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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

DOCKET NOS. 50-443 OL
50-444 OL

(Seabrook Station, Unit 1)

SEACOAST ANTI-POLLUTION LEAGUE'S SECOND
SUPPLEMENTAL PETITION FOR LEAVE TO INTERVENE

Pursuant to 10 C.F.R. §2.714(b), the Seacoast Anti-Pollution League (SAPL) submits the following contentions for litigation in this proceeding. The contentions are based on the submitted Radiological Emergency Response Plans for the State of New Hampshire and the Towns of Seabrook, Newfields, Portsmouth, Kingston, Exeter, Brentwood, Rye, Stratham, Greenland, Hampton Falls, Kensington, East Kingston, Hampton, South Hampton, North Hampton, New Castle, and Newton, New Hampshire

It is SAPL's position that the submitted plans fail to meet the standards set forth in 10 C.F.R. §50.47.


The following contentions apply to the New Hampshire State plan and to all seventeen of the submitted plans except where noted.

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We also wish to join in the Contentions filed by the towns of South Hampton and Hampton Falls.

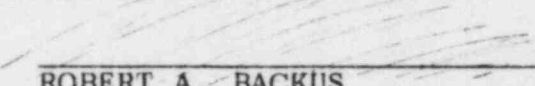
Respectfully submitted,
SEACOAST ANTI-POLLUTION LEAGUE
By its attorney,
BACKUS, MEYER & SOLOMON



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DATE: February 21, 1986

I hereby certify that a copy of the within Second Supplemental Petition for Leave to Intervene and attached Contentions have been sent this date, first class, postage prepaid, to all counsel on the service list.



ROBERT A. BACKUS

Contention 1:

The New Hampshire state and local radiological emergency response plans fail to provide "reasonable assurance" because they do not set out how emergency vehicles (buses, vans and EMS vehicles) will be able to make their way into the Emergency Planning Zone (EPZ) to their respective destinations against a potential outgoing flow of evacuating vehicles. No route maps are provided from the locations from which the buses, etc. are traveling to their destinations in the EPZ. Therefore, these plans do not meet the requirements of 10 C.F.R. §50.47(a)(1), §50.47(b)(3) and NUREG-0654 II. J. 10.K.

Basis: Regulations specifically require that arrangements for requesting and "effectively using assistance resources" have been made (emphasis added). The buses and other vehicles referred to in the plans will be of no effective use if they cannot reach the schools, nursing homes, homes of the non-auto owning populations and other destinations at which they are to pick up evacuees within a reasonable time frame. Numerous buses listed in the plans are to come from areas that are some distance and travel time from the EPZ. Among the locations from which buses will be traveling, according to the plans, are Salem, Plaistow, Manchester, Dover, Durham, Somersworth and the Nashua-Hollis area.

These buses, vans and EMS vehicles from outside the zone would be in the untenable position of trying to travel into the zone against the outgoing flow of evacuating traffic in those instances in which an early warning and evacuation of the public proved necessary. Most of the school children in the zone will require busing. Children are more susceptible to injury from radiation exposure than are adults because their cells divide more rapidly because they are still growing and because they have longer prospective lifespans. Thus, there is no reasonable assurance that children and other segments of the populace requiring transportation assistance can or will be adequately protected in the event of a radiological emergency at Seabrook Station.

Contention 2:

Contrary to the requirements of 10 C.F.R. 50.47(a)(1), 10 C.F.R. Part 50, Appendix E, Sections IV.A.8. and IV. D.3., and NUREG-0654 II.A.2.a and b, II.A.3 and II.E.1 and 3., the responsibilities, authorities and concept of operations between the State of New Hampshire and the State of Massachusetts in ordering any protective action have not been sufficiently defined nor set forth in a written agreement.

Basis: According to the N.H.R.E.R.P, the ultimate authority to order protective actions resides in the Governor or his designee. Because there are two states with territory within Seabrook's EPZ , in order to ensure that there is a timely accord on the protective actions ordered by the two governors (or their designees) there should be, as NUREG-0654 II.A.3. require, a written agreement setting out the steps by which the governors could resolve any differences of opinion as to the appropriate protective action or actions to order. Otherwise, there remains the risk or undue delay in decision-making or the risk that decisions may not be the same and confusion of the public and inequitable protection of the public could result. 10 C.F.R. Part 50. Appendix E., IV.D.3. sets out that "the licensee shall demonstrate that the State/local officials have the capability to make a public notification decision promptly on being informed by the licensee of an emergency condition" (emphasis added). This necessitates that there be a prompt means of resolving differences of opinion between the two governors.

Contention 3:

The New Hampshire State and host community plans do not provide for sufficient capacity in the New Hampshire community reception centers for registration and monitoring within about 12 hours all residents and transients arriving at the relocation centers. Therefore, the New Hampshire State, local and host plans do not meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(8), §50.47 (b)(9), §50.47 (b)(10), §50.47 (b)(12) and NUREG-0654 II.J.12.

Basis: NUREG-0654 II.J.12. specifically requires that personnel and equipment available should be capable of monitoring, within about a 12 hour period, all (emphasis added) residents and transients in the plume exposure EPZ arriving at relocation centers. If substantial numbers of evacuees are exposed to contaminants from the plume, then it is to be expected that substantial numbers would report to relocation centers for monitoring and decontamination. To assume otherwise would call into question the efficacy of the public notification and education procedures required by 10 C.F.R. §50.47 (b)(5), 10 C.F.R. §50.47 (b)(7), NUREG-0654 II. E.5., 6 and 7. and NUREG-0654 II.G. 1. and 2.

Table 1, located in each of the 17 New Hampshire local plans, provides 1985 peak population figures for each of the local communities, which sum to a total of 191,849 for all 17 towns. The assumption that people will not go to reception centers does not meet the NRC's mandate that there be "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency" for those circumstances in which the population has been exposed to contamination from a radiation plume. If people who have been thus contaminated proceed directly to the homes of friends and relatives without being first monitored and decontaminated, they may, over time, receive significant doses from the unremoved contaminants as well as needlessly expose others to ionizing radiation.

The total capacity for mass care shelters in the five communities to which maps in the local plans direct evacuees is 45,087. The capacity of the reception centers are only a small fraction of this number. No estimates are given of the numbers of evacuees who can be registered and monitored within any given time frame at these facilities. Therefore, there is no reasonable assurance that all evacuees who should be registered and monitored within 12 hours will in fact be thus protected.

Contention 4:

The New Hampshire, State, local and host community plans fail to meet in adequate fashion the requirements that provisions be made for medical treatment of contaminated

injured individuals as set forth at 10 C.F.R. §50.47 (b)(12) and NUREG-0654 II.L. 1. and L. 3.

Basis: Section 2.8 of the New Hampshire State plan describes the medical and public health support available to cope with a radiological emergency. Table 2.8-1 lists the local medical facilities capable of treating radiation accident patients. The total capacity of all these facilities, even assuming their maximum capacity, is inadequate for the task of treating those numbers of individuals who are likely to be both contaminated and injured in a serious nuclear accident at Seabrook, much less those in addition who are exposed to excessive amounts of radiation. Assuming maximum capacity, the hospitals listed can treat a total of 51 Type 2 patients (Type 2 patients being defined in the Table as those requiring medical care as well as radiologically contaminated) and a total of 76 Type 1 patients (defined as those who have experienced excessive exposure to radiation). Only two of the hospitals listed can treat the numbers of patients specified for Type 2 treatment in addition to the numbers requiring Type 1 treatment. This means that the absolute maximum number of patients who could be treated at any one time is 91 patients.

Table 1, located in each of the 17 New Hampshire local plans, provides 1985 peak population figures for each of the New Hampshire municipalities within the plume exposure EPZ. The combined total 1985 peak population of the 17 New Hampshire towns is 191,849. Even if dealing only with the Type 2 patients, ¹it is unreasonable to assume that only 51 persons out of 191,849 would be both injured and contaminated in a serious nuclear accident involving an evacuation of the plume exposure EPZ. 51 is only .027% of 191,849. Realistically, in a serious accident scenario, thousands of people could require specialized medical care.

1. SAPL holds the position that "contaminated injured individuals" at 10 C.F.R. §50.47 (b)(12) should properly be construed to include those exposed to excessive levels of radiation as well, the so-called Type 1 patients. Excessive radiation exposure injures living tissue.

Furthermore, the capacities listed for Exeter Hospital and Pease Air Force Base hospitals should not be assumed since Exeter Hospital lies within the plume exposure EPZ and might need to be evacuated. Pease is just a short distance beyond the EPZ boundary and might conceivably also be evacuated. If evacuated, neither facility would be available for the provision of medical treatment, thereby reducing the capacity for treatment of Type 2 patients to 47. Five of the hospitals listed, Mary Hitchcock Memorial Hospital, Cheshire Medical Center, Cottage Hospital, Newport Hospital and Sceva Spere Memorial Hospital are more than 50 miles from Seabrook Station and would require significant travel time before arrival. If contaminated individuals were severely injured, they might not be able to survive the duration of the trip. Travel time would be lengthened by the congestion of the roadways in the EPZ in an evacuation scenario.

Contention 5:

The New Hampshire State and local plans are deficient in that they do not ensure that there will be adequate personnel or the timely arrival of personnel trained in radiological monitoring in the plume exposure EPZ following a release of radiation from Seabrook Station. Neither is there assurance that monitoring can be carried on for the required time frame. Therefore, the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(1), §50.47 (b)(8), §50.47 (b)(9), and NUREG-0654 II.L.7, L.8. and L. 11 and II.A. 4. are not met.

Basis: NUREG-0654 requires that each organization describe the capability and resources for field monitoring within the Plume Exposure EPZ. It further requires that there should, where appropriate, be the methods, equipment and expertise to make rapid assessments of potential or actual radiation hazards. NUREG-0654 further specifies that arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.

The Division of Public Health Services is the state agency responsible for accident assessment. Page 1.3-8 of the N.H.R.E.R.P. states that the Division of Public Health

Services will do its own monitoring in addition to maintaining contact with utility representatives. To take samples at ground level, the Division of Public Health Services personnel must get to the various monitoring locations in the Seabrook Station EPZ. The State plans say that they are to drive to the IFO/EOF in Newington, pick up equipment and proceed from there to monitoring locations. It will take, according to p. 2.5-6 of the N.H.R.E.R.P., approximately one and one-half hours to deploy field monitoring teams to a "point of readiness" in the IFO/EOF from the time the decision to deploy teams is made. Further, it states at p. 2.5-16 that state and utility monitoring teams will be dispatched jointly. If this implies that no utility field monitoring goes on until the State teams arrive, it means that for a period of over one and one-half hours, there will be no offsite ground sampling data on which to base a protective action recommendation. Even if that is not the case, it clearly does mean that there will be no State conducted field monitoring for a period of over one and one-half hours.

If an evacuation is ordered prior to the field monitoring teams getting to their locations, they will not be able to get to those locations for many hours because of the outward flow of evacuating vehicles. Timely State field monitoring will be effectively preempted under those circumstances.

The Division of Public Health Services Emergency Response Procedure for Seabrook Station lists only 11 individuals on the monitoring team. The maximum number of two-person teams is therefore five, which is hardly sufficient for covering the area of the Seabrook Station Plume Exposure EPZ. Further, NUREG-0654 requires at II.A.4. that each principal organization shall be capable of continuous (24 hour) operations for a protracted period. If available personnel were divided into two twelve hour shifts, this would allow coverage by three teams on one shift and two on the next. (Twelve hour shifts are probably not practicable given the demanding nature of the job of field monitoring.) Page 2.5-6 of the N.H.R.E.R.P. states that the Division of Public Health Services will mobilize a minimum of three two person field teams to monitor ground

level radiation. There are insufficient trained State personnel to allow this statement to be true on a continual 24 hour basis for a protracted period of time.

Contention 6:

The New Hampshire State and local plans do not meet the requirement that there be maps showing population distribution around the nuclear facility as required at NUREG-0654 J.10.b.

Basis:

The population figures in Table 1 and Figure 2 of the local plans and at Appendix E in the New Hampshire State plans are not consistent with one another and therefore are not meaningful estimates of population distribution within the EPZ. Figure 2 in the local plans show the cumulative EPZ resident population at 105,968 as compared to the 140,857 total obtained by adding the resident population figures for each Town listed in Table 1 of the local plans. That represents a discrepancy of 34,889, which is not an insignificant number. Further, p. E.9 ;in the State plan shows a cumulative EPZ resident population of 103,645.

Additionally, further Figure 2 in the local plans shows the cumulative peak EPZ population at 241,983. Adding the figures given in Table 1 for peak population, one obtains a total of 287,964. This discrepancy is even larger than that for the resident population, i.e. 45,981. Again, examination of the State plan yields a different number. The addition of the cumulative resident population from p.E.9 and the cumulative summer weekend transient population from p.E-14, yields a total of 246,701.

Because there is no internal consistency in the numbers in the planning documents, there is no possible way for those using these plans in an emergency response to determine which are the real numbers.

Contention 7:

The New Hampshire State and local plans fail to meet the requirements of 10 C.F.R. §50.47 (b)(11) and NUREG-0654 K.5.b. because there has been no showing that

the means of radiological decontamination of emergency personnel, wounds, supplies and equipment have been established. Further, there has not been a clear showing that adequate means for waste disposal exist.

Basis: The decontamination facilities for emergency personnel are inadequately described in the emergency plans and therefore do not provide reasonable assurance that proper decontamination can be effected. Page 2.7-9 of the State plan says that a contaminated person and his possessions will be sent to a "state decontamination facility".

The State plan at 2.4-4 describes such decontamination centers as follows:

"Removing radioactive material from individuals and/or equipment that may have been contaminated will occur in these facilities. Most decontamination involves relatively simple washing procedures. If special equipment is required, individuals will be transferred to facilities equipped to treat radiologically exposed individuals (see Section 2.8 of this RERP for a list of facilities).

That concludes the entire description of decontamination centers in the State plan. The local plans note that the decontamination centers will be co-located with reception centers, but neither the local plans nor host community plans describe the adequacy of the facilities to provide sufficient showering capacity for the numbers of people to be dealt with, sufficient car washing facilities for the numbers of vehicles to be expected or any provisions for decontamination of equipment or supplies. No provisions are made for isolating the contaminated water resulting from the showering and car washing activities.

As noted in Contention 4 above, the available medical facilities described in the plans are likely to be overburdened in a radiological emergency if there are large numbers of evacuees. This would obviate the possibility of emergency workers obtaining treatment for their contaminated wounds.

Provisions for waste disposal are grossly inadequate. The State plan states that each decontamination center is capable of storing a minimum of 1 cubic meter of contaminated waste and two cubic meters of contaminated personal articles for quarantine. The very next sentence states that "this is sufficient for the worst expected

decontamination required". There is no stated "maximum" capacity, so its sufficiency remains in doubt.

The provisions for waste disposal are exceedingly vague and consequently there is no sufficient basis for concluding their adequacy. Page 2.7-10 of the State plan simply states that the Division of Public Health Services will dispose of waste materials through a "local brokerage". There is no reference to any specific entity or its licensed status to accept such materials or its capacity to accept them. Without specific information as to the name, location, capabilities, and licensed status of such entity, its utility in this matter remains in doubt.

Contention 8:

The New Hampshire State and local plans fail to meet the requirements that there be adequate manpower and 24-hour per day emergency response, including 24-hour per day manning of communications links, as required by 10 C.F.R. §50.47 (a)(1), §50.47 (b)(1), §50.47 (b)(2), and NUREG-0654 II.A.1.e, II.A.4. and II.F.1.a.

Basis: There are not enough personnel at both the state level and local level to ensure an effective and continuous emergency response effort sufficient to ensure the health and safety of the public. For example, there is only one full-time police officer and four part-time police officers for the Town of Hampton Falls. The initial notification to the Town from the State Police Communication Center and Rockingham County Dispatch is to the "Police Office on Duty or On Call" according to page II-9 of the plan that has been prepared by the New Hampshire Civil Defense Agency for the Town of Hampton Falls. Hampton Falls Police Chief Andrew Christie, Jr. says that if that police officer on duty or call is out of town on an investigation or in Boston for court, for example, then there is no back-up for receipt of notification. Police Chief Christie further states that he is unable to fulfill the duties designated to him in the plan due to lack of manpower and equipment. There is no RADEF Officer for Hampton Falls and also no Transportation Coordinator.

The Kingston RERP relies on the same individual to perform the functions of Civil Defense Director and RADEF Officer. If that individual is unable to perform his functions due to illness or other circumstances the Kingston emergency response effort may be significantly impaired. A Selectman is listed as back-up for his Civil Defense functions. There is no one listed to perform his RADEF Officer functions.

The Hampton plan is similarly flawed in that one individual is listed as the Town Manager, Civil Defense Director and Health Officer.

In the Portsmouth plan, one individual listed as a back-up to the Public Works Director is a selectman in Greenland. Presumably, that individual would be contributing to the emergency response effort in Greenland and would not be available to be a part of Portsmouth's emergency response organization.

At least a half dozen of the plans do not have Fire Department personnel and Police personnel listed in Appendix A. Appendix A refers instead to attachments to the plan or to lists kept by the Fire and Police Departments. No such attachments or lists are provided in the plans.

Other towns in addition to Hampton Falls lacking a RADEF Officer are Newton, New Castle, Stratham, and East Kingston. Transportation Coordinators are lacking in East Kingston and Newton. Newton also is lacking a Civil Defense Director. These lacks are symptomatic of a deeper problem, that is, that there are not sufficient personnel in the EPZ towns listed to do all the jobs required in a full scale evacuation.

The Selectmen of Hampton sent a letter to the Governor of New Hampshire on October 29, 1985 stating their conviction that there are insufficient manpower resources to carry out an adequate emergency response in Hampton. The selectmen of Rye have unanimously asserted that they too lack sufficient manpower for an effective emergency response in Rye. The Kensington Civil Defense Director and Selectman Sandra Gavutis have stated that Kensington's plan cannot be carried out due to a lack of personnel resources. As mentioned above, Police Chief Andrew Christie, Jr. has cited inadequate

manpower as a factor adversely affecting Hampton Falls' emergency response. His views are concurred in by the Hampton Falls Selectmen. The Mayor and Police Chief of Portsmouth have also publicly stated their concern about the insufficiency of manpower.

A significant number of towns, therefore, have spoken out about manpower deficiencies. Hampton's concerns are particularly telling because of the large population on the beaches in Hampton in the tourist season and the proximity of the town to the Seabrook reactors. The State and local plans provide that the towns should request additional manpower from the State when the need arises. However, the State of New Hampshire is also deficient in manpower for its own emergency response functions. The June 27, 1985 transmittal letter to Mr. Richard H. Strome from FEMA Region I, which accompanied a preliminary review of the New Hampshire State and local draft plans, stated: "There are also serious concerns about the number of staff resources of the State (and local) levels to adequately perform [sic] all the necessary functions that are assigned to them in the planning." There is no evidence to indicate that the lack of manpower at the State level has been markedly improved. In view of these facts, it is quite unreasonable to assume that the number of local communities which would be requesting additional manpower resources from the State during an emergency could have their needs met. Therefore, there is no "reasonable assurance" that the plans can be carried out in a manner adequate to ensure public protection.

Contention 9:

The New Hampshire State plan and the local plans for Seabrook, Exeter and Kingston fail to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency because these plans are incomplete. Therefore, they do not satisfy the requirement of 10 C.F.R. §50.47 (a)(1), NUREG-0654 II.J.8 and II.J.10,1.

Basis: The State of New Hampshire plan for Seabrook Station is lacking volumes 5, 7 and, further, Appendix E, the Evacuation Time Study (Volume 6), has not been provided

to all parties. A time study is required by NUREG -0654 II.J.8. and II J.10.1. The Kingston plan is lacking special facilities plans for eight camping areas named in the plan. The Seabrook special facilities plan for the Adams Campground has not been completed. Further, there is no special facilities plan for the Region #18 Vocation Center in Exeter and no special facilities plan for the County Nursing Home in Brentwood. Therefore, there is no reasonable assurance that the people in the omitted special facilities can be adequately protected in the event of a radiological emergency.

Contention 10:

The New Hampshire State plan fails to meet the requirements set out at 10 C.F.R. §50.47 (b)(16) and NUREG-0654 II.P.3, II.P.4., II.P.5. and II.P.10. because all of the lists of names for the Seabrook Station EPZ local communities listed in Appendix K of the state plan are seriously outdated.

Basis:

It is obvious that the State Civil Defense Agency has not reviewed and updated the State plan and kept it current on an annual basis. It seems quite extraordinary that so glaring an oversight could have been made now when these plans are being put forth by NHCDA in support of Seabrook's licensing. The oversight to which SAPL refers is the inclusion at Appendix K of the State plan of lists of local officials which date back about three years. Section II. P. 4 of NUREG-0654 states that each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis (emphasis added). There is clearly a problem with the State's review and update process. As an example, p. K-18 in the State plan identifies John Walker, Robert Lessard, Brian Doherty, Ashton Norton and Louise Woodman as selectmen of Hampton and provides their work and home phone numbers. Only Mr. Walker and Mr. Norton are still serving on the Hampton Board. Sherman Wheeler is also erroneously listed as the School Superintendent. As another example, the City of Portsmouth page at K-26 lists Peter Weeks as Mayor. Mr. Weeks was succeeded in that post by Eileen

Foley and she has since been succeeded by Mary Keenan. Stanton Remick is erroneously listed as the Police Chief. He has also been replaced. Almost every town listing suffers at least one such defect. This is clear evidence that the review and update procedures are inadequate. If the people responsible for an emergency response cannot be contacted due to outdated material in the plan, the reasonable assurance standard is not met.

Contention 11:

The New Hampshire State and local radiological emergency response plans fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(10) and NUREG-0654 II.J.9. in that the Protective Action Guides shown in Table 4 of each of the local plans have no clear technical bases.

Basis: NUREG-0654 refers to Tables 2.1 and 2.2 of the EPA's Manual of Protective Action Guides and Protective Actions for Nuclear Incidents. An examination of that document reveals that Appendix C, which is to describe the rationale and technical bases for these numbers is "to be developed". Table 4 in the local plans shows that an evacuation is not mandatory until a projected whole body dose of 5 rem (5,000 millirem) is reached. Natural background radiation is less than 200 millirems/year. An evacuation would not be ordered until projected doses were 25 times 200 millirems or 5,000 millirems. Allowing the public to be exposed to over 25 times the normal amount of radiation that is normally experienced over the period of a year in a short span of time does not, in SAPL's view, "reasonably assure" that the health and safety of the public will be "adequately protected."

Contention 12:

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Specifically the plans do not analyze or account for behavioral variations among members of the

public in the event of a radiological emergency. Such considerations are required by 10 C.F.R. §50.47 (a)(1) as interpreted by NUREG-0654 App. 4 IV B. (p.4-10).

Basis: Implicit in all of the plans submitted is the assumption that the public will respond rationally and obediently to emergency notification. This assumption is false and disregards the potential for panic and its impact upon an orderly evacuation.

In sworn testimony presented on behalf of Suffolk County, New York Susan Saegert, Professor at the Center for Human Environments, City University of New York, concludes that:

"Existing psychological research suggests that a number of psychological factors may interfere with successful management of a radiological emergency. Various studies report a large discrepancy between lay opinion concerning the danger of nuclear power and expert opinion. The public tends to see the occurrence of a radiological emergency that kills large numbers of people as relatively likely. This fear is likely to influence response to an emergency in the direction of leading to either defensive avoidance of information and emergency preparedness or in the direction of a tendency to overreact. Both responses could occur simultaneously. This state of affairs is made more difficult to remedy by a history of expert underestimation of the dangers related to nuclear energy and by the technical complexity and expert disagreement about probabilities and dangers. The dangers of nuclear power presents problems of risk evaluation to both the public and the experts because of its complexity and the uncertain state of scientific knowledge. The problem of traffic congestion further complicates an evacuation. The experience of traffic congestion will add to the likelihood that people will not be able to effectively comprehend the relative advantages and disadvantages of various courses of action. It increases the likelihood of frustration and irrational behavior, including possible aggressive behavior.

Similar conclusions have also been reached in detailed studies of Long Island, New York residents living in proximity to the Shoreham Nuclear Power facility. A report prepared by James H. Johnson, Jr., Ph.D., Department of Geography, University of California, and Donald J. Zeigler, Ph.D., Department of Geography and Political Science, Old Dominion University, Norfolk, Virginia, for Suffolk County, New York, also concludes that nuclear accidents are likely to give rise to higher levels of extreme behavior than has been reported in studies of non-radiological emergencies. In general, the Ziegler and Johnson study concludes that people tend to ignore official instructions and "spontaneously evacuate" in the event of a radiological emergency.

The research of Professors Saegert, Ziegler and Johnson into the area of psychological issues related to radiological emergency planning raises serious questions about the desirability of any plan that fails to even discuss and account for behavioral variation. This is particularly true with regard to Seabrook and its proximity to extreme high population densities.

Of additional importance in this proceeding is the nature of the beaches as recreational areas. Families often split up to pursue separate interests, agreeing to rendezvous later. In the event of a sudden public notification of a radiological emergency, it is entirely reasonable that parents would not depart the area without first gathering their families together. The confusion and panic resulting from such a situation would be catastrophic to the efforts of police and other emergency personnel to initiate and maintain an orderly evacuation.

Also, resident children attend schools throughout the area, often with relocation centers different from those assigned to their parents. Confusion and panic could foreseeably result from this situation as well. Parents would be reasonably expected to attempt to pick up their children from school, or to return to the EPZ from their assigned relocation centers when their children do not show up. All reasonably foreseeable scenarios of this type would seriously disrupt the evacuation process.

Another factor that would prove a serious hindrance in assuming the safety of the public is the phenomenon of denial. There will be a segment of the population who will refuse to leave their homes when an evacuation is ordered because they will refuse to believe that there is any danger or will refuse to accept that the consequences of staying in their homes are more undesirable than the consequences of leaving their homes. No provisions are in the plans for rescuing these individuals.

A factor affecting those who do evacuate is that there are sections of the EPZ road network from which the reactors are clearly visible. The Alan M. Voorhees report alluded to the psychological effect this might have on evacuees as follows:

"Most of the traffic caught in congestion is within five miles of the Seabrook Station, with a substantial portion within direct sight of the plant. The behavior of drivers under these conditions of delay and proximity to the Seabrook Stations can only be guessed. However, any breakdown in orderly traffic flow will result in evacuation times greater than those estimated."

Due to the extent of the available literature on the subject to psychological issues and radiological emergency planning, it is crucial that the plans address the issues of behavioral response directly. Failure to do so is to ignore what lay persons and various psychological experts agree is a reasonably foreseeable result of emergency notification: panic and its negative impacts on protective response.

Contention 13:

The plans are insufficient to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency as required by 10 C.F.R. §50.47 (a)(1). Specifically, the plans neither discuss nor account for behavioral variations among designated emergency personnel that would impair or extinguish the ability to implement the plans.

Basis: There is no reason to assume, as the plans implicitly do, that emergency personnel would disregard considerations of their own personal safety and the safety of their families in a radiological emergency.

An extensive study of emergency personnel responses to an accident at Shoreham in New York raises serious questions about the reliability of such personnel in a nuclear emergency. That study, conducted by Social Data Analysts, Inc., for Suffolk County, New York, examined the response potential for such key emergency personnel as school bus drivers and firemen. The study concludes that a radiological emergency would create serious role conflicts among emergency personnel, and large numbers of individuals would see first to the safety and relocation of their families before responding to official duty.

There is no evidence to support an assumption that emergency personnel in New Hampshire would react differently, or that the role conflicts stemming from an accident

would be limited to school bus drivers and firemen. There is evidence to the contrary. School Administrative Unit 16 has rejected draft copies of proposed plans for the schools included in that administrative unit. One of the reasons underlying that action was the concern over the roles that principals and teachers were being asked to assume under the plans. Therefore, the failure of the plans to investigate and discuss response factors among emergency personnel is a serious flaw that must be addressed to meet the standard of 10 C.F.R. §50.47 (a)(1).

Contention 14:

Procedures to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ required by 10 C.F.R. §50.47 (b)(5) are inadequate in that the plans do not provide for bilingual messages for the large numbers of French-speaking individuals who are often in the area in large numbers.

Basis: Local experience in the Seacoast area, particularly in the summer months, indicates serious language barrier problems with French-Canadian visitors. These people are known to visit the EPZ area in large numbers and would be unable to respond to any emergency notifications provided in English.

At a minimum, all relevant communications and informational material presented to the public must be in both English and French. Emergency response personnel who may have to deal with non-English speaking people must be fluent in French and all such personnel must be trained in handling the behavioral difficulties that may arise as a result of the language barrier.

Contention 15:

Because there are no specific letters of agreement included in either the New Hampshire State plan or the local plans, the plans fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(3) and NUREG-0654 II.A.3 and II.B.9.

Basis: NUREG-0654 requires that each plan include written letters of agreements referring to the concept of operations between Federal, State and local agencies and

other support organizations having an emergency response role within the EPZ. The agreements are supposed to identify the emergency measures to be provided and the mutually acceptable criteria for their implementation and specify the arrangements for the exchange of information. These agreements are not in either the State nor local plans. They are neither in an appendix to the plans as required, nor is there even a signature page in the plans to verify the existence of the agreements. There are transportation, personnel and material deficiencies in the planning effort which can only be met through assistance by entities such as bus companies, ambulance services, Federal agencies, and the Red Cross. Without explicit letters confirming the nature of services to be provided, there is no reasonable assurance that those services will be available when needed. The Index of Agreements in Part 4.0 of the New Hampshire State plan does not suffice to satisfy the requirements noted in this contention for the following reasons:

1. There is no agreement with the New England Telephone Company, the Rockingham County Commissioners (for the use of Rockingham County Dispatch Center), or the U.S. Coast Guard.

2. Some of the Agreements date back a number of years. For example, the New England State Police Compact is dated 6/69. Surely, the specifics of an emergency response for the area surrounding Seabrook Station were not contemplated when this compact was signed. Therefore, this compact cannot possibly meet the requirements of NUREG-0654 II.A.3. That agreement shall identify the emergency measures to be provided, the mutually acceptable criteria for their implementation and the specific arrangements for information exchanges.

3. The Index of Agreements page refers the reader to Appendices H and I for letters of agreement with New Hampshire Hospitals and School Bus Companies. There are in those appendices no such letters. Neither are there signature pages.

4. There are no letters of agreement from school teachers, owners of towing companies and others whose participation is absolutely essential to the carrying out of an effective, adequate emergency response. NUREG-0654 II.B.9. states that copies of the arrangements and agreements reached with contractor, private and local support agencies shall be appended to the plan. Agreements are supposed to delineate the authorities, responsibilities and limits on the actions of the contractor, private organization, and local services support groups.

5. There are no letter agreements referring to the concept of operations developed between Federal, State and local governments. Local governments should either prepare letters signifying their agreement to the concept of operations set out in these plans, as specified at NUREG-0654 II.A.3, or their cooperation and ability to carry out these plans should not be assumed.

For the above stated reasons, State and local New Hampshire plans are seriously deficient and provide no reasonable assurance that the government and private entities needed to carry out an adequate emergency response either intend to do so, or are capable of doing so.

Contention 16:

The New Hampshire State and local plans do not make adequate provisions for the sheltering of various segments of the populace in the EPZ and therefore the plans fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47(b)(10) and NUREG-0654 II.J.10.a. and m.

Basis: 10 C.F.R. §50.47 (b)(10) requires that a range of protective actions be developed for the plume exposure pathway EPZ . NUREG-0654 requires that there be maps of shelter areas and the inclusion of the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. NUREG-0654 II.J.10.m. specifies that the expected level of protection to be afforded in residential and other units must be evaluated. The New Hampshire State and local plans fail to

44. Other town's plans contain similar errors but of smaller magnitude. Without sufficient bus capacity identified in advance for the non-auto owning population, there is no reasonable assurance that such transportation will be available. Therefore, there is no reasonable assurance that all members of the non-auto owning population can be adequately protected.

Contention 19:

The plans are inadequate because they fail to address the impacts of egress route flooding, excessive snow accumulation, fog, rain and icing of roadways upon an orderly evacuation. The plans cannot reasonably assure that adequate measures can and will be taken in the event of a radiological emergency, as required by 10 C.F.R. §50.47 (a)(1), without addressing the excessive snow, fog, flooding and icing issues. NUREG-0654 II.J.10.K requires that the identification of and means for dealing with potential impediments to use of evacuation routes be addressed.

Basis: Route 286 and Route 1A have been closed at various times in the past near Brown's Fish Market in Hampton due to flooding. Parts of Route 51 and Ocean Boulevard are also subject to flooding, as they were during severe winter storms during the winter of 1978-79. Excessive snowfall, which impairs road passibility, is a frequent winter occurrence in the Seabrook Station EPZ. Icy roads are also not rarely a problem in winter. Fog is not a frequent occurrence, but neither is it an unusual occurrence. Fog occurs often enough that it is a phenomenon that ought to be considered.

NUREG-0654, Appendix 4 talks about the need to consider adverse conditions in relation to evacuation times. It states: "That is, a northern site with a high summer tourist population should consider rain, flooding, or fog as the adverse condition as well as snow with winter population estimates."

Provisions are not made in these plans to route population to different parts of the road network in the event of impassibility due to flooding. Neither are there provisions to clear roads more quickly than usual in the event of excessive snowfall or freezing

It is likely that the phone system would be overloaded if an accident were to occur at Seabrook. It should be clearly established that the phones employed by the emergency response organization all do have priority status. Numbers of phone lines should be evaluated for adequacy to be sure there are sufficient lines to make all the calls necessary to schools, day care centers, nursing homes and other such facilities in timely fashion. Other systems other than the commercial phone lines must be developed to allow citizens to request assistance when needed. Without a showing that all of these things have been accomplished, it is not reasonable to assume that there is assurance that the public can or will be adequately protected.

Contention 18:

The local New Hampshire community plans of Brentwood, Exeter, Portsmouth, Seabrook and New Castle significantly miscalculated the numbers of non-auto owning population based on the percentages of non-auto owning population given in each of the above-stated plans. No buses are provided in the plans for the individuals who are not accounted for due to these miscalculations. Therefore, these plans fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47(b)(8), NUREG-0654 II.J.10.g and NUREG-0654 Appendix 4, p. 4-3.

Basis: NUREG-0654 states that there must be means of relocation of evacuees. The estimate of non-auto owning individuals in the Town of Exeter plan is set at 18%. The resident population of Exeter, according to the town's plan, is 12,081. Therefore, the non-auto owning population should be calculated as 2,175. The plan improperly states that the number is 1,798. 377 people in the Town of Exeter are therefore not accounted for in the plans for transportation of the non-auto owning population. Assuming, as the plans do, that 36 adults can be transported per bus, this discrepancy represents a shortfall of 10 1/2 buses. The Brentwood, Portsmouth, Seabrook and New Castle plans suffer similar defects. Brentwood's plan does not plan for 53 people, Portsmouth's does not plan for 114, Seabrook's does not plan for 37 and New Castle's does not plan for

not assure that adequate provisions do exist for prompt communications. The local plans state that standard telephone equipment offered to the public by the New England Telephone Company or other independent telephone companies "will be used for many of the communications requirements during an emergency." The plans go on to state that the commercial telephone system is the "primary link". The radio system serves as a back-up. An examination of the internal communications schemes portrayed in Figure 7 of each of the local town plans indicates that there are, in all cases, no two-way radio communications between the community EOC's and the schools. Further, there is no specification of the number of phone lines available at each EOC. It is unreasonable to assume that there are enough phone lines serving each EOC to permit the number of calls needed for carrying out the plans absent a specific showing that the requisite number of phone lines in fact do exist. There is no such showing in the state or local plans.

Another problem with the reliance on the commercial phone system is the fact that the system can be overloaded during an emergency. In such an instance the phone company might need to implement "line load control". That is, only the priority lines in the system will be able to get calls through. Other phones will not get a dial tone. This raises questions as to how people without transportation would be able to contact the Town transportation coordinator, as in the case, for example, of a one car family with one working parent and children. If an accident were to happen while the primary breadwinner of the family was at work, the other parent would be at home without means of transport with the children. An overload of the commercial phone system would obviate the possibility of that parent calling the EOC for transport assistance. Line load control was implemented by the telephone company when an aircraft from Pease Air Force Base crashed in Seacrest Village, Portsmouth several years ago. That was an incident which affected a very small area as compared to the area for which an emergency response is planned if an accident should occur at Seabrook.

meet these requirements because there are no provisions for sheltering the population in the beach areas and no provisions for the sheltering of the population in the many camping areas in the EPZ . In a quickly developing accident with anticipated fast release of short duration, sheltering could be the only realistic protective location that could be implemented. Evacuation of all transients is supposed to be carried out, according to the plans, if an evacuation is ordered. There is, however, no realistic description as to how this can be done. Given the current status of these plans and the lack of availability of sheltering capability for large segments of the population, a reasonable level of assurance that adequate protective measures will be available for transients in beach or camping areas has simply not been attained.

Further, no evaluation of the sheltering adequacy of the buildings housing special facilities in the plume exposure EPZ have been included as is required by NUREG-0654 II.J.10.m. For example, the Kensington Elementary School has inadequate sheltering characteristics according to the town's Civil Defense Director, Benjamin Lovell. The building has no interior rooms for sheltering the students. The rooms all have exterior exposure and significant expanses of window space. The implicit acceptance of the sheltering capabilities of the buildings housing special facilities in the plume exposure EPZ is without any sound basis. Therefore, the adequate protection of the occupants of those buildings is by no means reasonably assured.

Contention 17:

The New Hampshire State and local plans fail to make adequate provisions for prompt communications among principal response organizations to emergency personnel and to the public. Therefore, the plans do not meet the requirements of 10 C.F.R. §50.47 (b)(1), §50.47(b)(5) and (b)(6) and NUREG-0654 Planning Standard F.

Basis: NUREG-0654 requires provisions for prompt communications among principal response organizations, emergency personnel and the public. The heavy reliance in the emergency response plans upon the availability of commercial telephone service does

rain. Additionally, there are no provisions to improve visibility of the evacuation routes in the event of fogging conditions. Evacuation egress routes ought to be clearly marked with highly visible signage.

Without provisions for alternate routing and the capability to clear roadways in a very short period of time and without highly visible road markings directing evacuees in the appropriate directions, there is no assurance that an evacuation can be carried out within a time frame that reasonably assures that the public can be adequately protected.

Contention 20:

The State and local plans fail to assure that adequate measures can and will be taken to protect the health and safety of the public in the event of a radiological emergency as mandated by 10 C.F.R. §50.47 (a)(1) and NUREG-0654 II.J.10.k. Specifically, the plans fail to address the impact of limited gasoline supplies within the EPZ upon an orderly evacuation. NUREG-0654 II.J.10.k. requires that contingency measures for dealing with impediments to use of the evacuation routes be developed.

Basis: The plans do not account for a limited gasoline supply available to the general public should a full evacuation be ordered. Such supplies are limited, and it is reasonably foreseeable that numerous vehicles would stall out due to lack of fuel while sitting in an evacuation traffic jam. The potential for this happening to large numbers of automobiles along egress routes has not been adequately addressed in the plans. Consequently, local officials have no way of knowing the extent to which stalled vehicles may impede evacuation be ordered. Such supplies are limited, and it is reasonably foreseeable that numerous vehicles would stall out due to lack of fuel while sitting in an evacuation traffic jam. The potential for this happening to large numbers of automobiles along egress routes has not been adequately addressed in the plans. Consequently, local officials have no way of knowing the extent to which stalled vehicles may impede evacuation progress and precisely how many tow trucks might be needed

in order to maintain the flow of outgoing evacuation traffic. The towing companies listed in the plan do not have sufficient capability to clear the EPZ evacuation routes and there are no letters of agreement with the towing companies to provide assurance of their commitment to render such services. Towing capability is particularly crucial in areas such as Hampton Beach, where tiny bottlenecks (e.g. where Route 51 meets Ocean Boulevard) can be entirely choked off with the stalling and abandonment of only one or two cars.

Contention 21:

The plans do not provide for the equipping of the evacuation vehicles with two-way radios so that the emergency personnel involved are kept completely informed of changing conditions. The plans do not designate alternate evacuation routes to be used by contracted transportation companies in the event that reasonably foreseeable occurrences (i.e. wind shift, precipitation, traffic breakdowns) necessitate a change in the primary evacuation route during an evacuation. The plans, therefore, do not meet the requirements of 10 C.F.R. §50.47 (a)(1), (b)(5), (b)(6) and NUREG-0654 F.1.e. and E.2. Basis 10 C.F.R. §50.47 (b)(5) provides that procedures be established for notification of emergency personnel by all organizations [state & local]. 10 C.F.R. §50.47 (b)(6) further provides for "communications among principal response organizations to emergency personnel and to the public." NUREG-0654 E.2 and F.1.e reiterate the necessity of these communications and add that they should be executed promptly.

The submitted plans do not contain any references to communications with evacuation vehicles. Though a communication network is set in place to interface with state field units and local medical units, buses and other modes of transportation, which are to be used to evacuate school children, hospital patients, etc. will have no means of communicating with response organizations once they are enroute. This inadequacy is critical because large numbers of persons may be evacuated in this manner. A failure

to be able to communicate changing conditions to these evacuation vehicles could result in unnecessary delays and exposure to radiation.

A corollary consideration to this is the lack of alternate evacuation routes. Having all vehicles equipped with two-way radios would remedy the communications deficiency but would not hasten the evacuation unless preplanned alternate routes were established. Foreseeable circumstances, such as wind shifts, precipitation, accident and general traffic jams, could render useless an evacuation plan which rests on only one route of egress. The existence of alternate routes, coupled with two-way radio access to the current status of all phases of the emergency would assure the most efficacious evacuation for these vehicles. The plans failure to account for these substantiate the conclusion that the plans do not provide reasonable assurance that adequate protective measures can be taken, in accordance with 10 C.F.R. §50.47 (a) (1).

Contention 22:

The Seabrook Station 10 mile EPZ radius is not sufficiently large to provide reasonable assurance that the public can and will be protected in the event of a radiological emergency. Onshore winds are frequently strong enough to cause a drifting effect which could expose people outside the present EPZ to a radioactive plume. Yet, individuals beyond 10 miles would receive no warning to shelter and would not be in a position to effect a timely evacuation given the likelihood that evacuation routes (I-95, Route 1) would be filled to capacity. There has been no study of traffic geographics beyond the 10-mile zone. Therefore, the New Hampshire State and local RERP's do not meet the requirements of 10 C.F.R. §50.47 (a)(1) and §50.47 (c)(2).

Basis: 10 C.F.R. §50.47 (c)(2) indicates that the size of the plume exposure pathway EPZ must "be determined in relation to local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes and jurisdictional boundaries". During winter months, prevailing north-west winds would tend to carry a plume out to sea. In the summer, however, these

prevailing winds diminish and the uneven heating of land and sea cause on-shore winds (sea breezes) which have the potential, given the relatively flat topography of the coastal area, to carry a radioactive plume inland a considerable distance. Data from a 19 year study obtained from the National Climatic Data Center, indicate that such on-shore winds would occur 53% of the time in summer.

The EPZ for Seabrook Station was designated using wind data from a one year study. To assess wind characteristics adequately, data must be compiled over a longer time span. Data from the National Climatic Data Center indicate greater wind speeds than those used as the basis for the Seabrook Station EPZ . The present boundaries, which are based on insufficient data, should be extended. The present EPZ does not provide "reasonable assurance" that adequate protective measures can and will be taken to protect those individuals who could be exposed to radiation beyond the current EPZ boundary. Table 1-38 of NUREG-0396, the so-called "planning basis" document for the choice of the 10-mile EPZ, shows that doses exceeding 200 rem are possible even beyond 10 miles. A site specific consequence study at Indian Point conducted for the New York State Attorney General, et al by Palenik and Beyea found as follows:

"...early deaths can occur beyond 10 miles relatively soon after the accident. Most of these deaths will occur in the 10-20 mile sector. Prior planning for an evacuation in areas between 10 to 20 miles from the plants would reduce the expected number of early deaths in this zone.

During the Three Mile Island accident, there was consideration of an evacuation out to 20 miles (The Report of the President's Commission on the Accident at Three Mile Island, pp. 39-40).

At the Seabrook site, the weather data provides insufficient basis for reasonable assurance that significant radiation exposure to the public would not occur beyond 10 miles under severe accident scenarios. In order to protect the populace beyond 10 miles adequately, the area of emergency planning should be extended. Until it is affirmatively shown that people beyond the 10 mile radius could be evacuated without either being adversely affected by or adversely affecting the evacuation of the populace

within the current plume exposure EPZ, there is no reasonable assurance of the adequacy of public protection, as is required by 10 C.F.R. §50.47 (a)(1).

Contention 23:

The New Hampshire State and local RERP's do not meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47(b)(7) and NUREG-0654 II.G.1 and its subsections because no samples of the material that is to be disseminated to the public to inform them of how they will be notified and what their actions should be in an emergency are provided in the plans.

Basis: The information that is to be provided to the public at least annually is not provided in the state or local plans. There are included in the plans some general references to such materials, but no sample of these materials are provided. The adequacy of the materials as means of informing the public about radiation, points of contact for additional information, protective measures, and special assistance for the handicapped cannot be assessed sight unseen. Therefore, the State and local plans do not yet have a demonstrated compliance with the requirements set forth at 10 C.F.R. §50.47 (b)(7) and NUREG-0654 II.G.1 and its subsections. The public cannot be adequately protected in a radiological emergency without an understanding of the basic measures they must take to protect themselves. Therefore, these plans do not reasonably assure that adequate public protection can be achieved.

Contention 24:

The State and local RERP's do not adequately address the methods for protecting the public from consumption of contaminated food and water which originate within the 50 mile ingestion pathway EPZ. Therefore, the State and local plans fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (c)(2) and NUREG-0654 II.J.11.

Basis: 10 C.F.R. §50.47 (c)(2) indicates that "plans for the ingestion pathway shall focus on such action as are appropriate to protect the food ingestion pathway". NUREG-0654 II.J.11. thoroughly describes these "actions", which include:

1. Developing criteria for deciding whether dairy animals should be put on stored feed,
2. identifying procedures for detecting contamination, estimating dose commitment consequences of uncontrolled ingestion, imposing protection procedures (impoundment, decontamination processing, decay, product diversion, and preservation), and
3. maintaining up-to-date lists of the name and location of all facilities which regularly process milk, food, and agricultural products originating in the ingestion pathway EPZ but located elsewhere.

The State plan does not adequately comply with these requirements. There are no specific criteria for deciding when to use stored feed. There are no procedures for detecting contamination, estimating dose consequences and imposing protection procedures, and there are no lists of plants outside the EPZ which process food originating within the ingestion pathway EPZ.

The most significant element missing from the State RERP's treatment of the 50 mile ingestion exposure pathway EPZ is the lack of cross-referencing with Maine's and Massachusetts' State plans. Considerable portions of Southern Maine and Northern Massachusetts are located within the ingestion exposure EPZ. Without this cross-referencing, any assurances that adequate protective measures can and will be taken simply have no basis.

Contention 25:

The New Hampshire State and local radiological emergency response plans do not reasonably assure that the public health and safety will adequately be protected because the provisions for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement are patently lacking. Therefore, the plans do not meet the requirements of 10 C.F.C. §50.47 (a)(1), §50.47 (b)(8) and NUREG-0654 II.J.10.d.

Basis: Under the provisions of the plans, a member of the local emergency response organization is to maintain a current listing of all the residents of the community with special needs. A review of all 17 local plans reveals that not one such person in the entire 10-mile EPZ has been identified. Every one of the local plans states as follows: "At present there is no known special needs population in _____"(fill in the name of the community). It strains credulity to believe that in the entire 10-mile radius around Seabrook, no special needs population exists. An adequate system of identification would doubtless have identified a number of such individuals. Clearly, the system set out in the plans is not adequate. In Hampton Falls, for example, there is currently a person who is dying of cancer who is immobile at Curtis' Rest Home.

The reliance upon town emergency workers is not realistic because, as stated in contention #8 above, there is inadequate manpower to perform the tasks assigned. The back-up of requesting state assistance is also not realistic because the State has very limited manpower. Further, as was noted in a June 27, 1985 letter accompanying the preliminary FEMA review of the New Hampshire State and local plans. The State plan has only identified 615 buses and 31 vans (this number is not in conformance with the number of vans identified in the 17 local plans, i.e. 22) and these vehicles are all assigned to perform other functions such as transporting school children and non-auto owning individuals. There are no letters of agreement with ambulance services listed in the State plan to ensure the availability of such EMS transport in time of radiological emergency. Such services would, if available, likely be heavily burdened with other tasks such as the transport of injured individuals to hospitals. Those confined either at home or in nursing homes and other institutions at the time of a radiological emergency are not reasonably assured adequate protection without the agreements for transport services being confirmed in writing in advance, adequate manpower being assigned, and emergency medical services providing such transport having advance knowledge of the routes by which they can get to the affected homes and institutions.

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The above have been sent first-class, postage prepaid a copy of the enclosed.



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