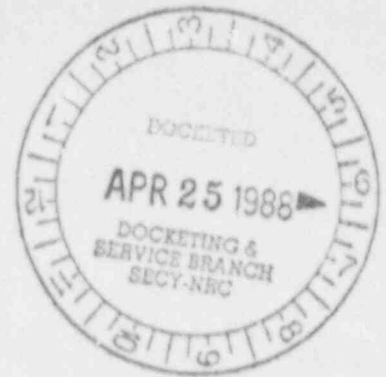


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

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)
) April 25, 1988
)

TESTIMONY OF ROBERT ECKERT
ON BEHALF OF THE ATTORNEY GENERAL
FOR THE COMMONWEALTH OF MASSACHUSETTS
ON SHELTERING CONTENTIONS

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TESTIMONY OF ROBERT ECKERT ON BEHALF OF THE
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OF MASSACHUSETTS ON SHELTERING CONTENTIONS^{1/}

My name is Robert Eckert. I'm with Salmon Falls Research Associates, Inc., and we have worked for the Massachusetts Department of the Attorney General evaluating Stone and Webster's report on sheltering.

This video was shot during December 1987, when few people were around and the towns were virtually closed down. However these are scenes of the beach area during Labor Day Weekend 1987.

^{1/} This testimony is the transcript of the narrative of the videotape attached hereto as Attachment 1.

The purpose of this video is to illustrate problems beach-goers in Hampton and Seabrook would have with sheltering in place, should they be instructed to seek shelter in the event of a radiological emergency at Seabrook Station nuclear power plant.

Some of these problems are that the potential shelters are unmarked, the buildings do not look like shelters, and most are of light wood-frame construction which would afford little protection against radiation. These buildings are crowded on narrow strips of barrier beach, surrounded by roadless marshes, 2 to 3 miles from the plant, and any movement away from the beaches would be toward the plant, which is often in full view.

During the video we will travel a route through Hampton and Seabrook Beaches, stopping at various locations to show what choices beach visitors would have in seeking shelter. We will indicate our locations on a topographic map.

As you view the scenes in this video, ask yourself, "Which places look safe and where would I seek shelter?"

If there were an emergency at Seabrook Station, this is the message people would hear -- "ATTENTION, ATTENTION -- Because of a problem at Seabrook Station, beaches are now closed. Please leave the beach and go indoors immediately. Listen to the radio for more information."

At Seabrook Beach, the only buildings between the beach and Route 1A are private residences. To find public shelter, people on the southern end of the beach would likely exit by

this cut through the dunes and go down Haverhill Street to Route 1A.

Once at Route 1A, there is little public shelter in sight -- only Poore Steve's Ice Cream stand in the distance. People moving toward Poore Steve's would be moving directly toward the plant.

This potential shelter (Poore Steve's) contains a small crowd kitchen and a crawl space under part of the building. The crawl space was wrongly listed as a full basement in Stone & Webster's report. Most of the space in the building is glassed-in or screened porch, which is now boarded up for the winter. The plant is in full view of Poore Steve's. Would people choose to come here, and, once here, to stay?

People at the Hooksett Street beach access would also be surrounded by small wood frame residences and would likely exit down Hooksett Street, toward the plant, to Route 1A.

Once at Route 1A, these are the potential shelters an alarmed beach-goer would see: Preston's Country Store, Ceal's Clam Stand, Arizona Turquoise jewelry store, Captain Don's Fish Market, DiBurro's Market, Mac's Clam Bar, and the Seabrook Beach Police Station.

Ceal's Clam Stand is listed as a potential shelter by Stone & Webster, as is the Arizona Turquoise jewelry shop next door. These buildings would not provide even minimal protection from radiation.

In the distance is Captain Don's Fish Market, another choice for shelter. The second story of Captain Don's is a private residence, as can be seen in these views of the upstairs windows. This residence was included as public shelter by Stone and Webster. This potential shelter is one of the closest to the plant, separated from it by only the harbor.

Even closer than Captain Don's are these private residences, which are supposed to provide shelter for those who live there.

Crossing over the bridge to Hampton Beach, we arrive at Hampton Beach State Park, one of the most congested of the beach areas. This parking area is very full in the summer and often the exit is jammed for hours under normal conditions.

People on the beach here would likely exit down this walkway, directly toward the plant. The bathhouse, with vents open to the outside, and the storage building, which is usually locked, are designated as potential shelters, and could hold only a small number of people at this beach.

People following instructions to seek shelter in public buildings would go toward the center of town by moving across this grassy area toward the cottages in the distance, about 250 yards away.

This is the view a family seeking shelter would see if they ran toward town from the State Park.

These small cottages are not winterized and are in general disrepair. Most are rented to summer vacationers, and, according to Stone and Webster, are supposed to provide shelter for those staying in them.

The "daytripper" who is instructed to seek shelter in a public building would likely head down this street, River Street, toward the main part of Hampton Beach.

Arriving at Ocean Boulevard, these are the potential shelters one would see ... looking south ... looking north.

The Harris Realty building might look like shelter to some. It has a high proportion of glass in the front of the building, and Stone & Webster overestimated the public space in this building by 2,600 square feet, by including the private apartments plainly in view on the second story, and by overestimating the basement space. Next door, included as public shelters, are the Harris Cottages -- seven cottages of approximately 200 square feet each.

Beachgoers on Hampton State Beach would have to leave the beach by this kind of stairway, or climb the iron fence. The snow fencing is not present in the summer.

Once off the beach, their choices of potential shelters include these buildings. All have a high proportion of glass.

From another stairway further north, these are the potential shelters beachgoers would see. The east wall of the Playland Arcade is entirely open in the summer. Many of these buildings are also open to the outdoors in the summer, even though their open areas are now covered with garage doors and boards. These buildings cannot be sealed off from air exchange, as exemplified by this fan which is blowing in the wind even in December when this was filmed.

People trying to get off the beach near the entrance to Route 51 have these choices of wood-frame structures.

For those people who couldn't find shelter on Ocean Boulevard, or hoped to find better shelter, and decided to go down some of the side streets, the Mai Kai Restaurant on Ashworth Avenue looks like a substantial building. This building is listed by Stone & Webster as having a full basement as part of its shelter space. If people decided to go to the basement, the only exterior is through this hatch -- and unfortunately for them there is nothing here but a crawl space.

Beachgoers moving off Ocean Boulevard in search of shelter might decide on a side street like J Street as we see here. On this street the selection of potential shelters consists of wood-frame buildings containing various businesses such as motels, rooming houses and small restaurants. Most of these buildings have a high proportion of glass in their walls.

Moving down J Street and arriving at Ashworth Avenue, one block west of Ocean Boulevard, these are the choices -- some motels and a large number of small cottages.

If the beachgoer did not like what he saw here and still chose to seek shelter, he could move down one of the side streets off Ashworth, but would only see small cottages, the marsh, and finally Seabrook Station.

These cottages are small, in various states of disrepair, not insulated and have a high proportion of window area in their walls. Often the windows can't be closed.

The O'Neil Cottages here are listed by Stone & Webster as potential shelters. They are small, uninsulated and have windows that cannot be closed, like the louvered window you can see on this cottage.

These final views show typical streets and the buildings on them in Hampton Beach. As you watch these buildings roll by, ask yourself if you would feel safe sheltering from radiation here.