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RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 SEP -7 P6:51

ATOMIC SAFETY AND LICENSING BOARD

Before the Administrative Judges:  
Sheldon J. Wolfe, Chairman  
Emmeth A. Lubke  
Dr. Jerry Harbour

OFFICE OF SELECTMAN  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	Docket Nos. 50-443-OL-1
	)	50-444-OL-1
PUBLIC SERVICE COMPANY	)	(On-Site EP)
OF NEW HAMPSHIRE, ET AL.	)	
	)	
(Seabrook Station, Units 1 and 2	)	September 6, 1988
	)	

MASSACHUSETTS ATTORNEY GENERAL'S  
ADDITIONAL RESPONSES TO INTERROGATORIES  
AND PRODUCTION OF DOCUMENTS

Introduction

Pursuant to the Memorandum and Order of the Board dated August 22, 1988, the Massachusetts Attorney General ("Mass AG") responds to the Applicants' discovery requests as follows:

A. Trial Preparation Materials

Response: The documents described in Mass AG's Response to First Request for Production of Documents are attached hereto.

B. Answers to Interrogatories 6 and 7

6. Has any representative of or person employed by the Department of the Attorney General of the Commonwealth been in contact with any selectman, civil defense director or other official of Amesbury, Merrimack, Newbury, West Newbury,

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Newburyport, Salisbury or Haverhill concerning any actual or proposed siren warning system for Seabrook Station? If so, please:

(a) Identify each selectman, civil defense director or other official who was contacted, and the official, representative, or employee who contacted them.

(b) Describe in detail the date, time, manner, place, and substance of the communication.

(c) Identify and produce every document that reflects, refers to, or relates in any way to any such contact.

Response 6: The Mass AG has already produced a town ordinance (pertinent to the town of Amesbury) and a communication related thereto. Other than this, the Mass AG knows of no other such ordinance. In addition, the Mass AG knows of no communication with a town official which would contain probative evidence bearing on the interpretation of any ordinance.

7. Has any other official, representative, or employee of the government of the Commonwealth of Massachusetts been in contact with any selectman, civil defense director or other official of Amesbury, Merrimack, Newbury, West Newbury, Newburyport, Salisbury or Haverhill concerning any actual or proposed siren warning system for Seabrook Station? If so, please:

(a) Identify each selectman, civil defense director or other official who was contacted, and the official, representative, or employee who contacted them.

(b) Describe in detail the date, time, manner, place, and substance of the communication,

(c) Identify and produce every document that reflects, refers to, or relates in any way to any such contact.

Response 7: The Mass AG knows of no communication with a town official which would contain probative evidence bearing on the interpretation of any ordinance.

C. Supplemental Answers

8. Please state in detail all the facts underlying the Mass AG's assertion that "the VANS and the New Hampshire fixed sirens because of their locations, height, acoustic range and number, do not provide tone or message coverage for essentially 100 percent of the population in the Massachusetts plume exposure pathway EPZ at the sound pressure levels required in NUREG-0654 and FEMA-REP-10," and explain exactly how those facts support the assertion.

Response 9: The Mass AG has no additional information at this time. The Mass AG's acoustic consultant will be conducting a study of the tone and message coverage at 123 dB(c), as opposed to 134 dB(c). The Mass AG believes this study will show that tone and/or message coverage is inadequate.

10. Please identify every segment of the population in the Massachusetts plume exposure pathway EPZ which the Mass AG contends would not receive tone or message coverage at the sound pressure levels specified in NUREG-0654 and FEMA-REP-10 from the VANS and the New Hampshire fixed sirens, state how many people are involved in each instance, and state what sound pressure levels those segments of the population would receive.

Response 10: See Response to Interrogatory No. 8.

11. Please identify every local ordinance which the Mass AG contends would prohibit the Applicants from operating their staging areas and from operating their VANS vehicles at the pre-selected acoustic locations, stating in each case exactly how each ordinance acts to prohibit the operation.

Response 11: The Mass AG has no additional information with which to supplement previous responses.

12. Please state in detail all the facts underlying the Mass AG's assertion that "the fourteen VANS locations are physically inaccessible to the VANS equipment", define precisely what is meant by "physically inaccessible," and explain exactly how those facts support the assertion.

Response 12: On August 10, 1988, representatives of the Mass AG's office viewed the acoustic locations and took

photographs showing the accessibility, or lack thereof, of each such location. Based on that information, the Mass AG believes that the following locations are inaccessible: VL-02; VL-03; VL-06; VL-12; VL-13. Copies of these photos are attached.

18. Please state in detail all the facts, analyses and estimates supporting the Mass AG's assertion that "the time needed for driver alert, dispatch, route transit, setup and activation in accordance with NRC regulations will exceed 15 minutes for many of the VANS vehicles in optimum weather conditions," and explain exactly how those facts support the assertion.

Response 18: In an earlier response, the Mass AG estimated that performance of various functions inherent in completion of VANS siren notification (i.e., dispatch, set-up, activation) would entail a total of nine (9) minutes. See Mass AG Response to First Set of Interrogatories, No. 20. Thus, actual transit time can be no greater than six (6) minutes in order for the VANS system to work within the prescribed fifteen (15) minute time frame.

Based on transit times supplied by the Applicants and based on transit times recorded by representatives of the Mass AG's office during a preliminary investigation, the following VANS transit routes take longer than 6 minutes: VL-01; VL-03; VL-07; VL-08; VL-09; VL-10; VL-11; VL-12; VL-15; VL-16S.

Whereas the aforementioned routes were timed both by the Applicants and the Mass AG during light to moderate traffic and at times when beaches were not frequented, the transit time

involved when beaches are populated and/or during heavier traffic flow and/or during adverse weather would result in significantly longer transit times. In those cases, the aforementioned routes would be even further out of the prescribed time frame and other routes which may have previously taken less than six (6) minutes would similarly fall out of the required range.

19. Please state in detail all the facts and estimates underlying the Mass AG's assertion that "in poor weather, heavy traffic, and nighttime conditions the times needed to accomplish these tasks will increase," and explain exactly how those facts support the assertion.

Response 19: The Mass AG has no additional information.

20. Please state in detail how long the Mass AG contends it will require to perform . . . the following function[s], for (1) optimum weather conditions and (2) poor weather, heavy traffic, or nighttime conditions, and state in detail all the facts underlying [subsection (e)] and how those facts support the answer: (e) VANS vehicle proceeds to acoustic location;

Response 20(e): See Response to Interrogatory 18.

Respectfully submitted,

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ATTORNEY GENERAL  
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By: 

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DATED: September 6, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket No.(s)  
50-443/444-OL-1  
(On-site EP)

CERTIFICATE OF SERVICE

I, Pamela Talbot, hereby certify that on September 6, 1988, I made service of the within MASSACHUSETTS ATTORNEY GENERAL'S ADDITIONAL RESPONSES TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS, by first class mail, or by Federal Express as indicated by [\*], or by hand delivery as indicated by [\*\*], to:

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Dated: September 6, 1988