

September 17, 1988

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.)

(Seabrook Station, Units 1 and 2))
)
_____)

Docket Nos. 50-443-OL
50-444-OL
(On-Site Emergency
Planning and Safety
Issues)

AFFIDAVIT OF JOSEPH STORY, II

I, Joseph Story, II, being on oath, depose and say as follows:

1. I am a working Foreman in the Health Physics Department of New Hampshire Yankee. I participated in the selection process of the pre-selected acoustic locations and participated in the transit time testing program for the spring and summer of 1988. I am personally familiar with the various roadways and traffic conditions within the Massachusetts portion of the EPZ. In addition, I have past experience as a truck driver and heavy equipment operator. A copy of my professional qualifications is attached hereto and marked "A".

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2. The purpose of this affidavit is to address allegations in Contention Basis A.3 that a VANS vehicle will be unable to drive into/onto and/or set up at the preselected acoustic locations.

3. I was one of two individuals responsible for evaluating areas selected as potential acoustic locations to determine if a given site could be accessed by a VANS vehicle. The criteria used to evaluate the acceptability of a given site included such considerations as sufficient room to allow the vehicles to park, adequate overhead clearance to allow boom erection and sufficient and level space for the vehicle to put out its outriggers.

4. In August, 1988, I participated in a review of each of the acoustic locations identified in the FEMA-REP-10 Design Report regarding physical accessibility of these sites for a VANS vehicles. This review entailed driving a

truck with a truck-mounted telescoping crane and A-frame type outriggers to each of the acoustic locations identified in the FEMA-REP-10 Design Report associated with the Alert and Notification System for the Massachusetts plume exposure EPZ.

5. At each location the truck was physically driven onto the acoustic location and outriggers deployed or traffic cones laid out in a pattern equivalent to the area required to park the truck and deploy the outriggers. The latter was

done where it was possible to leave tire marks or outrigger impressions on the grass or asphalt surfaces.

6. I concluded that the trucks could be parked and the outriggers deployed at each acoustic location. In addition, I re-verified that there were no overhead obstructions which would prevent the deployment of the siren.

7. I am familiar with the construction of a truck and the VANS vehicle design concept. These vehicles are commercial vehicles intended to be operated under varying weather and road surface conditions. These vehicles, when using snow and mud tires [see Affidavit of Sebastian N. Caruso at ¶ 13], will travel under adverse weather and road conditions such as snow and ice. In addition, these vehicles can drive into and set-up at acoustic locations which are not on hard road surfaces of concrete or blacktop.

8. Each of the six acoustic locations which the Massachusetts Attorney General alleged will be inaccessible¹ to the VANS are, in fact, accessible to the VANS vehicles. Each of these locations are discussed in the following paragraphs.

9. VL-02: At no time during the runs made to this location during the spring and summer of 1988 was the parking lot close to full. An area of the parking lot is not marked

¹ See "Massachusetts Attorney General's Further Response to Interrogatories 12, 13 and 20(c)" filed September 8, 1988, at 1-2.

for automobile parking and is available to and is large enough to accommodate VANS vehicle setup.

10. VL-03: All VANS drivers will be trained to identify this, as well as all the other acoustic locations Mass AG is unable to locate. During the test described in § 4 above, the truck was driven to VL-03 and the outriggers deployed. In addition, on September 16, 1988, I observed the VANS prototype vehicle set-up at this location with outriggers deployed and the boom fully raised. Width, incline, and stability of the location did not affect VANS vehicle set-up with the boom fully raised.

11. VL-06: The VANS setup location is on the access road to . The incline is negligible and well within the outrigger capabilities. The truck, when set up, does not prevent egress of vehicles from . On September 16, 1988, I observed the VANS prototype vehicle set-up with outriggers deployed and the boom fully raised without any interference caused by trees.

12. VL-07: As far as can be determined from the photocopied pictures submitted by Mass AG, Mass AG representatives appear to have been in a location other than VL-07 when they thought they had located and photographed VL-07. On September 16, 1988, I observed the VANS prototype vehicle drive over the curbing and set-up with the outriggers deployed and the boom fully raised. The vehicle was stable on the slight incline.

13. VL-12: During the test described in ¶4 above, the truck was set up at VL-12 with the outriggers deployed. There were no overhead obstructions prohibiting full boom extension. In addition, on September 16, 1988, I observed the VANS prototype vehicle set-up on the road shoulder location with the outriggers deployed and the boom fully raised. There was no interference caused by trees. Outrigger deployment resulted in over 17 feet of paved road surface remaining available for passage of traffic.

14. VL-13: As the VANS vehicle is designed for set up on dirt, use of the paved pad at this location is unnecessary. At no time during any of the runs conducted during the spring and summer of 1988 was there insufficient room at this location to deploy a VANS truck. In addition, on September 16, 1988, I observed the VANS prototype vehicle set-up at this location with the outriggers deployed and the boom fully raised.

Joseph Story II
Joseph Story, II

STATE OF NEW HAMPSHIRE

Rockingham ss.

September 16, 1988

The above-subscribed Joseph Story, II, appeared before me and made oath that he had read the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,

Beverly E. Silway
Notary Public
My Commission Expires: 3-6-90

JOSEPH STORY, II
Health Physics Working Foreman

Summary of Experience

Mr Story joined PSNH in June of 1982 as a Health Physics Technician. Subsequently, he was promoted to a Health Physics Working Foreman. During this time his responsibilities have included the development of plans and procedures necessary to support an operational as well as a preoperational Health Physics program. He has worked on the Onsite Emergency Plan. His current position in the Emergency Response Organization is Radiological Control Coordinator.

Before coming to Public Service Company of New Hampshire, Mr. Story worked as a contractor providing expertise in water processing, decontamination and health physics support. He held positions in 11 different operating nuclear power plants during this time.

Before working in the nuclear industry, Mr. Story worked in the construction industry. Positions held during this time included operating heavy equipment and driving trucks similar in size and construction to the VANS trucks.