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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 SEP 28 A11:42

ATOMIC SAFETY AND LICENSING BOARD

Before the Administrative Judges:
Ivan W. Smith, Chairman
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	Docket Nos. 50-443-OL-1
)	50-444-OL-1
PUBLIC SERVICE COMPANY)	(Off-Site EP)
OF NEW HAMPSHIRE, ET AL.)	
)	
(Seabrook Station, Units 1 and 2)	September 27, 1988

MASSACHUSETTS ATTORNEY GENERAL JAMES M. SHANNON'S
ANSWERS AND RESPONSES TO THE NRC STAFF'S FIRST SET OF
INTERROGATORIES AND FIRST REQUEST FOR DOCUMENTS

General Objection 1:

The Massachusetts Attorney General ("Mass AG") objects to any interrogatories and the production of any documents which would call for the disclosure of attorney-client communications or which reflect the work-product of the Department of the Attorney General or any other attorney(s).

General Objection 2:

The Mass AG objects to the scope of "Commonwealth of Massachusetts," as set forth in the Staff's introduction and as referred to in definition five (5), as being overly broad. The construction suggested by the Staff would, inter alia, include the local towns in the EPZ which are already parties to this litigation.

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General Objection 3:

The Mass AG objects to the Staff's demand that any pertinent information available to "officers, employees, directors, advisors, representatives or counsel" be provided. Compliance with such a directive would entail putting the Staff's Interrogatories and Document Requests to each employee of the Commonwealth. As such, it is overly broad, unduly burdensome and seeks information not reasonably calculated to lead to the discovery of admissible evidence.

General Objection 4:

The Mass AG objects to production of the requested documents at the location requested and instead will make them available for inspection at the office of the Mass AG and/or at the locations at which the documents are normally kept and in the manner in which they are retained in the usual course of business.

Objections to Instructions:

The Mass AG objects to Paragraph A of the Staff's Instructions because the Mass AG is not obliged to supply "estimated information." Similarly, the Mass AG is not required to describe the parameters of any such estimates. See Pennsylvania Power & Light Co. (Susquehanna Steam Elec. Station, Units 1 and 2), ALAB-613, 12 NRC 317, 334 (1980)(party responding to discovery request not required to engage in independent research and need only reveal information in its possession or control).

Paragraph B is objectionable insofar as that Instruction seeks to extend to or add to the rule regarding supplementation of interrogatories, as set forth in 10 CFR 2.740(e).

Similarly, Paragraph G is objectionable insofar as that Instruction seeks to establish additional obligations with regard to a claim of privilege which are not set forth in 10 CFR 2.740(b).

Objection to Definitions:

The Mass AG objects to Paragraph 6 of the Staff's "Definitions and Guidelines" because that definition is unclear and confusing.

The Mass AG objects to Paragraph 8(2) because identification of particular residential addresses, in this context, is irrelevant. Paragraph 8(8) is objectionable because it contradicts other sections of paragraph 8 and is confusing.

Paragraph 9 is objectionable because it calls for the identification of public information which is available to the Staff and which the Mass AG is not obligated to collect.

The Mass AG objects to Paragraph 10 because the Staff's independent request for documents precludes additional requirements of this kind. Moreover, such additional requirements are not contemplated or authorized by 10 CFR § 2.741.

The Mass AG objects to paragraph 11 on the grounds that it is unduly burdensome.

Answers to Interrogatories and Responses
to Requests for Production of Documents

1. Identify and supply each document containing procedures, plans, orders, instructions, directions, and training materials of the Commonwealth of Massachusetts, and intervenors as defined in definition 5 for any action in the event of:

(a) a radiological emergency or disaster stemming from a nuclear plant accident, whether the plant is located inside or outside of Massachusetts;

(b) other radiological emergencies or disasters; and

(c) all other "emergencies" or disasters as defined in paragraph 4 of the above definitions.

Answer and Response to 1:

OBJECTION: The Mass AG objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This request calls for emergency planning materials from any and all entities related to the Commonwealth concerning any and all types of emergencies irrespective of location. The matters at issue concern the Seabrook EPZ. Moreover, this request seeks some information directly related to and presumably in the possession of other intervenors. As such, the staff should direct such inquiries elsewhere.

2. With regard to each document set out in response to Interrogatory 1, describe the functions in emergencies of any of the following categories of personnel:

- (a) State and local police, to include persons employed full or part time, and both private and public security personnel, such as special officers and deputies;
- (b) Civil Defense personnel;
- (c) Professional or volunteer fire-fighting personnel;
- (d) First aid and rescue personnel;
- (e) Emergency Service personnel;
- (f) Local support services personnel;
- (g) Medical support personnel;
- (h) Health and Environmental Department personnel;
- (i) National Guard, Militia or Reserve personnel;
- (j) Boards of Education, School Boards or Departments, and teachers;
- (k) Employees of all other State, local or municipal departments or agencies;
- (l) Individuals obligated to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements; and
- (m) Individuals available to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements.

Answer and Response to 2:

OBJECTION: See Response to Interrogatory 1. In addition, the Mass AG objects to Interrogatory 2 on the grounds that it

is duplicative and confusing. In the event that documents are produced in response to (a more limited) Interrogatory 1, those documents will speak for themselves as to the information requested in number 2.

3. Set out the training each category of personnel set out in Interrogatory 2 has to perform its function in an "emergency."

Answers and Responses to 3(a) through 3(k):

OBJECTIONS:

(a) This Interrogatory is overly broad and unduly burdensome. To the extent that the Staff seeks information in the possession of other Intervenors, the Staff should address those inquiries elsewhere. Similarly, to the extent that the Staff seeks information pertaining to "private" security personnel, the Staff should address its inquiries elsewhere. The term "public" security personnel is objectionable in that it is vague, confusing and undefined.

The Mass AG is in the process of assembling information regarding the training program(s) for State Police.

(b) The Mass AG is in the process of accumulating information regarding the training program(s) for Civil Defense personnel.

(c) This Interrogatory is objected to. To the extent that the Staff seeks information pertaining to other Intervenors, the Staff should address those inquiries elsewhere.

(d) See Response 3(c).

(e) See Response 3(c).

(f) See Response 3(c).

(g) See Response 3(c). In addition, insofar as this request concerns employees of private institutions, the Staff should direct such inquiries to the respective institutions.

(h) The Mass AG is in the process of assembling information regarding the training program(s) for health and environmental personnel.

(i) The Mass AG objects to this Interrogatory to the extent that it seeks information about Reserve units not under the authority of the Commonwealth. The Mass AG is assembling information regarding the training program(s) for the National Guard.

(j) See Response 3(c).

(k) See Response 3(c). In addition, the Mass AG objects to this request because requesting training programs for all

"state, local and municipal departments or agencies" is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

(l) See Response 3(g).

(m) See Response 3(g).

4. Identify the Massachusetts Civil Defense agency areas in which the Seabrook plan emergency planning zone (EPZ) is located. Provide the Civil Defense plans for those areas and for the Commonwealth.

Answer and Response to 4:

The Mass AG is in the process of assembling this information.

5. Identify the number of individuals in each of the personnel categories listed in Interrogatory 2(a)-(m), and the number of such personnel: (a) with the 10-mile EPZ plume exposure pathway; (b) from 10 to 25 miles of Seabrook Station; (c) from 25 to 50 miles of Seabrook Station; (d) from 50 to 100 miles of Seabrook Station; and (e) with the Commonwealth of Massachusetts outside the aforementioned areas.

Answer and Response to 5:

OBJECTION: See Response 3 (a-m) which is incorporated herein by reference. The Mass AG is collecting information

regarding certain categories, as set forth in Response 3. However, the Mass AG objects to conducting analyses and engaging in computations regarding that data. See, e.g., Pennsylvania Power & Light Co. (Susquehanna Steam Elec. Station, Units 1 and 2). ALAB-613, 12 NRC 317, 334 (1980)(party responding to discovery not required to perform independent research and only has to reveal information in its possession or control). See also Houston Lighting & Power Co. (South Texas Project, Units 1 and 2), LBP-80-11, 11 NRC 477, 478 (1980). Further, the Mass AG objects to 5(e) on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

6. Identify the types and number of the following resources available for use in the event of emergencies pursuant to the documents identified in Interrogatory 1: (a) police vehicles; (b) fire trucks; (c) buses; (d) vans; (e) other vehicles; (f) helicopters and other aircraft; (g) boats; (h) sirens and public notification systems; (i) radios; and (j) all other equipment.

Answer . . . 1 Response to 6:

OBJECTION: See Response to Interrogatory 1.

7. Identify the resources enumerated pursuant to Interrogatory 6(a)-(j), according to their location: (a) with the 10-mile

EPZ plume exposure pathway; (b) from 10 to 25 miles of Seabrook Station; (c) from 25 to 50 miles of Seabrook Station; (d) from 50 to 100 miles of Seabrook Station; and (e) within the Commonwealth of Massachusetts outside the aforementioned areas.

Answer and Response to 7:

OBJECTION: See Response to Interrogatory 6. In addition, in the event that documents are produced in response to (a more limited) Interrogatory 1, the Mass AG objects to this request on the grounds that it is not obliged to conduct analyses or computations pertaining to information which it may have in its control or possession. See cases cited in Response to Interrogatory 5, supra.

8. Identify the number and location of Massachusetts National Guard Units, the number of members of each unit, their distance from the Seabrook plume exposure EPZ, and the number and location of the following resources available for use by the National Guard in emergencies: (a) cars; (b) trucks; (c) vans; (d) helicopters; (e) other means of transportation; and (f) communication facilities, including radios and other means of public notification. Supply the same information for any Militia or Reserve Unit in Massachusetts.

Answer and Response to 8:

OBJECTION: The Mass AG objects to the scope of this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, information disclosing the complete personnel profile of the National Guard would be classified. "Reserve Units" are not under the authority of the Commonwealth.

9. Identify any plans made for radiological monitoring in the event of a radiological emergency from any cause, including (a) the number and location of personnel trained and available to accomplish such monitoring, and (b) a description and enumeration of radiological monitoring equipment available for use in such an emergency, along with identification of the equipment's location.

Answer and Response to 9:

OBJECTION: The Staff seeks information pertaining to a radiological emergency from "any cause" anywhere in the Commonwealth. As such, this Interrogatory is objected to on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, to the extent the Staff seeks information concerning private individuals and institutions it should make inquiry elsewhere.

10. Identify any provisions made for handling of individuals contaminated in a radiological emergency stemming from any cause including (a) the number and location of personnel trained and available to assist in decontamination of contaminated individuals, and (b) a description and enumeration of equipment available for use in decontamination, along with identification of the equipment's location.

Answer and Response to 10:

OBJECTION: See Response and Objection to Interrogatory 9 which is incorporated by reference.

10a. Identify all documents in your possession identifying facilities in Massachusetts which have or claim to have equipment, personnel or expertise to treat radiologically contaminated individuals. Supply such documents.

Answer and Response to 10a

The Mass AG is in the process of determining whether any such documents exist.

11. Identify any provisions made by the Massachusetts Department of Agriculture, or other state or local governmental agency, concerning protective measures to be used for the 50-mile ingestion pathway from any nuclear plant, including the methods for protecting the public from

consumption of contaminated foodstuffs; and identify any procedures for detecting contamination, for imposing protective measures such as interdiction of food supply, impoundment, or quarantine, and for public notification concerning food contamination and the protective measures to be followed.

Answer and Response to 11:

OBJECTION: Insofar as this request seeks information pertaining to local governments and/or other Intervenors, the Staff should address such inquiries elsewhere. In addition, the Mass AG objects to this request as being overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence insofar as it concerns any nuclear reactor other than Seabrook Station.

12. Identify the number of Massachusetts Civil Defense personnel according to location within the Commonwealth, and identify the amount and location of equipment available for their use to protect the public in the event of an emergency. Set out the training of Civil Defense Personnel.

Answer and Response to 12:

See Responses to Interrogatories 3(b), 4 and 5.

13. Identify the location of stations authorized to broadcast under Federal Emergency Broadcast System (EBS) regulations

and the Massachusetts EBS Operational Plan ("Operational Plan"). Provide a copy of the Operational Plan.

Answer and Response to 13:

The Mass AG is in the process of assembling information requested.

14. Identify all documents, agreements, and communications dated within the last five years concerning the operation of the EBS. Produce a copy of all such documents, agreements and communications.

Answer and Response to 14:

OBJECTION: The Mass AG objects to this request on the grounds that it is overly broad, unduly burdensome and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. There is no rationale for a five-year archaeology of such documents.

15. Identify the provisions of federal or state law which preclude activation of the EBS at the discretion of management of AM, FM, and television stations, in connection with day-to-day emergency situations posing a threat to the safety of life and property, such as hurricanes, floods, icing conditions, heavy snows, fires, toxic gases, power failures, industrial explosions, and civil disorders.

Answer and Response to 15

OBJECTION: This Interrogatory is objected to on the grounds that: (1) it calls for legal conclusions and legal research which are the work product of the Attorney General; (2) it seeks information that is public and available to the Staff; and (3) it seeks to elicit portions of the legal position of the Attorney General on an issue to be decided as a result of this proceeding.

16. List all Federal funds received by Intervenors during the past 5 years for purposes of developing plans, procedures, manuals, and other documents concerning responses to emergencies, and identify, with respect to each such document, under what statutes these funds were provided and the Federal agencies or departments from which the funds were received.

Answer and Response to 16

OBJECTION: See Response and Objection to Interrogatory 14 which is incorporated herein by reference.

17. With respect to each document identified in Interrogatory 1, identify any Federal or state law or regulation pursuant to which each such document was prepared.

Answer and Response to 17:

OBJECTION: See Response to Interrogatory 1.

18. Identify all Massachusetts statutes and regulations, and all local regulations, ordinances or other provisions, (a) concerning actions to be taken by state or local authorities, or those acting in their behalf, in the event of emergencies, including the preparation of plans for actions to be taken in emergencies; (b) concerning any prohibitions on any such actions or plans; and (c) concerning any prohibitions on any person or organization other than state or local authorities with respect to any such actions or plans.

Answer and Response to 18:

OBJECTION: See Response and Objection to Interrogatory 15 which is incorporated herein by reference.

19. Set out the conditions, including citations to all applicable provisions of state and local laws regulations, (a) under which state and local authorities may permit private individuals or organizations to take action on their behalf in an emergency; and (b) under which state and local authorities are precluded from authorizing private individuals or organizations from taking action on their behalf in an emergency.

Answer and Response to 19:

OBJECTION: See Response and Objection to Interrogatory 15 which is incorporated herein by reference.

20. Set out examples illustrating the conditions described in Interrogatory 19 (a) and (b).

Answer and Response to 20:

OBJECTION: See Response to 19. In addition, the Mass AG objects to this interrogatory because it is the type of inquiry contemplated by the rules governing discovery. See 10 CFR § 2.740. The Mass AG is under no obligation to generate and provide examples or illustrations to the Staff.

21. Define what you consider to be "the beach" in the Massachusetts portion of the Seabrook Station EPZ. Set out the geographic boundaries of that "beach" area.

Answer and Response to 21:

The Mass AG is in the process of formulating a response to this interrogatory.

22. Using the definition of "the beach" you supplied in answer to Interrogatory 21, provide the following data, along with a copy of any study or other document relevant to the following information: (a) the maximum number of cars at the beach on the 10 busiest days within the last 5 years, along with indication of the time and date of such maxima; (b) the number of cars remaining at the beach following each 1/2-hour interval for the 8 hours after the aforementioned maxima; (c) the number of cars entering and

leaving the beach during each 1/2-hour interval within the 8-hour period. If you do not have data for 1/2-hour intervals, supply such data for periods you have. Indicate whether the foregoing computations were made manually or automatically.

Answer and Response to 22:

The Mass AG is seeking to determine whether any study or document is in its possession or control which contains the requested information. However, the Mass AG will not initiate or conduct any such study or analysis for the purposes of answering this request. See cases cited in Response to Interrogatory 5, *supra*.

23. Identify all studies conducted during the last five years concerning improving the movement of traffic in and out of "the beach" area. Provide a copy of all such studies.

Answer and Response to 23:

The Mass AG is seeking to determine whether any such studies exist. However, the Mass AG objects to the five-year period set forth in this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

24. Identify all studies conducted during the last five years concerning improving the movement of traffic in the event

of emergencies within the Seabrook Station EPZ which include estimates of volume of traffic or the time within which traffic can be evacuated. Provide a copy of all such studies.

Answer and Response to 24:

The Mass AG is seeking to determine whether any such studies exist. However, the Mass AG objects to the five-year period set forth in this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

25. Identify all State and local laws and regulations concerning the following actions to be taken in the event of radiological or other emergencies (see definition 4): (1) guiding traffic; (2) blocking roadways, erecting barriers in roadways, and channeling traffic; (3) posting traffic signs on roadways; (4) removing obstructions from public roadways, including towing private vehicles; (5) activating sirens and directing the broadcast of EBS' messages; (6) making decisions and recommendations to the public concerning protective actions; (7) making decisions and recommendations to the public concerning protective actions for the ingestion exposure pathways; (8) making decisions and recommendations to the public concerning recovery and reentry; (9) dispensing fuel from tank trucks to automobiles along roadsides; and (10) performing access

control at the Emergency Operations Center, the relocation centers, and the EPZ perimeters.

Answer and Response to 25

OBJECTION: See Response and Objection to Interrogatory 15 which is incorporated herein by reference.

26. Identify all studies performed during the last five years concerning the availability and possible use of sirens and other means of emergency communication to the public in the event of emergencies. Provide a copy of all such studies.

Answer and Response to 26

See Response to Interrogatory 24.

27. Identify all sirens or other means of emergency communication in the Seabrook EPZ which can be heard by the general public.

Answer and Response to 27.

OBJECTION: This Interrogatory is objected to on the grounds that it is overly broad and unclear. Insofar as the Staff's request concerns those towns and/or cities in New Hampshire the Staff should inquire elsewhere. In addition, the term "heard" in this context is ambiguous and undefined.

28. Identify all studies performed by Intervenor during the last five years concerning planning for emergencies. Produce a copy of all such studies.

Answer and Response to 28.

OBJECTION: This Interrogatory is objected to on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. To answer this request, the Mass AG would have to identify all plans for all communities throughout the entire state for a period covering the last five years.

Respectfully submitted,

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DATED: September 27, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Docket No.(s)
50-443/444-OL
(Off-site EP)

CERTIFICATE OF SERVICE

I, Pamela Talbot, hereby certify that on September 27, 1988, I made service of the within MASSACHUSETTS ATTORNEY GENERAL JAMES M. SHANNON'S ANSWERS AND RESPONSES TO THE NRC STAFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR DOCUMENTS, by First Class Mail, by Federal Express as indicated by [*], or by Telefax as indicated by [**] to the following parties:

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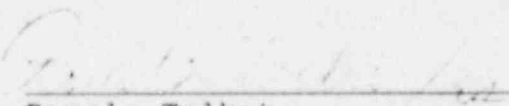
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DATED: September 27, 1988