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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

Docket Nos. 50-443-OL  
50-444-OL

(Seabrook Station, Units 1 and 2)

CONTENTIONS OF THE TOWN OF HAMPTON  
TO RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR THE TOWN OF HAMPTON,  
NEW HAMPSHIRE, NOVEMBER, 1985

INTRODUCTION

On January 17, 1986 this Board issued a Memorandum and Order which established a deadline of February 24, 1986 for filing contentions against the New Hampshire Radiological Emergency Response Plan (RERP), and against RERP for local governments filed with the State plan. The following Contentions are submitted on behalf of the Town of Hampton in opposition to the Town of Hampton RERP that was prepared and submitted by the State to FEMA.

Based on the Contentions set forth herein, the Hampton RERP violates FEMA regulations and State law. The Town of Hampton RERP further fails to provide reasonable assurance that the plan is adequate or can be implemented in the event of radiological emergency. 10 CFR, Section 50.47.

CONTENTION I

The State of New Hampshire violated FEMA regulations by denying the Town of Hampton the opportunity to prepare its own Radiological Emergency Response Plan (RERP), by failing to engage in integrated emergency planning with affected local units of government, and by failing to address substantial safety concerns raised by town officials on the inadequacy of the Hampton RERP prepared by the State. NUREG - 0654/FEMA - REP - 1, Rev. 1, pgs. 19 - 24 (hereinafter NUREG).

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BASIS: While ignoring substantial emergency planning concerns raised by Hampton officials, the State of New Hampshire prepared and submitted to FEMA a local Radiological Emergency Response Plan (RERP) for the Town of Hampton. The State thereby violated FEMA regulations by infringing upon the jurisdiction of the Town of Hampton to promulgate its own RERP and by denying Hampton officials any meaningful input into the Town emergency plan. NUREG, pgs. 19 - 24; see also 44 CFR, Section 350.5 incorporating NUREG into FEMA regulations.

NUREG provides:

Contiguous - Jurisdiction Government Emergency Planning

The concept of Emergency Planning Zones (EPZs) necessarily implies mutually supportive emergency planning and preparedness arrangements by several levels of government: federal, state and local governments, including counties, townships and even villages. .  
.There are obvious permutations and combinations of these situations but these are examples of what is desirable in terms of cross-jurisdictional emergency planning. The important point is that integrated emergency planning will benefit all of the communities within the Emergency Planning Zones. NUREG, pg. 19.

By its terms, NUREG contemplates "multi-jurisdictional" planning, NUREG, pg. 20, which confers upon each governmental unit final responsibility for promulgating its own RERP.

The purpose of multi-jurisdictional emergency planning is clear. Local officials are uniquely qualified to assess personnel, capabilities, road and traffic hazards, and population fluctuations which may significantly impact upon local emergency planning. Additionally:

Local government plans and response mechanisms are particularly important for the ten mile EPZ. This is because relatively shorter times may be available to implement immediate protective measures associated with the plume exposure pathway (sheltering, thyroid blocking, evacuation), as opposed to the generally longer times available for implementing protective measures for the ingestion exposure pathway. State government resources may be too far away from the involved local jurisdictions to be of much immediate help for a plume exposure problem in the early hours of an accident. NUREG, pgs. 20 - 21.

Since the Town of Hampton is located within the 10 mile EPZ , the Town will necessarily be required to implement and direct immediate protective measures in the event of emergency, relying exclusively on local personnel, until such time as state assistance can be provided. NUREG, pg. 20.

Given the substantial responsibilities placed upon Hampton officials to respond to radiological emergency, and the FEMA mandate for multi-jurisdictional planning, the Town must be permitted to prepare its own RERP to address significant local safety concerns.

Even assuming that "multi-jurisdictional" planning does not prohibit the State from imposing an RERP on local governments, at a minimum the State was required to provide the Town with meaningful input into its own RERP. In preparing the Hampton RERP, however, the State failed to address or remedy any of the numerous safety concerns raised by Hampton officials to the State by letter of October 29, 1985, see attached, and unilaterally terminated discussions with the Town on these issues.

The State thereby violated the integrated emergency planning between State and local governments required by FEMA. The Town of Hampton must therefore be afforded a reasonable opportunity to prepare its own RERP. Until this opportunity is provided, the Town of Hampton declines to participate in any RERP exercise since the local emergency plan, at present, cannot be implemented in the event of radiological emergency. The Town will not give tacit approval to the Hampton RERP, in which it was denied meaningful input, by participating in the RERP exercise.

#### CONTENTION II

The State of New Hampshire violated State law by denying the Town of Hampton the right to prepare and submit its own RERP to FEMA and by denying the Town any substantial input into the Hampton RERP prepared by the State. New Hampshire Revised Statutes Annotated, 107 - B(1).

BASIS: New Hampshire law provides:

Nuclear Emergency Response Plan

I. The Civil Defense Agency shall, in cooperation with affected local units of government, initiate and carry out a

nuclear emergency response plan as specified in the licensing regulations of each nuclear electrical generating plant.  
NH RSA 107-B:1.

By its terms, 107-B:1 requires a cooperative effort between state and local governments in the preparation of a local RERP. The State's unilateral termination of emergency planning discussions with local officials, however, plainly indicates that the State has abandoned its statutory obligation to cooperate with Hampton officials in the preparation of a local RERP in favor of the State's rush to present a Hampton RERP to FEMA. By failing to cooperate with local officials to resolve substantial safety concerns raised by the town, and by denying the town meaningful input into the Hampton RERP, therefore, the State violated New Hampshire law.

### CONTENTION III

The Evacuation Time Study for the Hampton RERP is based upon faulty assumptions and inaccurate factual data and thereby fails to provide reasonable assurance that adequate protective actions can be implemented, or that adequate facilities and equipment will be provided, in the event of radiological emergency. 10 CFR, Section 50.47(8), (10).

**BASIS:** The following contentions regarding the Evacuation Time Study (ETS), Appendix E, of the Hampton RERP are based upon the ETS prepared by Costello, Lomasney and De Napoli, Inc. in association with C.E. Maguire, Inc., March 1984 (hereinafter the Maguire Report). By motion filed with these Contentions, the Town of Hampton has requested additional time to respond to any updated or amended ETS that may subsequently be submitted by the State to FEMA.

The Maguire Report is based on the following inaccurate, unreasonable, or misleading assumptions:

1. The Maguire Report purportedly bases its population estimates, among other factors, upon data received from local chambers of commerce. Maguire Report III - 9. Allegedly based upon this information, the Maguire Report concludes that summer weekend transients within the Town of Hampton number 78,040, page III - 13, a resident population excluding non-auto owning individuals of 10,837, page III - 6, and an employee population of 2,845. Page III - 24. The total of these populations estimated in the Maguire Report, however, represent less than



40 percent of the peak summer population within the Town of Hampton as calculated by the Hampton Chamber of Commerce. See French Affidavit attached. The Maguire Report's reliance upon unreasonably low population estimates thereby raises substantial doubts on whether the personnel, equipment, and evacuation times contained in the report are reliable and whether an evacuation is in fact feasible utilizing this unrealistic data.

2. The Maguire Report assumes that beach visitors will be evacuated at a rate of 5.5 individuals per vehicle. Page III - 11. Even under normal conditions, it is wholly unreasonable to assume that this person to vehicle ratio is accurate. It can reasonably be assumed that a call for evacuation would precipitate panic and that many family members could be widely separated at the time the evacuation notice is given. Accordingly, it must be assumed that either substantially more vehicles will be required to evacuate the tens of thousands of beach visitors at Hampton Beach or, if additional evacuation vehicles are unavailable, these beach visitors would simply be without any reasonable means to evacuate the EPZ.

3. The Maguire Report provides for a "clear time estimate" of 5 hours 50 minutes within which to evacuate the entire 10 mile EPZ on a summer weekend under normal weather conditions. Page V - 6. Alternatively, the report hypothesizes a clear time estimate of 7 hours 40 minutes to evacuate the EPZ on a summer weekend during rain or fog. None of the clear time estimates, including those cited above, make any provision for "unexpected events" or "unusual conditions." Page V - 7. As an example of an "unexpected event," the report refers to a "vehicle breakdown on a busy evacuation route." Page V - 7. In time of mass evacuation, however, it can only be assumed that numerous vehicle breakdowns, stalled cars, gas shortages, and related events will prove to be the norm. The Maguire evacuation time estimates must therefore be dismissed out of hand as wholly unrealistic and unreasonable.

4. The Maguire Report states that such special events as Fourth of July will have no effect on the clear time necessary to fully evacuate the EPZ. Page V - 7. The Hampton Chamber of Commerce, however, has advised that the Fourth of July may increase the Town of Hampton population by as many as 100,000 individuals. See Affidavit attached. On its face, the Maguire Report's statement that an additional 100,000 individuals would have no measureable impact on clear time estimates is wholly unreasonable and it must be assumed that this substantial population increase would only further strain available local resources to respond to an emergency.

5. The Maguire Report unreasonably calculates clear time estimates on the assumption that "generally, traffic rules and

controls will be obeyed." Page II - 13. Even under normal summer driving conditions within the Town of Hampton, however, it is common for individuals to drive in the breakdown lane on Route 51, the major evacuation route leading from Hampton Beach and to otherwise routinely violate local traffic laws in an effort to negotiate normal peak traffic. In the event of mass evacuation, where panic by at least significant portions of the driving public must be anticipated, it can only be assumed that individuals evacuating in private vehicles would routinely and repeatedly violate local traffic laws in an effort to flee the EPZ.

6. The Maguire Report unreasonably assumes that "all major roads will be open and capable of carrying their full capacity." Page II - 13. The report therefore unreasonably fails to account for accident, vehicle breakdown, gas shortage, or population panic.

7. The Maguire Report assumes that certain major evacuation routes from the Town of Hampton, including Routes 51, 1A, and most of Route 1, will be converted so that all travel lanes will lead away from the EPZ. Page IV - 11, 12. In the event this scenario is carried out during an evacuation, however, the report fails to account for how State representatives, other emergency personnel, and evacuation vehicles located outside the EPZ will be able to enter the evacuation area to perform their responsibilities mandated by the Hampton RERP.

8. The Maguire Report recognizes that more than one-half (467) of the total of 979 buses needed to fully evacuate the EPZ are located more than 20 miles from Seabrook Station. Page IV - 25. For reasons set forth above, it is unreasonable to assume that these numerous evacuation vehicles could promptly, if ever, reach the evacuation site in view of the mass of private vehicles exiting from the EPZ in time of evacuation. If, as recommended by the Maguire Report, travel lanes within the EPZ shall be converted to lead away from the evacuation area, this would only further impede support personnel and evacuation vehicles from reaching the EPZ.

#### CONTENTION IV

The Hampton RERP fails to provide adequate emergency equipment to support an evacuation in the event of radiological emergency. 10 CFR, Section 50.47(8).

BASIS: NUREG requires that each local RERP include written agreements with any organization serving an emergency response role within the emergency planning zone. NUREG, pg.

32(3). The State has entered into three agreements with transportation companies to provide buses and vans to the Town of Hampton in the event of evacuation. See attached. Under these agreements, the Town of Hampton will be provided with only sixty-seven buses and two vans for an evacuation emergency. To evacuate the anticipated populations from schools, other special facilities, and the non-auto owning residents of the town, however, the Hampton RERP requires a minimum of seventy-four buses, twelve vans, and twenty-three EMS vehicles. RERP, pgs. II-28,29. On its face, therefore, and even using State projections, the evacuation transportation allocated to Hampton is plainly inadequate to meet town needs.

Additionally, while the RERP makes provision for providing transportation to non-auto owning residents of Hampton, the plan does not provide for any transportation for vacationers, transients, or other non-resident individuals who may lack their own transportation in the event of emergency. In view of the substantial number of tourists and transients coming to Hampton during the summer months, it is only reasonable to assume that a significant number of additional public transportation vehicles will be required in the event of evacuation.

Finally, although three agreements for bus and van transportation for Hampton have been executed, only the Berry Transportation Company of North Hampton is located in reasonable proximity to the Town of Hampton in the event evacuation is required. The Jan-Car Leasing Corporation of Nashua, and the Timberland Transportation Company of Salem, are located in the south central portion of the state, thirty-five and forty miles respectively from the Town of Hampton. Since under the RERP, individuals evacuated from Hampton will be taken to Nashua, RERP, pg. II-17, the buses attempting to reach Hampton for evacuation purposes will be required to maneuver through evacuation traffic leaving Hampton. The likelihood of substantial delay, if not impossibility, of evacuation vehicles reaching Hampton therefore raises significant questions on the feasibility of the evacuation transportation provided to the town under its RERP. The Hampton RERP therefore fails to provide reasonable assurance of control of access to evacuated areas and fails to consider the potential impediments of evacuation traffic in promptly providing evacuation vehicles to the town. NUREG, pg. 63, Protective Response.

#### CONTENTION V

The Hampton RERP fails to provide reasonable assurance that evacuation procedures appropriate to the locale can be implemented in the event of radiological emergency. 10 CFR, Section 50.47(10).

BASIS: The present road system available to Hampton residents and transients is wholly inadequate to implement an evacuation in the event of radiological emergency. As Town Selectmen advised the State by letter of October 29, 1985, "Nuclear plant owners and regulators have known for over 6 years that evacuation plans would be necessary; during that time no serious work has been done on Seacoast roads nor do there seem to be plans to improve these roads significantly." To date, the Town has received no response whatsoever from the State concerning these substantial emergency planning concerns.

Many of the evacuation routes prescribed in the Hampton RERP are narrow, two-lane roads which may easily be blocked by accident or vehicle breakdown. Hampton RERP II - 31. Route 51, which is the main access road from Route 95 to Hampton Beach, could reasonably be expected to become impassable either by the tens of thousands of beachgoers attempting to evacuate the town or by emergency personnel attempting to reach traffic control points. Route 51 also suffers from a serious bottleneck at the Tide Mill Bridge.

The Hampton RERP further fails to give consideration to the fact that Route 1, during the summer months, is frequently comparable to a parking lot even under normal driving conditions. The State, however, in preparing the Hampton RERP, has elected to ignore these substantial safety concerns by Town officials.

The Hampton RERP provides for evacuation to the reception center located in Nashua, New Hampshire. RERP II - 17. The Hampton RERP therefore fails to account for the fact that wind direction or other adverse weather conditions could direct the plume exposure pathway directly towards the evacuation center. It is only reasonable that the plan provide for alternative evacuation centers under this scenario to insure adequate safety protection to the public. Under the Hampton RERP, no alternative reception centers or evacuation sites are provided.

#### CONTENTION VI

The Hampton RERP fails to demonstrate that local personnel are available to respond and to augment their initial response on a continuous basis in the event of radiological emergency. 10 CFR, Section 50.47(b)(1).



BASIS:

(A) Population estimates. In establishing adequate levels of local personnel to respond in the event of a radiological emergency, the Hampton RERP relies upon a "peak seasonable population" of 110,000 for the Town of Hampton. This population estimate is purportedly "the maximum population which may be expected in the Hampton area at any time during the peak summer months," Hampton RERP, pg. I-11, and was computed utilizing second hand information prepared by non-local sources. The Hampton RERP thereby violates FEMA regulations since "estimates of transient population shall be developed using local data such as "peak tourist volumes." NUREG, Appendix 4 - 3.

By letter of October 29, 1985, the Town of Hampton specifically advised the State that the Hampton RERP peak population estimate of 110,000 was substantially below traffic counts and local business figures. As set forth on the attached Affidavit of Glen French, President of the Town of Hampton Chamber of Commerce, the local Chamber of Commerce routinely relies upon population estimates of between 150,000 to 200,000 people per day for the Town of Hampton during the summer season. As many as 250,000 people can be expected within the town on each day over the Fourth of July weekend.

The State therefore relies upon a peak population estimate less than one-half of actual figures, as determined by local officials uniquely qualified to make these computations based upon parking, both legal and illegal, business receipts, and seasonal shifts in the demand for municipal services. At a minimum, NUREG, Appendix 4 - 3 requires the State to fully explore with local officials the basis for the disparity in State and local population figures. The State, however, terminated all discussion on this issue.

Necessarily, the State's reliance upon unreasonably low population estimates raises substantial questions on the adequacy of local personnel allocated to the Town under the RERP to respond to a radiological emergency.

(B) Police Departments. The Hampton RERP provides that a total of 80 police officers and personnel will be available to respond to a radiological emergency. Hampton RERP, Appendix C-1. These figures are misleading and fail to account for the fact that 50 of the 80 police personnel are "special officers" hired by the department on a part time or seasonal basis. These special officers therefore lack the experience, skill, and training necessary to promptly implement adequate protective responses in the event of radiological emergency.

(C) Department of Public Works. The Hampton RERP provides that a total of 60 personnel are available from the Hampton Public Works Department to implement protective responses in the event of radiological emergency. Hampton RERP, Appendix C-3. These figures are misleading. Of the 60 department personnel, 24 of these individuals constitute "temporary" employees, who, by reason of inadequate training and experience, cannot reasonably be expected to promptly and appropriately implement necessary evacuation procedures. Similarly, an additional 19 members of the Public Works Department are routinely employed in waste water treatment and sewer maintenance. Accordingly, these individuals cannot reasonably be expected to implement the traffic control, evacuation transportation, or maintenance of evacuation routes which represent the primary responsibilities of the Hampton Public Works Department in the event of evacuation. Hampton RERP, IV - 25-29.

The remaining department personnel consist of the director and 16 highway personnel upon which would fall primary responsibility for initiating and implementing protective responses in the early stages of a radiological emergency. See NUREG, pg. 20. These duties include:

1. Responsibility for evacuation of all individuals without automobiles, families without the use of their vehicle, and people with special transportation needs. NUREG, Appendix IV - 27(7). Plainly the limited staff of 17 in the Public Works Department who are familiar with highway and transportation problems are wholly inadequate to insure the transportation of the thousands of individuals who may be located on the beach at the time evacuation is implemented, even assuming this was the sole function to be performed by the department in the event of radiological emergency. The additional and substantial duties of the department to canvas the town and direct evacuation of special needs individuals, families, vacationers, and other non-auto owning individuals, merely underscores the gross inadequacy of local public works personnel to meet their responsibilities under the RERP. 10 CFR, Section 50.47(b)(1).

2. Under the Hampton RERP, the Public Works Department is responsible for ensuring that "all evacuation routes are serviceable throughout the course of an evacuation." Hampton RERP II - 31. Clearly the available Public Works Department personnel are inadequate even to carry out this single function mandated by the Hampton RERP.

More significantly, the Hampton RERP unreasonably assumes that maintaining accessibility of evacuation routes will "entail normal adverse weather route maintenance only." RERP, pg. II - 31. The RERP therefore unreasonably fails to account

for accidents, breakdowns, driver disobedience, panic, and gas shortages which must be reasonably anticipated in the event of mass evacuation. The Hampton RERP therefore fails to provide reasonable assurance that the town has adequate staff to carry out its evacuation responsibilities, NUREG, pg. 31, Assignment of Responsibility, and the RERP relies upon an unreasonable and unrealistic model in determining staff capability to implement the plan. NUREG, pg. 61. Protective Response.

(D) Selectmen. The Board of Selectmen for the Town of Hampton are provided ultimate authority to direct radiological emergency operations for the Town. Hampton RERP I - 16. The RERP ignores the fact, however, that Selectmen are only part-time officials who may have full-time jobs even outside the Town of Hampton. It is reasonable to assume that at least certain members of the Board of Selectmen would be unavailable to promptly respond, implement, and direct an appropriate protective response. Additionally the Hampton Selectmen are annually elected which may thereby seriously compromise effective RERP education and training for newly elected officials.

#### CONTENTION VII

Hampton RERP exercises are inadequate to permit a reasonable evaluation of major portions of the Town of Hampton's emergency response capabilities. 10 CFR, Section 50.47(14).

**BASIS:** Given the substantial deficiencies, as set forth above, in the Hampton RERP, and the State's failure to address the town's specific concerns over RERP inadequacies, the Town of Hampton officials have advised the State that the town will not participate in the RERP exercise currently scheduled for February 26, 1986. The Town of Hampton therefore declines to give tacit approval to a local plan in which they were denied meaningful participation and input.

Prior to approval of state or local RERP, FEMA regulations require that state and local government emergency personnel participate in a RERP exercise "in sufficient numbers to verify the capability to respond to the actions required by the accident scenario." 44 CFR, Section 350.2(j); 350.9. Since no local Hampton officials will be participating in scheduled exercise, the State exercise will not provide any reasonable assurance that the plan in fact can be implemented in time of emergency and, absent local participation, FEMA should decline to approve the RERP for the Town of Hampton.

Even assuming that, for purposes of the exercise, the State utilizes State personnel to carry out local functions established by the RERP, in the event of actual emergency those State officials will likely be far removed from the site of the accident and unable to immediately implement reasonable protective measures. As presently designed, therefore, the RERP exercise cannot show personnel capability for implementing the RERP in time of crisis.

#### CONTENTION VIII

The Hampton RERP fails to provide for adequate emergency facilities to support an emergency response. 10 CFR, Section 50.47(8).

BASIS: In preparing the Hampton RERP, the State relies upon a "shelter-in-place" concept as a "valuable protective action" (in) that it can be implemented quickly, usually in a matter of minutes." RERP, pgs. II-25, 26. The Hampton RERP acknowledges, however, that "sheltering may not be considered as a protective action on Hampton Beach during the summer." RERP, pg. II-25. The plan thereby fails to provide reasonable assurance that adequate and immediate protection measures will be available to the thousands of beachgoers in the event of emergency. Under its RERP, therefore, the Town is required to rely upon evacuation as the sole means of avoiding radiological exposure to large segments of the population. Since a "major portion" of radioactive material may be released within one hour of the initiating event, NUREG, pg. 17, and present estimates indicate evacuation could take up to seven and one-half hours, RERP, II-32, RERP measures for evacuation are a wholly inadequate protective response to meet an emergency.

SHAINES & McEACHERN

By Matthew T. Brock

Matthew T. Brock  
Attorney for the Town  
of Hampton, NH



CERTIFICATE OF SERVICE

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I, Matthew T. Brock, one of the attorneys for the Applicants herein, hereby certify that on the 21st of February, 1985, I made service of the within document by mailing copies thereof, postage prepaid, to:

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