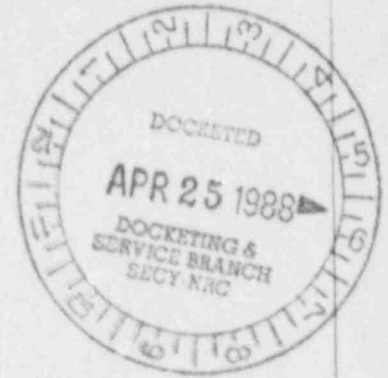


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the

ATOMIC SAFETY AND LICENSING BOARD

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

REBUTTAL TESTIMONY OF THOMAS F. MOUGHAN  
AND JEAN GREGG LINCOLN TO  
APPLICANTS' DIRECT TESTIMONY NO. 6 (SHELTERING)

My name is Thomas F. Moughan. I am Coordinator and Field Director for Citizens Within the Ten Mile Radius (C-10) and have served in this capacity since April, 1986.

My name is Jean Gregg Lincoln. I am a representative for C-10 and have been a member of this organization since February, 1987.

C-10 is a non-profit corporation organized under the General Laws of the Commonwealth of Massachusetts. C-10 originated as a citizens' organization in 1985 to address safety concerns involving the Seabrook nuclear power plant and to bring those concerns before all relevant local, state, and federal bodies within the legal, regulatory and

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political structure. C-10 has approximately 5,000 members in Massachusetts and New Hampshire and maintains a principal office in Newburyport, Massachusetts.

On October 17, 1987, C-10 commenced a survey of individuals who own certain properties or businesses in the beach area near Seabrook Station. These properties or businesses are identified as potential public shelters in a study compiled for New Hampshire Yankee by Stone & Webster Engineering Corporation, dated August, 1987. Stone and Webster cites approximately 350 commercial, municipal and church properties considered by Stone & Webster to be suitable for short-term emergency use by the beach population, in the event of an accident at the Seabrook reactor. 249 of these potential shelters are located in the New Hampshire portion of the Emergency Planning Zone (EPZ), with approximately 100 potential shelters located in Massachusetts.

For the purpose of this testimony, only New Hampshire data is cited. Data collected from Massachusetts beach areas is not included.

C-10 undertook the survey to determine whether any of the owners had been notified prior to their properties or businesses being designated as potential public shelters in the Stone & Webster study. The survey also sought to determine the number of these owners willing to have their premises used as a public shelter during a radiological emergency at Seabrook Station. In addition, C-10 made available a STATEMENT for signature to any property or business owner who did not wish to make his property available for a shelter. The Statement provides that New Hampshire Yankee remove that property or business

from any potential shelter list. Each of these STATEMENTS was signed by the property or business owner, or by the owner's authorized representative. Copies of all Statements are attached hereto and incorporated by reference.

Approximately twenty-five C-10 volunteers participated in the survey. Every potential shelter identified in the Stone & Webster study was assigned to a volunteer. Each volunteer was instructed to personally go to the shelters on his or her assigned list and to survey the owner or his representative on the premises. Repeated attempts were made to contact owners not initially available.

A summary of our survey data is as follows:

DATA RESULTING FROM C-10 SURVEY  
OF POTENTIAL SHELTER LOCATIONS

	Hampton	North Hampton	Rye	Seabrook	Total N.H.
1. Total Shelters Identified in S&W Study	205	4	23	17	249
2. Non-Existent or Erroneous Premises*	8	0	0	0	3
3. Corrected Number of Potential Shelters	197	4	23	17	241
4. Locations Contacted In Survey	128	4	18	17	157
% of Potential Shelters**	65%	100%	78%	41%	65%
5. Number of Shelter Owners Contacted by S&W/NHY Prior to Development of List	0	0	0	0	0

6. Those Expressing a Willingness to Permit Properties or Businesses as Public Shelters	7	0	1	1	9
% of Those Contacted	5%	0%	6%	14%	6%
7. Statements Signed Requesting Removal from Public Shelter List	100	4	14	3	121
% of Those Contacted	78%	100%	78%	43%	77%
8. Non-Responses of Those Contacted	21	0	3	3	27
% of Non-Responses	16%	0%	17%	43%	17%

\* Includes buildings that no longer exist, private dwellings, buildings listed twice.

\*\* All percentage figures are based on corrected number of potential shelters (line 3)

Our observations obtained from the C-10 survey include the following:

1. Stone & Webster or New Hampshire Yankee apparently did not seek permission, or even consult with, any property owners or businesspersons regarding the designation of their properties as potential shelters. Clearly, property and business owners had not been informed by Stone & Webster or New Hampshire Yankee that their premises had been identified as potential public shelters in the event of a radiological emergency at Seabrook Station.

2. Eight of the 249 potential public shelters identified by Stone & Webster do not exist, are listed twice, or are private dwellings.

3. Of the remaining 241 properties, C-10 was able to contact 65% (157) of these owners.

4. Of the 157 contacted, 77% (121) stated that they would not make available their properties for use as shelters in the event of a radiological emergency at Seabrook, requested their properties be removed from any list of potential shelters, and signed the prepared Statement.

5. Of the 157 contacted, 6% (9) stated they would make their premises available for shelter.

6. Many owners were visibly angered at having their properties listed as potential shelters, without their prior consultation or consent.

7. Many owners did not believe their properties or businesses would provide any significant protection from radiation, and therefore would not attempt to fool the public by making this inadequate shelter available to the public during an emergency.

8. A number of owners of commercial properties stated that their first concern would be for the safety of their families or guests, and questioned compromising that safety by admitting potentially contaminated members of the public into their premises during a radiological emergency.

9. Many owners stated they would close and lock up their properties or businesses and flee the area with their families and employees, thereby precluding the public from access to these premises.

10. Many owners stated that at least portions of their properties or businesses designated as potential public shelters were routinely kept locked, thereby precluding the public from access to these premises.

Based upon our survey, discussions with property and business owners, and our personal observations of many potential shelters, it is our opinion that the substantial majority of potential public shelters identified by Stone and Webster in the New Hampshire portion of the EPZ would not be available for use by the public in the event of an actual emergency at Seabrook Station.