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Shaines & McEachern

Professional Association, Attorneys

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The G&M Law Group
with affiliated offices in
Boston, MA
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Kittery, ME
Portsmouth, NH
Providence, RI

'88 APR 25 P5:41

April 22, 1988

Office of the Secretary
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Attention: Chief, Docketing and Service Section

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

Dear Sir:

Enclosed for filing in the above-referenced proceeding
please find TOWN OF AMESBURY TABLE OF CONTENTS AND BRIEF
DESCRIPTION OF CONTENTIONS ON SEABROOK PLAN FOR MASSACHUSETTS
COMMUNITIES.

Thank you for your assistance in this matter.

Very truly yours,


Matthew T. Brock

jlr

Enclosures

cc: Service List

8805040089 880422
PDR ADOCK 05000443
G PDR

P.O. Box 360, 25 Maplewood Avenue
Portsmouth, New Hampshire 03801
Telephone 603/436-3110; FAX: 603/436-2993

Robert A. Shaines, Paul McEachern, John H. McEachern, Duncan A.
McEachern, Gregory Robbins, Dan W. Thornhill, Branch Sanders, Alice
K. Page, Matthew T. Brock, Daniel C. Hoefle, Pamela D. Eldredge,
William B. Gamble, R. Timothy Phoenix, Fred J. Madrigan (retired)
of counsel J. Robert O'Brien

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 APR 25 P5:41

Before the
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges:
Ivan W. Smith, Chairperson
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

In the Matter of)	April 22, 1988
)	
PUBLIC SERVICE COMPANY OF)	Docket Nos. 50-443-OL
NEW HAMPSHIRE, et al,)	50-444-OL
)	
(Seabrook Station, Units 1 and 2))	Off-Site Emergency
)	Planning
)	

TOWN OF AMESBURY
TABLE OF CONTENTS
AND BRIEF DESCRIPTION OF
CONTENTIONS ON
SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES

CONTENTION NO. 1:

This contention focuses upon inadequacies in the Letters of Agreement proffered by Applicants.

BASES:

A. Facial inadequacies and deficiencies in Letters of Agreement.

B. Likely impediments to prompt mobilization and deployment of emergency response personnel.

CONTENTION NO. 2:

This contention focuses upon inadequacies in the mechanisms for

information exchange among emergency response workers and members of the public.

BASES:

A. Anticipated delays and miscommunications among emergency response personnel.

B. Anticipated delays and miscommunications between the Commonwealth of Massachusetts and the State of New Hampshire.

C. Deficiencies in EBS system.

CONTENTION NO. 3:

This contention focuses upon the lack of coordinated emergency planning, and lack of a coordinated emergency response, among state and local officials. Examples:

(a) Acoustical overlap of siren systems;

(b) Inconsistencies between NHRERP and SPMC concerning protective action recommendations;

(c) Conflicting protective action recommendations between New Hampshire and the Commonwealth of Massachusetts.

CONTENTION NO. 4:

This contention focuses upon inadequacies in personnel and resources to implement the SPMC and the inadequacy of the SPMC to provide a comprehensive traffic management plan.

BASES:

A. Delays in identification and deployment of emergency vehicles.

B. Lack of adequate personnel to staff traffic control

points, including those for Town of Amesbury.

C. Lack of adequate training for utility employees performing emergency response functions.

D. Lack of adequate personnel to implement protective actions for special needs facilities.

E. Lack of adequate supporting plans detailing procedures to implement protective action recommendations.

F. Unavailability of special needs facilities employees to implement SPMC.

G. Lack of timely assistance by local government officials to implement SPMC.

H. Lack of adequate training for drivers of emergency vehicles.

I. Unavailability of personnel resources for law enforcement and similar local emergency needs.

J. Inadequacies in Town of Amesbury traffic management plan.

K. Inadequacy of Traffic Control Point Number B-AM-06 (I-95 and Route 110).

L. Lack of adequate maps of traffic control posts.

M. Lack of adequate maps for evacuation bus routes.

N. Lack of traffic control regarding Route 110.

O. Lack of familiarity of utility workers with local traffic conditions.

P. SPMC violations of Town of Amesbury zoning ordinance.

Q. SPMC fails to provide dose savings.

CONTENTION NO. 5:

This contention focuses on the failure of the SPMC to provide reasonable assurance of dose savings to the public during an emergency. Information upon which protective action recommendations will be based will likely be inaccurate or delayed, and may result in incorrect protective action recommendations.

CONTENTION NO. 6:

This contention focuses upon the failure of the SPMC to provide dose savings or a range of protective actions. Neither sheltering nor evacuation provide reasonable assurance of adequate protection to the public.

Respectfully submitted,

TOWN OF AMESBURY
By Its Attorneys
SHAINES & McEACHERN
Professional Association

Dated: April 22, 1988

By


Matthew T. Brock

CERTIFICATE OF SERVICE

'88 APR 25 P5:41

I, Matthew T. Brock, one of the attorneys for the Town of Amesbury herein, hereby certify that on April 22, 1988, I made service of the foregoing document, TOWN OF AMESBURY TABLE OF CONTENTS AND BRIEF DESCRIPTION OF CONTENTIONS ON SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES, by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

*Ivan Smith, Esq., Chairman
Atomic Safety & Licensing Board
(Off-Site)
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

*Judge Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
(Off-Site)
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

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

*Stephen E. Merrill, Esq.
George Dana Bisbee, Esq.
Office of the Attorney General
State House Annex
Concord, NH 03301

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

*Dr. Jerry Harbour
Atomic Safety & Licensing Board
(Off-site)
U.S. Nuclear Regulatory Comm.
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

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

*Thomas Dignan, Esq.
George H. Lewald, Esq.
Kathryn A. Selleck, Esq.
Ropes & Gray
225 Franklin Street
Boston, MA 02110

*Carol S. Sneider, Esq.
Stephen H. Oleskey, Esq.
Allan R. Fierce, Esq.
Department of the Atty. General
One Ashburton Place
Boston, MA 02108

*Diane Curran, Esq.
Andrea C. Ferster, Esq.
Harmon & Weiss
2001 S Street, N.W., Suite 430
Washington, DC 20009-1125

*Edward A. Thomas
Federal Emergency Mgmt. Agency
442 J.W. McCormack (POCH)
Boston, MA 02109

Philip Ahrens, Esq.
Assistant Attorney General
Office of the Attorney General
State House, Station 6
Augusta, ME 04333

Mrs. Anne E. Goodman
Board of Selectmen
13-15 Newmarket Road
Durham, NH 03824

William S. Lord, Chairman
Board of Selectman
Town of Amesbury
Town Hall, Friend Street
Amesbury, MA 01913

R. Scott Hill-Whilton, Esquire
Lagoulis, Clark, Hill-Whilton
& McGuire
79 State Street
Newburyport, MA 01950

Stanley W. Knowles
Board of Selectmen
P.O. Box 710
North Hampton, NH 03862

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

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

William Armstrong
Civil Defense Director
10 Front Street
Exeter, NH 03833

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

Robert A. Backus, Esq.
Backus, Meyer & Solomon
111 Lowell Street
Manchester, NH 03105

Jane Doughty
Seacoast Anti-Pollution League
5 Market Street
Portsmouth, NH 03801

Rep. Roberta C. Pevear
Drinkwater Road
Hampton Falls, NH 03844

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

Ashod N. Amirian, Esquire
376 Main Street
Haverhill, MA 01830

Alfred V. Sargent, Chairman
Board of Selectmen
Town of Salisbury
Salisbury, MA 01950

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

Allen Lampert
Civil Defense Director
Town of Brentwood
Exeter, NH 03833

Gary W. Holmes, Esq.
Holmes and Ells
47 Winnacunnet Road
Hampton, NH 03842

Charles P. Graham, Esq.
Murphy & Graham
33 Low Street
Newburyport, MA 01950

Sandra Gavutis
Town of Kensington
RFD 1, Box 1154
East Kensington, NH 03827

Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
No. Hampton, NH 03862

Judith H. Mizner, Esq.
79 State Street
2nd Floor
Newburyport, MA 01950

Michael Santosuosso, Chairman
Board of Selectmen
Jewell Street, RFD 2
So. Hampton, NH 03827


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

Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

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

Beverly Hollingworth
209 Winnacunnet Road
Hampton, NH 03842

Leonard Kopelman, Esquire
Barbara J. Saint Andre, Esquire
Kopelman & Paige, P.C.
77 Franklin Street
Boston, MA 02110


Matthew T. Brock

*UPS Next Day Air