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OFFICE OF THE SECRETARY  
DOCKETING & SERVICE  
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February 21, 1986

Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTN: Public Proceedings Branch

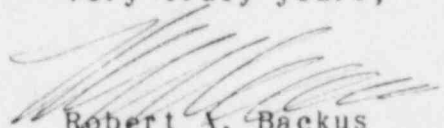
RE: Public Service Company of New Hampshire, et al  
Docket Nos. 50-443 OL - 50-444 OL

Dear Sir:

Pursuant to the Commission's Rules and Regulations, there are enclosed for filing in the above-captioned matter one signed and two conformed copies of the Contentions for the Town of South Hampton, with certificate of service attached.

We also wish to join in the Contentions filed by Hampton Falls and the Seacoast Anti-Pollution League.

Very truly yours,



Robert A. Backus

RAB/sld

Enc.

cc: All parties on the service list

8602250317 860221  
PDR ADOCK 05000443  
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Contention 1:

The RERP for South Hampton fails to provide "reasonable assurance" because, contrary to NUREG-0654 A.3, the plan includes no written agreements referring to the concept of operations or signatures of local agencies.

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Basis: Although a signature page was provided in the September, 1984 draft of the South Hampton RERP, it has now been eliminated. No agreements with the town's teachers, or voluntary town workers, have been obtained.

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REGISTRATION  
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Contention 2:

The RERP for South Hampton fails to provide reasonable assurance because, contrary to NUREG-0654 A.4, the town lacks the capacity for twenty-four hour continuous operation for a protracted period.

Basis: All town personnel are volunteers, with insufficient backup to provide twenty-four hour coverage. This is true of both the police and fire departments, where even the chiefs are part-time, and many officers are not available because of other jobs.

Contention 3:

The RERP for South Hampton fails to provide reasonable assurance because, contrary to NUREG-0654 C.4, it contains no letters of agreement from voluntary police officers, voluntary firemen, other emergency workers, school teachers, transportation companies and bus drivers. It also contains no agreements from Midway Excavators and personnel at the Tewksbury Pond Campground.

Basis: The number of available personnel at the Tewksbury Pond Campground, which has a peak population of 1,500 (about twice that of the size of the town) is exaggerated.

Contention 4:

The RERP for South Hampton fails to provide reasonable assurance because, contrary to NUREG-0654 E.5., reliance on a commercial FM radio station WOKQ, for follow-up information, is inadequate.

Basis: The town of South Hampton will need to guide its residents on the basis of the particular situation in the town, and appropriate responsive action cannot be assured by a broadcast over a commercial FM radio station. The NUREG criteria suggest a notification include the EBS, but in the case of South Hampton, exclusive reliance on the EBS will be inadequate since some households and campers will not have a working FM radio, specially in the event of power outage.

Contention 5:

The RERP for South Hampton fails to provide reasonable assurance because contrary to NUREG-0654 E.7, the plan does not contain draft public messages.

Basis: Some communication instruction must be available from local South Hampton officials and from the special facilities, Barnard School and Tewksbury Pond Campground.

Contention 6:

The RERP for South Hampton fails to provide reasonable assurance because, contrary to NUREG-0654 H.3, the town of South Hampton does not have a EOC capable for use in directing and controlling response functions.

Basis: The plan describes the South Hampton EOC as located in the fire station, states that it has ample space to accommodate all key town officials, and a generator to supply backup power. The town does not have an EOC, and the location pictured (the fire station) does not have adequate accommodations, especially in the winter, and it has neither a generator nor the two-way radio communications with the school or with State Civil Defense as indicated in the plan.

Contention 7:

The RERP for South Hampton fails to provide reasonable assurance because contrary to NUREG-0654 J.10.a, there has been no provision made for sheltering residents at the Tewksbury Pond Campground, despite a peak population of 1,500.

Basis: The Tewksbury Pond Campground can contain a peak population of 1,500, greater than the permanent residents of the town. No provision has been made for sheltering

of these persons, nor has there been any adequate basis for determining that sheltering permanent residents will be adequate, given the air exchange rates of typical housing.

Contention 8:

The RERP for South Hampton fails to provide reasonable assurance because, contrary to NUREG-0654 J.10.d, it fails to provide for protection of those persons whose mobility may be impaired due to such factors as institutional or other confinement.

Basis: The South Hampton plan states that there is no known special needs population in South Hampton. Planning, however, is based on the assumption that demand for one special needs vehicle exists. The town contends that the plan is inaccurate in this regard and fails to meet the NUREG criteria. There are in fact a significant number of special needs citizens in South Hampton, who are either bedridden or blind or have other disabilities. South Hampton has no special needs vehicles and it is unreasonable to assume that emergency workers, who must stay in South Hampton to direct the emergency response, could use their vehicles to transport these people to the Public Works facility in Nashua.

The estimates for the non-auto owning population fail to take into account the population of the Tewksbury Pond Campground. The plan also erroneously states that a list of the non-auto owning population exists. The plan is unworkable in that it will not be possible to locate the non-owning residents and pick them up in a single pass through the town before traveling to Nashua. The town has no assurance, by means of contract, that vehicles will be available and will travel to and find citizens of South Hampton. The town further contends that the phone system may not be available to request assistance in transportation.

Contention 9:

The South Hampton RERP lacks reasonable assurance because, contrary to NUREG-0654 J.10.h. and J.12., the Nashua Public Works facility will lack adequate shelter for all potential evacuees, and will lack adequate medical and decontamination facilities.

Basis: The means for assuring decontamination of emergency personnel, supplies and equipment, and for waste disposal, have not been reasonably assured, since state DPHS may be inaccessible, lack necessary personnel, and South Hampton local personnel who have not been trained in DPHS procedures.

Contention 10:

The South Hampton RERP fails to provide "reasonable assurance" in that, contrary to NUREG-0654 0.1. on page 75, local personnel have not received adequate training. This is based on lack of staff to fill positions, lack of equipment, and other considerations.

CERTIFICATE OF SERVICE AND SERVICE LIST

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February 21, 1986

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

  
Robert A. Backus