

September 28, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PUPP SERVICE COMPANY)
O. NEW HAMPSHIRE, et al.)

(Seabrook Station, Units 1)
and 2))

Docket Nos. 50-443-OL-1
50-444-OL-1

(Onsite Emergency)
Planning and Safety)
Issues))

AFFIDAVIT OF JAMES A. MACDONALD

I, James A. MacDonald, being on oath, depose and say as follows:

1. I am the Radiological Assessment Manager for New Hampshire Yankee. I have previously testified in these proceedings. During the Seabrook Station Graded Exercise in June, 1988, I was the Emergency Operations Facility Coordinator, a role which I have performed for over three years. My responsibilities as the EOF Coordinator include assessment of station conditions, formulation of protective action recommendations (PARs), and interface with offsite authorities, as required, to discuss and explain PARs and station conditions.

2. The NRC in Inspection Report No. 88-09 stated that:

"Results: No violations were identified.
Emergency response actions were adequate to

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provide protective measures for the health and safety of the public."

3. The above referenced inspection report identified both strengths and weaknesses. One of the weaknesses or areas for corrective action identified by this inspection report is the factual basis upon which the Massachusetts Attorney General (MA AG) relied in filing its motion. The purpose of this affidavit is to address the affidavit of Robert D. Pollard and the following excerpt from the NRC inspection report relied upon by the MA AG.

"The Technical Support Center (TSC) and Emergency Operations Facility (EOF) staff displayed questionable engineering judgment and/or did not recognize or address technical concerns (50-443/88-08-01). For example:

"-Neither the EOF or TSC staff questioned a release of greater than 7000 curies per second with only clad damage and no core uncover."

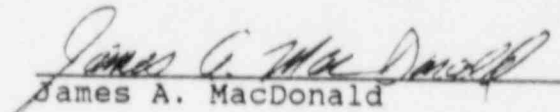
4. Exercise participants were provided specific instructions or guidelines regarding the conduct of the Seabrook Station Graded Exercise, one aspect of which included the use of information supplied by an Exercise Controller. The exercise participants were advised that their adherence to this guidance would be necessary in order to assure that all objectives of the exercise could be achieved. The guidance given regarding controller supplied information was that exercise participants shall accept this information and proceed although a participant could seek further clarification. More specifically, during previous drills TSC and EOF team members

were advised that it may be necessary to elevate or accelerate certain parameters that pertain to core damage in order to ensure a level of response commensurate with the objectives of the drill. Therefore, it is unlikely that release data provided by an exercise controller would have been questioned during the course of the Graded Exercise.

5. In any event, a review was made of materials generated during the exercise. In addition, discussions have been held with both controllers and exercise participants regarding this matter. This review concluded that the lack of correlation between the release condition and core cooling indications were questioned and discussed by key TSC emergency response personnel. These reviews also concluded that the personnel did as directed, i.e., they accepted the information from the controller as being correct and proceeded accordingly. Further, the emergency response personnel had themselves realized that it was necessary to produce elevated radiological conditions in order to fully exercise offsite responders.

6. The actual response and implementation of all emergency response procedures was not hindered by this lack of correlation. This includes all the sampling and analysis (containment airborne radionuclide and hydrogen levels, reactor coolant radionuclide and dissolved hydrogen levels, POST LOCA monitor readings and specific core parameters) which are required to be performed for assessment of the magnitude of core damage.

7. Based on the foregoing paragraphs, I have concluded that the observation of the NRC Inspector does not reflect a display in questionable engineering judgement and/or an inability to recognize or address technical concerns. The observation has since been found to be inaccurate because key TSC and EOF personnel were aware of this lack of correlation. Furthermore, this lack of correlation should not have been questioned by the players during the exercise because the players realized from their experience in past drills, and based on the guidelines for the June, 1988, exercise, that this information had been provided by the controller for the purpose of fully exercising offsite responders.


James A. MacDonald


STATE OF NEW HAMPSHIRE

Rockingham, ss.

September 28, 1988

Then appeared before me the above subscribed James A. MacDonald, and made oath that he was the author of the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,


Notary Public
My Commission Expires: 3/29/92