

Massachusetts portion of the Emergency Planning Zone for Seabrook Station.

B. As used herein, the term "person" shall mean any natural person, corporation, partnership, firm, trust, group, association or other organization and, where appropriate, the use of the singular includes the plural and the use of the plural includes the singular.

C. As used herein, the term "document" shall mean the original, and any and all copies which differ in any way from the original, of any notes, correspondence, memoranda (including written memoranda of telephone conversations, other communications, discussions, agreements and any other acts, transactions or activities), time sheets, contracts, agreements, pamphlets, receipts, order forms, records, bonds, requisitions, bills, plans, blueprints, layouts, drawings, specifications, sound recordings, minutes, diaries, by-laws, notebooks, logs, bulletins, circulars, brochures, forms, statements, journals, letters, telegrams, notices, interoffice and intraoffice communications, photostats, microfilms, studies, reports, analyses, messages, comparisons, graphs, charts, summaries, films, photographs, tapes, transcripts, advertisements and any other written matter of any kind including, but without limitation, any marginal comments appearing on any documents or any other writing.

D. As used herein, the term "communication" shall mean any oral or written transmittal of information, or request for information, made from one person to another person, whether

made in person, by telephone or by any other means and includes any documents made only for the purpose of recording a communication, idea, statement, opinion or belief.

E. Wherever appropriate, the masculine form of a word shall be interpreted as feminine, and vice versa, so as to bring within the scope of these interrogatories any information that might otherwise be construed to be outside their scope. The words "and" and "or" and the phrase "and/or" should not be read as to restrict the scope of the interrogatory.

F. For any document or part of a document that was at one time, but is no longer, in Applicants' possession, custody or control, or which is no longer in existence, or which cannot be located, identify the document, state where and how it passed out of existence or why it can no longer be located and reasons therefor, and identify each person having knowledge concerning such disposition or loss and the contents of the document, and identify each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

G. "Concerns," "concerning" or any other derivative thereof, includes referring to, responding to, relating to, pertaining to, in connection with, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting, and constituting.

INTERROGATORIES

1. Identify the person(s) who prepared the answers to each of the following interrogatories and all persons who provided information for the preparation of the answers to each of the following interrogatories.

2. For each of the SPMC contentions admitted, please:

(a) Describe in detail your position with respect to the contention and all facts underlying your position;

(b) State the source of each such fact. If the source is the personal knowledge of one or more persons, identify the person(s). If the source is one or more documents, identify the document(s);

(c) Identify any expert witness who is to testify concerning the contention, state the subject matter on which the expert is expected to testify, state the substance of the facts and opinions to which the expert is expected to testify, and summarize the grounds for each opinion;

(d) Identify any non-expert witness who is to testify concerning the contention, and state the substance of the facts to which the witness is expected to testify; and

(e) Identify any documents which reflect or refer to any type of study, calculation or analysis bearing upon the substance of the contention.

3. Regarding the evacuation time estimates ("ETEs") for the Massachusetts communities listed on Attachment 4 to I.P. 2.5 (at page 20):

(a) Describe in detail how, when, and by whom those ETES were calculated. Identify any and all documents which describe how these calculations were made.

(b) Was the IDYNEV model used to calculate these ETES? If so, what changes, if any, were made to the IDYNEV model itself from the form in which it was used to calculate the ETES contained in Volume 6 of the NHRERP? Identify any and all documents which describe these changes.

(c) Describe all assumptions and input variables used in calculating the SPMC's ETES that differed from those used in calculating the ETES contained in Volume 6 of the NHRERP. For each new assumption or input variable, state the source of or the basis for it. Identify any and all documents which describe those new assumptions and input variables and also those which describe the bases for these changes.

(d) Describe all efforts which have been undertaken to modify the ETE study set forth in Volume 6 of the NHRERP to account for the circumstances that will pertain in Massachusetts to an evacuation carried out pursuant to the SPMC. Identify any and all documents which describe these changes.

(e) In calculating the ETES for the SPMC, what specific assumption(s) were made regarding when the traf...

control posts would be staffed? E.g., was it assumed that TCPs would be staffed at the point of a beach closing announcement? At the point when the order to evacuate was issued? Some other time?

4. List the road crew companies currently being relied upon to supply road crews in the event of a radiological emergency at Seabrook Station and for each crew list the following:

(a) The name, location and business phone number of the owner or manager;

(b) The number and kind of vehicles which the companies have agreed to provide and whether these vehicles have two-way radios;

(c) The number of drivers each company has agreed to provide;

(d) The names, addresses, and phone numbers of each of these drivers;

(e) Any and all known conditions, limitations, reservations, or uncertainties regarding the 24-hour per day, year-round availability of these vehicles and drivers; and

(f) Any and all known conditions, limitations, reservations, or uncertainties regarding where the company or the drivers have agreed to drive in the event of a radiological emergency or what they have agreed to do.

5. How many road crews will be prepositioned at each of the local Transfer Points in the Massachusetts EPZ, and at what point in the mobilization process will these road crews be Dispatched to Transfer Points?

6. For each of the NHY ORO's Traffic Guides:

(a) State the Traffic Guide's name, home and work addresses, and phone numbers.

(b) State the number of hours of experience s/he has had directing actual traffic.

7. Have evacuation time estimates been determined for the transit dependent population, the special facilities, and schools in the Massachusetts EPZ? If so, state these ETEs and describe how each one was determined. Identify any and all documents which concern these ETEs.

8. In the event of a summertime emergency at Seabrook Station, does NHY's ORO intend to use the summertime ETEs set forth in Appendix 4 of I.P. 2.5 regardless of the weather, size and distribution of the beach area populations, large crowds at special event days, the time of day, or the existence of other conditions which vary from those assumed when the ETEs were determined? If not, how are adjustments to the ETEs to be made to account for these variations and who will make these adjustments?

9. Identify the person(s) in NHY's ORO who is most knowledgeable about:

(a) the ETEs and how they would be used in an emergency;

(b) the evacuation process and the traffic management plan.

10. Does the SPMC rely on the efforts of the Commonwealth of Massachusetts to post notices and/or distribute pre-emergency informational materials to the transient population at Salisbury Beach State Reservation and along the rest of Salisbury Beach to ensure that the transients there will know what to do when and if the VANS sirens sound in the Massachusetts beach areas? If not, how will these transients know what to do?

11. With respect to the use of cones and barricades at Access Control Points and Traffic Control Points:

(a) Describe the exact dimensions of the traffic cones;

(b) Describe the exact dimensions of the barricades;

(c) State how many traffic cones and how many barricades NHY's ORO has available, and state where these items are stored prior to an emergency.

(d) Identify any current contracts for the supply of these cones and/or barricades.

(e) In Appendix J, a note on each Traffic Control Summary and Access Control Summary (see, e.g., p. J-21) states: "Three Cones May Be Used In Place Of One Barricade." Has the decision already been made to use cones instead of barricades for particular TCPs and/or ACPs? If so, which ones? If not, when and on what basis will this decision be made, and who will make it?

12. Point 8 in both the TCP and ACP procedures (p. J-2 and J-4) states that upon arrival at TCPs and ACPs, the Traffic Guides are to wait at the side of the road until notified to activate the post. The procedures go on to state as follows: "However, if traffic problems occur, expedite traffic flow and report the situation to the Evacuation Support Dispatcher." Describe what is meant by "traffic problems" and "expedite traffic flow".

13. Describe what, if anything, NHY's ORO, using the SPMC, intends to do regarding the Gillis Bridge in the event of a radiological emergency at Seabrook Station on a day when there is heavy boating traffic on the Merrimac River.

14. Describe what, if anything, NHY's ORO, using the SPMC, intends to do to notify and instruct boaters on the Merrimac River, especially those without radios on board, in the event of a radiological emergency at Seabrook Station.

15. Identify any and all documents and correspondence which relate to the use of the host special facility during a radiological emergency at Seabrook Station.

16. State what arrangements have been made, if any, to ensure that when the host special facility is hosting a circus, rodeo, or other similar event, the floor space being relied upon in the SPMC will be available for SPMC purposes in a timely fashion.

17. Describe how, absent pre-planning, the American Red Cross will be able to set up and staff the host special facility and the congregate care centers in a timely fashion in the event of a radiological emergency at Seabrook Station.

18. Identify all documents and correspondence which relate to the participation of the American Red Cross in planning in Massachusetts for a radiological emergency at Seabrook Station.

19. How much time do you estimate that it will take the American Red Cross to set up and staff the Host Special Facility and each of the congregate care centers after first being notified to do so in the event of a radiological emergency at Seabrook Station? Describe in detail your reasons and/or bases for this estimate, and state the names and positions of the American Red Cross officials who provided information which supports this estimate.

20. Do you contend that the American Red Cross has undertaken some planning for its response in Massachusetts to a radiological emergency at Seabrook Station? If your answer is yes, describe in detail the nature and extent of this planning.

21. What provisions exist for back-up power at the ORO EOC/Seabrook Station EOF in the event of a loss of power to this facility.

22. In the event of a fast-developing radiological emergency at Seabrook Station which results in an offsite release of radiation that quickly blows west over I-95, or which threatens to do so, by what route is it anticipated that members of the media based in the Boston area will travel to the Media Center in Newington? How long is it anticipated that such a trip will take?

23. In the event of a radiological emergency at Seabrook Station, what facility does ORO intend to use as a Staging Area, assuming no changes in the zoning laws in Haverhill and no court decisions which overturn the city's interpretation of its zoning laws.

24. What is the capacity of the water storage tanks in the Monitoring Trailers?

25. Identify any arrangements or provisions for replacing or pumping storage tanks, including but not limited to, personnel designated for each replacement or pumping.

26. Describe the procedure for the handling and disposal of contaminated materials, including but not limited to, personnel who would bag, label and set aside contaminated articles belonging to evacuees.

27. Identify any documents and/or correspondence related to persons employed for services related to the handling, storage and/or disposal of contaminated waste water and/or contaminated materials.

28. Please state separately for buses, vans, ambulances wheelchair vans, and road crews the number of each which you contend can respond and be available for SPMC service in a radiological emergency at Seabrook Station:

- (a) Immediately upon notification;
- (b) One-half hour after notification;
- (c) One hour after notification;
- (d) One and one-half hours after notification;
- (e) Two hours after notification;
- (f) Three hours after notification;
- (g) Four hours after notification.

29. Identify all the individuals currently working for or on behalf of NHY/ORO as instructors and/or having responsibility for the training of personnel.

a. Please state the date each of these individuals began such work.

b. Please describe the prior job experience of each of these individuals from January 1, 1983 to the dates set forth in response to (a) above.

c. Please state the educational experience and qualifications of each of these individuals.

d. Are these individuals (and/or any number of them) currently engaged full-time in ORO training activities?

e. If the answer to (d) above is no for any number of these individuals please describe their other activities including the name of their employers if not PSNH or NHY.

f. Please set forth the current salaries for each of these individuals.

g. Please identify for each individual the subject areas in which he or she provides training.

30. Identify all the individuals working for or on behalf of NHY/ORO as instructors and/or having responsibility for the training of personnel from September 1987 to the present who are not identified in response to the immediately preceding interrogatory.

a. Please state the date each of these individuals began and terminated such work.

b. Please set forth the reasons given by or to each individual for the termination of such work.

c. Please set forth the most recent information available as to the whereabouts of each individual.

d. Please describe the prior job experience of each of these individuals from January 1, 1983 to the date each began such work.

e. Please state the educational experience and qualifications of each of these individuals.

f. Please identify for each individual the subject areas in which he or she provided training.

31. Please state the number of individuals selected as "qualified instructors" (Appendix K at K-6) from April 1, 1987 to the present time. State the number of those who sought to be selected as "qualified instructors" during that time period but were not selected.

a. Please identify by name those individuals who sought to be so selected.

32. Does NHY/ORO provide training for those individuals working as instructors and/or having responsibility for the training of personnel?

a. Please describe the training program provided to these individuals.

b. Please identify any document generated by or for or as a consequence of this training program, including

without limitation, lesson plans, training materials, evaluation forms and reports, Instructor Guides, and training schedules.

33. Please identify all the individuals (and if appropriate the entities) involved in the preparation of the training materials described in SPMC, Section 6.0 and Appendix K.

34. Please identify any document referring to, reflecting or constituting efforts made by "Managers and Supervisors who have personnel designated as members of the [NHY/ORO]" to ensure these personnel "attend the scheduled training and are made available to participate in drills and exercises." SPMC Appendix K at K-3.

a. Please set forth the substance of any written and/or oral communication made to "personnel designated as members of the [NHY/ORO]" by those superior to them in the employment hierarchy referring or relating to attendance at Seabrook emergency preparedness training.

b. Please identify any documents relied upon or consulted and reviewed in answer to (a) above.

c. Please set forth the substance of any written and/or oral communication, not set forth in response to (a) above, among and/or between employees (including without limitation senior management) of NHY and PSNH referring to, relating to or concerning the attendance of NHY/ORO

personnel at training and/or methods or ways to secure that attendance.

d. Please identify any documents relied upon or consulted and reviewed in answer to (c) above.

35. Please describe in detail all recruitment activities engaged in by NHY and PSNH, from April 1, 1987 to the present, the object of which was (and is) to ensure that a certain number of individuals have been identified as ORO personnel.

a. Please identify all documents relied upon or consulted and reviewed in answer to the above interrogatory.

b. Please state the names of those individuals with responsibility for and authority over the recruitment activities as described above.

c. Please identify all documents relating to, referring to or concerning the willingness of employees of PSNH and NHY to volunteer or otherwise agree to be counted among ORO personnel.

36. Please state the names of (a) the current Training Manager; (b) the current subject matter experts; and (c) the Training Supervisor.

37. Please indicate if any revisions in the Lesson Plans as prepared and approved by ORO personnel between September and November 1987 have been made between December 1, 1987 and the present date. If such revisions have been made, please

identify those documents that constitute those revisions and the dates such revisions were effective.

38. Please state the names of all individuals (including instructors) who received requalification training or retraining (as described in Appendix K at K-4).

a. Please state the dates on which these individuals were first trained and then retrained.

b. Please identify any documents generated during or as a consequence of this retraining.

39. Please name those individuals who have held the title of Training Supervisor and Training Manager from April 1, 1987 to the present. If any of these individuals are no longer associated with NHY ORO and/or PSNH please provide the most recent information available concerning their whereabouts.

40. Please state how many individuals have failed to successfully complete required training module(s) even after remedial training and a retest. Please describe in what fashion the assignments of these individuals have been reevaluated and adjusted as described at Appendix K at K-8. Please list the name of each such individual, the assignment before such reevaluation and the assignment after such reevaluation. Please identify any and all documents that refer to, reflect or constitute this reevaluation and adjustment of assignment.

41. Please set forth the substance of any and all comments and recommendations received by NHY ORO from personnel receiving training. Please identify any documents containing such communications.

42. Please identify any and all instances in which cheating during testing was suspected or uncovered. Please identify all documents referring to or concerning such cheating.

43. Please state whether any events occurred or were thought to occur between April 1, 1987 and the present which led to changes in the manner in which tests and other evaluation materials used in the NHY ORO training program were controlled, produced, disseminated and retained.

44. Set forth the pass/fail rate on tests taken by all trainees from April 1, 1987 to the present date.

45. Please describe the procedure used to verify and evaluate the qualifications of those individuals seeking to be associated with NHY ORO.

46. Please describe the present training schedules for each training module included in the SPMC including the number of classroom and tabletop hours of initial training.

47. Are personnel trained in and as teams? If the answer is yes, how many trainees train together? For which training modules is team training used, and for what purpose?

48. What instruction and/or training is provided to enable the trainees to handle non-routine and unexpected events. What methods and materials are utilized to develop skills in responding to such events?

49. Please describe the communications training module, including:

- a. The types of skills developed;
- b. The types of equipment used in the module; and
- c. The number of hours each trainee spends in hands-on practice with each type of equipment.

50. Are emergency response personnel trained for more than one specific job function? If so, what positions are "cross-trained?"

51. What number of ORO personnel represents full-staffing? Please set forth this full-staffing number for each distinct ORO position (including those individuals with training, administrative and planning responsibilities, i.e., those with non-emergency response roles.) Please indicate for each month beginning April 1987 up to October 1988 whether for that month full-staffing was achieved. For those months during

which full-staffing was not achieved please indicate which ORO positions were not fully staffed.

52. In answering the preceding interrogatory, were ORO personnel who had not been "qualified" (as described in the SPMC at Section 6 and in Appendix K at K-8) or who had not been "requalified" within a year of initial qualification included within the number of ORO personnel counted in determining whether full-staffing was achieved? If such individuals were counted indicate their number and position for each month in which they were counted.

53. Does NHY ORO have a policy of planned overstaffing of qualified or trained personnel to mitigate the effects of attrition or for any other reason? On average, what length of time is required to transform a "raw recruit" into a "qualified" individual. If the variation in such time is so great that no average time is considered by NHY ORO to be useful, please set forth the average times for each ORO position.

54. Please state how long the training period is for new ORO personnel in the following general categories:

- a. management or supervisory positions, including directors, coordinators, advisors and leaders;
- b. technical positions, including equipment operators, technicians, analysis personnel;

- c. skilled administrative positions, including liaisons;
- d. unskilled administrative positions.

55. On August 12, 1988, Robert J. Harrison, ("Harrison") then President and CEO of PSNH in a sworn statement declared that:

"Instability in the willingness or ability of Public Service and other Joint Owners to meet their financial responsibilities to the Seabrook project jeopardizes the confidence and morale of the existing staff at Seabrook Station. The existence of NHYEC as the long term operator of Seabrook Station will likely improve that confidence and morale, retaining loyalty of the existing personnel and attracting new employees as necessary."

In reference to this statement please provide the following information:

a. The names of the individual(s) who authored, drafted and edited this statement and those who were consulted about its substance;

b. Any and all information available or made available to Harrison and the individuals identified in response to (a) above on the basis of which or in reliance on which the statement was made;

c. Please identify any and all documents reviewed, consulted or assembled by Harrison and the individuals identified in response to (a) above prior to August 12, 1988 which concern the subject matter of the statement;

d. Please identify by name and position those individuals that make up "the existing staff at Seabrook Station";

e. Please describe in what fashion and to what extent the confidence and morale of the existing staff was jeopardized by the purported financial instability;

f. Please identify by position those new employees, if any, that Harrison and the individuals identified in response to (a) above believed it was or in future would be necessary to attract.

56. Specifically describe the training programs offered to and required of traffic guides, bus drivers and transfer point dispatchers as to the following:

a. methods and equipment used to familiarize the trainees with the road systems and land geography of the EPZ;

b. methods used to develop proper skills for dealing with an evacuating population that may be emotionally unstable, angry, frightened, uncooperative and/or violent;

c. amount of time each trainee spends in "hands-on" practical training for directing and controlling traffic, dealing effectively with traffic impediments, and moving and placing traffic cones and barricades;

57. Identify all entities that are providing support to NHY ORO for the implementation of the Plan and whose personnel have or will be trained by NHY ORO.

58. Please identify by name all personnel from the support organizations identified in the immediately preceding interrogatory, who have been, and/or will be, trained by NHY ORO. Include therein the specific dates and training modules each person is or will be offered and required to take.

59. Specifically describe the type and extent of training provided to the identified support organizations' personnel for each emergency response position occupied by those personnel as to the following:

- a. The number of hours of training;
- b. The number of follow-up sessions required;
- c. Training designed to ensure effective interaction between ORO personnel and the support organizations during an emergency;
- d. The length of time it takes to identify, train and "qualify" new support organization personnel.

Respectfully submitted

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ATTORNEY GENERAL
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