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RELATED CORRESPONDENCE

'88 JUL 22 P2:16

July 15, 1988

OFFICE OF SECRETARY
PLANNING & SERVICE
BRANCH

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' SECOND SET OF INTERROGATORIES
REGARDING THE MASSACHUSETTS ATTORNEY GENERAL'S
AMENDED CONTENTION ON NOTIFICATION SYSTEM

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicants hereby request that the Attorney General of the Commonwealth of Massachusetts ("Mass AG") respond to the following interrogatories.

General Definitions and Instructions

1. The word "document" as used herein shall mean any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, films, computer storage devices or any other medium and shall include, without limitation, matter in the form of books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes,

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records, correspondence, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, photographs, and any published materials and shall also include, without limitation, originals, copies (with or without notes or changes thereon) and drafts.

2. The word "communications" shall mean correspondence, contact, discussion, or any other kind of written or oral exchange between two or more persons or entities including, but not limited to, all telephone conversations, face-to-face meetings or conversations, visits, conferences, internal and external discussions, and exchange of a document or documents.

3. In the event that it is claimed that any document responsive to any request is privileged, each privileged document should be fully identified in writing, signed by counsel, except that the substance thereof need not be described to the extent said substance itself is claimed to be privileged. To "identify" a document claimed to be privileged means to state:

- (a) the date on which the document was prepared;
- (b) the author or authors of the document;
- (c) the addressee(s) and recipient(s) of the document, if any;
- (d) the title of the document;
- (e) the number of pages in the document; and

(f) the substance of the document to the extent it is not privileged.

4. Please include, with the answer to each of the interrogatories that follow, the name, institutional affiliation and professional qualifications, if any, of the person who is answering.

5. "Amended Contention on Notification System" shall mean the Mass AG's contention and bases admitted to this proceeding by the On-Site Licensing Board by Memorandum and Order dated June 2, 1988.

6. If any document required to be identified in these answers has been destroyed and no copy exists within the Mass AG's or the Commonwealth's possession, custody or control, identify the documents, state the date of its destruction, identify the person responsible for ordering destruction, state the purpose of destruction, and (if applicable) identify any document retention policy that governed the retention or destruction of the document. To "identify" a document, for all purposes in these requests other than those covered by Instruction #3 above, means to state:

- (a) the date on which the document was prepared;
- (b) the author or authors of the document;
- (c) the addressee(s) and recipient(s) of the document, if any;
- (d) the title of the document;

(e) the number of pages in the document; and

(f) the substance of the document.

7. "Mass AG Response" shall mean the document, entitled "Massachusetts Attorney General's Response to First Set of Interrogatories Regarding the Massachusetts Attorney General's Amended Contention on Notification System", filed on July 12, 1988.

INTERROGATORIES

1. Please define exactly what is meant by "acceptable levels" of sound outputs in Mass AG Response No. 8, citing specific decibel levels, and state in detail all the facts underlying that definition.

2. Please state whether the Mass AG, or any entity or individual contracted to or cooperating with the Mass AG, has performed or intends to perform any calculation(s) to assess the existence or size of "uncovered areas" as that term is used in Mass AG Response No. 8. If so, please state:

(a) who performed the calculation(s), giving the name, institutional affiliation, business address, and professional qualifications, if any, of all individuals involved;

(b) the method or manner in which the calculation(s) was performed, including but not limited to any scientific texts or practices relied upon in setting up the calculation(s);

- (c) all data used in the calculation(s);
- (d) all results generated by the calculation(s),
indicating which set of data produced which result.

3. Please state in detail what the Mass AG contends are the appropriate technical design specifications for a mobile siren alert system such as Applicants' VANS system, for each of the following variables:

- (a) weight of equipment carried;
- (b) amount of equipment carried;
- (c) nature of equipment carried;
- (d) weight distribution of fully extended siren;
- (e) stress capacity of lifting mechanism;
- (f) weight of siren;
- (g) lift capacity and reliability of telescopic crane.

4. Please define exactly what is meant by "time required to pack the vehicle" in Mass AG Response No. 18(c), and state in detail all the facts underlying that definition.

5. Please define exactly what is meant by "extreme weather conditions" in Mass AG Response No. 22, and state how frequently such conditions occur in the Massachusetts portion of the EPZ for Seabrook Station.

6. Please state in detail all the facts underlying the Mass AG's assertion that such "extreme weather conditions", as referred to in Mass AG Response No. 22, will cause "snow and ice [to] gather . . . in the sections of the crane through

which its extension takes place and in the mechanism designed to rotate and oscillate the siren," indicating how much snow and ice allegedly would gather under each level of "extreme weather", and how much snow and ice would need to gather before the extension of the crane would be materially impeded.

7. Please state exactly where in the Design Report the Mass AG asserts that a requirement exists for use of the message mode along public beaches in Massachusetts.

8. Please define, by percentage, exactly what is meant by "a substantial failure rate" in Mass AG Response No. 32, and state in detail all the facts underlying that definition.

9. Please state how frequently each of the "debilitating" weather conditions described in Mass AG Response No. 37 occurs in the Massachusetts portion of the EPZ for Seabrook Station, and state in detail all the facts underlying that answer.

10. Please define exactly what is meant by "virtually impractical", "will rarely fly", "make flight impractical", and "severe visibility problems" in Mass AG Response No. 37, and state in detail all the facts underlying those definitions.

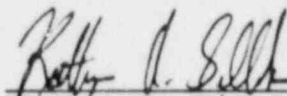
11. Please state in detail all the facts underlying the Mass AG's assertion that "[a] pilot will never fly in freezing rain because of the ice build-up that occurs on control

surfaces", including but not limited to all facts concerning the amount of ice build-up that occurs under each amount and duration of freezing rain.

12. Please identify all documents upon which the Mass AG has relied, does rely or intends to rely to support his position on the Amended Contention on Notification System. Identify the information in each document on which the Mass AG has relied, does rely or intends to rely and the specific basis and sub-basis of the contention which that information concerns.

13. If you have not already done so in accordance with Instruction No. 4, please state, for each of the foregoing interrogatories, the name, institutional affiliation, and professional qualifications, if any, of the person(s) answering.

By their attorneys,



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CERTIFICATE OF SERVICE

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I, Kathryn A. Selleck, one of the attorneys for the Applicants herein, hereby certify that on July 15, 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) the individuals listed below with one exception, namely, Carol S. Sneider, Esquire, Assistant Attorney General, who is being served in hand this date.

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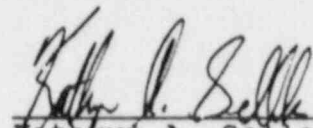
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