

DOCKETED  
USNRC

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION <sup>86</sup> MAY -5 11:02

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE  
DOCKETING  
BRANCH

\_\_\_\_\_  
Public Service Company of New )  
Hampshire, et. al. )  
(Seabrook Station, Units 1 and 2) )

Docket Nos.  
50-443, -444

860430

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S  
FIRST SET OF INTERROGATORIES AND REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS TO THE STATE OF NEW HAMPSHIRE ON  
NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLANS

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the State of New Hampshire, to the best of your personal knowledge of the facts or information requested in each interrogatory. We remind you of your obligation to supplement answers to interrogatories, under 10 C.F.R. § 2.740(e)(1) and (2).

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer printouts, photographs, microfilm,

microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" with respect to any document shall mean to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

INTERROGATORIES:

1. With respect to each contention and subpart thereof admitted by the Licensing Board's order of April 1, 1986, please provide the following information:

a. What is the State of New Hampshire's position with respect to each contention and its subparts? Describe in detail the reasons for your position. Identify any relevant portions of the state and local plans that are under revision or which the state expects to change at any time in the future.

b. Identify and provide access to all documents on which you rely during this proceeding to support your position on each of these contentions. This includes all documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

c. Identify all persons on whose factual knowledge, opinions, or technical expertise you rely for your position on each contention and subpart thereof.

d. Identify all persons you may call as witnesses on each of these contentions during these proceedings; describe the substance of their testimony; and identify and describe any documents and the portions thereof that they may rely on for their testimony.

2. Please identify and provide access to all documents not identified in response to interrogatory 1(b) that evaluate or discuss the adequacy of emergency planning and preparedness with

respect to any of the contentions admitted by the Licensing Board's April 1, 1986, prehearing conference order.

3. With respect to NECNP contention RERP-2, please provide the following information:

a. Identify all areas in which the state will require federal assistance during a radiological emergency.

b. Describe the equipment and/or services that the state expects to request from the federal government.

c. What is the expected time of arrival for each category of equipment and services, and how is that arrival time determined?

d. Describe all existing arrangements for federal aid.

e. Describe all arrangements for federal aid that the state expects to make in the future.

f. Identify and produce all documents that demonstrate that the state has or is making arrangements for federal assistance in the event of a radiological emergency.

4. With respect to NECNP contention RERP-3, please provide the following information:

a. Identify and provide access to all pre-emergency instructional material that the state intends to use in the Seabrook Emergency Planning Zone.

b. Describe the locations at which each type of instructional material will be placed.

c. Describe the quantity of each type of instructional material to be placed at each location.

5. With respect to NECNP contention RERP-8, please provide the following information:

a. Identify and provide access to all studies, assessments, and calculations, regarding the effectiveness and/or capacity of buildings in the Seabrook emergency planning zone for sheltering from radiological releases.

b. Identify and provide access to all documents showing the criteria for designation of shelters during a radiological emergency.

c. Identify and provide access to all documents, including maps, that show the locations of buildings that the state intends to be used for sheltering during a radiological emergency.

d. Describe the basis for the state's conclusion that "generally, sheltering can provide protection for two to five hours." (PERP at 2.6-7).

(i) To what extent is your assessment based on studies of sheltering facilities in the Seabrook EPZ?

(ii) Explain the basis for the change in the current state Radiological Emergency Response Plan ("RERP") from the previous plan, which estimated that sheltering would be effective for only two hours.

(iii) Identify and provide access to any documents on which you rely for your conclusion that sheltering can provide protection for two to five hours.

e. Describe and explain the basis for the statement that "The main reason sheltering is a valuable protective action is that it can be implemented quickly, usually in a matter of minutes." (RERP at 2.6-7)

f. Identify and provide access to any calculations performed by the state of New Hampshire regarding the time necessary for transients in the EPZ to take shelter in public buildings, as provided in the RERP at 2.6-8.

g. The RERP states that "The dose reduction from which an individual benefits by sheltering is a function of how well the structure is sealed and how long the Plume takes to travel over the area." RERP at 2.6-7. Identify and provide access to any and all calculations of how these factors would affect dose reductions during a radiological accident at the Seabrook plant.

h. Describe the procedural steps by which the Governor will consider and/or recommend sheltering as a protective action during a radiological emergency at Seabrook.

i. Identify all individuals who will be consulted by the Governor in making a decision regarding whether to order sheltering and the type of sheltering measures to be taken.

j. Identify all documents to be used by the Governor or his advisors in making a decision regarding whether to order sheltering and the type of sheltering measures to be taken.

k. Identify all areas where the Governor may recommend sheltering, including but not limited to public shelters. (See RERP at 2.6-7.)

l. List all groups who may be given "special instructions" and describe all special instructions that may be given.

m. Describe and identify the source of the "shelter-in-place" concept described at RERP page 2.6-7, and list all other nuclear facilities at which you are aware that it is used.

n. Identify the state parks and outdoor recreation areas described in the third full paragraph on page 2.6-8, and the number of individuals in each park or recreation area.

o. Describe the means by which "individuals located in State parks and outdoor recreation areas will be asked to leave open areas and leave the EPZ or enter one of the shelters made available in the local communities." RERP at 2.6-8.

p. Describe and identify the location of each shelter that will be made available to individuals in parks and outdoor recreation areas. Include in your description the capacity of each shelter, your evaluation of its effectiveness for sheltering against radiation, and the basis for that evaluation.

6. With respect to NECNP contention RERP-12, please provide the following information:

a. Identify and describe the criteria by which the state of New Hampshire intends to choose protective actions for hospitals, nursing homes, schools, and jails in the event of a radiological emergency at Seabrook. If these criteria differ for individual institutions or types of institutions, describe the manner in which they differ.

b. Describe the circumstances under which the state would not order the evacuation of the institutions described in interrogatory 6(a) above.

c. Are the criteria and circumstances described in your answers to interrogatories 6(a) and (b) above any different from the criteria to be used for protective actions for the general public? If so, describe in detail the manner in which they differ.

d. What provision, if any, has the State made for the distribution of radioprotective drugs to persons institutionalized in hospitals, nursing homes, jails, and schools in the Seabrook EPZ?

e. State the rationale for your answer to interrogatory 6(d) above and identify all documents on which you rely to support your rationale.

Respectfully submitted,



Diane Curran  
HARMON & WEISS  
2001 S Street, N.W.  
Suite 430  
Washington, D.C. 20009  
(202) 328-3500