

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PUBLIC SERVICE COMPANY OF) Docket Nos. 50-443-OL-1
NEW HAMPSHIRE, et al.) 50-444-OL-1
) Offsite Emergency
(Seabrook Station) Planning Issues
Units 1 and 2))

TOWN OF AMESBURY ANSWERS TO
NRC STAFF'S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE
TOWNS OF AMESBURY, NEWBURY, SALISBURY, WEST NEWBURY,
AND MERRIMAC, AND THE CITY OF NEWBURYPORT

NOW COMES the Town of Amesbury (TOA) and hereby answers NRC
STAFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE TOWNS OF AMESBURY, NEWBURY, SALISBURY, WEST
NEWBURY, AND MERRIMAC, AND THE CITY OF NEWBURYPORT dated September 6,
1988 as follows:

OBJECTION TO PRODUCTION OF DOCUMENTS

TOA objects to the Staff's request that any documents to be
produced by TOA must be provided at Staff offices located in
Rockville, Maryland. The request is unduly burdensome and costly to
TOA, is disruptive of record keeping maintained by the Town, and could
unreasonably compel TOA to transfer documents outside the EPZ. In
addition, in view of the great disparity in resources between the
Staff and TOA, it is only appropriate that the Staff assume the burden
of coming to TOA to inspect any relevant documents of TOA, provided,

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however, that said inspection is conducted during the discovery period, during normal business hours, at a mutually agreeable time, following reasonable notice to TOA.

INTERROGATORIES

QUESTION:

1. Identify and supply each document containing procedures, plans, orders, instructions, directions, and training materials of the Intervenors 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:

1 (a - b). This Interrogatory is objected to as overly broad and unduly burdensome. To the extent the Staff seeks identification or production of documents concerning Intervenors other than TOA, or information on issues beyond TOA's jurisdiction, the Staff should address those inquiries elsewhere. This Interrogatory is also objected to on grounds that, on information and belief, the Staff is already in possession of all planning documents concerning Seabrook Station, which were generated in conjunction with Applicants and the Commonwealth, prior to the vote by the Commonwealth and TOA not to participate further in emergency planning for Seabrook Station. TOA is not in possession of any documents involving radiological emergency planning generated since that date.

1 (c). TOA has not approved any emergency or disaster plan for the Town.

QUESTION:

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) Local support services personnel including Civil Defense/Emergency Service personnel;
- f) Medical support personnel;
- g) Emergency Service 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:

2. See Answer to Interrogatory 1. By way of further objection, the documents speak for themselves and the Staff has substantially greater resources to analyze these documents as it chooses.

QUESTION:

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

ANSWER:

3. See Answer to Interrogatory 2.

QUESTION:

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

ANSWER:

4. See Answer to Interrogatory 1.

QUESTION:

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) within 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:

5. See Answer to Interrogatory 1. By way of further answer, the number of individuals in each of the personnel categories in TOA are as follows:

- a) Police: 1 Chief, 5 Sergeants, 23 full time, 6 reserve
15 auxillary
- b) Civil Defense personnel: 1 full time, 15 volunteers
20 reserve
- c) Professional or volunteer fire-fighting personnel:
1 Chief, 1 Deputy, 28 Professional and 14 volunteer
- d) First aid and rescue personnel: See Answer to 5(c).
- e) Local support services personnel including Civil Defense/
Emergency Service personnel: See Answer to 5(c).
- f) Medical support personnel: 250 employees - Town of Amesbury
Hospital
- g) Emergency Service personnel: See Answer to 5(c).
- h) Health and Environmental Department personnel: 1
- i) National Guard, Militia or Reserve personnel: 0
- j) Boards of Education, School Boards or Departments, and
teachers: School Committee: 7 members

School Administration: 1 Superintendent; 4 Administrative Staff

As of 1987-1988 - Teachers:

Horace Mann: 1 Principal
13 Teachers (including half-time)

Ames Elementary: 1 Principal
32 Teachers (including 1 nurse)

Cashman Elementary: 1 Principal
45 Teachers (including 1 nurse)

Amesbury Middle: 1 Principal
1 Assistant Principal
49 Teachers (including 1 nurse)

Amesbury High: 1 Principal
1 Assistant Principal
58 Teachers (including 1 nurse)

k) Employees of all other State, local or municipal departments or agencies: Public Works Department: 40
(12 water, 6 Sewer, 24 Public Works)
3 Administrators; 1 Secretary
1 Town Manager

l) Individuals obligated to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements; and

1) See Answer to Interrogatory 1. By way of further answer, TOA will assist other Towns if requested, and, if TOA resources are available and not otherwise engaged.

m) Individuals available to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements: See Answer to 5(1).

QUESTION:

6. Identify the type 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:

6. See Answer to Interrogatories 1 and 2.

QUESTION:

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

7. See Answer to Interrogatory 1. By way of further answer, TOA owns the following resources: (a) police vehicles: 1 staff car, 4 cruisers, 1 unmarked cruiser, 1 canine vehicle; (b) 11 fire Department Vehicles; (c) 0 buses; (d) 1 van; (e) other vehicles, Public Work Department has 7 pickup trucks, 10 dump trucks, 2 back hoes, 1 trojan loader, 6 enclosed service trucks; School Department has 3 pickup trucks; (f) 0 helicopters and other aircraft; (g) 2 boats; (h) 1 fire horn; 1 public square siren; (i) radios; Police and Fire Department's have radios in vehicles and portable and (j) all other equipment. (j) is objectionable as vague and overly broad.

QUESTION:

8. Identify the number and location of Massachusetts National Guard Units in each of the Intervenor jurisdictions, 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 such jurisdiction. (Footnote: If any of the data sought under Interrogatory 8 are withheld on the ground they are classified, please indicate the type of data so withheld.)

ANSWER:

8. See Answer to Interrogatory 1.

QUESTION:

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:

9. See Answer to Interrogatory 1.

QUESTION:

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:

10. See Answer to Interrogatory 1.

QUESTION:

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:

10a. Hospital Management of Radiation Accidents, Dennis Carlson, M.D. (1980). The Staff may inspect this document in accordance with the conditions set forth in OBJECTION TO PRODUCTION OF DOCUMENTS, supra.

QUESTION:

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:

11. See Answer to Interrogatory 1.

QUESTION:

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:

12. See Answer to Interrogatory 1.

QUESTION:

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:

13. See Answer to Interrogatory 1.

QUESTION:

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:

14. See Answer to Interrogatory 1.

QUESTION:

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:

15. See Answer to Interrogatories 1 and 18.

QUESTION:

16. List all Federal funds received by any Intervenor jurisdiction 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:

None

QUESTION:

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:

17. See Answer to Interrogatory 18.

QUESTION:

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:

18. See Answer to Interrogatory 1. By way of further answer, this Interrogatory is objected to as calling for a legal opinion. The Staff may inspect TOA's ordinances in accordance with the conditions set forth in OBJECTION TO PRODUCTION OF DOCUMENTS, supra.

QUESTION:

19. Set out the conditions, including citations to all applicable provisions of state and local laws and 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:

19. See Answer to Interrogatory 18.

QUESTION:

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

ANSWER:

20. See Answer to Interrogatory 18.

QUESTION:

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:

21. This Interrogatory is objected to as irrelevant and not likely to lead to the discovery of admissible evidence.

QUESTION:

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 five 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 the periods you have. Indicate whether the foregoing computations were made manually or automatically.

ANSWER:

22. See Answer to Interrogatories 1 and 21. By way of further answer, TOA adopts the statements, testimony, and evidence presented by Intervenor, to the extent applicable, in the NHRERP litigation.

QUESTION:

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:

23. TOA has conducted no such studies. See Answer to Interrogatory 1.

QUESTION:

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 the volume of traffic or the time within which traffic can be evacuated. Provide a copy of all such studies.

ANSWER:

24. None. See Answer to Interrogatories 22 and 23.

QUESTION:

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 protection 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:

25. See Answer to Interrogatory 18.

QUESTION:

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:

26. TOA has conducted no such studies. TOA adopts, and incorporates by reference all relevant statements, documents, reports, evidence or other information proffered by the Commonwealth concerning sirens and siren contentions for the Seabrook EPZ, with supporting documentation as detailed therein and as previously filed in this proceeding. See Answer to Interrogatory 1.

QUESTION:

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

ANSWER:

27. See Answer to Interrogatories 1, 7(h) and 26.

QUESTION:

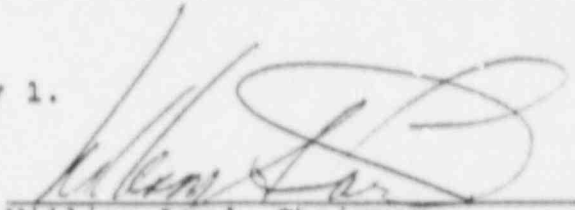
28. Identify all studies performed by Intervenors during the last five years concerning planning for emergencies. Produce a copy of all such studies.

ANSWER:

28. See Answer to Interrogatory 1.

DATED: September 23, 1988

By:



William Lord, Chairman
TOWN OF AMESBURY
Board of Selectmen

STATE OF NEW HAMPSHIRE
ROCKINGHAM, SS.

September 23, 1988

Personally appeared the above-named William Lord and swore to the truthfulness of the foregoing statements based upon personal knowledge, information and belief.

Before me:


~~Notary Public/Justice of the Peace~~

My Commission Expires: 5-21-91

DOCKETED
USNRC

CERTIFICATE OF SERVICE

88 SEP 26 P5:26

I, Matthew T. Brock, one of the attorneys for the Town of Amesbury herein, heroby certify that on September 23, 1988, I made service of the foregoing document, TOWN OF AMESBURY ANSWERS TO NRC STAFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE TOWNS OF AMESBURY, NEWBURY, SALISBURY, WEST NEWBURY, AND MERRIMAC, AND THE CITY OF NEWBURYPORT, by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

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*UPS Next Day Air