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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY LICENSING BOARD

DOCKETED
USNRC

'88 SEP 26 A9:35

OFFICE OF SECRETARY
DOCKETING SERVICE
BRANCH

IN THE MATTER OF)	
PUBLIC SERVICE COMPANY OF)	
NEW HAMPSHIRE, ET AL)	Docket #'s 50-443-OL
Seabrook Station Units 1,2))	50-444-OL
)	Off-site Emergency Planning

Town of Salisbury's Answers to
Interrogatories Propounded by NRC Staff

Interrogatory #1:

Answer:

- A. None
- B. None.
- C. None.

Interrogatory #2:

Answer:

A. through M. Not applicable.

Interrogatory #3:

Answer:

No such training has yet been contemplated as no such plans exist for the Town of Salisbury that have originated through local groups or officials. A committee is to be composed to promulgate such plans and the Town recognizes its obligation to supplement these interrogatories in the event such plans are promulgated in draft or otherwise.

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Interrogatory #4:

Answer:

This information is not known to the Town and is likely to be answered by the Massachusetts Attorney General.

Interrogatory #5:

Answer:

This answer applies to Salisbury only. The Town will not for the sake of this answer institute a region-wide information gathering campaign.

- A. 16 regular police officers, 1 Chief;
- B. 3 part-time;
- C. 3 full-time; 19 call firefighters;
- D. None (some firemen and policemen may have first aid training);
- E. None, except as mentioned above.
- F. None.
- G. None.
- H. One part-time health inspector;
- I. No National Guard unit in Town;
- J. 5-man school committee, 14 teachers;
- K. Other than as mentioned above, town employees include:
 - 1. 3 highway department - full time;
 - 2. Clerk, Treasurer, Accountant, Assessor, Building Inspector (part-time), 6 clerical employees, 3 part-time clerical employees.
- L. Fire mutual aid with other towns (all of which lie within 10 miles of Seabrook Station).

M. See L. above.

Interrogatory #6:

Answer:

There are no such documents identified by the Town of Salisbury in Interrogatory #1.

Interrogatory #7:

Answer:

This answer applies to Salisbury resources only.

- A. 2 police cars, 1 police van;
- B. 4 fire trucks;
- C. no buses;
- D. no vans;
- E. 2 DPW trucks, 1 rubbish truck;
- F. No helicopters or airplanes;
- G. One skiff;
- H. no sirens or public notification system;
- I. 22 radios (police), various beepers (call fire department);
- J. None.

Interrogatory #8:

Answer:

There is a National Guard unit in Newburyport. Town of Salisbury lacks any other information regarding its composition or resources.

Interrogatory #9:

Answer:

There are no such plans promulgated by Salisbury or in effect through local officials in Salisbury.

Interrogatory #10:

Answer:

There are no such documents in Town of Salisbury possession or control.

Interrogatory #11:

Answer:

Salisbury has made no such provisions.

Interrogatory #12:

Answer:

Salisbury lacks the information required to respond to this interrogatory.

Interrogatory #13:

Answer:

There are none in Salisbury.

Interrogatory #14:

Answer:

There are no such documents in Town of Salisbury possession or control.

Interrogatory #15:

Answer:

Salisbury is unaware of such provisions.

Interrogatory #16:

Answer:

Salisbury has received no such funds.

Interrogatory #17:

Answer:

There were no such documents described in response to Interrogatory #1.

Interrogatory #18:

Answer:

Salisbury will not undertake herein a treatise of Massachusetts law as it applies to emergencies particularly where such information is already ascertainable to the NRC Staff. Salisbury has not adopted any by-law, rule, or policy with respect to "actions to be taken in the event of emergencies". Salisbury, however, may be adopting such by-laws or rules and policies as a result of its current efforts to effect compliance with the emergency planning act. Town of Salisbury recognizes its obligation to supplement this answer in the event of adoption of any of the above on the part of the Town.

Interrogatory #19:

Answer:

Salisbury Police Department regulations and Salisbury Police Contract (IBPO Local #450) provide that only a police officer appointed by the Selectmen is to perform the duties and functions of a police officer. Town of Salisbury has not adopted any other laws or regulations permitting or prohibiting private action in an emergency.

Interrogatory #20:

Answer:

- A. None.
- B. Traffic control, investigation, arrest, stopping vehicles within the Town, detouring traffic.

Interrogatory #21:

Answer:

The land area within 600 yards of and abutting the Gulf of Maine starting at the New Hampshire/Massachusetts state line and continuing southward to the southernmost point in the Town of Newbury that abuts the Gulf of Maine.

Interrogatory #22:

Answer:

Town of Salisbury does not have "data" in response to this information. Town of Salisbury has reviewed data provided in the course of this litigation from other parties, but has not as yet formulated an estimate which it cares to adopt.

Interrogatory #23:

Answer:

Town of Salisbury does not have in its possession a copy of the so-called "Broadway Mall" project which is proposed by the State Highway Department (District 5) with partial funding by the federal government. Town of Salisbury is unaware as to any approval of this project in the near future, but understands its purpose is to facilitate improved traffic flow in the central recreational area of the beach.

Interrogatory #24:

Answer:

See number 23 above.

Interrogator #25:

Answer:

Massachusetts General Laws Chapter 41 charges the highway

surveyor with responsibility to keep the roads free of obstructions and impediments to travel.

Article XIII, Section 1 Town of Salisbury By-Laws requires the highway surveyor to remove whatever obstructs the public way. Section 3 provides that no person shall obstruct a way without first obtaining a permit from the Selectmen.

Town of Salisbury contends that numerous other state statutes and regulations bear upon the enumerated activities, a more thorough list of which is likely to be provided by the Massachusetts Attorney General. Town of Salisbury contends that in light of the above, the compilation of the requested information for the purpose of this interrogatory is overburdensome and unjustified.

Interrogatory #26:

Answer:

No such studies have been originated or delivered to Town of Salisbury.

Interrogatory #27:

Answer:

Town of Salisbury is unaware of sirens or other mechanisms other than the "fire horn" (which is being replaced with beepers) located within Salisbury which can be heard by the general public.

Interrogatory #28:

Answer:

Salisbury has performed no such study.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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Adjudicatory File
Atomic Safety and Licensing
Board Panel Docket (2 copies)
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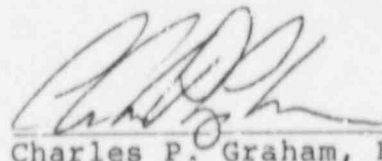
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Signed under pains and penalties of perjury this 21st day
of September, 1988.



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