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RELATED CORRESPONDENCE

DOCKETED
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October 11, 1988 4:41

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
)
(Seabrook Station, Units 1 and 2))
_____)

Docket Nos. 50-443-OL
50-444-OL
Off-site Emergency
Planning Issues

APPLICANTS' INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO ALL INTERVENORS AND
PARTICIPATING LOCAL GOVERNMENTS CONCERNING JOINT
INTERVENOR CONTENTIONS 1-26

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicants hereby request that the Attorney General for the Commonwealth of Massachusetts ("Mass AG"), the New England Coalition on Nuclear Pollution ("NECNP"), the Seacoast Anti-Pollution League ("SAPL"), the Town of Amesbury ("TOA"), the Town of Newbury ("TON"), the City of Newburyport ("CON"), the Town of Salisbury ("TOS"), the Town of West Newbury ("TOWN"), the City of Haverhill ("COH"), and the Town of Merrimac ("TOM") [hereinafter collectively "Intervenors"] respond to the

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following interrogatories, and produce for inspection and copying the documents requested belcw.

These interrogatories and requests directly address the assertions made by Intervenors in Joint Intervenor Contentions 1-26. Since several of the Intervenors have indicated that they intend to litigate only certain Contentions, those Intervenors need not respond to questions concerning those Contentions that they have stated they will not litigate (unless their intentions have changed). See infra nn. 1-26.

Mass AG and NECNP, however, have stated that they intend to litigate all Contentions, and so should answer all questions. TOA's intentions have apparently changed between September 30, when Mr. Lord stated under oath that TOA only intended to litigate eleven Contentions, and October 6, when TOA served interrogatories and document requests going to all sixty-three Contentions. Since TOA has now decided to litigate all Contentions, it should answer all questions. Finally, TOWN, COH, and TOM have failed or refused to state their intentions, and so should answer all questions.

The production of the documents requested herein (or copies thereof) shall take place at the offices of Ropes & Gray, 225 Franklin Street, Boston, Massachusetts, at 10 a.m. on Monday, November 14, 1988.

DEFINITIONS AND INSTRUCTIONS

1. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of the term "documents and tangible things" in Federal Rule of Civil Procedure 34(a), and therefore shall include, without limitation, any written or otherwise recorded information.
2. To "identify" a document means to either:
 - (a) state the author, date, title, addressee(s), and subject matter of each individual document; or
 - (b) if a request calls for the identification of more than twenty documents similar in subject matter, and those documents are also being produced, list the subject matter categories of documents, indicating the number of responsive documents in each category.
3. To "identify" a person other than an expert witness means to state the person's full name, title, business address, affiliation, and professional qualifications (if any). To "identify" an expert witness means to state, in addition to the foregoing:
 - (a) the profession or occupation and field(s) of expertise of the person:

- (b) the educational and specialized training history of the person, including date and granting institution of all degrees earned;
 - (c) a list of publications by the person in the area(s) of expertise; and
 - (d) the age of the person and the amount of time the person has worked in the field of expertise.
4. If any of the interrogatories or document production requests contained herein are claimed to be objectionable, then please identify the portion(s) to which objection is made and the portion(s) to which answer or production is made.
 5. If it is claimed that any document responsive to any request is privileged, please fully identify each privileged document in accordance with Instruction 2(a) above.
 6. If any document required to be identified or produced in the answers has been destroyed, please identify the document, state the date of its destruction, identify the person responsible for ordering destruction, state the purpose of destruction, and (if applicable) produce any document retention policy that governed or should have governed the retention or destruction of the document.

7. "SPMC" means the most current updates of the Seabrook Plan for Massachusetts Communities and all appendices, amendments, and attachments thereto.
8. The "Massachusetts EPZ" means the Massachusetts portion of the Emergency Planning Zone for Seabrook Station and consists of Amesbury, Merrimac, Newbury, Newburyport, Salicbury, and West Newbury.
9. The term "contention" is defined to include the complete text of the contention itself and all bases and sub-bases thereto.
10. Except for Interrogatories 1-3, all the interrogatories and requests which follow are grouped according to the Joint Intervenor Contention to which they refer. In case of doubt as to the intended scope of an interrogatory or request, it should be assumed that the request or interrogatory encompasses all information and material within the scope of the referenced contention.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

1. Please produce all analyses, studies, and reports bearing on any and/or all of the factual issues raised in the Joint Intervenor Contentions.
2. In each case where one of the following interrogatories asks for "all the facts" or "all the facts, estimates, and observations", please also identify the person(s)

and/or document(s) that are the source(s) of those facts, estimates, and/or observations, and produce all documents that reflect, concern, refer or pertain to any and/or all of those facts, estimates, and observations.

3. Please identify the person(s) answering or substantially contributing to the answer to each of the following interrogatories. Please also identify all persons consulted, and identify and produce all communications and documents consulted and/or relied upon, in answering each interrogatory.

AS TO JI CONTENTION 1¹

4. Please describe in detail all the "special difficulties, circumstances, and delays in conducting an evacuation in Massachusetts" which Intervenor's assert are not adequately taken into account in the KLD Evacuation Time Estimate Study and Traffic Management Plan Update. For each such special difficulty, circumstance, and delay, state all the facts, estimates, and observations underlying Intervenor's assertion.
5. Please describe in detail all the "many effects that result from an evacuation conducted under the SPMC" which Intervenor's assert "the old KLD ETE study . . .

¹ The following Intervenor's have indicated that they do not intend to litigate JI Contention 1, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

did not take into account." For each such "effect", state all the facts, estimates, and observations underlying Intervenors' assertion.

6. Please state all the facts, and describe in detail the regulatory basis (if any), underlying Intervenors' assertion that "an evacuation time study [must] be done on a case-by-case basis."

AS TO JI CONTENTION 2²

7. Please state, individually for each town in the Massachusetts EPZ (or for the entire EPZ, if no town figures are available) what the "maximum size of the Massachusetts beach area vehicle population" is. If Intervenors do not know what the "maximum size of the Massachusetts beach area vehicle population" is, please so state, and then state all the facts underlying the assertion in MAG Contention 39A that the Applicants' estimate of the "maximum size of the Massachusetts beach area vehicle population . . . is significantly too low." In either case, state all the facts, estimates, and observations underlying your answers.
8. Please identify every location in the Massachusetts EPZ, not presently specified in the SPMC as a designated

² The following Intervenors have indicated that they do not intend to litigate JI Contention 2, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

Traffic Control Point ("TCP"), which Intervenor assert would require TCP personnel in order to avoid the "inadequacies" alleged in JI Contention 2. For each such location, describe in detail all the alleged "inadequacies," and state how many TCP personnel would be required to avoid the "inadequacies" alleged. Please also state all the facts underlying your answers.

9. Please identify every SPMC TCP location which Intervenor assert is inadequately staffed, and state for each location how much additional personnel would be required to avoid the "inadequacies" alleged in JI Contention 2. Please also state all the facts underlying your answers.
10. For each TCP location which Intervenor assert is either inadequately staffed (Interrogatory 9) or omitted altogether from the SPMC (Interrogatory 8), state in detail the precise empirical, observable results that Intervenor assert the absence of the allegedly necessary TCP personnel at that location would cause. Please also state all the facts underlying your answers.
11. Please identify every location where Intervenor assert that "the traffic congestion will eliminate two-way road flow, so tow trucks will not always be able to travel to the blockages," indicating for each location why "traffic congestion will eliminate two-way road flow"

- and how frequently (and for how long) the congestion would actually impede tow truck access. Please also state all the facts underlying your answers.
12. Please state in detail all the facts underlying Intervenor's assertion that "ORO traffic guides will [not] be able to move the traffic in Massachusetts just as fast as State/local professionals would," and define "State/local professionals."
 13. Please produce all training curricula and training manuals used to provide traffic control training to "State/local professionals" working within the Massachusetts EPZ within the last five years.
 14. Please identify every "traffic and access control diagram" which Intervenor's assert is "ambiguous" and/or "confusing" and/or does not "indicate which position at a given intersection should be staffed first" and/or does not "sufficiently inform traffic guides what the term 'discourage' really means," and/or contains "no clear instructions on how to place cones and barriers". For each diagram identified, state which of the alleged infirmities that diagram has, what facts about the diagram cause it to suffer that alleged infirmity, and all the facts which indicate that infirmity "cannot be remedied by training."

15. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenor's assertion that "orderly and efficient traffic flow will not be maintained due to the inadequacies in planning for the use of traffic control personnel and for the removal of road blockages by tow trucks", and define "orderly and efficient traffic flow."
16. Please identify every assumption in Applicants' ETE calculations "about road, intersection, and ramp capacities in Massachusetts" which Intervenor asserts are "higher than can be expected", and state for each assumption exactly how much "higher than can be expected" it is. Please also state in detail all the facts, estimates, and/or observations underlying these assertions.
17. Do the Intervenor assert that "road, intersection, and ramp capacities in Massachusetts" differ from the capacities of similar road, intersections, and ramps in New Hampshire? If so, please describe in detail every difference, and state all the facts, estimates, and observations underlying your answers.
18. Please state all the facts, estimates, and observations underlying Intervenor's assertion that "data collected on the major evacuation roads in the Massachusetts

portion of the EPZ" would have shown V_F "to be in the range of 0.75 of V_E ."

19. Please identify all the "specific critical intersections in the Massachusetts EPZ towns" for which Intervenors assert Applicants' ETEs "are based on overly optimistic assumptions about the discharge headways that can be achieved." For each such intersection, please state all the facts that Intervenors assert make the assumptions overly optimistic, and what assumptions Intervenors assert would instead be correct. Please also, for each such intersection, state all the facts, estimates, and observations underlying your answers.
20. Please identify all "assumptions concerning the number of cars that will flow through roads, intersections and ramps in Massachusetts", other than those identified in response to the preceding interrogatories, which Intervenors assert are "incorrect." For each such assumption, please state all the facts underlying Intervenors' assertion that the assumption is incorrect.
21. Please describe in detail the types and causes of "delays" Intervenors assert "will result from the confusion among the public caused by hearing different emergency messages from different sources," identify all of the "different sources," and quantify each delay. Please also state all the facts underlying your answers.

22. Please state whether Intervenors still assert that Applicants' ETEs are based upon crossing a "curbed, grassy median that cannot be traversed in adverse weather." If so, please state all the facts underlying Intervenors' assertion that the median "cannot be traversed in adverse weather," and define "adverse weather".
23. Please state all the facts, other than those discussed in response to the preceding interrogatory, underlying Intervenors' assertion that Applicants' "traffic management plan . . . overestimates the traffic flow rate through the intersection of Route 110/I-95/Elm Street in Amesbury."
24. Please state all the facts, estimates, and observations underlying Intervenors' assertion that the "SPMC's ETEs do not account for the large number of evacuating vehicles which will travel south on Rt. 1A from Seabrook, NH, cross the state line, and seek to evacuate through Salisbury, Massachusetts, on Rt. 1A."
25. Please state all the facts, estimates, and observations underlying Intervenors' assertion that the "SPMC's ETEs fail to account for the large number of transients who regularly visit portions of the Massachusetts EPZ which are not in the beach areas." Please also describe in detail all of these "regularly visit[ed] portions",

state how many transients visit each location, and state all the facts, estimates, and observations underlying your answers.

26. Please identify all "special event days" in which Intervenor's assert "huge crowds" not accounted for in Applicants' ETE's would gather in the Massachusetts EPZ. For each such "special event day," please quantify those "huge crowds," indicating number of persons, whether they are primarily residents or transients, where they would gather, and for how long. Please also state all the facts, estimates, and observations underlying your answers.
27. Please identify every other way, not discussed in response to the preceding interrogatories, in which Intervenor's assert that Applicants' ETEs "are based on an undercount of the number of vehicles evacuating from or through the Massachusetts portion of the EPZ." For each such assertion, state all the facts, estimates, and observations underlying it.
28. Please identify every intersection at which Intervenor's assert "vehicles will be blocked" from "legitimate reasons to travel against or across the flow of evacuation traffic" if Applicants implement their "traffic management plan." Please also identify every "legitimate reason" why vehicles would be travelling

across or against the flow, explain in detail why traffic control personnel would not be able to facilitate such travel when it in fact is necessary (by temporarily moving traffic cones or otherwise), and explain in detail what the consequences of every such asserted blockage would be. State all the facts underlying your answers.

29. Please state how much larger Intervenor's assert the population of the Massachusetts EPZ is, broken down by individual towns, than was assumed in Applicants' ETES. Please state all the facts, estimates, and observations underlying your assertions.
30. Please state what Intervenor's assert the average number of people per evacuating car would be. Please also state all the facts, estimates, and observations underlying that assertion.
31. Please identify every "major road" on which Intervenor's assert that there "could be . . . thousands of 'through' vehicles" for which the "ETES fail to account", and state, for each such road, how many "through vehicles" are allegedly unaccounted for. Please state all the facts, estimates, and observations underlying these assertions.
32. Please identify every instance in which Intervenor's assert Applicants have underestimated the number of

"campground spaces and hotel, motel, and guest house rooms in the Massachusetts portion of the EPZ," and, for each case, provide the number that Intervenors assert to be correct. Please state all the facts, estimates, and observations underlying those assertions.

33. Is it Intervenors' assertion that all traffic control personnel must be in place prior to a recommendation to evacuate in order for the SPMC ETEs to be realistic? Please state all the facts underlying your answer.
34. Please state all the facts, not already discussed in response to the preceding interrogatory, underlying Intervenors' assertion that "the traffic control personnel will [not] be able to staff their posts in a timely manner." If this assertion applies only to certain accident scenarios, identify every such scenario.
35. Please state all the facts underlying Intervenors' assertion that "traffic and access control guides will show up . . . intermittently in groups of twos, threes, and fours over a long period of time", and define "long period of time".
36. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that the SPMC ETEs "are too

unrealistic to form the basis of adequate protective action decision-making."

AS TO JI CONTENTION 3³

37. Please describe in detail the "real-time, computer-based system to monitor the size of the beach population" envisioned in JI Contention 3. This description should include, but not be limited to:

- (a) a description of all components of the system, their locations (including the locations of all roadway traffic counters), and how they would be connected and would interact;
- (b) a list of every similar system known to Intervenors which presently is operational, along with its manufacturer and application, and all computer hardware and software presently available to support such a system;
- (c) the cost and time to acquire or develop such a system and the cost of maintaining it;
- (d) the actual or projected reliability of such a system, the name(s) and business address(es) of all qualified installation and maintenance personnel, and a description of the backup to the system;

³ The following Intervenors have indicated that they do not intend to litigate JI Contention 3, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

- (e) the frequency with which such a system would report its findings;
- (f) whether the Commonwealth of Massachusetts presently uses or intends to use such a system for radiological or non-radiological emergency planning and, if not, why not.

Please state in detail all the facts underlying this description.

38. Please state all the facts underlying Intervenor's assertion that the SPMC is "deficient" absent such a "real-time, computer-based system."

AS TO JI CONTENTION 4⁴

39. Please identify every error and ambiguity that Intervenor's assert exist in Applicants' current traffic control diagrams. Please state all the facts underlying each of Intervenor's assertions of error or ambiguity.
40. Please state all the facts, other than those stated in response to the preceding interrogatory, underlying Intervenor's assertion that "the traffic control

⁴ The following Intervenor's have indicated that they do not intend to litigate JI Contention 4, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL.

In addition, TOS may limit its responses to just those questions that concern issues which it indicated, in its Request for Limited Participation Status (October 6, 1988), that it intends to litigate.

diagrams contained in the SPMC are not sufficiently clear to allow the SPMC's traffic management plan to be implemented."

41. Please identify every location along "heavily travelled evacuation routes" where Intervenors assert that more traffic control personnel would be needed "to ensure that two-way traffic flow can be maintained." Please state all the facts underlying your answer.
42. Please state all the facts, for each TCP, underlying Intervenors' assertion that more personnel and equipment are needed at the traffic control points listed in the SPMC for Newburyport.
43. Please define the following terms used in CON Contention 6:
 - (a) "staging of TCP equipment";
 - (b) "readily available";
 - (c) the time period covered by "the advent of a radiological emergency";
 - (d) "other transports".
44. Is it Intervenors' assertion that TCP equipment must be pre-positioned in the field? If so, please state all the facts underlying that assertion.
45. Please identify every "anticipated and significant choke point" in Amesbury at which Intervenors assert that

traffic guides would be necessary. Please state all the facts underlying those assertions.

46. Please state all the facts underlying Intervenors' assertion that "alteration of TCPs and traffic control devices, in heavy traffic, will present dangerous conditions beyond the capabilities of NHY employees," and define "dangerous conditions".
47. Please state all the facts underlying Intervenors' assertion that "the SPMC assigns too few traffic guides and insufficient equipment to the Salisbury Transfer Point and to those points along Beach Road where travel lane reductions occur," and identify every point along Beach Road "where travel lane reductions occur."
48. Please state what the clearance of the B&M Bridge over Lafayette Road in Salisbury is. Please also state how many tractor trailers incapable of passing that clearance would be diverted along that road under the SPMC, and state all the facts underlying your answer.
49. Please state all the facts underlying Intervenors' assertion that "significant traffic congestion can reasonably be assumed" for the specified "critical intersections" in West Newbury.
50. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying

- Intervenors' assertion that "the number of traffic control personnel relied upon by the SPMC is inadequate."
51. Please state all of the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "insufficient capacity-enhancing measures and other poorly conceived traffic control strategies are utilized by the SPMC's traffic management plan," and define "capacity-enhancing measures."
 52. Please describe in detail all the "problems that will occur during an evacuation in the event that the Gillis Bridge is closed to traffic in order to facilitate the passage of boats" that Intervenors assert "the SPMC has not adequately addressed." Please also state when, how frequently and how long the bridge would be closed to traffic. State all the facts, estimates, and observations underlying your answers.
 53. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the traffic control diagrams contained in the SPMC are not sufficiently clear to allow the SPMC's traffic management plan to be implemented."
 54. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying

Intervenors' assertion that "the evacuation plan contained in the SPMC is so poorly designed and so inadequately staffed that, even if state and local officials are assumed to make a best efforts response, there is no reasonable assurance that either the permanent residents or the transients can or will be evacuated as efficiently as possible."

AS TO JI CONTENTION 5⁵

55. Please describe in detail, and produce all documents that reflect or refer to, the procedures relied upon by the Commonwealth of Massachusetts for "surveillance and removal of road blockages" in the event of radiological emergencies at the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants.
56. Please state all the facts underlying Intervenors' assertions that "Route Guides for the hearing impaired . . . will likely avoid travel along major evacuation links, and they are not out in sufficient numbers".
57. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the method utilized by the

⁵ The following Intervenors have indicated that they do not intend to litigate JI Contention 5, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; CON; TOS.

SPMC for surveillance and removal of road blockages is not adequate to ensure that road blockages will be identified and removed promptly enough", and define "promptly enough".

58. Please state all the facts underlying Intervenor's assertion that "the communications procedures for dispatching tow vehicles once blockages have been spotted are too cumbersome and ineffective", and define the meaning and consequences of those procedures being "too cumbersome and ineffective."

AS TO JI CONTENTION 6⁶

59. Please define the geographic boundaries of the "river basin" referred to in JI Contention 6.
60. Please identify every dockage point, boat launching ramp, and permanent mooring point available on the Merrimac River within the Massachusetts EPZ.
61. Please state all the facts, estimates, and observations underlying Intervenor's assertion that "possibly hundreds of commercial and pleasure boaters on the Merrimac River...may be confined to the river basin . . . without adequate dockage and transportation ashore."

⁶ The following Intervenor's have indicated that they do not intend to litigate JI Contention 6, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON.

62. Please state all the facts, not stated in response to the preceding interrogatory, underlying Intervenor's assertion that "frequently occurring conditions of wind and tide" would confine boaters to the "river basin," and define (with quantification) "frequently".

AS TO JI CONTENTION 7⁷

63. Please state all the facts underlying Intervenor's assertion that, in Newburyport, the SPMC's "method of circulating buses significantly reduces the reliability of actually accomplishing the retrieval of these individuals and increases the potential for a broad spectrum of the populace . . . to be left behind."

64. Please state all the facts underlying Intervenor's assertion that the Newburyport Transfer Point is "subject to periodic flooding and severe tidal conditions," and define (with quantification) "periodic" and "severe tidal conditions."

65. Please state all the facts underlying Intervenor's assertion that the Newburyport Transfer Point is "not

⁷ The following Intervenor's have indicated that they do not intend to litigate JI Contention 7, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL.

In addition, TOS may limit its responses to just those questions that concern issues which it indicated, in its Request for Limited Participation Status (October 6, 1988), that it intends to litigate.

- suitable for the safe sheltering or even staging of large numbers of people."
66. Please state all the facts underlying Intervenors' assertion that the Newburyport Transfer Point "offers poor visibility and turning access for buses coming into and out of the facility."
 67. Please identify the agency and/or individual(s) responsible for placing and maintaining road signs in Newbury. Explain why adequate road signs have not been placed at each of the locations described in TON Contention 1 as being unmarked and/or poorly marked.
 68. Please identify all segments of roads in Newbury that are subject to flooding, and state for each such road how frequently the road is rendered impassable by flooding. State in detail all the facts underlying your answer.
 69. Please state all the facts underlying Intervenors' assertion that Downfall Road in Newbury is "nonexistent and impassable".
 70. Please identify every bus route within the scope of TOS Contention 14, describe the geographic boundaries of the "flooding marsh", and state how frequently each segment of each bus route would assertedly be "impassable" due to "weather and tide." Please state all the facts underlying your answer.

71. Please state what Intervenors assert a realistic estimate of "passenger demand" for each bus route in Salisbury would be. State all the facts, estimates, and observations underlying your answer.
72. Please identify every intersection at which bus drivers are required to turn in West Newbury where Intervenors assert that there are no street signs, and state all the facts underlying your answer.
73. Please identify the agency and/or individual(s) responsible for placing and maintaining road signs in the West Newbury. Explain why adequate road signs have not been placed at each of the locations listed in response to the preceding interrogatory.
74. Please identify exactly which parts of River Road and Ash Street Intervenors assert become impassable due to flooding, state how frequently Intervenors assert that such conditions occur for each such part, and state all the facts underlying your answers.
75. Please state all the facts underlying Intervenors' assertion that the Stewart Street transfer site is "inadequate for a bus turn around."
76. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the bus routes proposed for Newbury, Newburyport, West Newbury and Salisbury as

particularized in their contentions as filed, will not expedite the evacuation of [the transit dependent] population."

AS TO JI CONTENTION 8⁸

77. Given the route maps provided in the SPMC and the notification to the public in EBS messages regarding the start times for bus routes, do Intervenor's assert that there are further practicable measures that can be taken to shorten the time during which transit dependent persons in Salisbury and West Newbury would wait outside along bus routes? If so, please describe in detail all such measures, including all the steps necessary to make each measure practicable, and state all the facts, estimates, and observations underlying your answer.
78. Please state, for each bus route in Salisbury and West Newbury, how long Intervenor's assert that the average transit dependent person would be waiting outdoors, and what "radiation dose" and "exposure to the elements" that person would receive during the wait. If Intervenor's assert that the times, doses, and/or exposures would vary depending on the accident scenario, answer separately for each such scenario. Please state

⁸ The following Intervenor's have indicated that they do not intend to litigate JI Contention 8, and so do not need to respond to the questions concerning it (unless their intentions have changed): TON; TOS; CON.

all the facts, estimates, and observations underlying your answers.

AS TO JI CONTENTION 9⁹

79. Please identify all emergency personnel whose availability Intervenor's assert would be affected in the event of a strike or other form of job action. State all the facts underlying your answer.

AS TO JI CONTENTION 10¹⁰

80. Please identify every Federal agency that Intervenor's assert would not be required to respond to a Seabrook emergency in the manner relied upon in the SPMC. Please state, with respect to each such agency identified, all the facts underlying your assertion.
81. Please describe in detail all the "lessons learned from exercises of the FRERP conducted at the Zion Nuclear Facility in June, 1987" which Intervenor's assert "indicate that responsible emergency organizations . . . should meet and plan adequate interfaces with the NRC to insure effective use of FRERP Federal assistance."

⁹ The following Intervenor's have indicated that they do not intend to litigate JI Contention 9, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

¹⁰ The following Intervenor's have indicated that they do not intend to litigate JI Contention 10, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

82. Please describe in detail all the "lessons learned from the exercise of the FRERP conducted at the Zion facility in June 1987" which Intervenors assert "indicate that the estimate of 3 to 8 hours for a federal response at Plan 2.3.-2 is totally unrealistic and that 24 to 48 hours would be more reasonable."
83. Please identify each of "the responsibilities attributed to federal agencies at Plan @ 2.3.3" that Intervenors assert exceed "both the FRERP and the policy of these individual agencies." For each such responsibility, please state all the facts underlying that assertion.
84. Please identify each "federal support option" that Intervenors assert "would be available only in light of a Presidential Disaster Declaration." For each such federal support option, please state all the facts underlying your answer.
85. Please describe in detail each instance in which Intervenors assert that FEMA has resisted a Presidential Disaster Declaration for radiological emergencies. For each such instance, please state all the facts underlying your answer.
86. Please state all the facts underlying Intervenors' assertion that the ORO "is totally unprepared to effectively interface with these Federal agencies in the event of an actual emergency."

87. Please state all the facts underlying Intervenors' assertion that "[m]onitoring and dose assessment information provided to the NRC by the Department of Energy during the Zion exercise of the FRERP in June 1987 overwhelmed the capacities of the NRC."
88. Please state all the facts underlying Intervenors' assertion that the SPMC's alleged failure to provide "practical information" hinders the ORO from "assess[ing] whether communication links and other forms of interface between ORO and the Federal agencies will even be possible during an emergency," and define "practical information."
89. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the SPMC fails to provide adequate arrangements for requesting and effectively using Federal assistance resources and does not comply with 50.47(b)(3) and NUREG 0654, II.C.1.a, b. and c."

AS TO JI CONTENTION 11¹¹

90. Please state all the facts underlying Intervenors' assertion that "[t]he SPMC does not provide for the

¹¹ The following Intervenors have indicated that they do not intend to litigate JI Contention 11, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

capability of continuous operations for a protracted period of time."

91. Please state all the facts underlying Intervenors' assertion that "[d]elays can be expected in [experienced management personnel's] response to requests for assistance."
92. Please identify each position where Intervenors assert "there are fewer staff available for some positions than will be reasonably necessary on a 24-hour basis during protracted emergency." For each such position, please state all the facts underlying that assertion.
93. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the SPMC fails to provide for the adequate or continuous staffing of ORO personnel to maintain or sustain an emergency response."

AS TO JI CONTENTION 12¹²

94. Please state all the facts underlying Intervenors' assertion that "there is no reasonable assurance that an evacuation could be completed within one shift."
95. Please state all the facts underlying Intervenors' assertion that "there is no reasonable assurance ...

¹² The following Intervenors have indicated that they do not intend to litigate JI Contention 12, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

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that during a radiological emergency at Seabrook Station which is serious enough to warrant a second shift for these evacuation-specific positions, enough volunteers can be recruited by Yankee Atomic to fill all such positions."

96. Please state all the facts underlying Intervenors' assertion that Yankee Atomic employees "will not volunteer in sufficient numbers or in a timely fashion during a radiological emergency."
97. Please state all the facts underlying Intervenors' assertion that "first-shift workers [will] want to minimize dose consequences by getting out of the EPZ as quickly as possible."
98. Please state all the facts underlying Intervenors' assertion that "on-the-job training during an emergency, offered by first-shift workers who want to minimize dose consequences by getting out of the EPZ as quickly as possible, is very likely to be inadequate."
99. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "there is no reasonable assurance that there will be adequate second shift manpower capability for certain evacuation-specific positions," and list all of the "certain evacuation-specific positions."

AS TO JI CONTENTION 13¹³

100. Please state all the facts underlying Intervenors' assertion that "[t]he position of senior manager of a business office does not provide the training skills or experience required to make prudent emergency management decisions," and state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."
101. Please state all the facts underlying Intervenors' assertion that "[s]ince the Monitoring/Decontamination Personnel are dealing directly with the public, it is imperative that they have past experience and training in Health Physics and methods used for the monitoring of and the removal of contamination from personnel and vehicles," and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."
102. Please state all the facts underlying Intervenors' assertion that "[t]he position of senior manager of a business office does not provide the training skills or

¹³ The following Intervenors have indicated that they do not intend to litigate JI Contention 13, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

experience required to direct the mobilization of emergency offsite personnel and the logistics therewith (i.e., bus coordination, traffic control, traffic guides, access control, etc.)," and please state all the facts underlying; Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

103. Please state all the facts underlying Intervenors' assertion that the SPMC's not enumerating the "qualifications" listed by Intervenors for Technical Advisor amounts to a "deficiency," and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

104. Please state all the facts underlying Intervenors' assertion that the SPMC's not enumerating the "qualifications" listed by Intervenors for Radiological Health Advisor amounts to a "deficiency," and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

105. Please state all the facts underlying Intervenors' assertion that the qualification requirements identified in the SPMC for Accident Assessment Coordinator are

"insufficient" and that the "qualifications" listed by Intervenor for that position are necessary in order to avoid a "deficiency," and please state all the facts underlying Intervenor's further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

106. Please state all the facts underlying Intervenor's further assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Field Monitoring Teams is a "deficiency" and that the skills listed by Intervenor for that position are necessary in order to avoid such a "deficiency," and please state in detail all the facts underlying Intervenor's further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."
107. Please state all the facts underlying Intervenor's assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Reception Center Coordinator is a "deficiency," describe what qualifications are needed to accomplish adequately the duties listed by Intervenor for Reception Center Coordinator and state in detail all the facts underlying that assertion, and please state all the facts underlying Intervenor's further assertion that "[t]he

training provided by the SPMC . . . is not adequate to compensate for this deficiency."

108. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Reception Center Leader is a "deficiency," describe what qualifications are needed to accomplish adequately the duties listed by Intervenors' for Reception Center Leader and state in detail all the facts underlying that assertion, and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

109. Please state all the facts underlying Intervenors' assertion that "qualifications" listed by Intervenors for Public Notification Coordinator are necessary in order to avoid a "deficiency," and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

110. Please state all the facts underlying Intervenors' assertion that the requirements listed by Intervenors for NHY Offsite Response EOC Contact are necessary in order to avoid a "deficiency," and please state all the facts underlying Intervenors' further assertion that

"[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

111. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Communication Coordinator is a "deficiency," describe what qualifications are needed to accomplish adequately the duties listed by Intervenors for Reception Center Leader and state in detail all the facts underlying that assertion, and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."
112. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of telephone operator is a "deficiency," and that the requirements listed by Intervenors for that position are necessary in order to avoid such a "deficiency," and please state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."
113. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience

and training needed to perform the tasks required of the Administrative Staff is a "deficiency," describe what qualifications are needed to accomplish adequately the duties listed by Intervenors for the Administrative Staff and state all the facts underlying that assertion, and state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

114. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Special Population Coordinator is a "deficiency," and that the requirements listed by Intervenors for that position are necessary in order to avoid such a "deficiency," and state all the facts underlying Intervenors' further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

115. Please state all the facts underlying Intervenors' assertion that the SPMC's not quantifying the experience and training needed to perform the tasks required of Bus Driver is a "deficiency," and that the requirements listed by Intervenors for that position are necessary in order to avoid such a "deficiency," and state all the

facts underlying Intervenor's further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

116. Please state all the facts underlying Intervenor's assertion that "[i]t is inconceivable that Traffic Guides would not be required to have some substantial prior experience directing congested traffic," define "substantial prior experience," and state all the facts underlying Intervenor's further assertion that "[t]he training provided by the SPMC . . . is not adequate to compensate for this deficiency."

117. Please state all the facts underlying Intervenor's assertion that "[t]he ORO personnel to be used for radiological monitoring and dose assessment are inexperienced in the field of radiation and inadequately trained." Please also describe in detail, and produce all documents that reflect or refer to, the training and experience of the personnel relied upon by the Commonwealth of Massachusetts for "radiological monitoring and dose assessment" in the event of radiological emergencies at the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants.

118. Please state all the facts underlying Intervenor's assertions that "[t]he Dose Assessment Technician ("DAT") is not sufficiently experienced in computer-

based dose projections" and that the experience requirements are not adequate.

119. Do Intervenors know or have reason to believe that the training developed for the DAT position would not "qualify" an inexperienced computer user for this position or that the level of proficiency of a qualified DAT would in any way be inadequate? If so, please state all the facts that form the basis of that knowledge or belief.
120. Please state all the facts underlying Intervenors' assertion that "the Accident Assessment Coordinator who directs dose assessment and field radiological monitoring has neither sufficient experience in the field nor adequate training."
121. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the prerequisite experience required for qualification to hold numerous critical ORO positions, and the training provided by the SPMC for those positions, is inadequate to provide reasonable assurance that ORO can and will implement adequate protective measures in the event of a radiological emergency at Seabrook Station." Please also identify all such "critical ORO positions," other than those cited in the preceding interrogatories, explain in

detail why Intervenor assert that they are "critical", and state all the facts underlying your answers.

AS TO JI CONTENTION 14¹⁴

122. Please state, for each individual and/or position to which Intervenor contend that the assertion applies, all the facts underlying Intervenor's assertion that the ORO training is "entirely too general in nature, is much too brief, is not well done, and does not qualify ORO staffers to perform their jobs under the difficult and confusing circumstances that will prevail in the event of a serious radiological emergency at Seabrook Station."
123. Please state all the facts underlying Intervenor's assertion that "there is no reasonable assurance that the bus drivers who purportedly have agreed to respond to an emergency at Seabrook in fact have sufficient experience or training to perform this function."
124. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenor's assertion that "the SPMC provides inadequate training to members of ORO."

¹⁴ The following Intervenor have indicated that they do not intend to litigate JI Contention 14, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

125. Please explain in detail exactly why "State and local governments [sic] employees . . . are not receiving any training at all on SPMC procedures," and state all the facts underlying your answer.

AS TO JI CONTENTION 15¹⁵

126. Please state all the facts underlying Intervenors' assertion that "ORO emergency workers will be liable for damages resulting from their actions," and define "their actions."

127. Please describe all types of "damages resulting from [ORO emergency workers'] actions" that Intervenors assert would be likely to arise during an actual radiological emergency, and state all the facts underlying your answer.

128. Please describe every consequence that Intervenors assert would arise if "ORO emergency workers" were "liable for damages resulting from their actions," and state all the facts underlying your answer.

¹⁵ The following Intervenors have indicated that they do not intend to litigate JI Contention 15, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

AS TO JI CONTENTION 16¹⁶

129. Please state all the facts underlying Intervenors' assertion that "the number of monitoring teams . . . and the training and experience of the personnel is inadequate to adequately monitor radiation levels in the Massachusetts portion of the EPZ." Such answer should include, but not be limited to, a description of the number and training of the field monitoring teams that the Commonwealth of Massachusetts would supply for radiological emergencies at the Pilgrim, Yankee Rowe, and Vermont Yankee facilities.
130. Please state all the facts underlying Intervenors' assertion that "the procedures developed to direct and control these field monitoring teams are inadequate."
131. Please state all the facts underlying Intervenors' assertions that:
- a. "the SPMC provides no assurance that adequate coordination of dose assessment activities taking place at the EOC and the EOF based on a variety of different field monitoring teams will exist";

¹⁶ The following Intervenors have indicated that they do not intend to litigate JI Contention 16, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

- b. "no provision is made for the timely acquisition and communication of this data to the necessary personnel," and define "timely" and "necessary";
 - c. "no criteria exist in the SPMC on the basis of which the Accident Assessment Coordinator or the Field Team Dispatcher could decide to assign specific monitoring locations," and define "criteria";
 - d. "the locations of work and residence for these personnel are such that timely mobilization is not possible," and define "timely"; and
 - e. "no back-up personnel are provided for these field teams."
132. Please describe in detail all of the "specific local conditions" for which Intervenors assert the SPMC's "planning for the locations of effective radiological monitoring" does not account, and state all the facts underlying your answer.
133. Please state all the facts underlying Intervenors' assertion that "maps referenced at Plan 3.3-4 are not adequately explained," and define "adequately".
134. Please describe in detail what Intervenors assert would be "the impact of mobilizing and evacuating traffic on the timely availability of field team members at the dispatch location as well as the further delay in

arriving at a monitoring location," define "timely", and state all the facts, estimates, and observations underlying your answer.

135. Please state all the facts other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the SPMC fails to provide reasonable assurance that adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency are in use or could be used."

136. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "provisions in the SPMC for radiological monitoring are inadequate."

AS TO JI CONTENTION 17¹⁷

137. Do Intervenors assert that there are circumstances for which, following beach closure at the Site Area Emergency classification, greater dose savings would be achieved by an instruction to the transient beach population to shelter rather than evacuate? If so, please describe in detail all such circumstances, and state all the facts underlying your answer.

¹⁷ The following Intervenors have indicated that they do not intend to litigate JI Contention 17, and so do not need to respond to the questions concerning it (unless their intentions have changed): TON; CON; TOS.

138. Please state all the facts underlying Intervenor's assertion that "substantial portions of the beach population are entrapped by the traffic congestion generated by an order to evacuate and cannot remove themselves from areas close-in to the plant for many hours," and define (with quantification) "substantial portions" and "many hours."
139. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenor's assertion that "no choice of protective actions is set forth in the SPMC for large numbers of people," and define (with quantification) "large numbers."

AS TO JI CONTENTION 18¹⁸

140. Please state what percentage of permanent structures in the Massachusetts EPZ Intervenor asserts have a shelter protection factor better than .9, and state all the facts, estimates, and observations underlying your answer.
141. Please state all the facts, and describe in detail the regulatory basis (if any), underlying Intervenor's assertion that "skin and car deposition" and groundshine

¹⁸ The following Intervenor's have indicated that they do not intend to litigate JI Contention 18, and so do not need to respond to the questions concerning them (unless their intentions have changed): SAPL; CON; TOS.

must be considered in protective action decisionmaking. Please also describe in detail, and produce all documents that reflect or refer to, how these factors are considered (if at all) in protective action decision making at the Pilgrim, Yankee Rowe, and Vermont nuclear power plants.

142. Please state all the facts underlying Intervenors' assertion that "the SPMC's decision criteria for calculating thyroid shelter assumes an air exchange rate that is too high." Please also state what Intervenors assert would be the appropriate air exchange rate to use, and state all the facts, estimates, and observations underlying that assertion.
143. Please specify by category each type of structure considered by Intervenors in determining the appropriate air exchange rate for Massachusetts EPZ protective action decisionmaking, state the percentage of the total number of permanent structures in the Massachusetts EPZ within each category, and state all the facts, estimates, and observations underlying your answer.
144. Do Intervenors assert that PAR decision criteria should take into account exposures other than whole body and thyroid exposure? If so, please state all the facts, and describe in detail the regulatory basis (if any), underlying your answer.

145. Please state all the facts underlying Intervenors' assertion that "the entrapment phenomenon described by NUREG 1210, V.4 at 19-20 . . . will occur at the Seabrook site during times of high beach population, and define "times of high beach population."
146. Please state all the facts underlying Intervenors' assertion that the SPMC "fails to adequately consider and plan for the possibility of entrapment due to bad weather, such as blizzards or flooding conditions," and define "adequately."
147. Please state all the facts underlying Intervenors' assertion that the SPMC "under-estimates doses from iodine and other ground deposited material."
148. Please describe in detail all "non-radiological risks of evacuation" which Intervenors assert that the SPMC should consider but does not, and state all the facts underlying your answer.
149. Please state all the facts underlying Intervenors' assertion that "there is insufficient and untimely incorporation of meteorological data into PAR decision-making," and define "insufficient" and "untimely".
150. Please state all the facts, estimates, and observations underlying Intervenors' assertion that "meteorological assumptions made . . . do not adequately reflect or account for features of shoreline meteorology, including

the frequent change of wind direction and the phenomena associated with sea breezes along the coastline," and define "the phenomena associated with sea breezes along the coastline." Please also define (with quantification) "frequent" as used above to describe "change of wind direction."

151. Please describe in detail the dose assessment programs and protective action decision procedure(s) utilized by the Massachusetts Department of Public Health for the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants. Such description should include, but not be limited to:

- a. the results of the most recent FEMA graded exercise evaluation of these procedures for each plant;
- b. a description of how the procedures consider impediments to evacuation;
- c. a description of how the dose assessment program(s) estimate doses from iodine and other groundshine, skin and vehicle deposition;
- d. a description of how the procedures consider shelter first, rapid identification of hot spots, and relocation later as a PAR;
- e. a description of how meteorological data is considered;

- f. a description of the specific meteorological assumptions made for each site; and
- g. a description of how and when meteorological data is input and updated into the dose assessment program(s).

Please state all the facts underlying your description.

152. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the SPMC's decision-making criteria for selecting a sheltering as opposed to an evacuation PAR is [sic] inadequate and inaccurate."

- 1. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the SPMC does not establish or describe coherent decision criteria to be used by emergency decision-makers in formulating an appropriate PAR and otherwise fails to provide guidelines for the choice of protective actions consistent with federal policy," and define "coherent" and "federal policy."

AS TO JI CONTENTION 19¹⁹

153. Please state all the facts, estimates, and observations underlying Intervenors' assertion that "wind-shifts in

¹⁹ The following Intervenors have indicated that they do not intend to litigate JI Contention 19, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

the area of the plant are so frequent," and define (with quantification) "so frequent" and "in the area of the plant."

154. Please state all the facts, estimates, and observations underlying Intervenors' assertion that "the phenomena of sea breezes at this site make actual direction of plume travel difficult to predict," and define "the phenomena of sea breezes" and "difficult."
155. Please state all the facts, estimates, and observations underlying Intervenors' assertion that "for this plant site, the normal potential results of high and low wind speeds as shown on Attachment 6 to IP 2.5 simply are not reliable."
156. Please describe in detail "the sudden 180° wind shift during the course of a serious hazardous materials fire at Seabrook, New Hampshire in March 1988," identify all witnesses who have described the "wind shift" to Intervenors or their agents, and state all the facts underlying your answer.
157. Please state all the facts, estimates, and observations, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that the SPMC's allowing and encouraging "decision-makers to call for an evacuation of EPZ by sectors (S, SW, NE, SE,

N), even within 5 miles, depending on which way the wind is blowing," is "a deficiency."

AS TO JI CONTENTION 20²⁰

158. Please describe in detail all the "conditions" that Intervenor's assert would be so at variance from "those assumed in the ETE study" as to require that "the ETEs used by protective action decision-makers" be "adjusted", and define "adequately adjusted." Please also state all the facts, estimates, and observations underlying your answer.

AS TO JI CONTENTION 21²¹

159. Please state all the facts, estimates, and observations underlying Intervenor's assertion that "the figures listed for the permanent residents are incorrect for the current time period," and define "current time period."

160. Please state all the facts, estimates, and observations underlying Intervenor's assertion that "the 'peak' population totals for both 'summer midweek' and 'summer

²⁰ The following Intervenor's have indicated that they do not intend to litigate JI Contention 20, and so do not need to respond to the questions concerning it unless their intentions have changed): SAPL; TON; CON; TOS.

²¹ The following Intervenor's have indicated that they do not intend to litigate JI Contention 21, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; CON; TOS.

weekend' are significantly too low", and define (with quantification) "significantly."

161. What do Intervenor's assert are the correct current figures for "permanent residents", "summer midweek peak", and "summer weekend peak" for the Massachusetts EPZ, by municipality? Please state all the facts, estimates, and observations underlying your answer.

AS TO JI CONTENTION 22²²

162. Please state all the facts underlying Intervenor's assertion that "the SPMC's evacuation time estimates have been rejected by state and local officials as totally unrealistic and unreliable." Please include in your answer a detailed description of every direct or indirect communication between "local officials" and "consultants retained by the [Massachusetts] Attorney General" concerning the alleged unreliability of Applicants' ETES and/or the consultants' estimate of "realistic evacuation times." Identify all the "consultants" and "local officials" involved in these communications.

²² The following Intervenor's have indicated that they do not intend to litigate JI Contention 22, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

163. Please identify the person(s) who gave "local officials" to "understand that the ETEs in the SPMC were calculated using incorrect assumptions about notification times, beach population, times to staff traffic posts, an 'early beach closing', and traffic orderliness." Describe in detail every communication in which this understanding was conveyed to "local officials", identify the "local officials" involved in each communication, and produce every document that reflects or refers to any and/or all of those communications.
164. Please describe in detail the types of documentation, data, and advice that Intervenors assert "state and local officials" would use to "make an ad hoc judgment regarding what protective actions are likely to maximize dose reductions." Please also state all the facts underlying your answer.
165. Please state all the facts underlying Intervenors' assertion that "those decision makers have no alternative set of ETEs available to them."
166. Do Intervenors assert that "state and local officials" would continue to reject Applicants' PARs throughout the course of a radiological emergency, or only that those officials would not agree to "immediate implementation" of the PARs. If the latter, state how much delay would

occur and what its consequences would be. Please also state all the facts underlying your answers.

167. Please state all the facts underlying Intervenors' assertion that Massachusetts state and local Civil Defense and Public Health professionals, who allegedly lack their own set of ETEs for a radiological emergency at Seabrook Station, would in an actual emergency nonetheless automatically reject Applicants' ETEs and the PARs based upon them. Please also state all the facts underlying Intervenors' assertion that state and local officials charged with protecting the health and safety of the public would in an actual emergency automatically reject Applicants' ETEs and the PARs based upon them if advised by Civil Defense and/or Public Health officials to use those ETEs and PARs as the best (or only) ones available.

AS TO JI CONTENTION 23²³

168. Please state all the facts underlying Intervenors' assertion that "the possibility exists for delayed and conflicting PARs being formulated, transmitted and recommended to the relevant state governments." Please also quantify that "possibility" and the asserted

²³ The following Intervenors have indicated that they do not intend to litigate JI Contention 23, and so do not need to respond to questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

delays, describe in detail the consequences of the asserted conflicts, and state all the facts underlying your answer.

AS TO JI CONTENTION 24²⁴

169. Please list, describe in detail, and quantify every delay that Intervenors assert would occur in the delegation of "authority . . . to perform governmental emergency response functions" in an actual radiological emergency at Seabrook State, and define "governmental emergency response functions." If Intervenors assert that the delay(s) would differ for different types of emergencies, answer separately for each type. Please also state all the facts underlying your answers.
170. Please state all the facts underlying Intervenors' assertion that these alleged delays "would preclude prompt public notification or a timely public emergency response," and define "prompt", "timely", and "public emergency response."

²⁴ The following Intervenors have indicated that they do not intend to litigate JI Contention 24, and so do not need to respond to questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

AS TO JI CONTENTION 25²⁵

171. Please state all the facts underlying Intervenors' assertion that "only a small handful of ORO personnel appear to be trained and qualified to make protective action recommendations," and define (with quantification) "a small handful." Please also state all the facts underlying Intervenors' assertion that "only one individual is designated as having the responsibility to formulate. . . PARs."
172. Please state all the facts, estimates, and observations underlying Intervenors' assertion that the "arrival [of the RHAs] will be delayed because the RHAs live and work too far from EOC," and define (with quantification) "delayed" and "too far."

AS TO JI CONTENTION 26²⁶

173. Please list all of the "appropriate officials and agencies at both the state and local levels" whom Intervenors assert should receive "prompt notification" concerning "the need for protective measures for the

²⁵ The following Intervenors have indicated that they do not intend to litigate JI Contention 24, and so do not need to respond to questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

²⁶ The following Intervenors have indicated that they do not intend to litigate JI Contention 26, and so do not need to respond to the questions concerning it (unless their intentions have changed): SAPL; TON; CON; TOS.

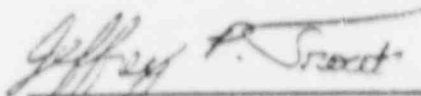
- ingestion pathway EPZ," define "prompt", and state all the facts underlying that assertion. Please also list the business telephone numbers of all officials and agencies listed in your answer.
174. Please state all the facts underlying Intervenors' assertion that "adequate public information for the ingestion pathway EPZ has not been prepared," and define "adequate."
175. Please produce copies of all "public information for the ingestion pathway EPZ" maintained by the Massachusetts Civil Defense Agency for use in the event of radiological emergencies at the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants.
176. Please state all the facts underlying Intervenors' assertion that "sampling procedures in the SPMC are inadequate," and define "inadequate."
177. Please state all the facts underlying Intervenors' assertion that "field samples will not be adequately gathered, record or tested," and define "adequately."
178. Please define "timely" and "effective" as used in JI Contention 26, Basis D, and describe in detail the regulatory basis (if any) for those definitions.
179. Please describe in detail, and produce all documents that reflect or refer to, the following procedures

utilized by the Massachusetts Department of Public Health:

- a. procedures for ensuring "timely and effective" ingestion pathway PARs for the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants;
 - b. procedures for the collection, recording, and analysis of field samples from the ingestion pathway of the Pilgrim, Yankee Rowe, and Vermont Yankee nuclear power plants; and
 - c. food and milk sampling procedures (if any) utilized in response to the Chernobyl accident of April 1986.
180. Please state all the facts underlying Intervenors' assertion that "the Sample Collection Teams are not adequately trained," and define "adequately".
181. Please state all the facts underlying Intervenors' assertion that "persons should be sought who reside within 20 miles of the plant, are familiar with the local areas and are already experienced in sampling procedures," and define "familiar" and "experienced."
182. Please state all the facts, other than those discussed in response to the preceding interrogatories, underlying Intervenors' assertion that "the provisions, procedures

and planning for the 50-mile ingestion pathway emergency
planning zone are not adequate," and define "adequate."

By their attorneys,



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CERTIFICATE OF SERVICE

I, Jeffrey P. Trout, one of the attorneys for the Applicants herein, hereby certify that on October 11, 1988, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

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Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
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Board of Selectmen
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Adjudicatory File
Atomic Safety and Licensing
Board Panel Docket (2 copies)
U.S. Nuclear Regulatory Commission
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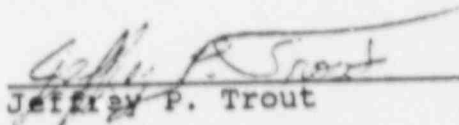
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