mass. Attorney General Supplemental Interrogatory 45 to the Applicants: The sheltering capacity for the population, including transients, in each New Hampshire beach area in the Seabrook Station plume exposure EPZ (with shelters having a minimal cloud shielding factor at least as effective as that assumed in the NHRERP) is provided in "A Study to Identify Potential Shelter in Beach Areas Near Seabrook Station" performed for New Hampshire Yankee by Stone & Webster Engineering Corporation in

August 1987. This study has been served on the parties in this proceeding.

2. Supplement to Applicants' supplemental response to Mass. Attorney General's Interrogatory 91 to the Applicants: Yes. This response is based on adequacy of shelter facilities per NHRERP Volume 1, Section 2.6.5 and the availability of sufficient facilities as documented in the Stone & Webster Engineering Corporation Study of August 1987, entitled "A Study to Identify Potential Shelters in the Beach Areas Near Seabrook Station."
3. Supplement to Applicants' supplemental response to Mass. Attorney General's Interrogatory 98 to the Applicants: NHRERP Volumes and the Stone & Webster Engineering Corp. study of August 1987 have been served on the parties. Study worksheets and notes used to compile this study have been placed in the Seabrook Station discovery room and have been made available for inspection.
4. Supplement to Applicants' supplemental response to Mass. Attorney General's Interrogatory No. 119 to the Applicants: Circumstances which include the range of conditions explained on pages 5 and 6 of Enclosure 1 of the State's response to FEMA Supplemental Testimony would be applicable.

INTERROGATORY NO. 7

Question:

State how and in what manner, if any, your current position with respect to sheltering the summer beach population differs from the position articulated in Applicants' prefiled Direct Testimony No. 6 on Sheltering, dated September 10, 1987, and provide, for each specific change in position, the basis for that change, including all supporting documentation.

Response:

Applicants' current position and the prefiled Direct Testimony No. 6 dated September 10, 1987, do not materially differ. There have been minor changes in the prefiled testimony and attachments as described in the errata sheets served on the parties.

INTERROGATORY NO. 8

Question:

On p. 3 at ¶ 2, of the "New Hampshire Response to FEMA Supplemental Testimony" ["NH Response"] it is stated with respect to the State's position on sheltering, "This position does not preclude the State from considering and selecting sheltering as a protective action for the beach population." Please identify and describe:

- a. under what conditions the State would consider and might select sheltering as a protective action for the beach population;
- b. the means by which the beach population will be instructed to shelter, including any emergency messages;
- c. how the buildings which will shelter the beach population will be identified;
- d. the specific buildings which will be relied upon to shelter the beach population;

- e. the personnel who may be employed to assist the beach population in seeking shelter, including the numbers of such personnel who may be available and a description of any training such personnel will receive pertinent to that task; and
- f. any agreements, understandings, or other communications with the owners of buildings that may be used as public shelters relating to the owners' consent to use their buildings as public shelters in the event of an accident at Seabrook Station.

Response:

The Applicants' defer to the State's response to this interrogatory.

INTERROGATORY NO. 9

Question:

On page 22 of Applicants' Direct Testimony No. 6 (Sheltering), dated September 10, 1987, it is stated with respect to the beach population, that:

Sheltering for example may be the appropriate protective action for a puff release -- a gaseous or gaseous and particulate release -- of less than two hours duration. (Manual of Protective Action Guides, U.S. EPA, p. 129.)

Do you still contend that sheltering of the beach population may be the appropriate protective action for a puff release of less than two hours duration?

Response:

Yes.

INTERROGATORY NO. 10

Question:

Do you anticipate that there might be circumstances in which transients with access to transportation would be instructed to shelter?

Response:

Yes.

INTERROGATORY NO. 11

Question:

Please define the term "transient beach population" as used in the NH Response, stating whether the term applies only to day-trippers to the beach area or whether it also includes overnight visitors staying in motels, hotels or rental cottages.

Response:

The Applicants' defer to the State's response to this interrogatory.

INTERROGATORY NO. 12

Question:

On page 4 of the NH Response it is stated, "The addition of these precautionary measures alleviates most concerns about sheltering the beach population." What State concerns does it not alleviate?

Response:

The Applicants defer to the State's response to this interrogatory.

INTERROGATORY NO. 13

Question:

On page 4 of the NH Response it is stated, "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."

- a. What are the "other nuclear power plant sites" referred to in the above sentence?
- b. What is the size of the transient populations at these other sites?
- c. What the evacuation time estimates for the transient populations at these other nuclear power plant sites?
- d. What is the proximity of the transient populations at these other sites to the nuclear power plant?
- e. Is any sheltering available for the transient populations at these other sites, and, if so, what the Dose Reduction Factors [DRF] of these shelters?

Response:

The "other plants" referred to are:

- a) Surry Power Station - Virginia
Zion - Illinois
Brunswick - South Carolina
Indian Point - New York
Millstone - Connecticut
Perry - Ohio
Davis Besse - Ohio
San Onofre - California
Palisades - Michigan
D.C. Cook - Michigan
St. Lucie - Florida
Pilgrim - Massachusetts
- b) Surry - 42,000
Zion - 50,000
Brunswick - 7,000-8,000
Indian Point - not available
Millstone - 81,000
Perry - 30,000
Davis Besse - 29,105
San Onofre - 6,000-8,000

Palisades - 19,000
D.C. Cook - not available
St. Lucie - 21,099
Pilgrim - 21,000

- c) Information on ETE's for transients was not obtained.
- d) Surry - 8-10 miles
Zion - 1-5 miles
Brunswick - 2-7 miles
Indian Point - not available
Millstone - 4.5 miles
Perry - 10 miles
Davis Besse - 7-8 miles
San Onofre - 1-7 miles
Palisades - adjacent to plant site
D.C. Cook - 5 miles
St. Lucie - 1-10 miles
Pilgrim - 1-9 miles
- e) Surry - yes, shelter available
Zion - no
Brunswick - no
Indian Point - no
Millstone - yes
Perry - no
Davis Besse - no
San Onofre - no
Palisades - no
D.C. Cook - no
St. Lucie - no
Pilgrim - yes

Shelter Dose reduction factors were not available.

INTERROGATORY NO. 14

Question:

On p. 7 of the NH Response, it is stated: "It [the Shelter Study] identified a large number of shelters that may serve as a pool from which public shelter choices will be made." Please answer:

- a. How and when will such choices be made?
- b. On what criteria will the choices be based?

Response:

Applicants defer to State's response to this interrogatory.

INTERROGATORY NO. 15

Question:

Provide copies of all draft or proposed amendments to the NHRERP concerning protective actions for the beach population that the State is presently considering and for each proposed amendment:

- a. state whether the State has any present intention to adopt such amendment;
- b. describe the steps that must be taken before such amendment is adopted;
- c. provide the anticipated date by which such amendment will be adopted;
- d. state whether there are any considerations against adopting such amendment, and the basis of such considerations; and
- e. provide any proposed changes to the draft amendment.

Response:

Applicants defer to State's response to this interrogatory.

INTERROGATORY NO. 16

Question:

Does the term "beach population" as used in the NH Response include permanent residents of the Seabrook and Hampton beach area?

Response:

Applicants defer to State's response to this interrogatory.

INTERROGATORY NO. 17

Question:

Do you foresee any situation in which the transient beach population would be instructed to evacuate and the residents of the Seabrook and Hampton beach area instructed to shelter?

Response:

No.

INTERROGATORY NO. 18

Question:

On page 29 of Applicants' Direct Testimony No. 6 it states:

The result of the residential survey showed that 34 percent of 3,036 residences in Hampton beach and 51 percent of 758 residences in Seabrook Beach provide basement and masonry sheltering capability. The remaining percentage of residences provide sheltering characteristics at least as effective as that assumed by the NHRERP. The field survey revealed very few wood-frame residences that would not meet these sheltering characteristics.

Please produce such survey, and all documentation, notes, calculations and memoranda pertinent thereto, and for each residence surveyed:

- a. provide the address of the residence;
- b. indicate the type of residence, e.g., whether it is an apartment, house, condominium, etc.
- c. indicate whether the residence has a basement or masonry sheltering capability;
- d. indicate whether the residence does or does not "provide sheltering characteristics at least as effective as that assumed by the NHRERP."

Response:

- a. Specific street addresses were obtained for condominiums. Other residences were tallied by street, or groups of streets, therefore, specific individual residence addresses were not obtained. (See Attachment 1)
- b. The structures were broken down into only two categories, condominiums or residential structures. This breakdown is provided in Attachment 1.
- c. See Attachment 1.
- d. The residential survey (Attachment 1) did not have as an objective locating residences that would not meet the minimum sheltering characteristics assumed by the NHRERP. However, that survey and a subsequent external visual survey of residences did not identify any residences that did not meet the criteria in Reference 11, response to Mass AG Interrogatory No. 1.

INTERROGATORY NO. 19

Question:

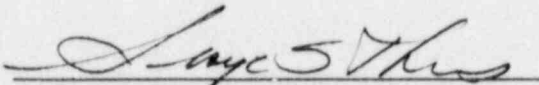
On what basis do you contend that the sirens in the beach area, when used in the voice mode to instruct the beach population, can be intelligibly heard and understood by all persons in the beach area? Please provide copies of any and all documentation, calculations and analyses including any acoustical tests, that form, or are in any way relevant to, the basis for your response, whether or not it supports your response.

Response:

The Applicants do not contend what the question suggests.

Means for notifying the public at the beach are described in the NHRERP, Rev. 2, Volume 1, page 2.1-14.

As to Answers:



George S. Thomas
Vice President, Nuclear Production
New Hampshire Yankee Division of
Public Service Company of New
Hampshire

March 25, 1988

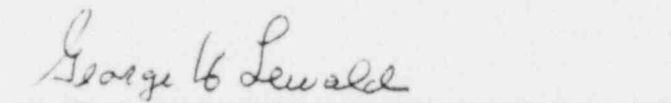
State of New Hampshire
Rockingham County, ss.

Then appeared before me the above subscribed George S. Thomas and made oath that he is the Vice President, Nuclear Production of New Hampshire Yankee Division, authorized to execute the foregoing responses to interrogatories on behalf of the Applicants' that he made inquiry and believes that the foregoing answers accurately set forth information as is available to the Applicants.

Before me,


My Commission Expires March 6, 1990

As to objections:


Thomas G. Dignan, Jr.
George H. Lewald
Kathryn A. Selleck
Deborah S. Steenland
Ropes & Gray
225 Franklin Street
Boston, MA 02110
(617) 423-6100

Counsel for Applicants

ATTACHMENT 1

HAMPTON

<u>Street(s)</u>	<u>No. of Residential Structures With Masonry and/or Basement</u>	
	<u>Yes</u>	<u>No</u>
Epping	5	20
River Avenue	7	13
Boston	10	17
Concord	7	21
Dover	8	33
Ocean Boulevard (east side)	29	36
Atlantic Avenue	9	8
Bradford Avenue	2	12
Haverhill Avenue	1	4
Sunsurf Avenue	2	6
Great Boar's Head Avenue	3	7
Boar's Head Terrace	9	21
Dumas Avenue	16	12
Cliff Avenue	10	12
Ancient Highway	14	13
Shaw	2	1
Toppan	1	5
James	3	7
Beach Plum Way	8	11
Ocean Boulevard (west side)	49	58
King's Highway (east side)	7	34
King's Highway (west side)	7	48
1-19 Streets	27	42
Roads west off King's Highway	13	77
Huckleberry Lane	25	11
Bayberry/Linden/Juniper	13	2
Robin Lane	5	6
Brian Road	0	9
Roads off Brian	5	26
North Shore Road (to Quinlan)	20	33
Cusack Avenue	1	0
Seaview Avenue	7	22
Cliff Road/Willow Lane	1	6
Mill Pond Lane/Fox/Glen	9	32
Birch	43	12
Acorn Road	4	51
Smith Avenue	0	2
High Street (to Birch)	21	10
Winnacunnet Road	21	31

HAMPTON
(continued)

<u>Street(s)</u>	No. of Residential Structures With Masonry and/or <u>Basement</u>	
	<u>Yes</u>	<u>No</u>
Bonair/Shirley Terrace	9	18
Acadia Avenue/Hemlock	8	10
Walnut/Sapphire	15	20
Emerald + 4 off roads	13	18
Thorwald/Viking	11	22
Island Path/Garland/Battcock/Jones	6	91
Brown + off roads	22	69
Ashworth Avenue (west side)	4	3
Hobson Avenue	4	22
Manchester	0	19
Keefe	1	7
Mooring	0	26
Auburn + Ext.	0	32
Perkins	1	24
Johnson	3	17
Riverview	0	31
Bragg	1	16
Tuttle	0	18
Fellows/Harris	6	30
Dow/Whitten	4	9
Dustin/Harbor	0	11
Bailey	5	4
Ocean Boulevard (south-west side)	5	5
Ashworth Avenue (east side)	8	21
A - Q	42	153
Nudd	1	61
Highland	7	50
Kentville Terrace	0	35
Ross Avenue	2	13
Church/Charles	8	30
Williams/Lyons/Francis	5	10
McKay/Cutter	10	20
Ocean Park/Fuller Acres	7	19
Tilton	0	5
TOTALS	632*	1710

* 632 have basements.

HAMPTON CONDOS

<u>Map/Lot</u>	<u>Name/Address</u>	<u>No. of Residential Structures With Masonry and/or Basement</u>	
		<u>Yes</u>	<u>No</u>
265/17	Atlantic Shores 421 Ocean Boulevard	10	0
151/9	Bailey 933 Ocean Boulevard	0	30
210/25	Blue Spruce 66 King's Highway	0	16
265/2	Coast View 425 Ocean Boulevard	12	0
235/24	Coastal Scene 591 Ocean Boulevard	15	0
295/15	Daniel's Landing 20 Harris Avenue	20	0
134/83	Harbor Point 975 Ocean Boulevard	0	30
235/12	Holiday Shores 615 Ocean Boulevard	0	23
255/7	Island View 541 Ocean Boulevard	17	0
183/51	King's Highway 120 King's Highway	0	6
167/6,7,8	Meadow Pond Estates 475-481 King's Highway	6	0
210/15	North Beach 68 King's Highway	32	0
168/2	Ocean Crest 190 King's Highway	36	0
245/10	Ocean Meadows 561 Ocean Boulevard	20	0
265/9	Ocean Spray 407 Ocean Boulevard	22	0
133/68	Ocean Willows 23 Cusack Road	0	32
152/13	Plaice Cove 971 Ocean Boulevard	30	0
266/52	Rocky Bend 504 Ocean Boulevard	0	18
245/3	Royale Sand Beach Club 579-581 Ocean Boulevard	27	0
151/4	St. Magnus 943-951 Ocean Boulevard	0	26

HAMPTON CONDOS
(continued)

<u>Map/Lot</u>	<u>Name/Address</u>	<u>No. of Residential Structures With Masonry and/or Basement</u>	
		<u>Yes</u>	<u>No</u>
235/11	Sardipiper Bay 571 Winnacunnet Road	0	16
265/63	Sea Castle 20 Fuller Acres	6	0
151/5	Seaborne 939 Ocean Boulevard	20	0
266/1	Seabreeze 461-3 Ocean Boulevard	0	36
265/8	Seven Gables 405 Ocean Boulevard	27	0
266/8	Surfside Thirty 493 Ocean Boulevard	30	0
266/28	Top of the Surf 445 Ocean Boulevard	15	0
222/7	Twin Oak 470 Winnacunnet Road	0	18
296/13	U.S. Hampton Beach 19 Atlantic Avenue	21	0
235/10	Village by the Sea 2 King's Highway	12	0
223/75	Waterglade Villas 30 King's Highway	0	16
183/12-13	146-8 King's Highway 146-8 King's Highway	0	4
222/78-81	476-482 Condos 476-482 Winnacunnet	8	0
235/13	611 Ocean Boulevard 611 Ocean Boulevard	9	0
134/51	989 Ocean Townhouses 989 Ocean Boulevard	0	28
TOTAL		395	299

395
+299

694 condo units

HAMPTON SUMMARY

With Masonry and/or Basement Structure:

Residential Structures	632
Condo Units	<u>395</u>
TOTAL	1,027

Without Masonry or Basement:

Residential Structures	1,710
Condo Units	<u>299</u>
TOTAL	2,009

1,027
<u>2,009</u>

OVERALL TOTAL	3,036
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$$100\% \times \frac{1,027}{3,036} = 34\%$$

SEABROOK

<u>Street(s)</u>	No. of Residential Structures With Masonry and/or Basement	
	<u>Yes</u>	<u>No</u>
Atlantic Avenue (south), State Line	29	22
Street, Amesbury, Newbury, Groveland		
Route 1A (east side)	18	21
Route 1A (west side) including a 10-unit brick condo	18	3
Thorton	23	6
Ocean Drive (east side)	20	15
Ocean Drive (west side)	22	7
Portsmouth (east side)	25	24
Portsmouth (west side)	8	10
Campton	6	0
Plymouth	12	8
Woodstock	13	21
Ashland	12	20
Bristol	7	22
Tilton	12	22
Franklin	11	17
Concord	10	16
Pembroke	11	14
Suncook	6	8
Hooksett	7	5
Manchester	12	10
Atlantic Avenue (east side)	30	10
Atlantic Avenue (west side)	16	10
Lawrence	4	1
Methuen	3	3
Andover	3	2
Dracut	3	2
Lowell	4	2
Chelmsford	7	3
Tyngsboro	4	4
Nashua	10	5
Hudson	7	8
River	11	34
Cross Beach Road	0	18
Route 286	1	0
	<hr/>	<hr/>
TOTAL	385	373

385 (Yes) + 373 (No) = 758 Overall Total

$100\% \times \frac{385}{758} = 51\%$ Having Masonry and/or Basement Structure

* 354 of these have basements

'88 MAR 31 P4:21

CERTIFICATE OF SERVICE

I, Kathryn A. Selleck, one of the attorneys for the Applicants herein, hereby certify that on March 28, 1988, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

Administrative Judge Ivan W. Smith
Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
North Hampton, NH 03862

Judge Gustave A. Linenberger
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Diane Curran, Esquire
Andrea C. Ferster, Esquire
Harmon & Weiss
Suite 430
2001 S Street, N.W.
Washington, DC 20009

Dr. Jerry Harbour
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Stephen E. Merrill
Attorney General
George Dana Bisbee
Assistant Attorney General
Office of the Attorney General
25 Capitol Street
Concord, NH 03301-6397

Adjudicatory File
Atomic Safety and Licensing
Board Panel Docket (2 copies)
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Sherwin E. Turk, Esquire
Office of General Counsel
U.S. Nuclear Regulatory
Commission
One White Flint North, 15th Fl.
11555 Rockville Pike
Rockville, MD 20852

*Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Robert A. Backus, Esquire
116 Lowell Street
P. O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

Paul McEachern, Esquire
Matthew T. Brock, Esquire
Shaines & McEachern
25 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Mrs. Sandra Gavutis
Chairman, Board of Selectmen
RFD 1 - Box 1154
Route 107
Kensington, NH 03827

*Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

*Senator Gordon J. Humphrey
One Eagle Square, Suite 507
Concord, NH 03301
(Attn: Herb Boynton)

Mr. Thomas F. Powers, III
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

H. Joseph Flynn, Esquire
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.
Washington, DC 20472

Gary W. Holmes, Esquire
Holmes & Ells
47 Winnacunnet Road
Hampton, NH 03841

Mr. J. P. Nadeau
Selectmen's Office
10 Central Road
Rye, NH 03870

Carol S. Sneider, Esquire
Assistant Attorney General
Department of the Attorney
General
One Ashburton Place, 19th Flr.
Boston, MA 02108

Mr. Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

Mr. Angie Machiros
Chairman of the Board of
Selectmen
Town of Newbury
Newbury, MA 01950

Mr. Peter J. Matthews
Mayor
City Hall
Newburyport, MA 01950

Mr. William S. Lord
Board of Selectmen
Town Hall - Friend Street
Amesbury, MA 01913

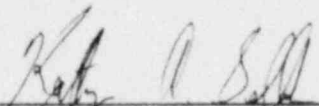
Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

Richard A. Hampe, Esquire
Hampe and McNicholas
35 Pleasant Street
Concord, NH 03301

Mr. Ed Thomas
FEMA, Region I
442 John W. McCormack Post
Office and Court House
Post Office Square
Boston, MA 02109

Judith H. Mizner, Esquire
Silvergate, Gertner, Baker,
F -e, Good & Mizner
88 Broad Street
Boston, MA 02110

Charles P. Graham, Esquire
McKay, Murphy and Graham
100 Main Street
Amesbury, MA 01913



Kathryn A. Selleck

(* = Ordinary U.S. First Class Mail)