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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF GENERAL COUNSEL
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Before Administrative Judges:
Ivan W. Smith, Chairman
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

In the Matter of)
PUBLIC SERVICE COMPANY) Docket Nos. 50-443-OL
OF NEW HAMPSHIRE, et al) 50-444-OL
(Seabrook Station,) (ASLP No. 82-471-02-OL)
Units 1 and 2) (Offsite Emergency Planning)
)
)
) September 20, 1988

SEACOAST ANTI-POLLUTION LEAGUE'S
CONTENTIONS ON THE GRADED EXERCISE

NOW COMES the Seacoast Anti-Pollution League and files the following 14 contentions on the 1988 FEMA graded exercise of the radiological emergency response plans for Seabrook Station. SAPL relies on the facts contained in the draft and final reports filed by FEMA on this exercise, the facts garnered by intervenor observers, the NHRERP, documents obtained from Seabrook Station, and the 1986 FEMA Final Exercise Assessment for the facts contained in these contentions. SAPL hereby joins in and adopts contentions on the 1988 graded exercise filed by the Massachusetts Attorney General ("Mass AG") the New England Coalition on Nuclear Pollution ("NECNP") and the Town of Hampton.

SAPL Graded Exercise Contention 1 (SAPL EX-1)

The graded exercise of the New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook Station did not result in an adequate demonstration that appropriate Protective

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Actions (PA's) can be implemented to reasonably assure the protection of school children within the plume EPZ. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10), §50.47(b)(14) and NUREG-0654 J.9 and J.10.d., g., k. and m. have not been met.

Bases

a) The Same Deficiency Cited by FEMA in the February 1986 Final Exercise Assessment Still Exists.

The February 1986 FEMA Final Exercise Assessment cited as a deficiency that:

The capability to demonstrate the organizational ability to effect an orderly evacuation of schools, which was an exercise objective (D.8), was hampered by the extent of simulated school participation. Since schools were not in session on the day of the exercise, school notification, and requests for an activation of school bus resources could not be evaluated. (February 26, 1988 Final Exercise Assessment at p. 125)

Schools were not in session during the June 28 and 29, 1988 graded exercise either and there was again no sufficient demonstration of the organizational ability of schools to effect an orderly evacuation. No school personnel were shown to be available to supervise school children during an evacuation.

b) Protective Action Decisions Affecting School Children Were Not Effectively Handled.

The decision was made not to order early dismissal of children in plume EPZ communities because of a concern for latchkey children. The City of Portsmouth, though inappropriately acting on its own in a manner incongruent with the rest of the EPZ

communities, did decide upon an action that would have resulted in greater dose savings to the children, i.e. recommending early dismissal for children other than latchkey children and holding the latchkey children in schools until their parents could pick them up. [The Town of Brentwood also took an action not in congruence with the State of New Hampshire and called the Swasey School and told them to let children take their normal bus routes home after the sheltering order was received.]

The State of New Hampshire instead ordered at the Site Area Emergency ECL that a precautionary PA be effected to hold plume EPZ children in school until 5:00 p.m. This late dismissal decision was extended at 11:52 a.m to keep school children in school until 7:00 p.m.. Subsequently, at 2:09 p.m., the Governor concurred in an NHY recommendation that an evacuation be ordered for six towns within a 5-mile radius and that sheltering should be put in effect for the 5-10 mile portion of the zone. In the sheltering towns, children were to be sheltered in place in the schools.

At 4:26 p.m, the PA order went out to evacuate six more towns, those in ERPA F. The wrong EBS message was sent out subsequently and parents were told not to pick up their children at the schools. (See p. 198 of the FEMA Draft Exercise Report where it notes that "Information about school children was confusing and at one point contradictory.")

At 6:10 p.m., the IFO Controller in Newington called the State EOC to check on whether school dismissal was still scheduled

for 7:00 p.m. The IFO Controller was told not to worry. However, at 6:30 p.m. the State EOC called the IFO Controller to verify that the children were getting out. At 6:50 p.m., just 10 minutes before the scheduled dismissal time, Local Liaisons were instructed to call the town EOC's to ask if transportation was needed for school children. This confused and untimely response was clearly not a satisfactory demonstration that effective PA's can be ordered and carried out for school children.

SAPL EX-2

The graded exercise of the NHRERP failed to demonstrate the ability to provide a sufficient number of buses and ambulances with properly trained drivers to reasonably assure that transit-dependent, special facility and special needs populations can be adequately protected. There was further not an adequate demonstration that the buses that were employed in the exercise could be properly routed. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10), §50.47(b)(14) and NUREG-0654 J. 9 and J.10.d, g and k have not been met.

Bases:

The February 26, 1986 FEMA Final Exercise Assessment described two of the deficiencies in the prior exercise as follows:

Serious questions arose at the exercise regarding the ability of the State to provide buses for transportation of special populations, including school children, mobility-impaired, and otherwise transit-dependent populations. Driver resources were not sufficient to meet the transportation requirements. (February 26, 1988 Final Exercise Assessment at p. 136)

Bus drivers consistently experienced problems in getting to where they would have been needed. They were unfamiliar with alternate routes and experienced difficulties because of the poor quality of photocopied maps. One of the bus drivers made wrong turns and required prompting to complete his route. One of the buses that arrived at the Rockingham County Dispatch Center was unable to continue because it was low on fuel. Some of the evacuation and other bus route maps distributed at the Rockingham County Staging Area were illegible, some provided insufficient detail to specify the route clearly, and some did not include adequate addresses for the locations at which evacuees were to be picked up. (February 26, 1988 Final Exercise Assessment at p. 138-139)

Both of those deficiencies were not shown remedied in the current exercise. There still are serious questions about the ability of the state to provide buses for transportation of special populations.

The majority of the bus routes run during the exercise were run out of the proper sequence that the scenario would have required (a good number were run on Day 2). Further, the majority of the routes were run in private passenger vehicles rather than in buses. This did not provide a realistic test of the capability to coordinate the running of the routes in a timely manner and it did not test the ability to provide the numbers of buses and drivers that would actually be required during an emergency at Seabrook.

Out of the 79 transit-dependent bus routes attempted during the exercise, the exercise report states that only 51 routes or 65

percent were completed with only "minor" problems. Routes that were not completed were as a result mainly of drivers getting lost, though in one instance a driver actually caused an accident and forced a private passenger vehicle off the road. (See South Hampton Route 1 at p. 211 of the FEMA Draft Exercise Report) Further, no routes were run from South Hampton to the Salem Reception Center as was supposed to have been done.

It appears that of the 93 routes for schools, nurseries and day care centers attempted, only 70 out of 93 of the routes were completed without controller intervention. (The Draft Report stated at p. 225 that only 60 routes were completed with drivers needing assistance on ten. If this number is correct, it would mean that only 50 routes, or 54 percent of the 93 routes were completed without controller intervention.)

During the actual course of the exercise on Day 1 of the scenario, intervenor observers noted that only six buses and drivers arrived at the Portsmouth Business Center (formerly the Omne Mall) and only five of those buses were dispatched to other locations.

At the Rockingham County Staging Area in Brentwood, only 14 buses, one wheelchair van and one ambulance were present. The FEMA Exercise Report states that 750 regular buses, 95 vans, 34 wheelchair vans, 32 ambulances and 55 coach buses were available (see p. 165). Those vehicles had to have been imaginary; the real numbers were miniscule in comparison. There was no explicit mention in the FEMA report of how many vehicle drivers could have

been made available on the day of the exercise or how that number was verified. A total of 87 drivers from the National Guard and DOT were alleged to have been put on standby, but those number would be grossly insufficient if there were a significant shortfall of bus company drivers.

Virtually the same problems with drivers having difficulties getting where they were needed and having difficulty with reading maps due to not a high enough quality of map were evidenced in this exercise as in the prior exercise. In several cases this time, maps for special facilities had wrong instructions or wrong addresses (See p. 231 of the FEMA Draft Exercise Report). The FEMA Draft Exercise Report also states that: "Some drivers demonstrated no capability to read any map" which indicates that problems with driver training have not been adequately addressed.

Further, the problem of refueling buses has not been adequately addressed. On the day of the exercise, the buses that needed fuel stopped at a gas station, which would not be possible during the course of a real radiological emergency as the proprietors would have evacuated. The signatory of the bus refueling letter of agreement in Volume 5 of Rev. 2 of the NHRERP has gone out of business.

SAPL EX-3

The graded exercise of the NHRERP did not result in an adequate showing that emergency workers have been properly trained in the use of dosimetry, as required by 10 CFR §50.47(a)(1), §50.47(b)(11) and NUREG-0654 K.3.a and b.

Bases:

The February 26, 1986 Final Exercise Assessment states as follows:

The two bus drivers of Timberlane Bus Company who were interviewed at the Seabrook EOC (where they had mistakenly arrived--see section 2.2.9) stated that they had not been trained in the use of dosimetry.

The FEMA Draft Exercise Report states that though county and state emergency workers were well-versed in dosimetry use, most bus drivers, ambulance drivers and local town personnel and a few local police were not adequately trained in dosimetry equipment and exposure control procedures. The emergency workers at Stratham TCP (GST-01) did not demonstrate the ability to monitor and control their exposure limits at all. Therefore, there has still not been a demonstration sufficient to provide reasonable assurance that there has been adequate preparation for the protection of emergency workers.

SAPL EX-4

The appropriate use of equipment and procedures for collection and transport of samples of food, water and other appropriate items was not adequately demonstrated by the exercise. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(9), §50.47(b)(10), §50.47(b)(14) and NUREG-0554 I. 7 and 8 and J.11. have not been met.

Bases:

Only two sampling teams were included in the exercise. One of two sampling teams, or 50 percent of those exercised, performed poorly. Team #1 was unfamiliar with procedures for sample collection and with survey techniques with the assigned

instruments. Both teams had trouble with maps and had difficulty reaching their original locations and Team #1 actually collected its sample at the wrong location. Team #1 also used poor technique in collecting the sample.

SAPL EX-5

The graded exercise of the NHRERP failed to demonstrate the adequacy of medical facilities, including proper training of staff, to reasonably assure that treatment and decontamination of seriously ill or trauma patients contaminated with radioactive material can be carried out. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(12), §50.47(b)(14) and NUREG-0654 L. 1., 3. and 4. have not been met.

Bases:

Only two hospitals, the Elliott Hospital in Manchester, N.H. and the Wentworth-Douglas Hospital in Dover, N.H. were included in the exercise, and there was no significant test of the capability of these facilities to handle a major radiation emergency since each hospital simulated the handling of only one patient. Further, the medical and nursing staff members in both hospitals need additional training in the biological effects of radiation and the significance of CPM readings and mR/hr readings.

SAPL EX-6

The graded exercise of the NHRERP failed to demonstrate the adequacy of personnel to staff both the traffic control posts (TCP's) and access control posts (ACP's) designated in the plan to control evacuation flow and control access to evacuated and sheltered areas. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10), §50.47(b)(14) and NUREG-0654 J.10.i, j., k. and l. have not been met.

Bases:

The total number of state police required to provide assistance in staffing of ACP's in New Hampshire is 26-28 state police. (NHRERP, Vol 6 at p. 9-12) An additional 40 state police

are needed to staff TCP's and provide municipal security. During the exercise, only 4 ACP/TCP locations were staffed by N.H. State Police from Troop A, Epping. Only 13 of the 17 local communities staffed an ACP/TCP and only one was staffed in each of those communities. There was, therefore, no adequate demonstration that there is the organizational ability or personnel and equipment resources to staff all the required traffic and access control locations in New Hampshire. One of the towns that did not staff any location at all was Hampton. Hampton is the town with the most severe evacuation problems due to its extremely large beach population. The capability to control traffic in that community is critical to an adequate radiological emergency response. Further, the establishment of the TCP/ACP's was done out of the sequence and hence did not provide a true test of the capability to marshal state and/or local personnel and resources to appropriate traffic control locations in a timely manner during an emergency.

SAPL EX-7

The graded exercise of the NHRERP for Seabrook Station failed to demonstrate the capability for decontamination of emergency workers, equipment and facilities because the facility that is to be used under the plan was not opened up and demonstrated during the exercise. Further, there was no showing that there is adequate provision for disposal of wastes. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(11), §50.47(b)(14) and NUREG-0654 K.5.a. and b. have not been met.

Bases:

The Hillside Junior High School was, according to FEMA's report, unavailable for purposes of demonstration during the course of the exercise. There was no showing that there were

adequate numbers of trained personnel to staff the facility and no showing that the facility had been ever tested for its proposed use. The only FEMA evaluation of the facility was a visual inspection on July 22, almost a month following the exercise. Further, there was no exercise of the capability to dispose of contaminated wastes.

SAPL EX-8

The graded exercise of the NHRERP failed to demonstrate reasonable assurance of adequate public protection since no capability for 24 hour continuous staffing of Staging Areas and Reception Centers was demonstrated and continuous staffing of local and host EOC's over a continuous 24 hour time frame was not shown to be fully adequate in any of the local or host communities. Key positions at the IFO were not fully staffed by appropriately trained individuals and the Governor's office was not represented according to the plan. Further, the exercise did not demonstrate that there are adequate provisions for filling the roles of those personnel who are absent due to sickness, vacation or other causes. Therefore, the requirements of 10 CFR \$50.47(a)(1), \$50.47(b)(1), \$50.47(b)(14) and NUREG-0654 A.1. and A.4. are not met.

Bases:

The host EOC's in Salem, Dover and Rochester did not demonstrate shift changes. The Manchester EOC is alleged to have done so, though outgoing staff failed to brief the incoming staff. Neither the Rockingham County Staging Area nor the Portsmouth Circle Business Center Staging Area attempted shift changes. The exercise ended before the shift change was completed at the Reception Center in Dover. Firefighters in Dover conducted a demonstration and distributed a statement which said, inter alia, that "the firefighters . . . universally oppose the evacuation plans as unworkable." The proposed corrective action mentioned at p. 200 of the FEMA Exercise Report of having DPHS obtain 30

personnel from the N.H. National Guard does not address the problem since the DPHS functions require very specialized training and expertise. Further, adding personnel to DPHS does not address the problem of lack of Sheriffs Deputies to staff a second shift at the staging areas. Reference to "the Hampton Center" in the Exercise Report makes no sense since there is no such location designated as either a Staging Area or Reception Center under the NHRERP.

Not even one local EOC in the 17 towns demonstrated a full shift change. The Seabrook EOC was not even staffed in accordance with the plan for the first shift, and the Civil Defense Director did not appear to be trained adequately. Further, no second shift capability was demonstrated for Sheriff's Deputies staffing the non-participating communities. Additionally, three of the Local Liaison Officers and a special needs liaison were not replaced on the second shift at the IFO. The second shift state police did not demonstrate appropriate knowledge and capabilities. One of the two positions at the Joint Telephone Information Center (JTIC) was unstaffed due to illness. The exercise demonstrated no capability to bring in trained replacement personnel for positions left unfilled due to illness or other causes.

SAPL EX-9

The graded exercise of the NHRERP failed to demonstrate the ability to monitor, understand and use emergency classification levels (ECL's) Further, it failed to demonstrate the ability to provide for emergency actions to be taken by state and local organizations consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local offsite conditions that exist at the time of the emergency. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(4) and NUREG-0654 D 1. are not met.

Bases:

As the FEMA Exercise Report states at p. 139, the Rockingham County Dispatch Center (RCDC) is responsible for the initial notification of all 17 N.H. plume EPZ communities at each ECL. Appendix B of the procedures for the RCDC in Vol. 4B of the NHRERP shows that RCDC is to advise the towns of protective actions and as to whether or not there has been a release of radioactivity. RCDC failed to provide this information to the towns in an appropriately prompt manner to reasonably assure adequate public protection. For example, even though the release of radiation occurred at Seabrook Station at 1:44 p.m. and the NH IFO transmitted notification of the release to RCDC at 2:13 p.m., the Director and other RCDC personnel were unaware that there had been a release until approximately 3:00 p.m., approximately 1 hour and 16 minutes after the release occurred. Further, the second NH evacuation PAR was not known and posted until approximately 4:20 p.m. because the radio over which that information was monitored was in a separate room. The EOC in Seabrook, N.H. also failed to keep its status boards current.

SAPL EX-10

There is no reasonable assurance that a 24-hour continuous response by adequate numbers of trained personnel can be maintained during a radiological emergency at Seabrook Station since there was no exercise of the capability to respond to either an unannounced and/or off-hours emergency. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(1), §50.47(b)(14) and NUREG-0654 A.4 and N.1.b are not met.

Bases:

The graded exercise of the emergency response plans conducted by FEMA was a pre-announced exercise which occurred largely during normal weekday work hours. It was apparent that many of the emergency responders were aware of and were poised and ready to respond during the time frame during which the exercise was to transpire and some even arrived at response locations before they would have known any emergency had occurred at Seabrook under real life circumstances. For example, most participants arrived at the EOC in Stratham about 8:00 a.m. and roughly five New Hampshire Yankee officials arrived at the Portsmouth Business Center staging area at around 9:00 a.m. The Alert declaration at Seabrook Station, the first ECL declared, did not occur until 9:09 a.m. under the exercise scenario and no protective action decision was made until 10:32 a.m. There was, therefore, no test at all of the capability to staff emergency response functions during an unannounced, off-hours emergency.

SAPL EX-11

The performance of emergency responders during the graded exercise of the emergency response plans for Seabrook Station did not adequately demonstrate that "early notification" and timely protective actions can be implemented to reasonably assure the safety of the populace in the plume exposure pathway EPZ. Therefore, the requirements of 10 CFR 50.47(a)(1), 50.47(b)(4), 50.47(b)(14) and NUREG-0754 D.4 are not met.

Bases:

The utility made its announcement of the Alert ECL at 9:09 a.m. The decision to order the protective action of beach closure was not arrived at until 10:32 a.m., a full 1 hour and 23 minutes

later. Thereafter, it took another 28 minutes before the RCDC was instructed to activate the sirens, which means that there was an elapsed time of 1 hour and 51 minutes between the Alert declaration at Seabrook Station and any protective action implementation. Had a General Emergency been the very first ECL, this amount of elapsed time to recommend the first PA would have been extremely serious. Beach closure is a protective action that is supposed to occur under the NHRERP as a matter of course during the summer tourist season and the decision to act according to the plan should have followed promptly and immediately upon the Alert ECL having been declared.

Further, the General Emergency ECL was declared at Seabrook Station at 1:32 p.m. The decision to evacuate the 0-5 mile portion of the EPZ was not made until 2:09 p.m, 37 minutes later, and the sirens were not activated until 2:18 p.m., a full 46 minutes after the General Emergency was classified.

Additionally, the utility made the recommendation that more of the plume EPZ should be evacuated at about the 3:20-3:30 p.m. time frame. A state decision to evacuate additional communities in ERPA F did not follow until 4:26 p.m. Sirens were not activated to notify the public until 4:35 p.m., approximately 1 hour and 10 minutes after the action was recommended. These undue and lengthy delays betray a fundamental problem in the protective action decisionmaking and implementation process.

SAPL EX-12

The adequacy of procedures, facilities, equipment and personnel for the registration, radiological monitoring and

decontamination of evacuees was not demonstrated during the exercise. Facilities were not well organized and not run in an adequately effective manner. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10), §50.47(b)(14) and NUREG-0654 J.12 have not been met.

Bases:

Only two of the host communities opened Reception Centers during the exercise: Salem and Dover. In Salem, mock evacuees were kept waiting outdoors from approximately 3:14 p.m. until 5:09 p.m. when the first evacuee was monitored. Difficulties in setting up the facility included phone lines strung across a corridor, the DPHS Supervisor's radio not working and too few personnel. The personnel problems were compounded when fire personnel got called away to deal with real life situations. Monitoring times were not efficient and there was a mix-up of the Mettags. An actual breakdown in the monitoring process occurred at 6:28 p.m.

In Dover, the workers in the Reception Center seemed unclear on their responsibilities and there were not enough personnel. Mock evacuees were not allowed into the Dover Reception Center until after 3:30 p.m. There was a good deal of disarray in the organization in the monitoring section and the process of monitoring evacuees did not begin until 4:40 p.m. Some of the evacuees wandered into the wrong areas. Not enough headsets were available for the monitoring instruments.

At the State EOC, the DPHS staff who are to be an information and referral resource to the personnel at the Reception Centers were not familiar with their responsibilities and duties under the Radiological Health Screening Program. This is a very serious defect in the response capability for a radiological emergency.

SAPL EX-13

The graded exercise of the NHRERP did not provide an adequate demonstration of reasonable assurance that those persons confined to nursing homes, hospitals and like special institutions can be adequately protected in the event of a radiological emergency. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10), §50.47(b)(14) and NUREG-0654 J.9, J.10.d., e., f. and g. have not been met.

Bases:

There was no test of capability to transport hospital and nursing home patients to host facilities by ambulance and the plan for testing of bus bed conversion capability was severely limited. There were only two mini-scenarios to test the emergency bed bus capability and it is not clear from reviewing the Exercise Report whether or not those mini-scenarios were carried out. Further, there is no mention of any test of the ability to make decisions regarding the administration of KI to institutionalized persons in regard to Objective #16. Finally, there was no test of host special facilities to receive special population evacuees and no test of the capability to monitor and decontaminate these special population evacuees. Therefore, the graded exercise provided no reasonable assurance that institutionalized persons can be adequately protected in the event of a radiological emergency at Seabrook.

SAPL EX-14

The graded exercise of the New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook Station did not result in an adequate demonstration that appropriate Protective Action decisions will be made for the plume EP2 communities or that expansion of the response beyond ten miles can be carried out when it is prudent to carry out such an expanded response. Therefore, the requirements of 10 CFR §50.47(a)(1), §50.47(b)(10) and NUREG-0654 J.10.m. have not been met.

Bases:

The exercise scenario resulted in a wind shift which brought a concentrated plume over the communities of Portsmouth, Rye and Greenland toward the end of Day 1 of the scenario, yet those communities were never ordered evacuated. In view of the radiation levels in the plume as the wind carried it over those municipalities, the evacuation order should have been expanded to encompass ERPA G. Further, the concentration of the plume as it passed over Kittery, Maine would have warranted an evacuation of Kittery as well. NUREG-0654 states at p. 12 that the 10-mile plume EPZ planning basis is based on the consideration, inter alia, that:

detailed planning within 10 miles
would provide a substantial base for
expansion of response efforts in the
event this proved necessary

The exercise demonstrated that appropriate protective actions were not wholly carried out even within the boundaries of the EPZ. The exercise showed no capability for an expansion of the response beyond 10 miles when warranted.

Respectfully submitted,

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By its Attorneys,

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