

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY LICENSING BOARD

IN THE MATTER OF:)	
)	
PUBLIC SERVICE CO.)	Docket #50-443
of NEW HAMPSHIRE)	Docket #50-444
)	

TOWN OF SALISBURY'S AMENDED CONTENTIONS
WITH RESPECT TO APPLICANT'S
PLAN FOR MASSACHUSETTS COMMUNITIES

1. The SPMC fails to provide assurances that adequate measures can be taken to protect the public in the Town of Salisbury as it fails to provide any reasonable assurance that timely notice will be received by any member of the executive board of the Town of Salisbury, in the event of an incident requiring local response or local authority for actions to be taken any private organization, and failing such timely notice the plan sets forth no assurance that local municipal resources will be mobilized or timely authority will be given for the applicants implementation of the plan.

BASIS

The SPMC provides for notification to and solicitation of authority from local municipalities (Plan 1.1-3) within a

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critical time frame from the onset of an emergency. The Plan fails to distinguish amongst those to be notified, the person or persons who, in fact, are able and legally competent to grant any such authority. In the case of Salisbury, to the extent such authority could be granted, it could be done only upon the concurrence of a majority of the Board of Selectmen. The Plan (Appendix H) fails to identify the necessary personnel to be contacted to acquire such grant of authority. Moreover, the failure of such notice, even absent the grant of authority requested, allows for a confused or mixed response by municipalities which would impede the overall effectiveness of an emergency response.

2. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury as it fails to provide for a local E.O.C. in the Town of Salisbury for coordination and dispatch of Salisbury O.R.O. personnel, thus enhancing the likelihood of an uncoordinated and ineffective response in the critical high traffic areas of the town.

3. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury as it fails to establish any reasonable basis from which it may be assumed that the offsite response organization will be sufficiently equipped and replenished to continue 24 hour

operations for a protracted period within the Town of Salisbury.

4. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to conform to NUREG 0654 11.J.10.a. as it depicts non-existent roads in the Town of Salisbury as evacuation routes which routing would in numerous instances strand motorists and complicate the overall traffic flow from the area in the event of an evacuation.

BASIS

The Plan depicts (Appendix J) Salisbury Bus Route number 1 as employing portions of Baker Road that do not exist.

5. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan relies upon seasonally unpassable, one lane, dirt roads as evacuation routes and alternative routes, for which roads the plan does not provide traffic guides or tow crews or any other mechanism for the control of traffic along such roads in the event of evacuation.

BASIS

The Plan depicts (Appendix J) Salisbury Bus Route number 1 as employing portions of Baker Road that are one lane unimproved surfaces that are seasonally impassable.

The Plan depicts (Appendix J) Salisbury Bus Route number 3 as employing Ferry Road, a road which is subject to regular flooding and therefore may, at any given point in time, be impassable and utterly useless as a bus evacuation route.

6. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide for the dispatch of sufficient numbers of traffic guides and supplies along major evacuation routes and at major intersections in the Town of Salisbury particularly at the Salisbury Transfer Point and at points on Beach road where traffic becomes restricted to fewer travel lanes, which failure would promote disorder and delay in evacuation of the beach areas of the town.

BASIS

The Plan fails to provide for traffic control at the following locations, each of which is critical in ensuring that traffic flow follows the designated routes set forth on Page 5-19 in Appendix J of the Plan.

- 1) Route 286 and South Main Street, Seabrook, NH
- 2) Route 286 and Adams Street, Seabrook, NH
- 3) Route 286 and Washington Street, Seabrook, NH
- 4) Seabrook Road and Forest Road, Salisbury, MA

- 5) Gerrish Road and Lafayette Road, Salisbury, MA
- 6) True Road and Lafayette Road, Salisbury, MA
- 7) Beach Road and Ferry Road, Salisbury, MA
- 8) Hayes Street and Beach Road, Salisbury, MA
- 9) North End Blvd and Central Avenue, Salisbury, MA

7. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to compensate for emergency personnel vehicle parking at Beach Road transfer point where any parked vehicles would impede evacuating traffic and cause critical delay in evacuating populated areas of the town.

BASIS

At the specific transfer point designated in Appendix J there is insufficient shoulder on the state road and no other provision made for parking of emergency vehicles or the vehicles of emergency personnel. Insofar as this location is critical for buses and bus turn arounds, the presence of parked vehicles in the roadway would severely impede the effective evacuation flow.

8. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the plan provides for bus turn around locations at the transfer point where there is insufficient

width of roadway to turn a bus and where no traffic guides have been assigned to assist bus turn arounds thus enhancing the possibility that the populations to be served by buses may not in fact be removed in the event of an evacuation as well as adding to traffic difficulties and evacuation times within the town.

9. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide any compensatory measures for south bound evacuating traffic on U.S. Route 1 which may be substantially impeded by closure of the Gillis Bridge for the passage of boats, and as U.S. Route 1 is a major south bound evacuation route from the most populated area of the town any delay on this route is likely to have a severe ripple effect along major routes to the north and east of the bridge.

10. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide traffic control at critical points on Route 110 in Salisbury where eastbound emergency traffic is likely to be obstructed by westbound traffic entering from side streets and attempting to travel against the planned flow of traffic.

BASIS

The traffic control plan as shown in Appendix J (page 5-1) makes no provision for traffic turning west on Route 110 from Bartlett Street. Bartlett Street and True Road combine to make a well known short cut from areas north of Salisbury Square to Route 95. As the plan provides no traffic control on Gerrish Road or Lafayette Road and True Road, there is every likelihood that drivers familiar with the area will employ this short cut and compound traffic at Route 110 and Bartlett Street.

11. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the plan fails to provide any reasonable basis from which the assumption may be safely drawn that contracted support organizations will be able, at any time of day and at any time of year, to provide the contracted resources in sufficient quantity and in time to carry out the plan in a fashion that provides adequate protection to the public.

BASIS

The provision, by the applicant, of letters of agreement to ensure the acquisition of support services can be taken as no more than an expression of intent on the part of any such vendor. With respect to such vendors and contracted services, the plan utterly fails to provide any information from which it

may be assumed that the vendors are capable of fulfilling their agreements under a variety of circumstances including season, weather, and other contracts the vendors may have equipment or personnel committed to at the time of any Seabrook emergency.

12. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide for reasonable primary and backup communication to transfer point dispatchers from Special Vehicle dispatchers and in certain locations there exists no reasonable back up telephone communication to transfer point dispatchers who according to the plan direct buses to continue routes in the area or travel to a reception area, and without such backup communication critical information regarding bus dependent local populations may never be received by transfer point dispatchers. Bus dependent persons left behind would require additional compensatory resources which are not provided for in the plan.

BASIS

The SPMC provides for the transfer point to be located on Beach Road in Salisbury where there appears to be no available commercial telephone service to be employed as a back up means of communication. Under such circumstances, transfer point dispatchers would be entirely radio dependent for communication.

13. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide for protective measures for possibly hundreds of commercial and pleasure boaters on the Merrimac River all or great numbers of whom may be confined to the river basin by frequently occurring conditions of wind and tide, without adequate dockage and transportation ashore.

14. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to conform to NUREG 0654 11.J in that it depicts bus routes through a flooding marsh in the Town of Salisbury that is impassible depending upon weather and tide.

BASIS

The Plan shows Ferry Road in Salisbury as a major leg of a bus evacuation route. This road is monthly and seasonally subject to "moon tide" flooding (also known as "spring tide"). Under the Plan as drawn, the unavailability of this road for buses will severely impact Bridge Road (Route 1) evacuation traffic.

15. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of

Salisbury because the Utility plan fails to provide for an adequate equipment inventory, in particular blinking light cones, to be maintained at the staging area, and therefore, fails to provide for adequate measures to protect the public.

BASIS

The SPMC as it applies to Salisbury is lacking at least nine traffic control points. It also lacks the inventory of cones and barricades for such traffic control points (see Contention #6). Even with the traffic control points designated in the plan, the inventory of cones and barricades is insufficient.

16. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's Plan provides that special populations evacuated via buses are to be instructed to bring sufficient belongings for several days, yet the delays occasioned by this instruction and the space consumed on each bus for such belongings has not been compensated for in the Utility's Plan.

17. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide for traffic congestion caused by tractor trailers stuck at the B & M Railroad Bridge over Lafayette Road in Salisbury where trucks

diverted along this road will find the clearance too low for passage and cause north-south traffic obstruction.

18. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan Transfer Point Summary table provides an unrealistically low estimated passenger demand for all bus routes in Salisbury wholly failing to accomodate transient and seasonal populations of the Town of Salisbury and thus fails to provide for adequate measures to protect such populations.

19. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide for notification to bus dependent populations as to the arrival times of buses in different areas of the town and thus creates the potential for elevated radiological exposure to persons walking and waiting for buses at out of doors locations within the town.

20. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to conform to NUREG 0654 11.J as it fails to accurately depict the width (in lanes) available for inbound and outbound traffic on the entire length of Beach Road in Salisbury and thus fails to compensate

for the inadequate space for emergency transportation eastbound on Beach Road.

21. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide adequate measures to protect the public in the event of a snow storm emergency as it fails to identify necessary resources for expedited snow removal and additional buses necessary to compensate for snow bound passenger cars.

BASIS

While it is clearly the obligation of state and local governments to remove snow from the ways, the timeliness of snow removal is critical to evacuation times in a snow storm evacuation. The Town of Salisbury lacks the equipment and manpower to perform regular snow removal functions and respond (as it may be assumed it will) to a Seabrook related emergency. To the extent that the SPMC relies upon the assumption that local governments will respond in accordance with the plan, the Plan fails to take into consideration or otherwise compensate for the Town of Salisbury's incapacity to respond to the emergency and remove snow at the same time.

Regardless of municipal responses, the Plan fails to compensate for the additional bus passengers that are likely in a snow storm emergency due to the unavailability of personal automobiles.

22. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan fails to provide adequate and reliable means to acquire up to date local weather conditions and wind information at various altitudes immediately above the E.P.Z. from which evacuation priorities are presumably to be determined.

BASIS

Fundamental to the SPMC is the presumed ability to concentrate plant and governmental resources in plume pathway areas as the same are anticipated at the time of release or known shortly thereafter. The Plant is situate on the seashore and is subject to customary and usual wind conditions wherein wind direction changes in a relatively small change in altitude. Without the demonstrated on-site capability to determine wind velocity and direction at various altitudes over the Plant and E.P.Z., the ability to effectively prioritize the commitment of resources with this E.P.Z. is severely impaired. Moreover, computer modeling of wind speed and direction, or

information from sources such as Pease Air Force Base or Logan Airport is insufficient for accurate on site or E.P.Z. specific wind information.

23. The SPMC fails to provide assurances that adequate measures can and will be taken to protect the public in the Town of Salisbury because the Utility's plan relies upon the assumption that local governments have the adequate resources to implement the Utility's Plan, which assumption is rebutted and fails as a matter of fact in the case of the manpower and equipment resources available to the Town of Salisbury, because Salisbury does not now have nor is it likely to acquire sufficient policemen, firemen, public works employees, or civil defense employees to effectively implement, oversee, or participate in a safe evacuation of the entire town.

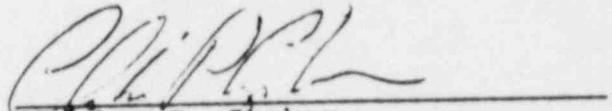
BASIS

Implicit in the Plan is the assumption that local governments shall perform the functions they are normally obliged to perform. However, in the various evacuation scenarios the demands for manpower and equipment upon the Town of Salisbury would become insurmountable for it to perform its normal governmental functions.

There are two police cruisers in the Town of Salibury and at any given point in time, up to four regular police officers on duty. There are a total of sixteen regular police officers in

the department. The evacuation of \$80,000+ on a summer weekend would require police supervision and direction (regardless of the availability of plant designated personnel who have no police powers). Police personnel would also be required to protect persons and property. The Salisbury Fire Department has three full time employees and a call firefighter force. The Salisbury Highway Department has three full-time employees and its private support is not contracted under any letters of agreement to provide services under circumstances as unusual as an evacuation.

Respectfully submitted,
Town of Salisbury
By its Attorney:



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I, Charles P. Graham, Counsel for the Town of Salisbury
in the above entitled action, hereby certify that I have
caused copies of the enclosed documents to be served upon
the persons at the addresses listed below, by first class,
postage prepaid, mail.

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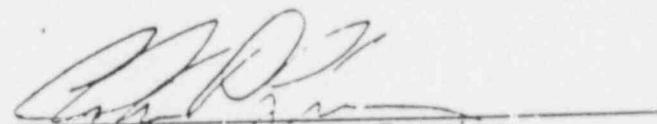
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Signed under seal this 17th day of June, 1988.



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