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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY LICENSING BOARD

DOCKETED  
USNRC

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IN THE MATTER OF	)	
PUBLIC SERVICE COMPANY OF	)	Docket #'s 50-443-OT
NEW HAMPSHIRE, ET AL	)	50-444-OL
Seabrook Station Units 1,2)	)	Off-site Emergency Planning

Town of Salisbury's Answers to Interrogatories Propounded by Applicants

Interrogatory #1:

Answer:

The material and information provided in these responses has largely been gathered by Charles P. Graham, Town Counsel for the Town of Salisbury, whose address is 33 Low Street, Newburyport, Massachusetts. The information set forth has been contributed to and partially received by Salisbury's former Police Chief, Edwin Oliviera (now deceased) and citizens within the town varying in number from 5 to 25, all of whom participated in assembling contentions after reviewing the SPMC and submitted the same to Charles Graham for final assembly and submission. As at least one of these citizens has undergone considerable harassment for her role in reviewing the plan and framing contentions, it is the desire of the several citizens involved to remain unidentified until ordered to do otherwise. It may be fairly said that no public officials of the Town actively or directly participated in the preparation of contentions or in answering the instant interrogatories.

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Interrogatory #2:

Answer:

There are no documents in the possession or control of the Town of Salisbury that in any way reflect or refer to what actions could, might, would, could not, would not, might not, do in the event of a radiological emergency except the SPMC (a copy at the Board of Selectmen's office without revisions, and a copy at Town Counsel's office with revisions) which plan the Town would not implement for various reasons including primarily the following:

1. Under no circumstance will the Town yield or permit control of an evacuation within the Town to other than the state and local officials charged with the responsibility for the inhabitants' safety and health.
2. The Town has no confidence that any private organization can effectively provide the communication, transportation, equipment, and manpower required for a timely evacuation.
3. The Town's response in the event of a town-wide radiological emergency would likely vary significantly from the SPMC.
4. The SPMC has numerous defects as it relates to Salisbury, all of which suggest that the planners knew little or nothing about the Town and traffic within the Town, and altogether ignored significant management issues relating to communication, human behavior, and the resources at the disposal of the Town.

There have been countless "conversations" regarding what action the Town or its officials would or would not take in the event of a radiological emergency. However, there have been no formal deliberations in any public agency or board of the Town as to Salisbury's response to a radiological emergency. The Town is unaware of any minutes of any meetings wherein any such response was discussed. Generally, the content of casual conversations by Selectmen, police officials, and other town officials over the past several years has fallen into one or more of the following categories:

1. Whether or not the Plant will open;
2. Woeful underestimates of summer beach population and traffic problems within the Town;
3. Evacuation of school children by parents and the traffic problems resulting;
4. Problems evacuating the Merrimac River Basin;
5. Inadequacies of Town resources;
6. Lack of confidence in the planners (plant's) ability to provide additional resources;
7. The relative merits and risks of the proposed plant.

Interrogatory #3:

Answer:

In 1987, at the request of numerous citizens, the Salisbury Town Meeting directed and authorized the Town to seek intervenor status in Public Service Co. of New Hampshire vs. West Newbury

and appropriated \$1,000.00 to defray the costs. While there were genuine questions as to the authority for the issuance of siren permits and the liability of the Town, it may be fairly said that part of the motivation of the Town Meeting then assembled was to hinder the licensing of Seabrook Yankee. In 1985, the Town Meeting voted not to participate in evacuation planning for Seabrook Station. This was after draft plans had been submitted for Salisbury by the State Civil Defense Department, which plans entirely ignored the suggestions and comments of the local planning committee. The Town would object to any assertion that this action was intended to "block, hinder, or delay" the licensing of Seabrook Station.

Interrogatory #4:

Answer:

There are no such documents currently in the possession or control of the Town. The Selectmen have studied the process whereby a committee shall be appointed, a consultant retained, and plans promulgated for non-radiological emergencies within the Town. To the best of the Town's current knowledge, no documents have yet been generated as a result. The Town recognizes its obligation to supplement this answer.

Interrogatory #5:

Answer:

Town Counsel and the Board of Selectmen are reviewing the admitted contentions to prepare a request for limited

participation in the current proceeding. As of this writing, such review has not been completed and the Town may not accurately answer this interrogatory. The request, however, will be submitted prior to October 5, 1988 and will delineate with specificity those contentions which Salisbury cares to actively litigate.

Interrogatory #6:

Answer:

Because of the answer to Interrogatory #5, a complete answer may not be provided to this Interrogatory. The following answer, however, will be supplemented as the information required for the response is acquired.

1. Town of Salisbury #4.

- A. The Plan shows a bus route employing Baker Road in Salisbury which is believed not to be a through street as a portion of it is covered by woodland.
- B. Citizen residents of the Town who care not to be identified, particularly as the information is easily ascertainable upon a view.
- C. None.
- D. Robert Pike, Highway Surveyor, 63 Lafayette Road, Salisbury, Massachusetts.
- E. None.

2. Town of Salisbury #5.

- A. Parts of Baker Road are one lane dirt and seasonably impassable. Parts of Ferry Road are subject to seasonal, storm and tidal flooding.
- B. Numerous citizen residents of the Town.
- C. None.
- D. Robert Pike, Highway Surveyor, 63 Lafayette Road, Salisbury, Massachusetts.
- E. None.

3. Town of Salisbury #6 as modified by Board Order

- A. The plan provides for bus turnarounds at the transfer point on Beach Road where the road is too narrow to accommodate the turning radius of a bus. As this is also one of two east to west evacuation routes, additional equipment and personnel are required. Likewise, Beach Road is of variable width with two or three travel lanes depending upon location along its length. Where reductions in width occur, there are no guides or equipment assigned.
- B. Police Chief Edwin Oliviera (now deceased).
- C. None.
- D. Officer in Charge or Police Chief when new Chief is appointed to fill vacancy.
- E. None.

4. Town of Salisbury #9 as modified (applicants wording).

- A. The Plan makes no provision for the fact that Gillis Bridge is a draw bridge and therefore fails to compensate for traffic backup occasioned by normal operations due to increased boating traffic resulting from evacuation of the river basin.
- B. Common sense and personal experience of numerous citizens in the Town.
- C. None.
- D. An as yet undesignated police officer, probably the officer in charge or a new Chief upon appointment of same.
- E. None.

5. Town of Salisbury #13

- A. As there is a bar at the mouth of the Merrimac River, unusually hazardous sea conditions frequently occur under otherwise benign weather conditions, the most typical of which is a summer sea breeze (east or southeast) of 15+ knots in the course of an outgoing tide. While the rolling waves resulting from this condition pose danger to all boats, the danger is substantial for small craft and underpowered craft such as sail boats. The Merrimac hazard is well known to the United States Coast Guard and is set forth in coastal navigation publications. For many years, the Coast Guard has maintained a "strobe" type flashing light on Plum Island that operates to warn

boaters in the basin when this relatively common combination of wind and tide occur to create the dangerous sea condition. Boats are capsized and or lost every year at the mouth of the Merrimac River on account of this condition and an attempted exit by a small or underpowered boat under these conditions may fairly be described as foolhardy and dangerous.

- B. Common knowledge to water men and fishermen in the area.
- C. None.
- D. Asst. Harbormaster William Dickie, Town Hall, Salisbury, Massachusetts.
- E. None.

6. Town of Salisbury #14

- A. The particular road is Ferry Road as it passes through the marsh north of Ring's Island. Otherwise see the answer 6-(1) above.

7. Town of Salisbury #15

- A. The plan documents reviewed indicate that more cones would be placed in locations throughout the EPZ than were shown to be in inventory at the staging area.
- B. Not applicable.
- C. Not applicable.
- D. Not applicable.
- E. Not applicable.



8. Town of Salisbury #16

- A. The facts underlying this contention evolve out of a basic contradiction in the provisions of the plan as set forth in the contention.
- B. Not applicable.
- C. Not applicable.
- D. Not applicable
- E. Not applicable.

9. Town of Salisbury #17.

- A. The B & M Railroad Bridge is too low for several types of tractor trailer trucks. This coupled with the plan's purported diversion of east bound traffic on Route 286 onto Lafayette Road south bound is likely to send tractor trailers arriving off Route 95 to the B & M Bridge where they will likely get stuck and back up traffic.
- B. Not applicable contained in plan documents.
- C. None.
- D. Robert Pike, Highway Surveyor.
- E. None.

10. Town of Salisbury #18.

- A. This contention is likely to be argued by Massachusetts Attorney General, however, the factual basis is the former Police Chief's review of the table as it compares to transient beach populations he has dealt with as Chief of Police since 1978.

- B. Chief Edwin Oliviera, now deceased.
- C. None - Massachusetts Attorney General may have documents.
- D. Officer in charge or newly appointed Police Chief.
- E. None.

11. Town of Salisbury #19.

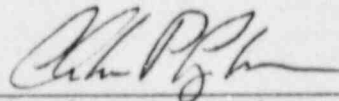
- A. The factual basis for this contention is the plan itself.
- B. None.
- C. None.
- D. Officer in charge or newly appoint Chief of Police.
- E. None.

12. Town of Salisbury #23.

- A. The factual basis for this contention is provided in the following:
  - 1. Salisbury has 3 full-time highway employees.
  - 2. Salisbury relies substantially upon private contractors for road cleaning and other roadwork in the Town.
  - 3. Salisbury has a call fire department with 3 full-time firefighters. Most call firefighters work out of town and would have difficulty returning in an evacuation.
  - 4. Salisbury has 16 full-time police officers, two cruisers, and a van. On any given shift, there are 4 police officers available.

5. Salisbury has 3 civil defense employees all of whom are part-time and have other full-time work.
- B. Board of Selectmen's personal assessment of Town resources as stated to Town Counsel.
- C. None.
- D. Member of Board of Selectmen, or Police Chief (yet to be determined).
- E. None.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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USNRC

I, Charles P. Graham, Counsel for the Town of Salisbury, hereby certify that I made service of the within document by mailing copies thereof, postage prepaid, to:

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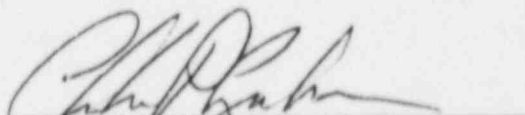
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Signed under pains and penalties of perjury this 16th day  
of September, 1988.

  
Charles P. Graham, Esquire