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UNITED STATES NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
'88 SEP 23 P2:28

OFFICE OF SECRETARY
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BRANCH

In the Matter of)
)
Public Service Company of)
New Hampshire, et al.)
)
(Seabrook Station, Units 1 & 2))
_____)

Docket Nos. 50-443 OL
50-444 OL
OFFSITE EMERGENCY
PLANNING

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
AND TOWN OF HAMPTON'S CONTENTIONS REGARDING THE
1988 EXERCISE OF OFFSITE PLANS AND PREPAREDNESS
FOR THE SEABROOK EMERGENCY PLANNING ZONE

Introduction

The New England Coalition on Nuclear Pollution and the Town of Hampton jointly submit the following contentions regarding the emergency planning exercise conducted on June 28-29, 1988. These contentions are based on the Federal Emergency Management Agency's Exercise Report (September 1, 1988), FEMA's draft Exercise Report (August 2, 1988), news releases from the State of New Hampshire and the New Hampshire Yankee Offsite Response Organization, and observations made by Intervenors stationed at Newington on Day 1 of the exercise.

Contentions TOH/NECNP EX-2 and TOH/NECNP EX-3 are presented below. Contention TOH/NECNP EX-1 has been filed separately by the Town of Hampton. These contentions demonstrate fundamental flaws in emergency planning for Seabrook.

Contention TOH/NECNP EX-2): The exercise demonstrated that there is no reasonable assurance that adequate measures can and

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will be taken to protect school children during a radiological emergency at Seabrook.

Basis: During the exercise, Applicants and the State of New Hampshire demonstrated an inability to successfully carry out and integrate protective actions on behalf of the school children in the Seabrook Emergency Planning Zone ("EPZ"). Instructions to the public regarding care of school children were confusing and inaccurate, bus drivers were unable to complete their assignments without assistance, protective action ("PA") decisions regarding school children were made and carried out too late and too slowly, and the State of New Hampshire failed to follow through on protective actions for school children. The process by which the State of New Hampshire ("NH") and the New Hampshire Yankee Offsite Response Organization ("ORO") arranged for care of school children was one that would have created chaos and confusion in a real accident.

EBS messages, summarized in Table 8 of the Draft and Final Reports, lack sufficient information for parents to obtain assurance or make informed decisions about the protection of their children. At 1045, NH announced that it had closed the beaches (NH Advisory #2), and at 1101 NH beach sirens were sounded. Nothing was said at that point about the status of school children, even though beach residents whose children were in school needed that information in order to make decisions about protecting their family members.

Less than an hour later (1152), the State made a decision to keep school children in school buildings until 1700 (5 p.m.) That decision was not even conveyed to the public until 1242 (NH Advisory # 4), almost two hours after the beaches had been closed. Thus, parents who were evacuating the towns of Seabrook and Hampton were likely to go to school to get their children, in contravention of the State's procedures for orderly protective actions.

To complicate matters further, Portsmouth and Brentwood ordered protective actions that differed from the State's. Final Exercise Report at p. 173; Draft Report at p. 231.

In Massachusetts, ORO issued a News Release (#06) at 3 p.m. telling Salisbury and Amesbury residents to evacuate, while at the same time stating that school dismissal would be "delayed." No instructions were given to parents regarding whether or when to retrieve their children. It is difficult to conceive that parents in Salisbury and Amesbury, having been told by this announcement that it was advisable to leave the area, would just leave their children to await some later "dismissal."

The next News Release issued by ORO (#07 at 3:12) was also confusing. Amesbury and Salisbury residents were told to evacuate immediately. The press release also contained the contradictory statements that schools were being evacuated (p. 2) and that "children are currently being safely maintained at school, where they will be kept until it is determined that they

can be safely moved." (p. 5) The underlying message conveyed to parents by that press release was that if they wanted to assure that their children would leave the EPZ immediately, as the parents had been told was advisable, they should go to school and get them.

With so many different protective actions being ordered for different groups of people (i.e. beaches closed while surrounding communities told to take no action, some communities told to evacuate while others told to shelter), and with the constant changes in those instructions¹, parents had a strong incentive to "hedge their bets" by fetching their children from school.² For instance, it is reasonable to expect that parents, hearing at the Alert or Site Area Emergency stage that beaches had been closed, would go to school and get their children so that they would be ready to evacuate when the order came. It is also likely that

1 Table 7 shows two different "waves" of evacuations of the NH EPZ: NH PA # 3 (evacuation of 0-5 miles), and NH PA # 4 (evacuation of ERPA F). In the first wave, an EBS message at 1435 told some towns to evacuate while others sheltered. In the second wave, an EBS message at 1640 told some of the towns that had been ordered to shelter in the previous EBS message that they should now evacuate. The FEMA report does not contain sufficient detail to evaluate whether schools in each of those towns were also evacuated promptly and successfully, as they should have been.

2 The discrepancies in protective instructions extended across both community and state lines -- within the same state, some communities were ordered to evacuate while others were ordered to shelter; and beach closure was ordered in New Hampshire over an hour before it was ordered in Massachusetts.

parents who had been ordered to shelter at the General Emergency stage while other towns had been ordered to evacuate, would fetch their children from school. The poor timing of protective action decisions and the confusing media announcements prepared by NH and ORO encouraged these responses from parents. Moreover, NH and ORO failed to demonstrate any recognition of or attempt to deal with the problem. Had this been a real accident and not a simulation, the schools in both the NH and Massachusetts portions of the EPZ would have been jammed with parents trying to rescue their children.

Finally, once it had initiated protective actions for school children, the State of New Hampshire simply forgot about them. This was clearly apparent to Intervenor observers on the first day of the exercise, when protective actions for schools were carried out. For example, it wasn't until 5:45 p.m. that the State EOC asked the IFO when the towns had been or would be evacuated. At that point, the status board showed only Seabrook as having completed an evacuation -- a complete fiction, since Seabrook had withdrawn from the exercise early in the day. At that time, the status board also showed only the estimated time of arrival of buses at reception centers, and not the actual arrival times.

At 6:30 p.m., a half hour before the exercise ended, it also became apparent that NH officials had forgotten that a significant number of children were still in school awaiting late

dismissal (i.e. those children in NH towns that had been ordered to shelter). Intervenor observers heard conversations between various officials who were unsure how many children were left in the schools and whether they would be bused or picked up by their parents. Nine minutes before the scheduled 7 pm dismissal, intervenors heard the IFO call the State EOC and ask what transportation arrangements had been made for these children; the EOC responded that arrangements had been made, but EOC did not know what they were.

NH's news releases reflected the confusion over the status of children held in schools. At 1334, NH News Advisory # 6 stated that children would be held in school until 5 p.m. Nothing was said about how the children were to get home. At 4:01 p.m. (NH News Advisory # 11), NH changed the dismissal time to 7 p.m. for children who were still being held at their schools.³ At that point, parents were told that they could, if they wished, pick up their children before 7 p.m., but they were not told how the children would get home if they were not picked up by their parents. Less than an hour later, the same parents were told "not to call the schools or other institutions nor to drive to

3 Given that there were several waves of evacuation in New Hampshire (see note 1), and the lack of information as to whether schools were evacuated concurrently with the general population of towns in which they were located, it is not clear what schools were still awaiting 7 p.m. dismissal at the end of the exercise.

schools to attempt to pick up their children." (News Advisory # 12).

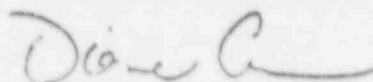
The actual evacuation of school children was beset with problems. See Draft Exercise Report at pp. B-94 - B-95. As demonstrated at pp. 225-231, a number of bus drivers got lost or needed controller intervention. Maps were poor. One driver took almost 4 hours to run a route between the East Kingston Local Staging Area and the Portsmouth Transportation Staging Area (Draft Exercise Report at p. 225). Some time estimates are so short as to appear to be incorrect: for instance, at pp. 227 and 229 of its Draft Report, FEMA states that a number of buses took only one or two minutes to travel between locals staging areas and schools. In Massachusetts, only 7 buses were dispatched for the 29 schools and 78 nursery schools and day care centers. Even with such a small test, bus drivers experienced difficulties. Final Report at 225-26.

Finally, NH did not show an ability to swiftly make and carry out protective actions. As discussed above, NH was slow to recognize and resolve the problem of transporting the school children who remained in the EPZ. The State of New Hampshire also delayed in making and implementing other PA decisions. For instance, Intervenor observed that at 1:39 p.m., NHY recommended evacuation. The State did not concur until 2:09, even though it would take at least 45 minutes to get traffic control personnel in place.

Contention TOH/NECNP EX-3): The exercise showed a lack of severe coordination between New Hampshire and the New Hampshire Yankee ORO, resulting in a failure to provide adequate protection to the public health and safety.

Basis: The order to close New Hampshire beaches was given an hour and twenty minutes before the order to close Massachusetts beaches. It is reasonable to expect that visitors to Massachusetts beaches would hear and respond to the advice given to New Hampshire beachgoers that they should evacuate the beaches. Under these circumstances, an evacuation from the Massachusetts beaches would have begun long before it was planned, and long before any traffic control or other personnel were in place to direct the evacuation.

Respectfully submitted on behalf
of NECNP and Town of Hampton,

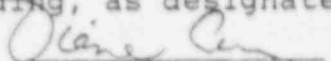


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September 21, 1988

CERTIFICATE OF SERVICE

I certify that on September 21, 1988, copies of the foregoing pleading were served by hand, overnight mail, or first-class mail on all parties to this proceeding, as designated on the attached service list.


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SEABROOK SERVICE LIST
Offsite Licensing Board

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'88 SEP 23 P2:28

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