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THE COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF THE ATTORNEY GENERAL

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

April 15, 1988

Docketing and Service
Nuclear Regulatory Commission
1717 H Street
Washington, DC 20555

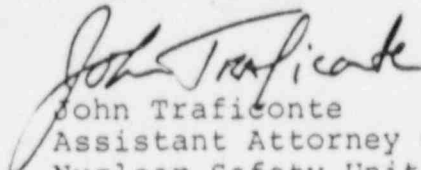
Re: Public Service Company of New Hampshire, et al.
(Seabrook Station, Units 1 and 2)
Docket Nos. 50-443-OL and 50-444-OL

Dear Sir or Madam:

Under the press of time, a paragraph was misplaced in the Contentions Document filed by Attorney General James M. Shannon. Enclosed please find new pages 142 and 159. Please place these pages into the original.

Thank you for your consideration.

Very truly yours,


John Traficante
Assistant Attorney General
Nuclear Safety Unit

JT/ds

Enclosures

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hearing-impaired individuals do sense that a person is at their door, when they look and see that this person is a stranger many hearing-impaired individuals will not let the Route Guide in, especially at night. If the Route Guide does run this gauntlet of obstacles and gets face-to-face with the hearing-impaired person, he hands the person one of three pre-scripted written messages, none of which are adequate for the situation.

B. The Route Guide's procedures, Pro. 2.11, are inadequate, ambiguous, and confusing. For example, no instruction is provided regarding how to catch the attention of hearing-impaired persons upon arrival at their homes. Also, while the prescribed message asks the hearing-impaired individual to "identify any special assistance we may provide," the Route Guide is not instructed whether or not he should actually provide that assistance.

C. Special equipment should be provided to each household in the Massachusetts EPZ with a deaf or nearly deaf member. This equipment (a form of teletype) is not expensive and would insure notification to the hearing-impaired.

CONTENTION 53: The SPMC does not provide for adequate pre-emergency public information to establish the preparedness needed to adequately meet the special needs of persons with handicaps during a radiological emergency. The SPMC therefore fails to comply with 10 C.F.R. 50.47(a)(1), 50.47(b)(7), 50.47(b)(10), 50.47(c)(1), and NUREG 0654, Rev. 1, Supp. 1, Sections II.G and II.J.

BASIS: A. With respect to public education materials, the types of materials to be utilized will not be effective in reaching many special needs persons.

restrictions is one regarding the maximum number of persons permitted inside. At the height of the evacuation, when the facility is also serving as the host school facility, this legal limit would be exceeded.

H. The American Red Cross has not certified that this facility meets the criteria established by the ARC for mass care shelters to be used for evacuees from a nuclear power plant disaster. Absent certification by the American Red Cross, there is no reasonable assurance that the ARC will in fact establish this shelter during an emergency.

I. The facility does not meet the American Red Cross criteria for shelters for nuclear power plant disasters.

J. Regardless whether the facility meets the ARC generic shelter standards, the facility itself is not suitable for use as a host special facility for the population intended.

K. Use of this facility as a shelter for the elderly in nursing homes and elderly housing projects will be hazardous to the health and well-being of these individuals because it will substantially exacerbate the effects of the "transfer trauma" they will already be experiencing from the evacuation experience itself.