

RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 SEP 12 P2:30

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE GENERAL COUNSEL  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al.  
(Seabrook Station, Units 1 and 2)

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} Docket Nos. 50-443-0L-1  
50-444-0L-1  
Offsite Emergency  
Planning Issues

NRC STAFF'S FIRST SET OF INTERROGATORIES AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE  
TOWNS OF AMESBURY, NEWBURY, SALISBURY, WEST NEWBURY,  
AND MERRIMAC, AND THE CITY OF NEWBURYPORT

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, the NRC Staff hereby request that the towns of Amesbury, Newbury, Salisbury, West Newbury, and Merrimac, and the city of Newburyport ("Intervenor" or "Intervenors") individually respond to the following interrogatories, and produce for inspection and copying the documents requested below.

Each interrogatory shall be answered separately and fully and shall include all pertinent information available to the above-noted parties, their officers, employees, directors, advisors, representatives, or counsel, based upon the personal knowledge of the person answering. The production of the documents requested herein shall take place at the Hearing Division, Office of the General Counsel, Nuclear Regulatory Commission, 11555 Rockville Pike, Rockville, Maryland.

Instructions

A. To the extent that Intervenors do not have specific, complete, and accurate information with which to answer any interrogatory, Inter-

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venors should so state, and the interrogatory should be answered to the extent information is available, identifying each person who is believed to have accurate information with respect thereto. Where exact information is not available, estimated information should be supplied; the answer should state that the information is an estimate and the basis on which the estimate was made. Where appropriate, the upper and lower boundaries of the estimate should be given.

B. Each interrogatory shall be deemed to be continuing, and intervenors are requested seasonably to supplement answers with additional facts, documents, information, and names of witnesses which become known, in accordance with § 2.740(e)(1) and (2) of the NRC's Rules of Practice.

C. The words "and" and "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

D. Wherever appropriate, the singular form of a word shall be interpreted in the plural, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

E. Wherever appropriate, the masculine form of a word shall be interpreted as feminine, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

F. Please produce each document in the form and condition in which it exists on the date of service of this request, including all comments,

notes, remarks, and other material that may have been added to the document after its initial preparation.

G. If Intervenors object to or claim a privilege (attorney-client, work product, or other) with respect to any interrogatory or document request, in whole or in part, or seek to withhold documents or information because of the alleged proprietary nature of the data, please set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Licensing Board to determine the validity of the objection or claim of privilege. This description by Intervenors should include with respect to any document: (1) author, addressor, addressee, recipients of indicated and "blind" copies together with their job titles; (2) date of preparation; (3) subject matter; (4) purpose for which the document was prepared; (5) all persons to whom distributed, shown, or explained; (6) present custodian; (7) all persons believed to have a copy of the document; and (8) the nature of the privilege or objection asserted.

H. For any document or part of a document that was at one time, but is no longer, in Intervenors' possession, custody, or control, or which is no longer in existence, or which cannot be located or produced, identify the document, state where and how it passed out of existence or why it can no longer be located and the reasons therefor, and identify each person having knowledge concerning such disposition or loss and the contents of the document, and identify each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

I. When, in order to answer a question fully or accurately, it is necessary to distinguish between the responses of individual Intervenors

or to identify individual intervenors, such distinctions or identifications should be made in the answer.

Definitions and Guidelines to be Used  
in Responding to this Request

1. The word "document" as used herein shall mean any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, films, computer storage devices or any other medium and shall include, without limitation, matter in the form of books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes, procedures, orders, instructions, directions, training materials, records, correspondence, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, photographs, and any published materials and shall also include, without limitation, originals, copies (with or without notes or changes thereon) and drafts.
2. The word "communications" shall mean correspondence, contact, discussion, or any other kind of written or oral exchange between two or more persons or entities including, but not limited to, all telephone conversations, face-to-face meetings or conversations, visits, conferences, internal and external discussions, and exchange of a document or documents.
3. Applicants request that documents produced in compliance with this request be accompanied with an indication as to the particular paragraphs under which the documents are being produced.
4. The word "emergencies" shall mean radiological and nonradiological emergencies, and shall include all natural and "manmade" disasters such

as floods, tornadoes, fires, hurricanes, earthquakes, riots, industrial accidents, transportation accidents, accidents involving radiation or radiological materials, and accidents involving any other hazardous or dangerous materials.

5. "Intervenor" or "Intervenors" means the towns of Amesbury, Newbury, Salisbury, West Newbury, and Merrimac, and the city of Newburyport, or any of them, or any agency thereof and any agent, employee, consultant, contractor, technical advisor, representative or other person acting for or on behalf of them, or at their direction and control, or in concert with or assisting them.

6. "Contractor" means any person, not affiliated with Intervenors, who performed work concerning Seabrook on behalf of Intervenors and/or pursuant to a contract with Intervenors or sub-contractors who performed work on behalf of a contractor with whom the person was not affiliated and pursuant to a contract with such contractor. A person other than a contractor, who contracts with the subcontractor, shall be deemed a sub-contractor.

7. "Concerns," "concerning," or any other derivative thereof, includes referring to, responding to, relating to, pertaining to, in connection with, compromising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting, and constituting.

8. "Identify" when used in reference to a natural person means to set forth the following:

1. his name;
2. his last known residential address;

3. his last known business address;
  4. his last employer;
  5. his title or position;
  6. his area of responsibility;
  7. his business, professional, or other relationship with Intervenor; and
  8. if any of the above information is changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time period referenced in the interrogatory.
9. "Identify" when used in reference to a corporation or other entity that is not a natural person shall mean to set forth the following:
1. the full name of such person, including its legal name and any assumed or trade names under which it transacts or has transacted business;
  2. the nature or form of such a person, if known;
  3. the address of its principal place of business or the principal place where such person is to be found;
  4. whether intervenors have or have had any relationship or affiliation with such person, its affiliates or subsidiaries, and, if so, a description of such relationship; and
  5. if any of the above information has changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current

information as well as the information applicable to the time referenced in the interrogatory.

10. "Identify" when used in reference to a document shall mean to set forth the following:

1. its title;
2. its subject matter;
3. its date;
4. its author;
5. its addressee;
6. its file designation or other identifying designation; and
7. its present location and present custodian.

11. "Identify" with respect to a contact or communication shall mean to set forth the following:

1. the date of the communication;
2. the place of the making and place of receipt of the communication;
3. the type and means of communication;
4. the substance of the communication;
5. each person making a communication, and his location at the time the communication was made;
6. each person to whom the communication was made, and his location at the time the communication was made;
7. all other persons present during, participating in, or receiving the communication and the location of each such person at the time;

8. each document concerning such communication; and
9. each document upon which the communication is based or which is referred to in the communication.

Interrogatories and Requests for  
Production of Documents

1. Identify and supply each document containing procedures, plans, orders, instructions, directions, and training materials of the Inter-venors for any action in the event of:
  - (a) a radiological emergency or disaster stemming from a nuclear plant accident whether the plant is located inside or outside of Massachusetts;
  - (b) other radiological emergencies or disasters; and
  - (c) all other "emergencies" or disasters as defined in paragraph 4 of the above definitions.
2. With regard to each document set out in response to Interrogatory 1, describe the functions in emergencies of any of the following categories of personnel:
  - (a) State and local police, to include persons employed full or part time, and both private and public security personnel, such as special officers and deputies;
  - (b) Civil Defense personnel;
  - (c) Professional or volunteer fire-fighting personnel;
  - (d) First aid and rescue personnel;
  - (e) Local support services personnel including Civil Defense/ Emergency Service personnel;



- (f) Medical support personnel;
- (g) Emergency Service personnel;
- (h) Health and Environmental Department personnel;
- (i) National Guard, Militia or Reserve personnel;
- (j) Boards of Education, School Boards or Departments, and teachers;
- (k) Employees of all other State, local or municipal departments or agencies;

(l) Individuals obligated to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements; and

(m) Individuals available to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements.

3. Set out the training each of the category of personnel set out in Interrogatory 2 has to perform its function in an "emergency."
4. Identify the Massachusetts Civil Defense agency areas in which the Seabrook plume emergency planning zone (EPZ) is located. Provide the Civil Defense Plans for those areas and for the Commonwealth.
5. Identify the number of individuals in each of the personnel categories listed in Interrogatory 2(a)-(m), and the number of such personnel: (a) within the 10-mile EPZ plume exposure pathway; (b) from 10 to 25 miles of Seabrook Station; (c) from 25 to 50 miles of Seabrook Station; (d) from 50 to 100 miles of Seabrook Station; and (e) within the Commonwealth of Massachusetts outside the aforementioned areas.
6. Identify the types and number of the following resources available for use in the event of emergencies pursuant to the documents identified

in Interrogatory 1: (a) police vehicles; (b) fire trucks; (c) buses; (d) vans; (e) other vehicles; (f) helicopters and other aircraft; (g) boats; (h) sirens and public notification systems; (i) radios; and (j) all other equipment.

7. Identify the resources enumerated pursuant to Interrogatory 6(a)-(j), according to their location: (a) within the 10-mile EPZ plume exposure pathway; (b) from 10 to 25 miles of Seabrook Station; (c) from 25 to 50 miles of Seabrook Station; (d) from 50 to 100 miles of Seabrook Station; and (e) within the Commonwealth of Massachusetts outside the aforementioned areas.

8. Identify the number and location of Massachusetts National Guard Units in each of the Intervenor jurisdictions, the number of members of each unit, their distance from the Seabrook plume exposure EPZ, and the number and location of the following resources available for use by the National Guard in emergencies: (a) cars; (b) trucks; (c) vans; (d) helicopters; (e) other means of transportation; and (f) communication facilities, including radios and other means of public notification. Supply the same information for any Militia or Reserve unit in such jurisdiction. <sup>1/</sup>

9. Identify any plans made for radiological monitoring in the event of a radiological emergency from any cause including (a) the number and location of personnel trained and available to accomplish such monitoring, and (b) a description and enumeration of radiological monitoring equipment

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<sup>1/</sup> If any of the data sought under Interrogatory 8 are withheld on the ground they are classified, please indicate the type of data so withheld.

available for use in such an emergency, along with identification of the equipment's location.

10. Identify any provisions made for handling of individuals contaminated in a radiological emergency stemming from any cause, including (a) the number and location of personnel trained and available to assist in decontamination of contaminated individuals, and (b) a description and enumeration of equipment available for use in decontamination, along with identification of the equipment's location.

10a. Identify all documents in your possession identifying facilities in Massachusetts which have or claim to have equipment, personnel or expertise to treat radiologically contaminated individuals. Supply such documents.

11. Identify any provisions made by the Massachusetts Department of Agriculture, or other state or local governmental agency, concerning protective measures to be used for the 50-mile ingestion pathway from any nuclear plant, including the methods for protecting the public from consumption of contaminated foodstuffs; and identify any procedures for detecting contamination, for imposing protective measures such as interdiction of food supply, impoundment, or quarantine, and for public notification concerning food contamination and the protective measures to be followed.

12. Identify the number of Massachusetts Civil Defense personnel according to location within the Commonwealth, and identify the amount and location of equipment available for their use to protect the public in the event of an emergency. Set out the training of Civil Defense personnel.

13. Identify the location of stations authorized to broadcast under Federal Emergency Broadcast System (EBS) regulations and the Massachusetts EBS Operational Plan ("Operational Plan"). Provide a copy of the Operational Plan.

14. Identify all documents, agreements and communications dated within the last five years concerning the operation of the EBS. Produce a copy of all such documents, agreements and communications.

15. Identify the provisions of federal or state law which preclude activation of the EBS at the discretion of management of AM, FM, and television stations, in connection with day-to-day emergency situations posing a threat to the safety of life and property, such as hurricanes, floods, icing conditions, heavy snows, fires, toxic gases, power failures, industrial explosions, and civil disorders.

16. List all Federal funds received by any Intervenor jurisdiction during the past 5 years for purposes of developing plans, procedures, manuals, and other documents concerning responses to emergencies, and identify, with respect to each such document, under what statutes these funds were provided and the Federal agencies or departments from which the funds were received.

17. With respect to each document identified in Interrogatory 1, identify any Federal or state law or regulation pursuant to which each such document was prepared.

18. Identify all Massachusetts statutes and regulations, and all local regulations, ordinances or other provisions, (a) concerning actions to be taken by state or local authorities, or those acting in their behalf, in the event of emergencies, including the preparation of plans for actions

to be taken in emergencies; (b) concerning any prohibitions on any such actions or plans; and (c) concerning any prohibitions on any person or organization other than state or local authorities with respect to any such actions or plans.

19. Set out the conditions, including citations to all applicable provisions of state and local laws and regulations, (a) under which state and local authorities may permit private individuals or organizations to take action on their behalf in an emergency; and (b) under which state and local authorities are precluded from authorizing private individuals or organizations from taking action on their behalf in an emergency.

20. Set out examples illustrating the conditions described in Interrogatory 19(a) and (b).

21. Define what you consider to be "the beach" in the Massachusetts portion of the Seabrook Station EPZ. Set out the geographic boundaries of that "beach" area.

22. Using the definition of "the beach" you supplied in answer to interrogatory 21, provide the following data, along with a copy of any study or other document relevant to the following information: (a) the maximum number of cars at the beach on the 10 busiest days within the last five years, along with indication of the time and date of such maxima; (b) the number of cars remaining at the beach following each 1/2-hour interval for the 8 hours after the aforementioned maxima; (c) the number of cars entering and leaving the beach during each 1/2-hour interval within the 8-hour period. If you do not have data for 1/2-hour intervals, supply such data for the periods you have. Indicate whether the foregoing computations were made manually or automatically.

23. Identify all studies conducted during the last five years concerning improving the movement of traffic in and out of "the beach" area. Provide a copy of all such studies.

24. Identify all studies conducted during the last five years concerning improving the movement of traffic in the event of emergencies within the Seabrook Station EPZ which include estimates of the volume of traffic or the time within which traffic can be evacuated. Provide a copy of all such studies.

25. Identify all State and local laws and regulations concerning the following actions to be taken in the event of radiological or other emergencies (see definition 4): (1) guiding traffic; (2) blocking roadways, erecting barriers in roadways, and channeling traffic; (3) posting traffic signs on roadways; (4) removing obstructions from public roadways, including towing private vehicles; (5) activating sirens and directing the broadcast of EBS' messages; (6) making decisions and recommendations to the public concerning protective actions; (7) making decisions and recommendations to the public concerning protective actions for the ingestion exposure pathways; (8) making decisions and recommendations to the public concerning recovery and reentry; (9) dispensing fuel from tank trucks to automobiles along roadsides; and (10) performing access control at the Emergency Operations Center, the relocation centers, and the EPZ perimeters.

26. Identify all studies performed during the last five years concerning the availability and possible use of sirens and other means of emergency communication to the public in the event of emergencies. Provide a copy of all such studies.

27. Identify all sirens or other means of emergency communication in the Seabrook EPZ which can be heard by the general public.

28. Identify all studies performed by Intervenors during the last five years concerning planning for emergencies. Produce a copy of all such studies.

Respectfully submitted,

*Stephen A. Bergquist*

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Counsel for NRC Staff

Dated at Rockville, Maryland  
this 6th day of September, 1988





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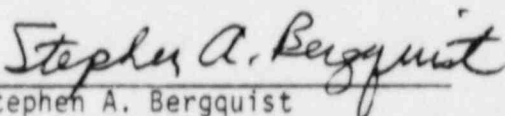
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