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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before the Administrative Judges:
Ivan W. Smith, Chairman
Gustave A. Linenberger, Jr.
Dr. Jerry Harbour

OFFICE OF SECRETARY
BUCKLE UP SERVICE
BRANCH

In the Matter of)	
)	
PUBLIC SERVICE COMPANY)	Docket Nos. 50-443-OL-1
OF NEW HAMPSHIRE, ET AL.)	50-444-OL-1
)	(Off-Site EP)
(Seabrook Station, Units 1 and 2))	October 7, 1988
)	

MASSACHUSETTS ATTORNEY GENERAL'S SUPPLEMENTAL
RESPONSES TO APPLICANT'S FIRST SET OF INTERROGATORIES

Interrogatory

6. For every admitted SPMC contention that you submitted and do not hereby withdraw, and for every other admitted SPMC contention that you did not list in response to Interrogatory 5 above, individually for each such contention please:

- (a) State in detail all the facts underlying each assertion contained in the contention;
- (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 and produce the document(s);

- (c) Identify any expert witness who is to testify concerning the contention, and state the substance of the facts, opinions, and grounds for opinions to which the expert is expected to testify;
- (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 and produce any documents which reflect or refer to any type of study, calculation or analysis bearing upon the substance of the contention.

Additional Responses

Facts underlying the Joint Intervenor ("JI") contentions are set forth in the contentions and bases originally filed by parties to this action. The Applicants have requested additional information pertaining to specific assertions contained in certain contentions. Where a particular original basis is the focus of the response, it is designated parenthetically after the JI contention being discussed. Where applicable, the Massachusetts Attorney General ("Mass AG") has indicated that additional information is presently being gathered.

JI 2B (MAG 39J, K)

During the NHRERP hearings, Dr. Thomas Adler and Dr. Avishai Ceder, expert witnesses for the Mass. AG, testified that the NHRERP's ETEs were based on incorrect assumptions concerning the rate at which cars will flow through roads, intersections, and ramps used to evacuate from the NH EPZ. Dr. Adler is now conferring directly with Mr. Lieberman of KLD Associates to learn whether any changes have been made in these assumptions in the calculation of the ETEs for vehicles evacuating from the Massachusetts EPZ. If no changes have been made, then the previous testimony of Drs. Adler and Ceder on this issue underlie the assertion contained in JI 2B. If changes have been made, we will have to analyze what those changes are. No determination has yet been made to call any expert or non-expert witnesses to support this contention/basis. Testimony which specifically dealt with discharge headway, road, intersection and ramp capacities has already been produced.

JI 2D (MAG 39U; TOA 4(K))

During the NHRERP hearings Dr. Thomas Adler and Dr. Avishai Ceder testified that the NHRERP's ETEs were inaccurate because they were calculated by the IDYNEV model using overly optimistic assumptions about the traffic flow rates over a grassy median and up the I-95 ramps at this intersection.

While the traffic control diagram for this intersection has now been reconfigured using a U-turn movement, it remains to be seen what flow rates were used for vehicles traveling up these ramps and through this intersection. We believe that the flow rates used for this intersection in calculating the Massachusetts ETEs are overly optimistic. Dr. Adler is currently conferring with Mr. Lieberman on this issue, and after assessing the latest IDYNEV runs he will advise us whether there are sufficient facts to support this contention/basis.

JI 2E

Towns in the EPZ host certain special event days (ie: Newburyport Homecoming; Salisbury Pro Beach Volleyball Tournament) which result in a significant increase in members of the transient population and traffic. The ETEs do not take these days into account. The Mass. AG is in the process of gathering additional information pertaining to the number and type of special events in the EPZ. No experts or witnesses have been identified to testify on this contention.

JI 2F (MAG 39AA)

Vehicles will be blocked at all intersections at which this strategy is employed.

JI 4A

Dr. Adler testified as to these matters during the NHRERP processing.

JI 19 (MAG 31; MAG 56F)

On the evening of March 12, 1988, a serious fire broke out in Seabrook, New Hampshire in a chemical warehouse on Route 1, very close to Seabrook Station. The warehouse was leased by the Aesar Division of Johnson Mathey Inc., a chemical supply firm. The plume of smoke generated by the fire was thought to contain various hazardous chemicals and metals stored in the warehouse, some of which were radioactive. Seabrook emergency responders evacuated an area downwind, but when the wind suddenly shifted nearly 180 degrees from a westerly to an easterly direction, the residents of the Adams Village Timber Parks were hit with the plume and they too had to be evacuated. The sources of these facts include Kevin Pacos, the Administrative Assistant to the Seabrook Selectmen, and Ernie Daniels, a resident of Adams Village, both of whom spoke at a public hearing on March 23, 1988, at the Seabrook Community Center. Some of this information was also contained in newspaper accounts, e.g., the article on p.52 of the Boston Globe, March 20, 1988.

Additional support for this contention is found in the Affidavit of Governor Dukakis, April 28, 1987, discussing, inter alia, expert opinion of Dr. Albert Carnesale regarding

wind and weather conditions at Seabrook. No experts or other witnesses have yet been selected to testify concerning this contention.

JI 22

No direct formal communications between local officials and the Mass. AG's traffic consultants have taken place.

JI 26C and E.

The SPMC has been amended (Amendment 5) to include an Ingestion Pathway Data Base (Appendix L) which contains information on food and milk producers and processors. The Mass. AG no longer wishes to litigate JI 26C and E and hereby withdraws these bases.

JI 30

The Mass. AG is in the process of gathering additional facts regarding commercial telephone usage and is negotiating to obtain expert assistance with regard to this contention. No expert or other witnesses have yet been selected to testify.

JI 39 (MAG 24C)

The Mass. AG is seeking information regarding distribution of pre-emergency information to members of the special needs population. The SPMC demonstrates no methodology, nor is there any indication that any effective means have been considered,

Preliminary inquiries have also indicated that some schools in the EPZ are inadequate for sheltering school children. The Mass. AG is planning a more detailed survey. No expert or other witnesses have been selected to testify on this contention.

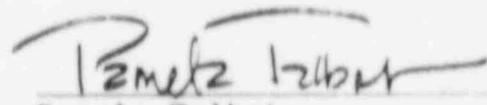
JI 50

Preliminary inquiries indicate that identification of and planning for certain special facilities in the EPZ has been omitted. For example: DSS home for women in transition (Amesbury); Northeastwood Nursing Home (Amesbury); DPH half way house for substance abusers (Newburyport). The Mass. AG is in the process of gathering additional facts regarding both the omission of special facilities and the inadequacy of protective measures pertaining to such facilities. No expert or other witnesses have been selected to testify on this contention.

Respectfully submitted,

JAMES M. SHANNON
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By:



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Date: October 7, 1988

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NUCLEAR REGULATORY COMMISSION

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Docket No.(s)
50-443/444-OL
(Off-site EP)

CERTIFICATE OF SERVICE

I, John Traficonte, hereby certify that on October 7, 1988 I made service of the within MASSACHUSETTS ATTORNEY GENERAL'S FIRST SET OF INTERROGATORIES TO APPLICANTS ON THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES and MASSACHUSETTS ATTORNEY GENERAL'S ADDITIONAL RESPONSES TO INTERROGATORY NUMBER SIX, by First Class Mail or by Hand Delivery as indicated by [*], to the following parties:

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DATED: October 7, 1988