



Specifically, this affidavit responds to an order issued by the Licensing Board on October 25, 1988, in which the Board solicited the views of the parties as to whether the Joint Intervenors' motion raised a significant safety issue which likely could have led to a materially different result had it been considered initially.

Q3. Gentlemen, have you reviewed the Joint Intervenors' motion to reopen the record and late-filed contention?

A3. (Conklin, Ruscitto) Yes, we have. We have also reviewed Applicants' response to the Joint Intervenors' motion as well as the responses of the Joint Intervenors' and Applicants to the Licensing Board's October 25, 1988 order. For the reasons made clear by the responses to the questions which follow, it is the Staff's position that the Joint Intervenors' motion does not raise a significant safety issue.

Q4. The Joint Intervenors' motion is based upon the results of an exercise conducted by Applicants on June 27-29, 1988 and observed by the NRC Staff. Did you observe that exercise?

A4. (Conklin) Yes. I observed the exercise in Applicants' Emergency Operations Facility (EOF) as an NRC/FEMA RAC member. Primarily, I was involved with accident assessment, dose assessment, and protective action recommendations as made by both the Applicant and the State of New Hampshire in the Incident Field Office (IFO), which is also located in the EOF. I had extensive contact with other NRC observers in the EOF, as well as other observers at the end of the exercise to discuss exercise findings.

(Ruscitto) I was a member of the NRC inspection team, and as such my duties were principally operations oriented. Initially, I observed the

drill from the simulator (Control Room). Following the loss of coolant accident (LOCA), I moved to the Technical Support Center (TSC).

Q5. What was the purpose of the exercise?

A5. (Conklin) The purpose of this exercise was to evaluate the major portions of Applicants' emergency plans and implementing procedures. Among the areas which to which our attention was directed were the adequacy of the timing and the content of implementing procedures and methods; the effectiveness of emergency equipment and communications networks; the public notification system; and the performance of emergency organization personnel. The exercise was designed to test as much as is reasonably achievable without mandatory public participation. Prior to the exercise, the New Hampshire Radiological Emergency Response Plan (NHRERP), the Seabrook Plan for Massachusetts Communities (SPMC), and Applicants' emergency plans and implementing procedures were reviewed. Subsequent to the plan reviews, an exercise is conducted to test the implementation of the major portions of these plans and implementing procedures.

Q6. Did you document your observations in a written report?

A6. (Conklin, Ruscitto) Yes we did. Inspection Report 50-443/88-09 (IR 88-09) documents our observations and findings. IR 88-09 discusses the pre-exercise activities of Applicants and the NRC Staff, describes significant exercise scenario events, identifies activities observed, and documents the NRC Staff's observations during the exercise. NRC Staff observers were stationed in all major facilities, including the Control Room, Control Room Simulator, Operations Support Center (OSC), Technical Support Center (TSC), Emergency Operations Facility (EOF), and the Media

Center. Additionally, supervisory and senior technical staff observed several of these areas to obtain an integrated analysis of performance. The NRC observation team concluded that although some specific findings were identified as exercise weaknesses, the performance of the emergency response staff provides reasonable assurance that adequate protective measures can and will be taken to protect the health and safety of the public in the event of an accident.

Q7. What was the basis for this conclusion?

A7. (Conklin, Ruscitto) The NRC evaluates several key areas when making a determination that a licensee's performance is adequate to protect the health and safety of the public. These include: recognition of emergency conditions; classification of these conditions into emergency action levels; timely notification of offsite authorities; timely notification of augmentation staff and subsequent activation of emergency response facilities; technical assessment; offsite dose projections, assessments and subsequent protective action recommendations; and overall command and control. The NRC observation team concluded that good command and control was demonstrated; that plant conditions were quickly recognized and classified; that emergency response facilities were activated promptly; and that protective action recommendations were prompt and conservative.

In addition, it is recognized that in the case of full-participation exercises, a significant offsite release must occur as part of the scenario to test offsite response. That precludes the onsite response organization from successfully mitigating the accident, i.e., exercise controllers must artificially prevent the response organization from

taking actions which would terminate a release until offsite objectives are satisfied. With this in mind (i.e., that a major release must occur), the primary focus of the observers shifts to evaluations of protective action decisionmaking. The response toward mitigation of accidents is also separately evaluated through the operator licensing process. Exercise "weaknesses" are classified as areas which need further evaluation and possibly corrective action by the licensee independent of the results of the evaluation. Areas were identified in this exercise which fall into that category. Specifically, concerns were raised by the observers in the TSC and EOF regarding identifying the extent of core damage and decisions made by the licensee in the mitigation of the accident. The term "questionable" was used in IR 88-09 to characterize the concerns of the observers regarding specific examples of engineering decisions made by the TSC and EOF staff. By this characterization, we did not intend to imply that these decisions were unacceptable, but rather to indicate that they should be further evaluated by Applicants to determine whether they were appropriate in the circumstances.

- Q8. At Page 5 of IR 88-09, it states that the "Technical Support Staff (TSC) and Emergency Operations Facility (EOF) staff displayed questionable engineering judgement and/or did not recognize or address technical concerns." What are the bases for this statement?
- A8. (Conklin, Ruscitto) IR 88-09 documents the items considered as exercise weaknesses related to questionable engineering judgement.
- Q9. Why did the Staff conclude in IR 88-09 that the failure of TSC or EOF personnel to question "a release of greater than 7000 curies per second with only clad damage and no core uncovering" was an example of "questionable engineering judgement"?
- A9. (Conklin) It should first be understood that a release rate of greater than 7000 curies per second was necessary to test the adequacy of dose

projections and protective action recommendations for offsite response. Specifically, this elevated release rate would cause the protective action guidelines (PAG's) to be exceeded for both the plume pathway and ingestion pathway portion of the exercise. This would in turn require extensive protective action decisionmaking and offsite response. A release of this magnitude is not possible given the conditions in the exercise scenario, i.e., clad damage with no core uncover. The NRC inspectors expected the TSC and EOF staff to discuss and question the offsite readings given what was known of core damage. The NRC inspectors did not observe these discussions, nor did Applicants address this subject at the exit meeting; therefore the Staff believe it to be a valid weakness. It was observed by the staff however, that the licensee performed prompt and correct dose projections and assessments and made appropriate protective action recommendations based upon the given release rate.

Q10. Why did the Staff conclude in IR 88-09 that the continuing efforts of the Seabrook personnel "to restore the Emergency Feedwater Pump after a large break LOCA" was an example of "questionable engineering judgement"?

A10. (Ruscitto) The finding concerning restoration efforts on the EFW pump was presented by Mr. Jamison, of Battelle National Laboratories, an NRC contractor. At the time, I agreed that further inspection of this issue was warranted. The concern in this regard was that efforts were being continued in an area which would probably be of little value to Applicants in the near term.

Q11. Why did you conclude, in IR 88-09 that "a questionable fix for the Containment Building Spray System" was an example of "questionable engineering judgement" on the part of the Seabrook staff?

A11. (Ruscitto) Regarding the activities to provide an alternative flow path to the Containment Building System (CBS), my concern was with the

effectiveness of the proposed fix to provide any substantial reduction of containment pressure. As I stated in response to the preceding question, the "fix", as I understood it at the time, did not seem to be an effective response. At the conclusion of the exercise, I felt further discussion of this issue was warranted.

Q12. Why did you conclude in IR 88-09 that the "lack of effort to locate and isolate the release path" on the part of the Seabrook personnel was an example of "questionable engineering judgment"?

A12. (Ruscitto) My concern was that I observed no effort being made to locate or isolate the leak. It was my view that this was a serious concern requiring resolution.

Q13. In IR 88-09 you stated that "no effort was noted to blowdown Steam Generators to lessen the heat load in containment." Why did you consider this an example of "questionable engineering judgment"?

A13. (Ruscitto) My concern was that step 15 of Emergency Operation Procedure E-1, which required S/G depressurization (not blowdown), was not performed. I had the opportunity to discuss this issue briefly during the drill with the Emergency Operations Manager but was unable to reach a conclusion as to the propriety of skipping that step.

Q14. Assuming these instances represented questionable engineering judgments, does any of these lapses reveal a failure of an essential element of the Seabrook onsite emergency plan?

A14. (Conklin, Ruscitto) No. As stated in the response to Question 6, these problems were minor and isolated. They did not affect the ability of the TSC or EOF staff to recognize plant conditions and make proper event classifications; nor did they affect their ability to make appropriate protective action recommendations. In fact, as stated in our response to Question 9, the EOF and TSC staff made prompt and accurate dose assessment and subsequent protective action recommendations based upon the given

release rate. The TSC and EOF staff properly and correctly implemented their emergency plan.

Q15. Assuming these instances represented questionable engineering judgements, are these types of failures capable of being remedied without significantly revising the Seabrook onsite emergency plan?

A15. (Conklin, Ruscitto) Yes they are. The weaknesses identified are a result of operator performance, not plan design. None of the performance weaknesses was as a result of incomplete or incorrect plans or implementing procedures. Further, it is evident that the response personnel were well trained on the emergency plan and implementing procedures.

Q16. On October 6, 1988, the NRC Staff issued Inspection Report No. 50-443/88-10. What was the purpose of the inspection documented in that report?

A16. (Ruscitto) NRC Inspection Report 50-443/88-10 (IR 88-10) is the report for the routine inspections conducted by the Senior Resident Inspector during the period July 6-September 6, 1988. In an effort to close the open items listed in IR 88-09, the NRC Senior Emergency Preparedness Specialist (Mr. Conklin) conducted a follow-up onsite inspection on September 21, 1988 during which time he performed additional inspection follow-up with Applicants' personnel related to the EP Drill. All items opened in an NRC inspection report must be closed in a subsequent NRC inspection report. For open items, further followup inspection is required to determine the acceptability of the issue. The issue may have been an actual weakness which has since been corrected or may have been regarded as a weakness because the inspector lacked certain material information.

The wording in IR 88-09 concerning "questionable engineering judgement" gives a misleading impression regarding the safety significance of the items requiring followup. It was always my intention to conduct routine followup on all of my findings in order to determine all the facts relating to each areas of concern. It should be pointed out that to avoid interference with the conduct of the exercise, unanswered questions must be pursued after the exercise is completed. These issues are normally left as open items and do not necessarily indicate that a deficient condition exists. It does mean that additional information is needed.

Q17. Joint Intervenors claim that the followup of the open items concerning the TSC and EOF staff's "questionable engineering judgement" was assigned to inspectors who had not observed them. Are they correct?

A17. (Conklin) No. The follow-up of the items identified during the exercise and documented in IR 88-09 was not assigned to a "new" inspector who had not observed these items. The inspectors who performed the followup were myself as the lead inspector for all emergency preparedness activities at Seabrook, and Mr. Ruscitto, the Senior Resident Inspector for Seabrook. I was present at the exercise and have been intimately involved with all aspects of both the onsite and offsite emergency plans, as well as scenario development and review. I acted as a RAC observer in the EOF during the exercise. As such, I provided the comment concerning the elevated release rate. Additionally, I met with the team leader and supervisors and extensively discussed exercise observations and findings. I also provided extensive input concerning the preparation of IR 88-09. The examples listed in IR 88-09 were provided by myself, Mr. Ruscitto and Mr. Jamison of Battelle National Laboratories.

Q18. In IR 88-10, the Staff closed out each of the open items referred to above, concluding that "[w]ith respect to the above identified weaknesses, the exercise inspection confirmed that the TSC/EOF staff possesses adequate capabilities to protect public health and safety." Please explain what appears to a complete reversal of the position taken by the Staff in IR 88-09.

A18. (Conklin, Ruscitto) The change is attributable to the information obtained by the NRC Staff during the follow-up inspection. Had this information been known to the Staff at the time IR 88-09 was issued, the findings regarding "questionable engineering judgement" would not have been made.

The closure of the "weakness" listed in IR 88-09 does not indicate a reversal of the position originally expressed by the NRC Staff. Designating these weaknesses as "open items" necessarily implies that further inspection followup is required. No final conclusion was made to the effect that the TSC and EOF staff did not possess acceptable engineering judgment. On the contrary, the Staff concluded in IR 88-09 that the performance of the TSC and EOF Staff satisfied the evaluation criteria. Several minor items, none of which were safety significant, required resolution. The resolution of these items did not affect the overall finding of adequate performance. After conducting followup activities, it was determined that although some of these activities were initially perceived to be potential weaknesses, no weakness in fact existed.

Q19. Applicants have stated that the staff's findings in IR 88-10 with respect to the open items discussed above "wholly confirms the position taken by the Applicants in their [September 28, 1988 response to Joint Intervenors' motion] and the affidavits filed therewith and confirm the lack of any significant safety issues." Are Applicants correct?

A19. (Conklin, Ruscitto) Yes. We agree with the Applicants' conclusion on page 14 of their September 28, 1988 submittal that none of the above issues presents a significant safety issue. We do not find any information in the affidavits of Messrs. Sessler, Kline, or MacDonald with which we disagree.

Q20. Attached to Joint Intervenors' response to the Licensing Board's October 25, 1988 order is an affidavit of Robert D. Pollard. Have you reviewed Mr. Pollard's affidavit?

A20. (Conklin, Ruscitto) Yes.

Q21. Let's take Mr. Pollard's concerns one at a time, starting with the failure of the TSC and EOF staff to question a release of greater than 7000 curies per second with only clad damage and no core uncovering. Do you agree with Mr. Pollard that the affidavit of Mr. MacDonald and IR 88-10 are not sufficient to resolve this "weaknesses"?

A21. (Conklin) I do not agree with Mr. Pollard that IR 88-10 and the affidavit of Mr. MacDonald are insufficient to resolve this weakness. In regards to his specific comment at paragraph 30, I did not review the specific logs that contained entries commenting on the mismatch during the exercise. Although these logs were available at the time of the NRC exit meeting, Applicants did not address the issues at that time. Consequently, the NRC Staff exited the meeting not knowing that Applicants had additional information on this subject until a later date. IR 88-09 was issued without access to this information. It is Applicants' responsibility to provide information which could clarify or correct inspection findings. If the information had been reviewed at the time, this item would not have been identified as a weakness. As noted in IR 88-10, it is the Staff's conclusion that Applicants correctly assessed the release rate from the given data and made conservative and prompt protective action recommendations.

Q22. Let's consider the second example of "questionable engineering judgement" identified in IR 88-09, i.e., continuing efforts of the Seabrook personnel "to restore the Emergency Feedwater Pump after a large break LOCA." Do you agree with Mr. Pollard that the affidavit of Mr. Kline and IR 88-10 are not sufficient to resolve this "weaknesses"?

A22. (Ruscitto) Let me preface my response with the following. Throughout Mr. Pollard's affidavit, he refers to the "new inspector." Those issues which I identified and listed as open items in IR 88-09 were also closed by me in IR 88-10. No new inspector was assigned to close open items identified by me. Although the concern regarding the EFW pump repairs was identified by another inspector, I was familiar with his concern and performed the followup in IR 88-10.

I provide the following amplification to my 88-10 closure paragraph (4.e.(1)): I used the word steam generator cooldown, not reactor cooldown. As Mr. Pollard states at page 4 of his affidavit, the EFW system "would be required in the very long term." I was not concerned that other higher priority items were overlooked as a result of this effort. Therefore, I do not agree with Mr. Pollard that my inspection findings reported in IR 88-10 and the affidavit of Mr. Kline do not adequately resolve this issue.

Q23. Let's consider the third example of "questionable engineering judgement" identified in IR 88-09, i.e., the questionable fix for the Containment Building Spray system." Do you agree with Mr. Pollard that the affidavit of Mr. Sessler and IR 88-10 are not sufficient to resolve this "weaknesses"?

A23. (Ruscitto) No, I do not. With respect to the Containment Building Spray (CBS) system modification, I refer to paragraph 14 of Mr. Pollard's affidavit. As I have previously stated there was no "second inspector." I reviewed Applicants calculations and discussed the flow path with them

during and after the exercise. If any inconsistency exists as Mr. Pollard asserts, it is that the initial characterization of the issue in IR 88-09 failed to amplify the NRC concerns which involved the effectiveness of the low recirculation flow of the SI pump compared to the high flow of the CBS pump. IR 88-10 and Mr. Sessler's affidavit adequately addresses this issue.

Q24. Let's consider the fourth example of "questionable engineering judgment" identified in IR 88-09, i.e., "a lack of effort to locate and isolate the release path." Do you agree with Mr. Pollard that the affidavit of Mr. Kline and IR 88-10 are not sufficient to resolve this "weaknesses"?

A24. (Ruscitto) No, I do not. With respect to isolation of the release path, Mr. Pollard's affidavit implies that restoration of a CBS pump would not have stopped the release. Depending on the location of the leak, the release could be stopped by reducing containment pressure to atmospheric. By removing the driving force behind the leak, radiation levels in some areas might be reduced to the extent that access could be restored.

It makes good engineering sense to repair those items most easily repaired. While the scenario did not allow for CBS pump repair, in a real situation, I believe that repair of the CBS pump, if feasible (which it was), is the highest priority. I do not agree with Mr. Pollard and believe my followup inspection findings reported in IP 88-10 and Mr. Kline's affidavit are sufficient to resolve this issue.

Q25. Let's consider the fifth example of "questionable engineering judgment" identified in IR 88-09, i.e., the failure to "blowdown Steam Generators to lessen the heat load in containment." Do you agree with Mr. Pollard that the affidavit of Mr. Sessler and IR 88-10 are not sufficient to resolve this "weaknesses"?

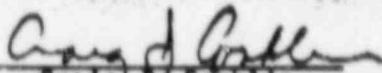
A25. (Ruscitto) No, I do not. The failure to "blowdown" steam generators was corrected in IR 88-10 to read "depressurize" steam generators. Although the decisions made by the EOP and TSC staff are understandable and Applicants emergency operating procedures are adequate, I believe that it would be useful for Applicants to clarify their procedures to provide better guidance as to when procedural step 15 may be omitted.

Q26. Gentlemen, based on your responses to the preceding questions, it is the NRC Staff's position then that none of the "weaknesses" documented in IR 88-09 raises a significant safety or environmental issue?

A26. (Conklin, Ruscitto) Yes it is.

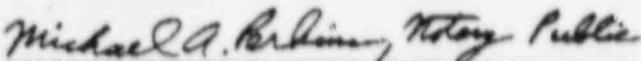
Q27. Gentlemen, does this complete your affidavit?

A27 (Conklin, Ruscitto) Yes it does.

  
Gerald J. Conklin

\_\_\_\_\_  
David G. Ruscitto

Sworn to and subscribed before me  
this 28th day of November 1988

  
Michael A. Perkins, Notary Public

My Commission Expires: March 20, 1989  
MICHAEL A. PERKINS, Notary Public  
Upper Merion Twp., Montgomery Co., PA  
My Commission Expires March 20, 1989

A25. (Ruscitto) No, I do not. The failure to "blowdown" steam generators was corrected in IR 88-10 to read "depressurize" steam generators. Although the decisions made by the EOF and TSC staff are understandable and Applicants emergency operating procedures are adequate, I believe that it would be useful for Applicants to clarify their procedures to provide better guidance as to when procedural step 15 may be omitted.

Q26. Gentlemen, based on your responses to the preceding questions, it is the NRC Staff's position then that none of the "weaknesses" documented in IR 88-09 raises a significant safety or environmental issue?

A26. (Conklin, Ruscitto) Yes it is.

Q27. Gentlemen, does this complete your affidavit?

A27 (Conklin, Ruscitto) Yes it does.

Craig J. Conklin

David G. Ruscitto  
David G. Ruscitto

Sworn to and subscribed before me  
this 28 day of November 1988

Beverly E. Sillway  
My Commission Expires: 3/6/90

PROFESSIONAL QUALIFICATIONS  
OF  
CRAIG J. CONKLIN

I am Senior Emergency Preparedness Specialist, Emergency Preparedness Section, Facilities Radiological Safety and Safeguards Branch, Division of Radiation Safety and Safeguards, United States Nuclear Regulatory Commission. I am responsible for the oversight of inspection activities concerning onsite emergency preparedness. As such, I have conducted dozens of inspections and been a team leader or senior specialist for Region I plants. Additionally, I have been the NRC Regional Assistance Committee (RAC) member for FEMA Region I since November, 1987. Responsibilities in RAC include the participation with FEMA and other RAC members in the review of the emergency plans and implementing procedures for state and local governments. I have held this position since November, 1987.

I received a Bachelor of Science Degree from the University of New Haven in 1983. The major curriculum area was Operations Management.

Prior Work History

- 1986 - 1987     Emergency Preparedness Inspector, Facilities Radiological Safety and Safeguards Branch. Responsible to Chief, Emergency Preparedness Section for conduct of onsite emergency preparedness inspections at several Region I power and research facilities.
- 1983 - 1987     Supervisor, Energy Consultants. Responsible for development of both onsite and offsite emergency preparedness programs for several facilities including Waterford 3, Davis Besse, Limerick 1, and Seabrook.
- 1976 - 1983     Technician, Northeast Nuclear Energy Company, Millstone Unit 2. Responsibilities included facilities planning, security, emergency planning, communications, engineering support and primary and secondary chemistry.
- 1974 - 1976     Technician, Donald C. Cook Nuclear Power Station. Responsibilities included primary and secondary chemistry and health physics.
- 1966 - 1974     U. S. Navy. Served on a nuclear submarine and a submarine repair ship. Completed the Nuclear Program and Submarine Training.

DAVID G. RIJSCITTO

STATEMENT OF PROFESSIONAL QUALIFICATION

SUMMARY: Over thirteen years engineering experience. Extensive background in nuclear plant operations, maintenance, engineering, inspection and training. Experience in fluid system planning, design, construction, operations and maintenance.

EDUCATION AND TRAINING: Bachelor of Civil Engineering; Villanova University Villanova, PA; 1975

U. S. Naval Nuclear Power School;  
Mare Island, CA and Idaho Falls, ID; 1976

QUALIFICATIONS: Qualified Inspector, USNRC; (Westinghouse PWR/General Electric BWR)  
Certified Examiner; USNRC; (Westinghouse PWR)

EXPERIENCE:

1985 - Present USNRC Resident Inspector Office - Seabrook, N.H. - Resident and Senior Resident Inspector

Responsible for NRC Inspection Program at Seabrook Station during construction, preoperational testing, startup testing and operations. Periodically assigned to inspect other facilities in NRC Region I including research reactor at University of Lowell.

1984 - 1985 USNRC, Region I Office - King of Prussia, PA - Operator Licensing Examiner

Conducted licensing examination for operator and senior operator candidates at Westinghouse PWRs throughout Region I. Developed, administered and evaluated oral, written and simulator examinations.

1981 - 1984 U.S. Peace Corps - Ministry of Water Development, Republic of Kenya, Kilifi District - District Water Engineer

Senior planning and design engineer responsible for administration of all water system development in district of 438,000 population. Conducted feasibility studies, route surveys, design cost estimates for projects serving up to 20,000 persons each. Purchased materials, supervised construction and operation of projects.

1979 - 1981 United States Navy - USS Arkansas (CGN-41) - Damage Control Assistant (Nuclear Engineer)

Qualified Senior Supervisory Watch, Engineering Duty Officer and Engineering Officer of the Watch, D2G Nuclear Propulsion Plant. Responsible for auxiliary and repair divisions including all non-nuclear ships systems.

1976 - 1979

U.S. Navy - USS Nimitz (CVN-68) - Reactor Mechanical Division Officer (Nuclear Engineer)

Qualified Propulsion Plant Watch Officer and Reactor Duty Officer, A4W/A1G Nuclear Propulsion Plant. Responsible for administration, maintenance, training and operation of RM Division. Supervised 120 enlisted men and 2 junior officers.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DELIVERED  
BY NRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '88 DEC -1 P3:17

In the Matter of

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2)

} Docket Nos. 50-443 OL-01  
} 50-444 OL-01  
} On-site Emergency Planning  
} and Safety Issues

CLERK  
SERVICE

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO LICENSING BOARD ORDER OF OCTOBER 25, 1988" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by double asterisk by use of express mail service, this 28th day of November, 1988:

Sheldon J. Wolfe, Esq., Chairman\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

H. J. Flynn, Esq.  
Assistant General Counsel  
Federal Emergency Management Agency  
500 C Street, S.W.  
Washington, DC 20472

Dr. Jerry Harbour\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Philip Ahren, Esq.  
Assistant Attorney General  
Office of the Attorney General  
State House Station  
Augusta, ME 04333

Dr. Emmeth A. Luebke\*\*  
Administrative Judge  
4515 Willard Avenue  
Chevy Chase, MD 20815

Stephen A. Jonas, Esq.\*\*  
Carol S. Sneider, Esq.  
Assistant Attorney General  
Office of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

Sheldon J. Wolfe, Esq.\*\*  
Administrative Judge  
1110 Wimbledon Drive  
McLean, VA 22101

George Dana Bisbee, Esq.  
Assistant Attorney General  
Office of the Attorney General  
25 Capitol Street  
Concord, NH 03301

Thomas G. Dignan, Jr., Esq.\*\*  
Robert K. Garl, III, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

Diane Curran, Esq.\*\*  
Harmon, Curran & Tousley  
2001 S Street, NW  
Suite 430  
Washington, DC 20009

Calvin A. Canney  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

Allen Lampert  
Civil Defense Director  
Town of Brentwood  
20 Franklin  
Exeter, NH 03833

William Armstrong  
Civil Defense Director  
Town of Exeter  
10 Front Street  
Exeter, NH 03833

Gary W. Holmes, Esq.  
Holmes & Ellis  
47 Winnacunnet Road  
Hampton, NH 03842

J. P. Nadeau  
Board of Selectmen  
10 Central Street  
Rye, NH 03870

Judith H. Mizner, Esq.,  
Silverplate, Gertner, Baker,  
Fine, & Good  
88 Board Street  
Boston, MA 02110

Robert Carrigg, Chairman  
Board of Selectmen  
Town Office  
Atlantic Avenue  
North Hampton, NH 03870

William S. Lord  
Board of Selectmen  
Town Hall - Friend Street  
Amesbury, MA 01913

Mrs. Anne F. Goodman, Chairman  
Board of Selectmen  
13-15 Newmarket Road  
Durham, NH 03824

Hon. Gordon J. Humphrey  
United States Senate  
531 Hart Senate Office Building  
Washington, DC 20510

Peter J. Matthews, Mayor  
City Hall  
Newburyport, MA 09150

Michael Santosuosso, Chairman  
Board of Selectmen  
South Hampton, NH 03827

Ashod N. Amirian, Esq.  
Town Counsel for Merrimac  
145 South Main Street  
P.O. Box 38  
Bradford, MA 01835

Robert A. Backus, Esq.\*\*  
Backus, Meyer & Solomon  
116 Lowell Street  
Manchester, NH 03106

Paul McEachern, Esq.\*\*  
Matthew T. Brock, Esq.  
Shaines & McEachern  
25 Maplewood Avenue  
P.O. Box 360  
Portsmouth, NH 03801

Charles P. Graham, Esq.  
McKay, Murphy & Graham  
100 Main Street  
Amesbury, MA 01913

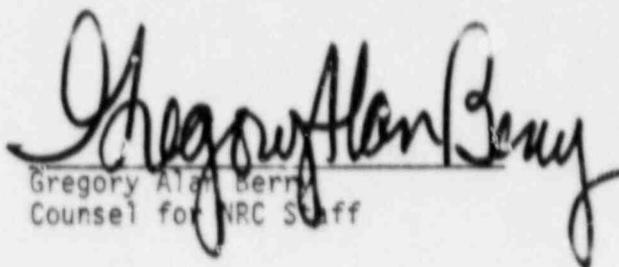
Sandra Gavutis, Chairman  
Board of Selectmen  
RFD #1, Box 1154  
Kensington, NH 03827

R. Scott Hill-Whilton, Esq.  
Lagoulis, Clark, Hill-Whilton  
& McGuire  
79 State Street  
Newburyport, MA 01950

Atomic Safety and Licensing  
Appeal Panel (5)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docketing and Service Section\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Atomic Safety and Licensing Board  
Panel (1)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

  
Gregory Alan Berry  
Counsel for NRC Staff