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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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)
)

CITY OF HAVERHILL'S

DETAILED CONTENTIONS

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CITY OF HAVERHILL CONTENTIONS TO THE S.P.M.C.

Because of the close proximity of these schools and their large enrollment, the city of Haverhill feels that they should be included in the S.P.M.C., as the safety of the children and staff can not be ensured other wise.

1) The Whittier Regional Vocation Technical High School, 115 Amesbury Line Road, is within yards of the plume exposure zone. The enrollment includes vast residents from Haverhill and the E.P.Z. towns.

2) Northern Essex Community Collage, 110 Elliott Street, is approximately one mile from the plume exposure zone with students originating from throughout Rocks Village, other areas in Haverhill and many E.P.Z. towns. Many students rely on public transportation and N.E.C.C. has a large handicapp enrollment which must be adressed.

3) Lakeview Nursing Home, 87 Shattick Street is approximately one mile from the plume exposure zone. Elderly and non-ambulatory clients will have to be adressed.

4) Merrimac Child Care Center, 366 Amesbury Line Road, is within the plume exposure zone but not included in any evacuation plans. The enrollment includes pre-school children from throughout Haverhill and the E.P.Z. towns.

5) The Rocks Village Area of Haverhill is within the plume exposure zone but has not been included in any evacuation plan. None of the residents have been assured of a safe evacuation. All other towns within the plume exposure zone are completely included even though only a small portion of its area is actually effected.

6) The population figures list approximately 44 homes in the plume exposure zone in Rocks Village for 1986. This figure has doubled.

7) Only nine (9) persons assigned to five (5) access control points through out Haverhill. This is inadequate considering the amount of evacuees moving through Haverhill and the distances they will be traveling beyond the Rt.110 and Rt.108 intersection to Rt.125. There are no traffic control persons, road signs or evacuation route indicators beyond the

Rt. 110 and 108 intersections. Persons unfamiliar with Haverhill may get lost or hold up traffic.

8) Amesbury persons will be evacuated on Rt.108 to Rt. 110 in Haverhill to get to I-495 along with the New Hampshire towns of South Hampton and Newton adding to the congestion and confusion of MASS. evacuees. Evacuees turning left on Rt. 110 from Rt. 108 must cross the stream of evacuees on Rt. 110. This will result in a tie up and delayed evacuation.

9) Evacuees attempting to cross the Rocks Village Bridge into West Newbury will be turned away on the West Newbury side only to return to East Main and River Road with no indication of where to go.

10) West Newbury evacuees are directed down Rt.113 through Groveland into Haverhill. Traffic will have to move through Haverhill on Water Street blocking a major fire station to the intersection of Water and Merrimac Streets, which is severely congested under normal conditions. Upon turning into Rt.125 in Bradford, the traffic again is severely congested at best and at a stand still during peak hours. Again, there are no markers identifying evacuation routes.

11) The Kimball Farm, 789 East Broadway which produces beef for human consumption has not been addressed. The grazing fields are located in Rocks Village only yards from the plume exposure line.

12) Haverhills Hale Hospital has not been included in any plans to deal with accident victims of evacuation through the streets of Haverhill is any thing less than perfect.

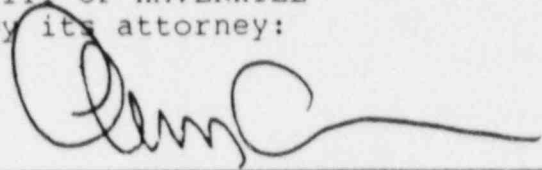
13) The problem of cars braking down or disabled in accidents has not been addressed. With all escape routes through Haverhill being only two city lanes wide, one disabled vehicle could stop the flow of evacuees for miles.

14) It is unlikely that Haverhills residents will remain in their homes while the evacuees from the E.P.Z. towns are trying to flee through Haverhill. If Haverhills residents were to join the E.P.Z. evacuees with no supervision or evacuation plan to follow, Haverhill officials such as police, fire and civil defense would be ill prepared to deal

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with the chaos that would be created. This S.P.M.C. will have a negative impact on Haverhill and by only including Haverhill as a whole will a evacuation plan serve the best interests on this community.

CITY OF HAVERHILL
By its attorney:

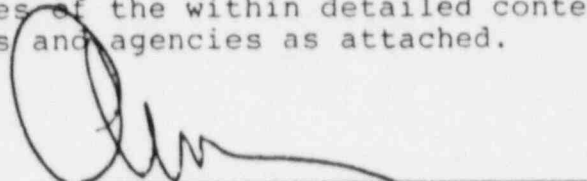


DATED: June 16, 1988

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CERTIFICATE OF SERVICE

I, Ashod N. Amirian, Esquire, Assistant City Solicitor to the City of Haverhill, hereby certify that on June 16, 1988, I have forwarded copies of the within detailed contentions to the following individuals and agencies as attached.



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