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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

ATOMIC SAFETY AND LICENSING BOARD

'88 MAY 16 P6:23

Before Administrative Judges:
Ivan W. Smith, Chairperson
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Docket Nos.
50-443-444-OL
(Off-site EP)

May 13, 1988

SUPPLEMENTAL CONTENTIONS
OF ATTORNEY GENERAL JAMES M. SHANNON
TO AMENDMENT 4 OF THE SEABROOK PLAN
FOR MASSACHUSETTS COMMUNITIES ("SPMC")

The Attorney General for the Commonwealth of Massachusetts ("Mass AG") hereby submits, in response to Amendment 4, the following additional bases for contentions already filed on the SPMC:

As new Basis U to Contention 47 (at page 114, et seq. of the April 13 Mass AG's Contentions) add:

U. The SPMC contains inadequate procedures for implementing dismissal or cancellation of schools (which results in children traveling back home) and early evacuation of schools (which results in the relocation to children outside

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the EPZ). See Plan-3.6-8 (Amendment 4). No real planning has been done to insure that : (1) necessary resources are available for early dismissal or evacuation; (2) parents receive adequate and timely information about their children's whereabouts; (3) decision-criteria will result in the best possible decision; and (4) school officials understand and will implement these PARS.

As new Bases G and H to Contention 56 (at page 160 et seq. of the April 13 Mass AG's Contentions) add:

G. The SPMC now proposes PARs for the transient population of the beach areas in the Massachusetts portion of the plume exposure EPZ which contradict and conflict with simultaneously used PARs for the non-transient populations in the same areas. Under various plant conditions beach populations in Massachusetts are instructed to shelter at the same time that non-transient populations are instructed to evacuate. See Pro-2.5 at 13, Attachment 2 (Amendment 4). Such conflicting PARs will result in confusion and neither PAR will be effectively implemented.

H. The SPMC provides that, under certain circumstances, the transient beach populations on Salisbury Beach and other Massachusetts beach areas are to be sheltered. See Pro - 2.5 at 13, Attachment 2 (Amendment 4). No adequate shelter exists

in these beach areas for the transient population and no planning of any kind has been done to supplement or augment the sheltering capacity of these areas. As a result, the PARs contemplated in the SPMC are totally inappropriate.

Respectfully submitted,

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DATED: May 13, 1988

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CERTIFICATE OF SERVICE

I, John Traficonte, hereby certify that on May 13, 1988, I made service of the SUPPLEMENTAL CONTENTIONS OF ATTORNEY GENERAL JAMES M. SHANNON TO AMENDMENT 4 OF THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES ("SPMC"), by First Class Mail to:

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