:7093

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al.	)	Docket Nos. 50-443-OL 50-444-OL
(Seabrook Station, Units 1 and 2)	)	Off-site Emergency Planning

INTERVENOR MOTION TO PERMIT RESPONSE
TO APPLICANTS' REPLY FINDINGS

NOW COME the Intervenors (Massachusetts Attorney General, NECNP, Town of Hampton and SAPL) and respectfully request leave to be permitted to file a response to the Applicants' Reply to Proposed Findings of Fact and Conclusions of Law of Other Parties on Shelter Contentions dated August 31, 1988.

Applicants, by a pleading dated August 31, 1988, filed a Reply to Proposed Findings of Fact and Conclusions of Law of Other Parties on Shelter Contentions. Although Intervenors recognize that the rules do not provide a right to reply to Applicants' reply findings, Applicants' reply findings are so replete with inaccuracies and mischaracterizations of the record, as set forth below in Intervenors' Reply, that, in the interest of fairness, this Board should grant Intervenors' motion to file the reply set forth below.

REPLY TO PART I: INTERVENORS' UNWARRANTED USE OF THOMAS POSITION AND TESTIMONY

Part I of this Reply deals with the testimony of Edward A. Thomas, and starts from the premise that what it describes as "the previous Thomas position[1/] should not be considered by the Board "because no witness adopted that position or attempted to defend it on cross-examination."

This is misleading, if not flatly untrue. In fact, Mr. Thomas did adopt the pre-filed testimony of September 11, and the facts on which it was based, and would have defended it on cross-examination, had either of the pro-licensing parties, Applicants or staff, chosen to cross-examine him.

Mr. Thomas testified: (p. 13551)

> Judge Smith: Mr. Thomas, when you sent this [FEMA's former position] down there [to Washington] did you believe it?
>
> The Witness: (Thomas) Yes.
>
> Mr. Dignan: Does he still believe it, that's the question.
>
> Judge Smith: Well, that's another matter.
>
> Mr. Dignan: Well, Your Honor, if you're taking for the truth of the matters contained, the witness must testify he believes it.

1/ Actually, the "previous Thomas position" (that the New Hampshire emergency plans fundamentally did not pass muster because of the problems of the beach population) was the previous official FEMA position, as all witnesses recognized. (Trans. 3147, (Thomas), 12846 (McLoughlin), 14010 (Cumming), 12843-44, 12867 (Krimm).

> Judge Smith: Well, that's right. You cover that on cross-examination. In the meantime it's accepted for the fact that on June the 3rd this was his judgment as to what the testimony should have been.

In short, contrary to the assertions in Applicants' Reply of August 31st, there was a witness who adopted the facts as set forth in the FEMA Statement of Position on June 4, which became the FEMA Pre-filed Testimony of September 11, and that witness was never cross-examined.[2/] In other words, in an effort to get this Board to ignore the testimony of Mr. Thomas, the Applicants have either flatly chosen to contradict the record, or have attempted to mislead, in suggesting that only witnesses who appear with the official approved FEMA stamp on their testimony can be credited. Applicants state that what they call the prior Thomas position, actually the prior FEMA position, was only admitted for a limited purpose, citing a ruling at Trans. 12862. However, at the time of this offer, the witnesses were McLoughlin, Krimm and Peterson, who did

---

2/ In addition, the other FEMA witnesses who did testify with the official FEMA stamp of approval on their testimony, Krimm, McLoughlin, Peterson, and Cumming, all agreed that they had no reason to quarrel with the facts set forth in the FEMA Statement of Position and Pre-filed Testimony of June 4 and September 11, 1987, respectively. (Trans. 12873-76 (McLoughlin), 12877 (Krimm), 12878 (Peterson, McLoughlin, Krimm)). Certain of the FEMA witnesses did quibble as to whether the statements were entirely accurate, insofar as they dealt with the estimated 2 percent of the beach population that was transit-dependent and, as to Cumming, with the statement that the wood frame structures without basements would offer less protective dose protection than normal winterized housing.

not originally sponsor the pre-filed testimony. Later, on June 14, when Thomas, the original sponsoring witness, was under oath, he affirmed his belief in the truth of the facts in this document, and the Board accordingly made the ruling referred to above, which serves to eliminate any limitation on the use of the prior FEMA positon of June 4 and Septmeber 11, 1987 for evidentiary purposes.[3/]

THOMAS CREDIBILITY

In addition to attempting to get this Board to ignore not merely the entire former FEMA position, but the salient and undisputed facts that underlie that position, the Applicants "Reply" unleashes yet another attack on the credibility of Mr. Thomas. This attack is both unwarranted and unfounded.

The Intervenors would respond, as follows:

A. As to the claim that the FEMA pre-filed Testimony of September was misleading in that it implied that there was RAC concurrence on FEMA position on the beach population: Mr. Thomas has explained that he was directed by FEMA's attorney, Mr. H. Joseph Flynn, to delete from the draft testimony (Mass. AG 50) text that explained the relationship of the RAC review to the beach population. In the September 11, 1987 filing,

---

3/ In addition, the former FEMA position was admitted as Attachment 7 to the Goble testimony, at Post Tr. 10962.

Thomas had wanted the agency to explain how it had gotten to where it was on the beach population, to what extent the RAC was being relied on and that there was disagreement with NRC. There was not time to do that. (Trans. at 13608) Mr. Thomas did make it clear in his testimony that the collegial process of review mentioned in the pre-filed testimony, although it included the RAC, did not consist solely of the RAC. (Trans. 3104)

> Q. Okay, so the RAC is only part of the collegial?
>
> A. (Thomas) That is also correct.

Finally, Thomas testified, without contradiction, that although there was not time to expand the pre-filed testimony on the beach population by the September 11 filing deadline, he believed that the necessary explanation could be provided on direct examination. He said:

> And I was involved with Mr. Flynn in creating that document, and we just, in terms of getting the testimony pre-filed, we weren't able to get it done by the time of the pre-filed date, and so we were holding that [the status of the RAC review of the beach issue] for use on direct testimony when the beach panel was put on . . . I thought it was very, very important for the agency to explain how it had gotten to where it was, and how much we were relying on the RAC, and how much we weren't relying on the RAC, and that there was a disagreement with the NRC, and to really just lay it out on one sheet of paper.

> And it was decided that, yes, it was a great idea. We just didn't have time to do it at that point, and we'd handle it on the direct examination portion. (Trans. 13608)(Emphasis added)

B. As to Thomas' disavowal of "technical expertise" as affecting Thomas' credibility. Applicants state that Thomas conceded he lacked technical expertise on nuclear power and that "he depended on the technical expertise of the RAC members . . . but he ignored their expertise on the beach shelter issue." (Applicants' Reply, p.4)

Actually, Thomas did acknowledge he lacked expertise on nuclear risk issues, but this is precisely why he was willing to let his judgment on plan adequacy at the April 15, 1987 RAC meeting be affected by the assertions about containment strength in Bores 1 (Staff Exhibit 5). He did not concede that the other RAC members had expertise on the beach issue, but rather he believed that he, and institutionally FEMA, had relevant expertise on that issue.

As to RAC expertise, Thomas testified:

> Q. Is it--could you describe for me, and I am not trying to restrict your answer in any way, as to what degree is particular expertise given weight in the RAC which, as I understand it, is a group of people from different disciplines and different departments of government if I fairly characterized it?

A. (Thomas) In terms of reaching a consensus, certainly we are going to listen very, very closely, for example if the representative of the United States Department of Transportation who is employed by the U.S. Coast Guard were to make a particular point about boating safety, I think, in reality, it would be listened to very, very closely, and possibly even be considered conclusive. (Tran. 3105-06)

D. As to the significance of the Seabrook containment. Applicants in their Reply make the argument that Thomas' assertion that he, and other RAC members, were influenced by the reference to containment strength in Bores 1 (Staff Exhibit 5) is not credible. However, the vast preponderance of the evidence in this case indicates that the Bores technical paper known as Bores 1 (Staff Exhibit 5), that was furnished to the RAC for the April 15, 1987 meeting, was indeed a very important factor in the deliberations of the RAC members on the adequacy of the New Hampshire plans.

See, for example, the Flynn letter to NRC Attorney Reis, dated May 1, 1987, (Mass. AG Exhibit 30), stating in part:

> On the other hand, Dr. Bores, who serves as NRC's RAC Representative for the Seabrook Station, has provided information that resolved many of the RAC's reservations about the safety of the beach population. A particularly important part of this information is that the probabilistic risk assessments for the Seabrook Station justify an assumption that it is highly unlikely that there will ever be an accident at the plant involving a serious release of radiation within one half hour of the onset of the emergency condition.

> As you can see, the technical material provided by Dr. Bores is essential to the RAC's deliberation on this issue.

The ad hoc attempts of the NRC witnesses to explain that they did not intend the RAC to rely on Bores' statements as to Seabrook containment strength is highly unconvincing, particularly in light of the fact that at least one RAC member continued to cite the Seabrook containment strength as reason for supporting the New Hampshire plans, even after the reference to containment in Bores 1 (Staff Exhibit 5) was withdrawn. (See reference to the DOT representative in Mr. Bores' Memo of October 15, 1987). (Staff Exhibit 2).

Dr. Bores' October 15 memorandum (Staff Exhibit 2) of the July 30th meeting reflects that DOT member Paul Lutz continued to believe that the containment strength was a factor that should be considered. Staff Exhibit 2, p. 3, paragraph 9, indicates that Lutz, on July 30 said that:

> whether or not the paper [Bores 1] discussed the specific plant features did not change the facts of construction.

E. As to events at the July 31 (sic), 1987 RAC meeting. Here the Applicants again attempt to re-visit the issue of whether a vote or poll was taken at the July 30 RAC meeting, as affecting Thomas' credibility.

As to this, this Board has already emphatically indicated it did not desire to hear anything further about the

issue of a vote or poll at the July 30th RAC meeting.

At Trans. 13601, Judge Smith stated as follows:

> Gentlemen, the Board has listened to this testimony and I recommended to my colleagues that we have just heard enough about the vote matter. My recommendation has been based upon, golly, more than three decades of trial experience in which totally honest people have unbelievably diametric versions of the same events, we don't think that it is worthwhile inquiring any further into it. It is not going to play a large role in our decision. It is taking too much time. It is causing anguish of people that is not deserved because of the facts, and we don't want to hear any more. That's our ruling. The record is closed on it.

For the Applicants to again attack Mr. Thomas' credibility on the basis of this vote issue, after these comments from the Board, is to say the least, brazen and unwarranted.

F. As to reasonable assurance. Applicants' Reply suggests that Thomas "disagreed with the NRC on the meaning of 'reasonable assurance'." This appears to be correct, but it hardly goes to Thomas' credibility. Rather, it goes to the underlying fundamental issue in this case, and that is whether the "reasonable assurance" and "adequacy" standards of 10 CFR §50.47(a) and 44 CFR §350.5(b) do indeed have substantive content, or only require plans that are complete, and meet the checklist requirement of NUREG-0654 and 50.47(b).

G. As to Seabrook as a special case. Applicants' Reply attacks Thomas for describing Seabrook as a special case, based on FEMA REP-3, the 1981 report. (Mass. AG 48)

However, Thomas said that he was influenced to consider Seabrook as a special case, not only because of the caption on page 10 of FEMA REP-3, but because that report recommended measures to enhance the capability for protective action at Seabrook not suggested for any other nuclear plant site.

Thomas testified as follows:

> The thing which struck me most of all about this when I read it and as I read it again was, Seabrook of the 12 sites that we at FEMA had been asked to look at, was considered a special case. And special recommendations were made with regard to Seabrook. The statement that Seabrook is a special case is located on page 10 of the document in paragraph, that has the letter "C".
>
> And other things that struck me were on page 46, talking about the behavior of drivers caught in congestion within direct sight of Seabrook can only be guessed at, at this time.
>
> And the other thing that struck me was that we were making specific recommendations on page 48 in the paragraph numbered eight with respect to behavior of drivers on the beach within sight of Seabrook, looking at sequential evacuation, sheltering the population, and building supplemental evacuation, only ramps onto I-95.
>
> That--those thoughts made an impact on me, a very great impact. And that impact has continued right through to this day. (Trans. 13384-85)(Emphasis added)

In short, Mr. Thomas relied on the FEMA REP-3 report for his conclusion that Seabrook was a special case, not only because of the caption of the description of Seabrook on page 10, but in the recommendations and text in that FEMA REP-3 pertaining to Seabrook, which suggested unique protective measures.

REPLY TO PART II:
PARTICULAR INTERVENORS PROPOSED FINDINGS
WHICH DO NOT STATE THE EVIDENCE CORRECTLY

Part II of Applicants' reply findings is directed at "Particular Intervenor Findings which do not state the evidence correctly." Applicants' own reply disputing Intervenors' findings is replete with distortions of the evidence, and in many instances has no support at all in the record. Intervenors respond herein only to the more egregious of Applicants' reply findings.

MASS AG PROPOSED FINDINGS

10.1.7 Throughout the testimony the justification given by the State of New Hampshire for not relying on a sheltering response for the transient beach population (except "in limited circumstances") is that it believes evacuation is the option which provides "maximum dose savings" against the biggest problem." E.g., Trans. 10413-414; See also FEMA Testimony at 14256. All the decision making in the NHRERP is premised on this assumption. Thus the issue does become whether evacuation is indeed the option which provides maximum

dose reduction against the biggest problem. To the extent this may change the precise issue raised by the contentions that is only a result of the numerous changes in the NHRERP, as well as the State's position, with respect to sheltering which have occurred throughout this proceeding.

10.1.8 Applicants' witness agreed with the statement, which was cited from Applicants' previously filed Direct Testimony on Sheltering Contention, without any of the qualifications Applicants would now insert. See Trans. 10374.

10.1.10 At Trans. 10224, Applicants' witness was asked directly whether he "would agree that the New Hampshire RERP should be able to cope with the fast-developing accident involving a large scale release", to which he replied, "That is the guidance that's indicted in NUREG-0654 . . .." See also, Mass AG Nos. 10.1.12 and 10.1.14.

10.1.23 Mass AG Finding No. 10.1.23 only represents that it is uncontradicted that "the most serious core-melt accidents, PWR-1 through PWR-5 . . . would likely have warning times of only one to two hours and that the major portion of the release in these accidents could occur very quickly within one to two hours after the start of the release." Applicants cite no testimony which contradicts this statement. Although Applicants' witness placed PWR-1 through PWR-5 accidents at the very end of the planning spectrum, See Mass AG No. 10.1.15, he

did agree that warning times for such accidents were in the range of one to two hours.

10.1.25-26 Although Mass AG does not necessarily dispute that it may be difficult to reliably predict the time to release and duration of release prior to the event, See Mass AG Nos. 10.1.51-10.1.56, Applicants provide no citation to support their claim that Applicants' own witnesses testified regarding these uncertainties. In fact, Mr. MacDonald testified that the utility "would have pretty good insight as to what the possibility was for containment failure" and "when containment failure could occur". Trans. 10502-503. Dr. Wallace testified that, "depend[ing] on the information that's available at the time . . . we may or may not know exactly how much time to release." Trans. 10448-449.

10.1.29 Mass AG did not inaccurately characterize Mr. Keller's testimony at Trans. 14196-197. At Trans. 14197, Mr. Keller agreed with Ms. Weiss that he thought she had asked him at Trans. 14196 whether evacuation must begin shortly or after a release for it to "reduce doses" to the public substantially, and that the "question and answer [at Trans. 14196] should be understood with that in mind." (Emphasis added)

10.1.31 Although Applicants claim that its testimony "controvert[ed] the statement that accidents with warning times of one to two hours account for a significant portion of the accidents for which off-site protective actions would be

warranted," Applicants cite to no testimony to support that claim. The conclusions set forth at Mass AG No. 10.1.31 are indeed amply supported by and/or logically deduced from the testimony cited therein.

10.1.35 Mr. Callendrello testified that it is possible for a plant condition that triggers an "Alert" or "Unusual Event" classification to proceed to a release within one-half hour. Trans. 10311.

10.1.36 Mr. Callendrello in fact testified contrary to Applicants' assertion:

> Clearly, precautionary actions would be associated with a time frame that [sic] you are going through accident classifications, the various accident classifications.
>
> In a more rapidly developing accident where you have maybe skipped an accident classification, you obviously would not implement the precautionary action that you had intended, or developed a plan for.

Trans. 10334. (Emphasis added)

10.1.38 At Trans. 10435-436, and Trans. 10446-448, the State of New Hampshire witnesses testified that the State would still need to verify the utility's recommendation before notifying the public, and at Trans. 10436-10441, the witnesses outlined the specific steps which would be taken, which are those set forth at Mass AG No. 10.1.38.

10.1.40 The cited interrogatory is in fact a quote from Applicants' previously filed Direct Tesimony on Sheltering Contentions. The State of New Hampshire did agree on

cross-examination without qualification that, "Sheltering, for example, may be the appropriate protective action for a puff release, a gaseous or gaseous and particulate release, of less than two hours duration." Trans. 10374 (emphasis added).

10.1.46 Contrary to Applicants' assertion, FEMA testimony at FEMA Dir, Post Trans. 13968 at 9-10, does address the dose reduction that would be achieved from the cloudshine, inhalation and groundshine components of dose by sheltering in "the 'unwinterized' structures in the New Hampshire beach areas," and relies on that testimony, in part, to justify the ultimate conclusion in its testimony.

10.1.50 Mr. Keller indeed testified at Trans. 14241-242 that he could generate "several" scenarios in which sheltering would be "a better choice" than evacuation.

10.1.56 Applicants characterize the testimony of Dr. Goble cited at Mass AG No. 10.1.56 as "muddled miscomprehenison" without citation to any testimony or evidence in the record that would contradict Dr. Goble's analysis. Applicants did not cross-examine Dr. Goble on this analysis and did not offer any testimony to rebut his analysis. Obviously, the quote cited by Applicants from Trans. 11662 is a mistake, whether caused by a slip of the tongue of the witness after a lengthy several days of cross-examination or by an error in transcription, and is intended to read "the core melts through the reactor vessel."

10.1.57-58 Applicants are completely wrong on this point. There is considerable testimony from Dr. Goble to the effect that evacuation times at this site may preclude the evacuation of the beach population prior to plume arrival and indeed the fact that the beach population may not be able to evacuate the beach area prior to plume arrival forms the basis for his testimony regarding consideration of sheltering for the beach population. See, e.g., Goble, et al Dir, Post Trans. 10963 at 13-17. It is implicit in Dr. Goble's testimony at Trans. 11664 where he states: "If it turns out that the [imminent] release does not occur, that the containment has held, then . . . there would be ample time at that point to evacuate the beach population," that if the reversed occurred, that is, the containment does not hold early on, then there would not be ample time to evacuate the beach population. Especially when read in light of Dr. Goble's other testimony concerning the timing of releases and his definition of the term "imminent release", e.g., Trans. 11465-467, Trans. 11614-614, no other reading of the testimony at Trans. 11664 is possible.

10.1.60 There is no evidence to support the conclusion suggested by Applicants that, although dose rate decreases with distance, the total dose would be less for a person evacuating from the beach area in line with the plume than for a person who remains in a shelter in a section of the beach area over

which the plume passes. This would obviously depend on many factors, including the length of time the plume remains in the beach area as well as the amount of time the person in the car must remain in the beach area prior to evacuating.

10.1.61 Dr. Goble speaks to the significance of inhalation dose in several portions of the testimony. E.g., Trans. 11574; 11623-624; 11665. While Dr. Goble did not agree that the greatest significance of the iodine release would be with respect to the inhalation dose, he went on to explain that:

> the critical doses that are received . . . in any sort of mix from groundshine, cloudshine and inhalation to the whole body, to the lung; these are the areas . . . along the gastrointestinal tract [that] are the . . . most sensitive for early injuries and possibly fatalities.
>
> And . . . the mix of iodine contributes very importantly when there's a large percentage of iodine released in such accidents to the exposures to those organs; and that's as much from cloudshine, groundshine as from the inhaled dose which goes into the thyroid.

Trans. 11623-624. And at Trans. 11665, Dr. Goble testified, "For particulates, you do worry about inhalation of particulates as well as ground deposition. Trans. 11665.

10.1.64 There is a typographical error in the Mass AG proposed finding. The citation which read "Trans. 229-230" should read "Trans. 14226; Trans. 14229-230."

10.1.67 Mr. Keller testified at Trans. 14194 that his "belief that there will be some dose savings afforded the beach population in the fast-breaking accident is based on [his]

opinion that some undetermined number of people will be able to move off the beaches before they're exposed to the plume."

10.1.90 Mr. Cumming actually testified that:

> Based on my review of the transcripts, there is implementing detail now for transit-dependent transients, to some degree.
>
> If the plan, if my understanding of the transcript is correct, and the plan calls for sheltering the 98, the so-called 98 percent, that would be a different factor.

Trans. 14252 (emphasis added). Mr. Cumming went on to say with respect to the option of sheltering the 98 percent:

> And for decisionmakers to use that option, they've got to know exactly what they're doing, or people could be hurt, especially in the two to three-mile inner ring.

Trans. 14253.

10.1.98 Even with respect to shelter for the transit-dependent population, the State of New Hampshire has not yet identified any specific shelter locations. Trans. 10205-207.

10.1.99 There are no plans to designate or train personnel to assist the beach population in sheltering. Trans. 10568.

10.1.123 In fact, two errors were established in the record at Trans. 10618-631: the inclusion of 2,886 square feet of frame building plus 962 square feet of basement for a building that had been torn down; and, for another designated

shelter, the inclusion of square footage for a second story that does not exist.

10.1.59 Mileti actually testified at Trans. 10132 that although he "certainly [does] not have the technical expertise", he "[doesn't] think that transcends into the kind of emergency we're planning for here."

10.1.137 Although there is no reference in the record to the precise number of buildings in the beach area with reduction factors less than 0.9 or air exchange rates greater than 2 per hour, there is considerable testimony and evidence in the record that would support the conclusion that it is a relatively high percentage of the buildings. See, e.g., Trans. 11569-571.

10.1.163-164 In fact, Dr. Eckert, who spent approximately four months in the beach area photographing, measuring and viewing the interiors and exteriors of the shelters on the Stone & Webster study, Trans. 11698, testified that "the vast majority of available public shelter space in Hampton Beach consists of rented rooms in hotels and motels." Goble et. al Dir., Post Trans. 10973, at 65. This testimony was never challenged, either by cross-examination or by rebuttal testimony and Applicants provide no citation in the record to dispute this fact.

CONCLUSION

For the reasons stated, the Board should reject the Applicants' Reply Findings.

SEACOAST ANTI-POLLUTION LEAGUE

Robert A. Backus, Esq.
Backus, Meyer & Solomon
116 Lowell Street, PO Box 516
Manchester, MA 03105
(603) 668-7272

JAMES M. SHANNON
ATTORNEY GENERAL
COMMONWEALTH OF MASSACHUSETTS

Carol A. Sneider
Assistant Attorney General
Nuclear Safety Unit
Public Protection Bureau
One Ashburton Place
Boston, MA 02108
(617) 727-2200

TOWN OF HAMPTON, NEW HAMPSHIRE

Matthew T. Brock, Esq.
Shaines & McEachern
24 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

NEW ENGLAND COALITION ON NUCLEAR POLLUTION

Ellyn Weiss, Esq.
Harmon & Weiss
2001 S Street, N.W.
Suite 430
Washington, DC 20009
(202) 328-3500

Dated: September 16, 1988

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

'88 SEP 19 P2:59

In the Matter of	)	
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, ET AL. (Seabrook Station, Units 1 and 2)	)	Docket No.(s) 50-443/444-OL (Off-site EP)

CERTIFICATE OF SERVICE

I, Carol S. Sneider, hereby certify that on September 16, 1988, I made service of the within Intervenor Motion To Permit Response To Applicants' Reply Findings, by firut class mail or by Federal Express as indicated by [*] or by hand deliver as indicated by [**] to:

*Ivan Smith, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Dr. Jerry Harbour
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

*Sherwin E. Turk, Esq.
U.S. Nuclear Regulatory Commission
Office of General Counsel
15th Floor
11555 Rockville Pike
Rockville, MD 20852

H. Joseph Flynn, Esq.
Assistant General Counsel
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.
Washington, DC 20472

*Docketing and Service
U.S. Nuclear Regulatory
Commission
Washington, DC. 20555

Roberta C. Pevear
State Representative
Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844

Atomic Safety & Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Matthew T. Brock, Esq.
Shaines & McEachern
25 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Sandra Gavutis, Chairperson
Board of Selectmen
RFD 1, Box 1154
Rte. 107
E. Kingston, NH 03827

Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

Senator Gordon J. Humphrey
1 Eagle Square, Suite 507
Concord, NH 03301
(Attn: Herb Boynton)

Stephen E. Merrill
Attorney General
George Dana Bisbee
Assistant Attorney General
Office of the Attorney General
25 Capitol Street
Concord, NH 03301

Paul A. Fritzsche, Esq.
Office of the Public Advocate
State House Station 112
Augusta, ME 04333

Diana P. Randall
70 Collins Street
Seabrook, NH 03874

Robert A. Backus, Esq.
Backus, Meyer & Solomon
116 Lowell Street
P.O. Box 516
Manchester, NH 03106

Jane Doughty
Seacoast Anti-Pollution League
5 Market Street
Portsmouth, NH 03801

J. P. Nadeau
Board of Selectmen
10 Central Road
Rye, NH 03870

Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

Angelo Machiros, Chairman
Board of Selectmen
25 High Road
Newbury, MA 10950

Edward G. Molin
Mayor
City Hall
Newburyport, MA 01950

Donald E. Chick
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

Philip Ahrens, Esq.
Assistant Attorney General
Department of the Attorney General
State House Station #6
Augusta, ME 04333

*Thomas G. Dignan, Esq.
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Beverly Hollingworth
209 Winnacunnet Road
Hampton, NH 03842

William Armstrong
Civil Defense Director
Town of Exeter
10 Front Street
Exeter, NH 03833

Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
North Hampton, NH 03862

Allen Lampert
Civil Defense Director
Town of Brentwood
20 Franklin Street
Exeter, NJ 03833

Charles P. Graham, Esq.
Murphy & Graham
33 Low Street
Newburyport, MA 01950

William Lord
Board of Selectmen
Town Hall
Friend Street
Amesbury, MA 01913

Gary W. Holmes, Esq.
Holmes & Ellis
47 Winnacunnet Road
Hampton, NH 03841

Ellyn Weiss, Esq.
Harmon & Weiss
Suite 430
2001 S Street, N.W.
Washington, DC 20009

Richard A. Hampe, Esq.
Hampe & McNicholas
35 Pleasant Street
Concord, NH 03301

Ashod N. Amirian, Esq.
376 Main Street
Haverhill, MA 01830

Michael Santosuosso, Chairman
Board of Selectmen
Jewell Street, RFD 2
South Hampton, NH 03827

Anne E. Goodman, Chairperson
Board of Selectmen
13-15 Newmarket Road
Durham, NH 03824

Sheldon J. Wolfe, Chairperson
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Barbara St. Andre, Esq.
Kopelman & Paige, P.C.
77 Franklin Street
Boston, MA 02110

Judith H. Mizner, Esq.
Lagoulis, Clark, Hill-Whilton
& McGuire
79 State Street
Newburyport, MA 01950

R. Scott Hill-Whilton, Esq.
Lagoulis, Clark, Hill-Whilton
& McGuire
79 State Street
Newburyport, MA 01950

Carol S. Sneider

Carol S. Sneider
Assistant Attorney General
Nuclear Safety Unit
Department of the Attorney General
One Ashburton Place
Boston, MA 02108-1698
(617) 727-2200

DATED: September 16, 1988