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PUBLIC SERVICE COMPANY OF NEW  
HAMPSHIRE, ET AL.  
(Seabrook Station, Units 1 and 2)

Docket Nos.  
50-433/444-OL  
(Off-Site EP)  
July 3, 1986

Attorney General Francis X. Bellotti hereby responds to Applicants' Interrogatories and Request for Production of Documents. Where Attorney General Bellotti has not fully answered a question because he has incomplete information, has not developed his position, or has not yet engaged an expert witness, those answers will be supplemented as soon as the information is available.

G-4(a) Mass. A.G. is not aware of any study.  
G-5(a) Mass. A.G. does not know.  
G-6(a) Mass. A.G. does not know.

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- G-7(a) Mass. A.G. does not know.
- G-8(a) Mass. A.G. does not know.
- G-9(a) Mass. A.G. is not aware of any advice, counsel or assistance on such matters that has been given to any New Hampshire town officials or citizens by representatives of or persons employed by his office.

Specific Interrogatories

- V1-1 Yes.
- V1-2 Mass. A.G. has not performed an "analysis or study" of Seabrook Station which supports the conclusion that "RERP measures for evacuation are a wholly inadequate protective response to meet an emergency." Mass. A.G. has retained experts to prepare testimony which would support a conclusion that evacuation alone is not a sufficient protective response. "Testimony" as opposed to "analysis or study" is beyond the scope of this interrogatory and hence is not produced.
- V1-3 Mass. A.G. is not aware of any studies which support the conclusion that "RERP measures for evacuation are a wholly inadequate protective response to meet an emergency. Mass. A.G. is aware of a number of Evacuation Time Studies prepared for the Seabrook EPZ (all of which the Applicants possess) which support the conclusion that evacuation alone is not a sufficient protective response for all emergencies.

V1-4        Mass. A.G. contends that there are a number of accident scenarios involving Seabrook Station in which evacuation alone would be an inadequate protective response. However, Mass. A.G. has not yet attempted to analyze whether sheltering exclusive of evacuation is an appropriate protective response for people at the beach. This is because Mass. A.G.'s analysis has been confined to the New Hampshire RERP which relies on evacuation as a protective response for the beach population virtually to the exclusion of sheltering.

V1-5        Yes.

(a)        Mass. A.G. has retained Dr. Jan Beyea and Dr. Gordon Thompson to offer testimony on this contention and is considering retaining additional experts who have not yet been selected.

(b)-(h)    The content of the testimony of the experts retained by Mass. A.G. will depend in large part on the testimony of the experts not yet retained. Mass. A.G. is therefore unable to answer these interrogatories regarding the substance of the expert testimony at this time. Mass. A.G. will provide a supplement to this answer as soon as such information is available.

XV-1        Yes.

XV-2        Yes.

XV-3        Mass. A.G. does not have sufficient information to be able to answer this interrogatory at this time.

XV-4 See response to Interrogatory VI-5.

XXXIX-1 Yes

XXXIX-2 Mass. A.G. has not yet sufficiently analyzed Appendix F to NHCDA procedures to be able to respond to this Interrogatory at this time. Mass. A.G. will supplement his response to this interrogatory as soon as the information is available.

XXXIX-3 See response to Interrogatory VI-5.

I affirm that the foregoing answers are true to the best of my knowledge and belief.

Respectfully submitted,

FRANCIS X. BELLOTTI

By:

Carol S. Snider

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Dated: July 3, 1986

Resume for Jan Beyea  
March 1986

EDUCATION:

Ph.D., Columbia University, 1968 (Physics).  
B.A., Amherst College, 1962.

EMPLOYMENT HISTORY:

1980 to date, Senior Staff Scientist and, as of 1985,  
Director of the Environmental Policy Analysis Department,  
National Audubon Society, 950 Third Avenue, NY, NY 10022.

1976 to 1980, Research Staff, Center for Energy and Environmental Studies  
Princeton University.

1970 to 1976, Assistant Professor of Physics, Holy Cross College.

1968 to 1970, Research Associate, Columbia University Physics Department.

CONSULTING WORK:

Consultant on nuclear energy to the Office of Technology Assessment, the New Jersey Department of Environmental Protection; the Offices of the Attorney General in New York State and the Commonwealth of Massachusetts; the State of Lower Saxony in West Germany; the Swedish Energy Commission; the Three Mile Island Public Health Fund; and various citizens' groups in the United States.

PUBLICATIONS CONCERNING ENERGY CONSERVATION, ENERGY POLICY, AND ENERGY RISKS:

Articles:

"Oil and Gas Resources on Federal Lands: Wilderness and Wildlife Refuges," Stege and Beyea, Annual Review of Energy (to be published, October 1986). [An earlier version appeared as National Audubon Society Report, EPAD No. 28, June 1985.]

"U.S. Appliance Efficiency Standards," Rollin and Beyea, Energy Policy, 13, p. 425 (1985).

"Computer Modeling for Energy Policy Analysis," Medsker, Beyea, and Lyons, Proceedings of the 15th Annual Modeling and Simulation Conference, Pittsburgh, PA, 15, part 3, p. 1111 (1984).

"Containment of a Reactor Meltdown," (with Frank von Hippel), Bulletin of the Atomic Scientists, 38, p. 52 (August/September 1982).

"Second Thoughts (about Nuclear Safety)," in Nuclear Power: Both Sides, W. W. Norton and Co. (New York, 1982).

"Indoor Air Pollution," Bulletin of the Atomic Scientists, 37, p. 63 (February 1981).

### Articles (Con't)

"Emergency Planning for Reactor Accidents," Bulletin of the Atomic Scientists, 36, p. 40 (December 1980). (An earlier version of the article appeared in German as Chapter 3 in Im Ernstfall hilflos?, E. R. Koch, Fritz Vahrenholt, editors, Keipenheuer & Witsch, Cologne, 1980.)

"Dispute at Indian Point," Bull. At. Scientists, 36, p. 63, (May 1980).

"Locating and Eliminating Obscure but Major Energy Losses in Residential Housing," Harrje, Dutt, and Beyea, ASHRAE Transactions, 85, Part II (1979). (Winner of ASHRAE outstanding paper award.)

"Attic Heat Loss and Conservation Policy," Dutt, Beyea, and Sinden. ASME Technology and Society Division Paper 78-TS-5, Houston, Texas, 1978.

"Critical Significance of Attics and Basements in the Energy Balance of Twin Rivers Townhouses," Beyea et al., Energy and Buildings, Vol. I (1977), Page 261. Also Chapter 3 of Saving Energy in the Home, Ballinger, 1978.

"The Two-Resistance Model for Attic Heat Flow: Implications for Conservation Policy, Woteki, Dutt, Beyea, Energy--The International Journal, 3, 657 (1978).

### Published Debates:

Proceedings of the Workshop on Three Mile Island Dosimetry, to be published by the Three Mile Island Public Health Fund, 1622 Locust Street, Philadelphia, Pa.

"Land Use Issues and the Media," Center for Communication Seminar, New York, New York, October 11, 1984.

Nuclear Reactors: How Safe Are They?, panel discussion sponsored by the Academy Forum of the National Academy of Sciences, Washington, D.C., May 5, 1980.

The Crisis of Nuclear Energy, Subject No. 367 on William Buckley's Firing Line, P.B.S. Television. Transcript printed by Southern Education Communications Association, 928 Woodrow Street, P. O. Box 5966, Columbia, South Carolina, 1979.

### Reports:

The Audubon Energy Plan, Beyea et al., 2nd Ed., July 1984 (1st Ed., 1981)

A Review of Dose Assessments at Three Mile Island and Recommendations for Future Research, Report to the Three Mile Island Public Health Fund, August 1984. [See also, "Author Challenges Review," Health Physics Newsletter, March, 1985, and "TMI--Six Years Later," Nuclear Medicine, 26, p. 1345 (1985).]



Reports (Con't)

"Implications for Mortality of Weakening the Clean Air Act," (with G. Steve Jordan), National Audubon Society, EPAD Report No. 18, May 1982.

"Some Long-Term Consequences of Hypothetical Major Releases of Radioactivity to the Atmosphere from Three Mile Island," Report to the President's Council on Environmental Quality, December 1980.

"Decontamination of Krypton 85 from Three Mile Island Nuclear Plant," (with Kendall, et al.), Report of the Union of Concerned Scientists to the Governor of Pennsylvania, May 15, 1980.

"Some Comments on Consequences of Hypothetical Reactor Accidents at the Philippines Nuclear Power Plant" (with Gordon Thompson), National Audubon Society, EPAD Report No. 3, April 1980.

"Nuclear Reactor Accidents: The Value of Improved Containment," (with Frank von Hippel), Center for Energy and Environmental Studies Report PU/CEES 94, Princeton University, January 1980.

"The Effects of Releases to the Atmosphere of Radioactivity from Hypothetical Large-Scale Accidents at the Proposed Gorleben Waste Treatment Facility," report to the Government of Lower Saxony, Federal Republic of Germany, as part of the "Gorleben International Review," February 1979.

"Reactor Safety Research at the Large Consequence End of the Risk Spectrum," presented to the Experts' Meeting on Reactor Safety Research in the Federal Republic of Germany, Bonn, September 1, 1978.

A Study of Some of the Consequences of Hypothetical Reactor Accidents at Barseback, report to the Swedish Energy Commission, Stockholm, DS I 1978:5, January 1978.

Testimony:

"Dealing with Uncertainties in Projections of Electricity Consumption," before the Committee on Energy and Natural Resources, U. S. Senate, July 25, 1985.

"Some Consequences of Catastrophic Accidents at Indian Point and Their Implications for Emergency Planning," testimony and cross-examination before the Nuclear Regulatory Commission's Atomic Safety and Licensing Board, on behalf of the New York State Attorney General and others, July 1982.

"In the Matter of Application of Orange and Rockland Counties, Inc. for Conversion to Coal of Lovett Units 4 and 5," testimony and cross-examination on the health impacts of eliminating scrubbers as a requirement for conversion to coal; Department of Environmental Resources, State of N.Y., Nov. 5, 1981.

Testimony (Con't)

"Future Prospects for Commercial Nuclear Power in the United States," before the Subcommittee on Oversight and Investigations, Committee on Interior and Insular Affairs, U. S. House of Representatives, October 23, 1981.

"Comments on Energy Forecasting," material submitted for the record at Hearings before the Subcommittee on Investigations and Oversight of the House Committee on Science and Technology; Committee Print No. 14, June 1-2, 1981.

"Stockpiling of Potassium Iodide for the General Public as a Condition for Restart of TMI Unit No. 1," testimony and cross-examination before the Atomic Safety and Licensing Board on behalf of the Anti-Nuclear Group Representing York, April 1981.

"Advice and Recommendations Concerning Changes in Reactor Design and Safety Analysis which should be Required in Light of the Accident at Three Mile Island," statement to the Nuclear Regulatory Commission concerning the proposed rulemaking hearing on degraded cores, December 29, 1980.

"Alternatives to the Indian Point Nuclear Reactors," statement before the Environmental Protection Committee of the New York City Council, December 14, 1979. Also before the Committee, "The Impact on New York City of Reactor Accidents at Indian Point, June 11, 1979. Also "Consequences of a Catastrophic Reactor Accident," statement to the New York City Board of Health, August 12, 1976 (with Frank von Hippel).

"Emergency Planning for a Catastrophic Reactor Accident," testimony before the California Energy Resources and Development Commission, Emergency Response and Evacuation Plans Hearings, November 4, 1978, Page 171.

"Comments on the Proposed FTC Trade Regulation Rule on Labeling and Advertising of Thermal Insulation," Beyea and Dutt, before the FTC, 1978.

"Consequences of Catastrophic Accidents at Jamesport." Testimony before the New York State Board on Electric Generation Siting and the Environment in the Matter of Long Island Lighting Company (Jamesport Nuclear Power Station, Units 1 and 2), May 1977.

"Short-Term Effects of Catastrophic Accidents on Communities Surrounding the Sundesert Nuclear Installation," testimony before the California Energy Resources and Development Commission, December 3, 1976.

Miscellaneous:

"Comments on WASH-1400," Statement to the Subcommittee on Energy and the Environment, Oversight Hearings on Reactor Safety, June 11, 1976, Serial No. 94-61, Page 210.

"Upper Limit Calculations of Deaths from Nuclear Reactors," Bull. Am. Phys. Soc. 21, III (1976).



**Resume  
for  
Gordon Thompson**

June 1986

Professional Expertise

Consulting scientist on energy, environment, and international security issues.

Education

- \* PhD in Applied Mathematics, Oxford University, 1973.
- \* BE in Mechanical Engineering, University of New South Wales, Sydney, Australia, 1967.
- \* BS in Mathematics and Physics, University of New South Wales, 1966.

Current Appointments

- \* Executive Director, Institute for Resource & Security Studies ( IRSS ), Cambridge, MA.
- \* Coordinator, Proliferation Reform Project ( an IRSS project ).
- \* Treasurer, Center for Atomic Radiation Studies, Acton, MA.
- \* Member, Board of Directors, Political Ecology Research Group, Oxford, UK.
- \* Member, Board of Directors, New Century Policies Educational Programs Inc, Cambridge, MA.
- \* Member, Advisory Board, Gruppe Okologie, Hannover, FRG.

Consulting Experience ( selected )

- \* Lakes Environmental Association, Bridgton, ME, 1986 : analysis of federal regulations for disposal of radioactive waste.
- \* Three Mile Island Public Health Fund, Philadelphia, PA, 1983-present : studies related to the Three Mile Island nuclear plant.
- \* Attorney General, Commonwealth of Massachusetts, Boston, MA, 1984-present : analyses of the safety of the Seabrook nuclear plant.
- \* Union of Concerned Scientists, Cambridge, MA, 1980-1985 : studies on energy demand and supply, nuclear arms control, and the safety of nuclear installations.
- \* Conservation Law Foundation of New England, Boston, MA, 1985 : preparation of testimony on cogeneration potential at the Maine facilities of

Great Northern Paper Company.

- \* Town & Country Planning Association, London, UK, 1982-1984 : coordination and conduct of a study on safety and radioactive waste implications of the proposed Sizewell nuclear plant.
- \* US Environmental Protection Agency, Washington, DC, 1980-1981 : assessment of the cleanup of Three Mile Island Unit 2 nuclear plant.
- \* Center for Energy & Environmental Studies, Princeton University, Princeton, NJ, 1979-1980 : studies on the potentials of various renewable energy sources.
- \* Government of Lower Saxony, Hannover, FRG, 1978-1979 : coordination and conduct of studies on safety aspects of the proposed Gorleben nuclear fuel center.

#### Other Experience ( selected )

- \* Co-leadership ( with Paul Walker ) of a study group on nuclear weapons proliferation, Institute of Politics, Harvard University, 1981.
- \* Foundation ( with others ) of an ecological political movement in Oxford, UK, which contested the 1979 Parliamentary election.
- \* Conduct of cross-examination and presentation of evidence, on behalf of the Political Ecology Research Group, at the 1977 Public Inquiry into proposed expansion of the reprocessing plant at Windscale, UK.
- \* Conduct of research on plasma theory ( while a PhD candidate ), as an associate staff member, Culham Laboratory, UK Atomic Energy Authority, 1969-1973.
- \* Service as a design engineer on coal plants, New South Wales Electricity Commission, Sydney, Australia, 1968.

#### Publications ( selected )

- \* Nuclear-Weapon-Free Zones : A Survey of Treaties and Proposals ( edited with David Pitt ), Croom Helm Ltd, Beckenham, UK, forthcoming.
- \* The Source Term Debate : A Report by the Union of Concerned Scientists ( written with Steven Sholly ), January 1986, Union of Concerned Scientists, Cambridge, MA.
- \* "Checks on the spread" ( a review of three books on nuclear proliferation ), Nature, 14 November 1985, pp 127-128.
- \* Editing of Perspectives on Proliferation, Volume I, August 1985, published by the Proliferation Reform Project, Institute for Resource and Security Studies, Cambridge, MA.
- \* "A Turning Point for the NPT ?", ADIU Report, Nov/Dec 1984, pp 1-4,

University of Sussex, Brighton, UK.

- \* "Energy Economics", in J Dennis (ed), The Nuclear Almanac, Addison-Wesley, Reading, MA, 1984.
- \* "The Genesis of Nuclear Power", in J Tirman (ed), The Militarization of High Technology, Ballinger, Cambridge, MA, 1984.
- \* A Second Chance : New Hampshire's Electricity Future as a Model for the Nation ( written with Linzee Weld ), Union of Concerned Scientists, Cambridge, MA, 1983.
- \* Safety and Waste Management Implications of the Sizewell PWR ( prepared with the help of 6 consultants ), a report to the Town & Country Planning Association, London, UK, 1983.
- \* Utility-Scale Electrical Storage in the USA : The Prospects of Pumped Hydro, Compressed Air, and Batteries, Princeton University report PU/CEES #120, 1981.
- \* The Prospects for Wind and Wave Power in North America, Princeton University report PU/CEES # 117, 1981.
- \* Hydroelectric Power in the USA : Evolving to Meet New Needs, Princeton University report PU/CEES # 115, 1981.
- \* Editing and part authorship of "Potential Accidents & Their Effects", Chapter III of Report of the Gorleben International Review, published in German by the Government of Lower Saxony, FRG, 1979 -- Chapter III available in English from the Political Ecology Research Group, Oxford, UK.
- \* A Study of the Consequences to the Public of a Severe Accident at a Commercial FBR located at Kalkar, West Germany, Political Ecology Research Group report RR-1, 1978.

#### Expert Testimony ( selected )

- \* International Physicians for the Prevention of Nuclear War, 6th Annual Congress, Koln, FRG, 1986 : Relationships between nuclear power and the threat of nuclear war.
- \* Maine Land Use Regulation Commission, 1985 : Cogeneration potential at facilities of Great Northern Paper Company.
- \* Interfaith Hearings on Nuclear Issues, Toronto, Ontario, 1984 : Options for Canada's nuclear trade and Canada's involvement in nuclear arms control.
- \* Sizewell Public Inquiry, UK, 1984 : Safety and radioactive waste implications of the proposed Sizewell nuclear plant.
- \* New Hampshire Public Utilities Commission, 1983 : Electricity demand and supply options for New Hampshire.
- \* Atomic Safety & Licensing Board, Dockets 50-247-SP & 50-286-SP, US Nuclear Regulatory Commission, 1983 : Use of filtered venting at the Indian

Point nuclear plants.

- \* US National Advisory Committee on Oceans and Atmosphere, 1982 :  
Implications of ocean disposal of radioactive waste.
- \* Environmental & Energy Study Conference, US Congress, 1982 : Implications  
of radioactive waste management.

Miscellaneous

- \* Australian citizen.
- \* Married, one child.
- \* Resident of USA, 1979 to present; of UK, 1969-1979.
- \* Extensive experience of public speaking before professional and lay  
audiences.
- \* Author of numerous newspaper, newsletter, and magazine articles and book  
reviews.
- \* Has received many interviews from print and electronic media.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
PUBLIC SERVICE COMPANY OF NEW ) Docket No.(s) 50-433/444-OL  
HAMPSHIRE, ET AL. )  
(Seabrook Station, Units 1 and 2) )  
 )  
 )

CERTIFICATE OF SERVICE

I, Carol S. Sneider, hereby certify that on July 3, 1986 I made service of the within document by mailing copies thereof, postage prepaid, by first class mail, or as indicated by an asterisk by express mail or as indicated by a double asterisk by hand delivery, to:

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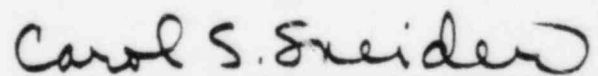
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July 3, 1986