



potential public shelters in the event of an emergency at Seabrook Station, in a study prepared by Stone & Webster Engineering Corporation dated August, 1987. Of approximately 100 individuals who spoke to me on this issue, not a single person was aware that their properties were designated as potential shelters until receipt of a letter from Salmon Falls, who was conducting survey research for the Commonwealth of Massachusetts on the properties identified in the Stone & Webster study. With one exception, each of these individuals requested that their property or business be removed from the list of potential shelters. Many of the property owners raised questions as to the legality of listing their properties as potential shelters without permission of the owners. Most of the owners additionally expressed the view that, in the event of an actual emergency at Seabrook Station, they would leave the beach area as soon as possible since they did not believe their businesses or homes would protect them, their families, or members of the public from radiation.

I believe that Stone & Webster's designation of potential shelters without the consent of the property owners has exacerbated the atmosphere of fear, disbelief and mistrust that pervades the beach population concerning the Seabrook Nuclear Power Plant. One consequence of circumventing discussions or failing to obtain consent of property owners will be to further discredit the reliability or believability of the owners of Seabrook Station and the New Hampshire Emergency Management Agency. Most of the residents of the Seacoast have an idea of what a radiation shelter should be, and most of the

buildings that have been listed do not even approach their expectation of an appropriate shelter. I would, therefore, expect that any instructions to "shelter" in an actual emergency would be ignored by large segments of the population.

Following the initial communications from my constituents in September, 1987, I personally undertook to investigate a number of the properties designated as potential shelters, and spoke further with many business owners to identify more specifically their concerns. Based upon this research, I have reached the following conclusions:

1. Certain properties identified by Stone & Webster are not designated at the correct location in that study. For example, the property identified at 31 Ashworth is the Sunset Haven rather than the Hollingworth Motor Court, as identified in the Stone & Webster Study. As a further example, the property identified at 7 A Street as the Hollingworth Motel is in fact the Silver Wave. Similar misdesignations and incorrect locations are found in the Stone & Webster Study.

2. Stone & Webster's calculations of square footage in certain proposed shelters were inconsistent with my personal observations and overstated available space.

3. The location of certain potential shelters is virtually impossible to identify. I have lived in the New Hampshire Seacoast my entire life and have never heard of such streets as Tilton Street or Gookin Court, which are cited in the Stone & Webster study.

4. A number of the potential public shelters, in whole or in

part, are private residences, rather than the "municipal and commercial buildings" claimed by Stone & Webster.

5. Of the approximately 100 owners of designated shelters with whom I spoke, every owner, except one, was clearly opposed to having his property or business utilized as a public shelter in the event of an emergency at Seabrook and requested the property or business be stricken from the list of potential shelters. The reasons provided by the owners for this position include:

a. The owners believe that their typically unwinterized, wood frame structures would not provide any meaningful protection for themselves or the public from radiation.

b. Many of the proposed structures have a significant amount of exterior glass walls and windows, which the owners believe would not provide any significant protection from radiation. The owners, therefore, would not permit the public to have access to these premises.

c. Many of the rental unit owners or operators believe that their paying guests, and not the general public, would have final authority to exclude the public from these buildings during a radiological emergency.

d. A number of the businesses identified as potential shelters have garage type or large exterior doors. The owners of these properties believe that, during a radiological emergency, each time such a door opens it would result in extensive additional exposure of radiation to those already inside. For this reason, many

of the owners have decided their premises are not safe as shelters and would not permit the public access.

e. A number of owners expressed the view that the proposed shelters are so close to Seabrook Station, and many are of wood frame construction and without even basic insulation, that individuals attempting to shelter in these facilities would receive as much exposure to radiation as if they remained outdoors. A number of the potential shelters identified by Stone & Webster have vents to the outdoors, holes in the outer walls, and windows, especially louvered windows, that do not properly close or that are broken. The owners, therefore, expressed the view that these properties would be essentially worthless in keeping out radiation.

6. At least 3 of the potential shelters identified by Stone & Webster have been torn down, or have been closed by public officials as unfit for occupancy.

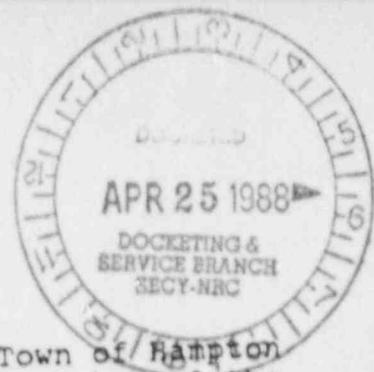
7. Stone & Webster appears to count utility rooms, with openings to the outside, as potential shelters. Open stairwells, such as that located in the Nautical Motel, and open spaces under buildings, such as the parking garage under the Ashworth Hotel, apparently have been counted as shelter space.

8. Certain of the basements of the potential shelters identified by Stone & Webster are often flooded. Other basements are constructed above ground, with large windows, utilized for business. Still other owners have advised me that their basements are typically filled with storage materials, including highly volatile materials. Certain other

basements are also utilized as apartments or owner residences, which would be occupied during the summer months and therefore do not represent the "municipal and commercial buildings" as claimed by Stone & Webster.

9. During the riots that have occurred in Hampton Beach in years past, residents have locked their doors not allowing others to enter. Many owners recently informed me that they would similarly lock their doors to members of the public, to avoid greater radiation exposure to themselves and their families.

10. Based upon my numerous communications with owners of properties and businesses designated as potential shelters, my personal observations of those facilities, and my lifetime of experience in the New Hampshire Seacoast, I believe that a substantial majority of those properties and businesses identified as potential shelters for Stone & Webster will not be available to the public for shelter in the event of a radiological emergency at Seabrook Station.



CERTIFICATE OF SERVICE

I, Matthew T. Brock, one of the attorneys for the Town of Hampton herein, hereby certify that on April 22, 1988, I made service of the foregoing documents, REBUTTAL TESTIMONY OF THOMAS F. MOUGHAN AND JEAN GREGG LINCOLN TO APPLICANTS' DIRECT TESTIMONY NO. 6 (SHELTERING) and REBUTTAL TESTIMONY OF BEVERLY HOLLINGWORTH TO APPLICANTS' DIRECT TESTIMONY NO. 6 (SHELTERING), 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

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

\*Sherwin E. Turk, Esq.  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
15th Floor - One White Flint North  
11355 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