

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

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Ivan W. Smith Esq., Chairman Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

DEFICE OF SECRETARY Mr. Gustave A. Linenberger BRANCH Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. Jerry Harbour Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

> In the Matter of PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, ET AL. (Seabrook Station, Units 1 and 2) Docket Nos. 50-443, 50-444 Off-Site Emergency Planning - 06

Dear Administrative Judges:

Enclosed is a copy of the document I referred to in the telephone conference call held earlier today, setting forth Dr. Bores' views, as the NRC RAC representative, with respect to the Stone & Webster shelter Copies of this letter and the enclosed document are being transmitted by telefax to the Massachusetts Attorney Ceneral's office and Counsel for Applicants.

Sincerely,

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Sherwin E. Turk Senior Supervisory Trial Attorney

cc w/encl.: Service List

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### UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONI 631 PARK AVENUE KING OF PRUSSIA, PENNSYLVANIA 19406

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Mr. Edward A. Thomas, Chairman Regional Assistance Committee Federal Emergency Management Agency, Region I John W. McCormack Post Office and Courthouse Boston, Massachusetts 02109

Es Dear Mr. Thomas:

Reference: (1) Updated Submission of Letters of Agreement for New Hampshire RERP

> (2) Shelter Survey for Seabrook Beach Areas - Stone & Webster. Draft 8/87, Rev. 1

> (3) Summary of Personnel Resource Assessment for NH RERP, 8/87

I have reviewed the subject documents as requested. I have few specific comments on these documents and the paragraphs below provide those comments and my overall evaluations of the submissions.

### (1) Letters of Agreement - Adequate

The New Hampshire response to the FEMA concerns appropriately clarifies the information provided relative to health care and special needs facilities. The letters of agreement executed by New Hampshire with the identified institutions and transportation providers indicate that adequate resources should be available for the transportation and medical care of patients requiring evacuation as a result of an emergency at Seabrook Station.

# (2) Shelter Survey - No rating

Stone & Webster discussed the methodology of the shelter survey in sufficient detail so as to provide a basis of assessing the reasonableness of location and protection factor for each facility. The survey identifies a lot of "public" shelter space located in the beach vicinity for several towns and relatively little in one or two towns. The survey of residences in those areas was also of interest. The question remains as to what this means in terms of protection of beach population. (a) Relative, average or maximum numbers of potential shelterees have not been identified. (b) The NH RERP doesn't describe the strategy of how and under what conditions sheltering of beach goers would be recommended. (c) Practical aspects, such as, would those identified facilities or residences really be available during an emergency, were not discussed.

In sum one could conclude that on an ad hoc basis, there is a large shelter capacity for beach goers in the near vicinity of the beaches. The limited situations during which sheltering might provide better protection than immediate evacuation of the beaches should be closely examined and then described in the beach population protection strategy. if sheltering is to be part of the strategy. I also note that the 10 square feet per person criterion used by FEMA as minimum shelter area per person is very small and in my opinion overly optimistic.

## (3) Personnel Resource Assessment - Adequate

My review included the identified resources for the State of New Hampshire with and without implementing a compensating plan for up to six NH towns and the resources for approximately seven of the NH EPZ towns. I matched the resources identified as "needed" and the provided response organizations with those provided in the respective town plans. In each case, the resource summary provided a more detailed organization and a larger number of "needed" personnel than could be ascertained from the previously submitted information. In all cases, the availability of adequate personnel was described in the resource summary. Based on the information provided, it would appear that if these personnel are trained and available, the personnel resources should be adequate for each of the towns and for the State.

The resource summary did not, however, describe necessary resources for the host communities. This may not be a major concern, however, when one considers the number of NH State and American Red Cross personnel who would supplement the local personnel in the reception centers and host facilities. The number of NH Division of Public Health Services personnel available to assist at the reception centers/host facilities to evaluate radiological monitoring and decontamination, (if necessary) may require a second look, however, to assure their adequacy.

Should you have any questions concerning my comments, please contact me at FTS 488-1213.

Sincerely,

Robert J. Bores

Technical Assistant

Division of Radiation Safety

and Safequards

cc:

W. Lazarus, RI