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October 15, 1988

UNITED STATES OF AMERICA '88 OCT 11 P3:40

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY LICENSING BOARD
OFFICE OF GENERAL INQUIRY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF)	Docket No. 50-443-OL
NEW HAMPSHIRE, <u>et al.</u>)	Docket No. 50-444-OL
(Seabrook Station, Units 1 and 2)	(Off-site EP)
)	

TOWN OF WEST NEWBURY'S 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

The Town of West Newbury (TOWN) files the following answers to the 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.

1. TOWN objects to this interrogatory on the grounds that it is overbroad and unduly burdensome. Without waiving these objections TOWN states the following:

(a-b) TOWN has no documents reflecting or referring to any emergency planning for a radiological emergency other than drafts of plans provided to the TOWN by the applicants which are in the possession of the applicants and, TOWN believes, in the possession of the NRC staff.

(c) TOWN has a Severe Storms Emergency Response Plan, prepared by the Office of Emergency Preparedness, West Newbury

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Civil Defense, November, 1986. The plan was approved by the Board of Selectmen on May 18, 1987.

2. A copy of the document referred to in 1(c) will be made available and the document speaks for itself.

3. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that the Severe Storms Response Plan referred to above was exercised as part of a statewide training exercise in June 1988. TOWN further answers that all full-time police officers have received full-time academy training through the Massachusetts Criminal Justice Training Council and part time officers have received reserve intermittent academy training. All officers receive firearms training on an annual basis. Both police officers and firefighters have received first responder training. Some police and fire personnel have received EMT training.

4. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it is located in the Massachusetts Civil Defense Agency/Office of Emergency Preparedness Area I. TOWN has no Civil Defense plans other than the severe storm plan referred to above and has no plans for the Commonwealth.

5. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers as to the number of individuals in TOWN, the following:

- (a) police - 6 full-time and 8 part time officers
- (b) civil defense - 8
- (c) fire-fighting - 34 regular call firefighters and approximately 10 reserve call firefighters. The numbers fluctuate.
- (d) first aid and rescue - regular call firefighters have received first responder training.
- (e) local support services - TOWN does not understand this interrogatory.
- (f) medical support - none.
- (g) emergency service - TOWN does not understand this interrogatory.
- (h) health and environmental department - the Board of Health has 2 part time employees. The Conservation Commission has 1 part time employee.
- (i) National Guard, militia or reserve - none.
- (j) Board of Education, School Board or Department, and teachers - School Committees - 8 (West Newbury and Pentucket Regional); administrators and teachers - 285; superintendent's office - 10. The numbers of persons identified above are employed at the Page School and the Pentucket Regional Jr.-Sr. High School which is located, in part, in West Newbury.
- (k) employees of other municipal departments - 7 full time and 11 part time.
- (l) individuals obligated to provide mutual aid - Police, fire and Civil Defense personnel will provide assistance to other communities if personnel are available and requested to provide assistance.

6. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers as to the resources in TOWN, the following:

- (a) police vehicles - two police cruisers. Purchase of a 4-wheel drive vehicle has been approved.
- (b) fire trucks - 3 pumper trucks; 1 tank truck; 1 ladder truck; 1 rescue truck; 1 forestry truck.
- (c) buses - none.
- (d) vans - none.
- (e) other vehicles - 1 pickup truck, 2 sanders, 1 snowplow, 2 dump trucks; 1 backhoe/frontend loader; 1 frontend loader.
- (f) helicopters and other aircraft - none.
- (g) boats - 1 14 ft. aluminum boat with outboard motor.
- (h) sirens and public notification systems - 2 firehorns; sirens on police cruisers and firetrucks.
- (i) radios - 45, including portable radios.
- (j) all other equipment - TOWN objects to this interrogatory as overbroad and vague.

7. All resources set forth above are located within TOWN.

8. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that there are no Massachusetts National Guard Units in TOWN.

9. None

10. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has no such provisions.

10a. None.

11. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has no such provisions.

12. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it does not have the information to answer this interrogatory.

13. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that some EBS stations are set forth in the Severe Storm Plan described above.

14. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has no such documents.

15. TOWN objects to this interrogatory as overbroad and unduly burdensome, as seeking work product or legal opinions or conclusions, and as seeking to have TOWN do legal research to provide information in the public domain which is as available to the Staff as it is to the TOWN.

16. None.

17. The document speaks for itself.

18. See answer to interrogatory 15.

19. See answer to interrogatory 15.

20. See answer to interrogatory 15.

21. TOWN objects to this interrogatory as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

22. See answer to interrogatory 21. Without waiving those objections, TOWN states that it has no such information.

23. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has conducted no such studies.

24. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has conducted no such studies.

25. See answer to interrogatory 15.

26. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has conducted no such studies.

27. TOWN objects on the grounds that this interrogatory is overbroad and unduly burdensome. Without waiving these objections, TOWN answers that it has no knowledge of all sirens or other means of emergency communication in the Seabrook EPZ which can be heard by the general public. There are two firehorns in West Newbury that can be heard by part of the general public in West Newbury and sirens on fire and police vehicles.

28. See answer to interrogatory 1.

TOWN objects to the Staff's request that the production of any documents take place at the Staff offices in Rockville, Maryland as unduly burdensome. Any relevant documents may be inspected in TOWN during the discovery period, during normal business hours, at a mutually agreeable time, following reasonable notice to TOWN.

Dated: October 5, 1988

By:



Thomas E. Pulkkinen, Chairman
West Newbury Board of Selectmen

CERTIFICATE OF SERVICE

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SERVICE
BRANCH

I, Judith H. Mizner, Counsel for the Town of West Newbury in the above-entitled action, hereby certify that I have ~~88~~ ~~001~~ ~~91~~ ~~P-3140~~ ~~es~~ of the enclosed documents to be served upon the persons at the addresses listed below, by first class, postage prepaid, mail and by Federal Express, postage prepaid, mail ~~to~~ those names which have been marked with an asterisk.

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- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
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Signed under seal this 5th day of October, 1988.



Judith H. Mizner