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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE  
SECRETARY  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20545

In the matter of:

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

DOCKET NOS. 50-443 OL  
50-444 OL

(Seabrook Station, Unit 1)

SEACOAST ANTI-POLLUTION LEAGUE'S THIRD  
SUPPLEMENTAL PETITION FOR LEAVE TO INTERVENE

Pursuant to 10 C.F.R. §2.714(b), the Seacoast Anti-Pollution League (SAPL) submits the following contentions for litigation in this proceeding. The contentions are based on the materials transmitted to H. R. Denton, NRC by letters dated March 4, 1986 and March 5, 1986 from the applicant and served on all parties thereafter.

In order to protect its rights, SAPL wants first to make clear that all of the contentions filed previously by SAPL with regard to the New Hampshire State, local and host community Radiological Emergency Response Plans apply to the adequacy of the overall emergency planning effort, including the New Hampshire Compensatory Plan. SAPL will not, for purposes of economy and to spare all parties the burden of additional paper, restate all its prior-filed contentions. SAPL instead is submitting herewith redrafted Contention Nos. 15 and 23 to respond to the contents of the above-mentioned materials that were transmitted to NRC on March 4 and March 5.

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SAPL's Contention No. 8 remains as filed on February 21, 1986 as it applies to the New Hampshire State and Local Radiological Emergency Response Plans. However, since substantially different manpower arrangements are contemplated for the New Hampshire Compensatory Plan, a new contention going to the issue of inadequacy of manpower under that plan is included herewith as Contention No. 8A.

SAPL's new contentions arising out of the materials newly submitted by the applicant and referenced above begin at No. 26 (SAPL's contentions filed on February 21, 1986 ended at No. 25) and advance serially through Contention No. 30.

Respectfully submitted,  
SEACOAST ANTI-POLLUTION LEAGUE  
By its attorney,  
BACKUS, MEYER & SOLOMON

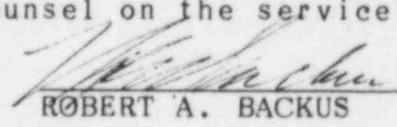


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DATE: April 8, 1986

I hereby certify that a copy of the within Third Supplemental Petition for Leave to Intervene and attached Contentions have been sent this date, first class, postage prepaid, to all counsel on the service list.



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ROBERT A. BACKUS

Contention 8A:

The New Hampshire Compensatory Plan fails to meet the requirements that there be adequate manpower and 24 hour per day emergency response, including 24 hour per day manning of communications links, as required by 10 C.F.R. §50.47 (a)(1), §50.47(b)(1), NUREG-0654 II.A.1.e., II. A.4., and II. F.1.a.

Basis:

a) The New Hampshire Compensatory Plan relies to an unacceptable extent on personnel who are not reasonably assured to be available to perform the duties specified under the plan. School Superintendents and personnel at special facilities are to be notified by the IFO Local Liaison and directed to implement their response plans (see p. L-1). If local communities' officials have opted not to participate in the implementation of the local plans, there is no basis for expecting that the other local community personnel will make themselves available to carry out the Compensatory Plan. This plan continues to rely on school superintendents and principals, day care center directors and other special facility personnel to carry out the emergency response. There is no evidence to support the belief that sufficient numbers of these individuals will be available to receive emergency communications and carry out an adequate emergency response. There are still no letters of agreement with these facilities or personnel.

b) It is clear from examining the letters of agreement that there are not enough bus drivers to drive the buses relied upon under the plans. For example, 197 Jan-Car Leasing Corporation buses are needed under the plans, but Jan-Car Leasing can only muster 150 drivers. That is a shortfall of 47 drivers. Watson Transportation Company of Rochester has only 28 drivers for the 45 buses called for under the plans.

c) There is no showing that there are sufficient numbers of Sheriff's deputies to carry out the responsibilities designated to them under the Compensatory Plan. The deputies are to dispense maps to buses going to schools, day care centers and special

facilities, guide buses picking up people without automobiles (which involves a deputy going to the municipality to activate a local community staging point), assist the Sheriff in logging in vehicles, assist the Sheriff in distributing dosimetry and direct traffic entering and exiting the staging area. 615 buses are needed to carry out an evacuation according to the State Plan. It would take a large number of deputies to coordinate the dispatch and direction of even a fraction of those buses.

d) So-called "Local Liaisons" are relied upon under the Compensatory Plan to determine the needs of special facilities and schools and contact the EOC Resources Coordinator to apprise him or her of those needs. No Local Liaisons are named in the Compensatory Plan, nor are their phone numbers provided. Their existence is therefore not assured. Further, it is absurd to rely on only one Local Liaison to make calls to all of the schools and special facilities in the communities where there are large numbers of such facilities, for example as in Exeter where there are 15 such facilities. It would take a considerable period of time to make all of those contacts, especially during an emergency when phone lines could reasonably be expected to be tied up. Such a community would require several people to make all those contacts. There is further no assurance that the Local Liaisons would be available on a 24 hour basis to receive emergency communications as required by NUREG-0654, II A.1.e. and II F.1.a. No alternate to the Local Liaisons are noted in the Compensatory Plan at II.F.1.a. It is not difficult to imagine a situation of no notification getting through to a local community when only one Local Liaison is designated. People do go on vacation, travel out of town or otherwise make themselves unavailable at times.

e) There are, it is absolutely clear, insufficient traffic control personnel for duty at the Traffic Control Posts designated in Attachment L-3 to the New Hampshire Compensatory Plan. Consider, for example, the relatively simple intersection at Traffic Control Post No. D-NH-03 in North Hampton at the intersection of Lafayette Road and Route 101-D (p. L-3-41). Only 1 guide with 6 traffic cones is supposed to control that

intersection. If even only one errant driver were to plow through the traffic cones and allow traffic to go south on Route 1, the traffic control officer could not go to reposition the cones without losing control of the rest of the intersection. 120 personnel total are required for traffic control in the Seabrook plume exposure EPZ according to page L-3-2 of the Compensatory Plan. It is unclear where such personnel are to come from. If local police officials are not participating and it is necessary to activate the Compensatory Plan, deputy sheriff's would be very busy as described at part c of this contention guiding buses to their destinations. There is absolutely no showing that the 120 traffic control personnel indicated in this plan are available. More than 120 would actually be required because too few people have been assigned to intersections such as the one in North Hampton noted above. Troop A of the New Hampshire State Police appears to be assigned this duty as well as access control functions and other law enforcement duties. There is no showing that Troop A has enough personnel for all of these duties.

Redrafted SAPL Contention No. 15:

The letters of agreement that have been submitted by the N.H. Civil Defense Agency in Volume 5 of the State plan fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(1), §50.47(b)(3), §50.47 (b)(12), Appendix E. II. B. and NUREG-0654 II.A.3., II. C.4., and II. P.4. because they do not demonstrate that adequate arrangements for requesting and effectively using assistance resources have been made, that the emergency responsibilities of the various supporting organizations have been specifically established, that each principal response organization has staff to respond or to augment its initial response on a continuous basis, or that agreements are being reviewed and certified to be current on an annual basis as is required.

Basis:

NUREG-0654 II.A.3. requires that each plan include written letters of agreement referring to the concept of operations between Federal, State and local agencies and other support organizations having an emergency response role within the EPZ. The agreements are supposed to identify the emergency measures to be provided and the mutually acceptable criteria for their implementation and specify the arrangements for the exchange of information. NUREG-0654 II.C.4 states that each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance and that such assistance "shall be identified and supported by appropriate letters of agreement." NUREG-0654 II.P.4. states that each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The letters of agreement in Volume 5 of the State plan do not suffice to satisfy these requirements for the following reasons:

a) Some of the letters of agreement bear no signature. The New England Interstate Radiological Assistance Compact has no signature page to validate it. The letter of agreement between New Hampshire Yankee and the States of New Hampshire and Massachusetts is neither completed, nor signed. The Memorandum of Understanding

with the Coast Guard has a typed in name, but no signature. The agreement with the New Hampshire Towing Association is not signed. (A prospective date of 11/27/86 appears on the agreement.) The Memorandum of Understanding Between the USAF and the State of New Hampshire is not signed nor dated.

b) There are no letters of agreement with many of the key response organizations and governments. For example, there are no letters of agreement with the 17 N.H. local communities nor are there letters of agreement with the host communities. Thus, the requirements of NUREG-0654 II.A.3 are not met.

c) Some of the agreements date back a number of years. For example, the New England State Police Compact is dated 6/69. Clearly, the specifics of an emergency response for the area surrounding Seabrook Station were not contemplated when this compact was signed. This is contrary to the requirements of NUREG-0654 II.P.4.

d) There are no letters of agreement with School Administrative Units, schools, teachers, owners of towing companies (other than the unsigned postdated agreement with the New Hampshire Towing Association mentioned above), day care centers, nursing homes, Rockingham County Dispatch, bus drivers or other organizations or individuals to be relied upon to provide assistance in an emergency as required by NUREG-0654 II.C.4.

e) There is no showing that the FAA Concord Flight Service Agreement or the agreement with New England Telephone are sufficient to establish the responsibilities of those organizations as required by 10 C.F.R. §50.47 (b)(1) because those letters are not provided in Volume 5 but are said to be "on file."

f) The letters of agreement with hospitals include a number of letters from hospitals which are not listed in the New Hampshire State Plan (see p.2.8-5 for the list.) It is very unclear to SAPL why these letters even appear in Volume 5. For example, the October 9, 1985 letter from Alice Park Day Memorial Hospital in Lebanon, New Hampshire states "...because APD is a small hospital with extremely limited resources, it is unable to handle radiation victims." The October 7, 1985 letter from Valley Regional

Hospital similarly states, "...the physical design of our facility, and in particular our emergency receiving area, would make appropriate isolation of the contaminated patient impossible." SAPL believes that all extraneous letters from entities not to be counted upon in an emergency response should be removed from Volume 5. It seems to SAPL that it would only add to the difficulty emergency responders face in making appropriate referrals to have non-applicable information to sift through.

The letters from hospitals that are listed in the State plan do not demonstrate that the requirements of 10 C.F.R. §50.47 (b)(12) have been met. There is no letter for Newport Hospital, which is listed in the state plan. Pease Air Force Base Hospital states, "We are willing to cooperate fully with civilian hospitals and disaster authorities in assisting with care of civilian casualties to the extent that such care does not interfere with our primary responsibility to active duty military personnel." (emphasis added) There is, therefore, no assurance that this hospital's resources will be available to civilians. Further, as was stated previously in SAPL Contention #4, Pease is just a short distance beyond the EPZ boundary and could under certain circumstances need to be evacuated. The letter provided for Huggins Hospital is illegible. The letter for Lakes Regional General Hospital in Laconia dated 10/15/85 states "...we recognize our responsibilities to treat such cases that occur in our service area and to help neighboring hospitals that may be faced with more casualties than they can treat as a result of a disaster situation." (emphasis added) Seabrook Station and its EPZ are not in the Lakes Region General Hospital service area nor are the hospitals in the Seabrook EPZ neighboring hospitals. The letter from Catholic Medical Center dated 10/17/85 states that a letter written by Dr. Windler on 1/6/84 still holds. No copy of the 1/6/84 letter is provided. For these and other reasons, the letters of agreement from hospitals included in Volume 5 of the State Plan do not provide support for a finding that adequate arrangements for medical services for contaminated injured individuals have been made.

g) Many of the letters are too non-specific and do not demonstrate that adequate arrangements for requesting and effectively using assistance resources have been made. The concept of operations is not clearly defined. For example, the R.S. Landauer, Jr. & Co. letter of 12/30/83 does not tell how fast the company can provide film badges. (The letter also needs to be updated as required by NUREG-0654 II.P.4.) The Memorandum of Understanding between the USAF and the State of New Hampshire makes no reference to an accident at Seabrook, and, as was mentioned above, it is unsigned and undated.

h) The letters of agreement with bus companies provide no assurance that bus drivers will be available to drive buses into the EPZ. In some cases there are too few drivers for the number of buses to be provided by a company under the plans. Jan-Car Leasing Corporation, for example, is to provide 197 buses, but only lists 150 drivers. SAPL also is concerned that some of the buses that are alleged to be available during emergencies might be chartered out or otherwise not available.

i) The letters of agreement with ambulance companies do not support a finding of reasonable assurance that adequate protective measures can and will be taken. Most, if not all, of the companies listed are a minimum of 1 hour's drive from the EPZ. None of the companies except Berlin Emergency Medical Services, Inc. state how many ambulances and what personnel are available. That company's letter notes that "If the patient is in a hazardous area, we usually have to wait on the outskirts until the patient is brought to us. This might be significant in the event of a disaster involving the nuclear plants."

For all of the above cited reasons, the letters of agreement fail to support the requisite 10 C.F.R. §50.47 (a)(1) finding of reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at Seabrook Station.

Redrafted SAPL Contention No. 23:

The New Hampshire State and local RERP's and the New Hampshire Compensatory Plan do not meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(7) and NUREG-0654 II.G.1 and its subsections because the samples of draft materials that have been prepared fail to disseminate adequate educational information on radiation hazards from nuclear plants and an adequate description of the protective measures that should be taken, and, in the case of the New Hampshire Compensatory Plan, appropriate contacts for additional information.

Basis:

The information in the section of the public information calendar entitled "About Radiation" is inadequate to inform the public of the particular hazards associated with exposure to ionizing radiation. It is very important that the public be clearly informed of the distinction between ionizing and non-ionizing radiation because it is the fact that radioactive materials have the capability to eject electrons from the orbits of atoms comprising living tissue that ionizing radiation exposure poses unique and very serious health hazards. The passage related to radiation in the calendar vaguely groups ultraviolet rays from sunlight together with X-rays and radiation from radioactive materials. The accompanying illustration is of a woman sunbathing. The intent of this presentation is probably to allay public anxieties about radiation. The public, however, has the right to know the difference. Ultraviolet light does not possess sufficient energy per photon to cause electrons to be ejected from their orbits. X-rays and the gamma, beta and alpha radiations emitted by radioactive materials do possess sufficient energies per photon to result in ejection of electrons from their orbits with a resultant destruction of chemical bonds. The random destruction of chemical bonds in the human body can result in damage of genetic material and cancer at lower doses and at high doses (exceeding a threshold dose of approximately 200 rems) can cause death. The licensing board in the Shoreham case stated quite unequivocally in the Concluding Partial

Initial Decision that public information materials must inform the public that exposure to radiation resulting from nuclear accidents can cause injury or death. In the Matter of Long Island Lighting Company (Shoreham Nuclear Power Station Unit 1), 22 NRC 410, at 429 (1985).

The information in the calendar that talks about the protection offered by the nuclear plant and the fact that it cannot explode like a bomb does not talk about the phenomena of overpressure, hydrogen burn, direct heating and steam explosions that can challenge the integrity of the containment. There is also no discussion of bypass of containment accident sequences. The information is, therefore, very misleading.

In the "About Safety at Seabrook Station" sections of the calendar and brochures, the bald assertion appears "Across the country, nuclear power plants have been run safely." That is certainly a debatable statement. There have been very dangerous incidents at Browns Ferry, Ginna, and Davis Besse, to mention but a few, and of course there was the well-publicized accident at the Three Mile Island nuclear plant. Virtually every plant has experienced incidents in which the level of plant safety has been degraded, including all seven of the New England plants. SAPL objects to the inclusion of this kind of gratuitous public relations statement.

SAPL finds the information "How to Take Shelter" inadequate in that it does not instruct the reader to take shelter in the basement or in interior rooms away from windows. Indeed the illustration accompanying the sheltering instructions in the calendar shows a woman and child standing near a window. People should be instructed that the more shielding (mass) between themselves and the radiation source, the better.

These calendars and brochures will not suffice for the New Hampshire Compensatory Plan because they will (when the proper phone numbers are added) instruct people to call the local Emergency Operations Center (EOC) for special help. If the communities are not participating, the EOC's will not be activated.

Further, these materials do not set out the prearranged bus routes along which buses are to travel to pick up non-auto owning individuals under the New Hampshire Compensatory Plan. There must be some mechanism by which those routes can be disseminated to the public.

Contention No. 26:

The New Hampshire Compensatory Plan, "Appendix L", fails to meet the requirements of 10 C.F.R. §50.47(a)(1) and §50.47 (6)(1), and NUREG-0654 II.A.1 and its subsections a, b, c, and e and NUREG-F.1.a. and F.1.e in that it fails to set out with sufficient clarity, which State and local organizations are to be part of the overall response effort, the concept of operations for each organization and suborganization and the relationship of each organization to the overall response effort. Interrelationships are not illustrated in block diagrams and an overall 24 hour per day response, including manning of communications links, is not demonstrated.

Basis:

The concept of operations set forth at p. L-1 is more a continuation of the statement of purpose than anything else. After reading it, one has no idea of how the compensatory response is to operate, which organizations are to be active in the response or how they are to interrelate. The first clues come in the section headed "Responsibilities". Even after reading the entire plan the concept of operations remains overly nebulous. It is never clearly set out which local personnel are assumed to participate or precisely how they are to interrelate with the state.

For example, an "IFO Local Liaison" is mentioned. It is not, as far as SAPL can see, stated where that individual works, though from the job title, one might assume at the IFO. At page L-2 there is a section entitled "4.0 References". Under that at 4.3 it says "IFO Local Liaison Procedures, Attachment 13-A." In the materials provided with the Director Procedures there is a section at 13-A entitled "NHEDA Local Liaison". It does little to illuminate matters. At 1. it says "Inform the IFO Controller of the failure/impairment of the municipalities emergency response." How does the Local Liaison learn about the failure of the municipalities emergency response? Who tells the Local Liaison? Will this Local Liaison be available 24 hours a day to carry out the functions listed in Attachment 13-A? These questions are not clearly answered.

It is apparent that the New Hampshire Compensatory Plan relies on the continued participation of School Superintendents, Principals, and special facility operators. As stated in SAPL Contention 8-A, there is no basis for this expectation. If these personnel are not available to communicate information to the IFO Local Liaison, the emergency response will break down.

A reading of the IFO Controller Procedure at 11-1 reveals that it is the IFO Controller who orders the Local Liaison Officers to establish communications with the 17 communities. This is after the IFO Controller travels to the IFO, presumably from Concord, NH, a distance requiring about a 1 1/2 hour drive.

The instructions say that if any Local Liaison Officers are unable to establish communications with any municipalities or if any municipality is unable or unwilling to support the emergency response, the IFO Controller is to implement the Compensatory Procedures at Attachment II-A. SAPL does not find an Attachment II-A among the papers served.

According to p. L-1 and 13 A-1, it is the IFO Local Liaison who is to communicate school and special facility needs to the EOC Resources Coordinator. However, at p. 7A-1, the procedure for the EOC Resources Officer (SAPL assumes that the EOC Resources "Coordinator" and EOC Resources "Officer" are one and the same) says at 2. that the status of towns that require compensatory actions is to be received from the EOC Operations Officer. This appears either inconsistent or duplicative.

In addition to the concerns related to the lack of clarity in the concept of operations, SAPL further has concerns that buses will not be available to be sent to the staging area on a 24 hour per day basis. There is no evidence to support a 24 hour per day availability of buses since most bus companies would not be operating at night. The difficulty that bus drivers from outside the area would encounter in finding their way into the EPZ would be compounded at night. The route maps would be of some

help after they obtain them at the staging area in Brentwood, but many drivers may not be familiar with the routes to the staging area.

Contention No. 27:

The New Hampshire Compensatory Plan fails to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(10) and NUREG-0654 J.10.d. because the plan to run buses around preassigned routes will not provide an adequate means for protecting many of those persons whose mobility is impaired due to lack of automobiles and/or lack of physical health.

Basis:

Under the New Hampshire Compensatory Plan, people without automobiles within a municipality are to obtain transportation by buses which are to go to local staging points activated by Rockingham County Sheriffs' deputies. The buses are then to travel around prearranged routes. People who are elderly or not very healthy may have difficulty walking to and standing along the prearranged routes, particularly in inclement weather. Days when frost bite is a problem due to wind chill factors would particularly cause problems for such individuals obtaining emergency transport. Without provisions to pick such people up at their homes, the plans do not provide the requisite basis for a finding that there is reasonable assurance that the public can and will be adequately protected in the event of a radiological emergency.

Contention No. 28:

The New Hampshire Compensatory Plan does not meet the requirements of 10 C.F.R. 50.47 (a)(1), §50.47 (b)(3), §50.47 (a)(10) and NUREG-0654 II. J. 10. a. because it does not contain maps of local staging areas or bus routes for 12 of the 17 EPZ communities, the lack of which could seriously impair or extinguish the capability to implement an evacuation of those communities under the Compensatory Plan's provisions. Further, a number of maps that are provided are unclear and/or inaccurate and would be difficult for drivers unfamiliar with the area to use effectively.

Basis:

The letter of transmittal dated February 19, 1986 by Richard H. Strome, Director of the New Hampshire Civil Defense to Mr. Henry G. Vickers, Regional Director of FEMA states the purpose of the New Hampshire Compensatory Plan as follows: "This plan outlines the means to be used by the State to protect citizens in towns within the Seabrook EPZ where municipal government, for whatever reason, does not fulfill the responsibilities described in the local emergency response plans." This plan could not be implemented for 12 of the 17 New Hampshire municipalities without the maps for the staging areas and bus routes through the communities being prepared and available in advance.

The maps for the Town of Kensington show the Transportation Staging Point (which according to p. L-2-14 is supposed to be at the Kensington Fire Station) in the wrong location. The Kensington Fire Station is north of the junction of Trundlebed Road and Route 150, but the maps show the Transportation Staging Point south of that junction. Errors such as this could be very confusing to out of town drivers. It would be advisable to include the name of the Transportation Staging Point right on the maps.

The names of roads on the special facility maps for Rye are illegible. Maps are lacking for Hampton Head Start, Peek-a-Boo Nursery and the Montessori Early Learning Center in Hampton. For reasons such as the above, the maps as they exist are inadequate

and fail to support a finding of reasonable assurance that the public can and will be adequately protected.

Contention No. 29:

The revisions of the Seabrook and Hampton RERP's fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(1) and NUREG-0654 II.A.1 and its subsections because each organization and suborganization having an operational role has not specified its relationship to the total effort and each response organization does not have the staff to respond and to augment its initial response on a continuous basis.

Basis:

The Town of Hampton has made very clear its position that it does not intend to participate in the emergency response effort for a radiological emergency at Seabrook Station. New Hampshire Civil Defense Agency nonetheless is continuing to rely upon Town of Hampton personnel in its plans for protective actions for seasonal beach populations. Appendix G states that the Hampton Police Department will establish certain traffic control points. That is not a reasonable expectation under the circumstances. Further, the NHCDA has supplied revised procedures for the Selectmen, Civil Defense Director, Fire Chief and Police Chief, all of whom cannot reasonably be expected to participate given recent votes in the Town of Hampton.

The New Hampshire Division of Resources and Economic Development (DRED) does not have the staff to respond and cannot initiate a response in a timely fashion. At the Alert stage of an accident at Seabrook, DRED personnel are to go to the State EOC in Concord and one representative is to go from the State Parks Service to the IFO/EOF at Newington Station. At the same time under these revised plans, DRED is to close beaches and State Park areas in Hampton Beach and large parts of Seabrook Beach and is to implement special patrols to advise beachgoers and State Park populations of those closings. There is no showing that DRED has the personnel to manage these tasks. Appendix A of the DRED Emergency Response Procedures lists one person, Richard MacLeod, who is supposed to have charge of 10 state properties, including Hampton Beach and Hampton Beach State Park.

Contention No. 30:

The revisions of the Seabrook and Hampton RERP's fail to meet the requirements of 10 C.F.R. §50.47 (a)(1), §50.47 (b)(10) and NUREG-0654 II.J.9 and II.J.10.m. because the protective action of sheltering is not being provided for beach area populations and the protective actions contemplated in these plan revisions will not be practicable for the full spectrum of accident conditions that must be planned for according to the regulatory requirements.

Basis:

There is still no provision for sheltering the populations on the beaches as a protective action for the faster developing accident sequences. If large populations are already at beaches and a general emergency must be declared right away, these plan revisions will suffice to add no more protection than what was to have been expected under the original versions of the Hampton and Seabrook plans. These plan revisions would only help when there is plenty of prior warning before a radiation release, which is a condition that cannot be counted upon. Therefore, these plan revisions do not provide reasonable assurance that adequate protective measures can and will be taken under the full spectrum of accident conditions that must be considered in emergency planning.

CERTIFICATE OF SERVICE AND SERVICE LIST

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April 8, 1986

The above have been sent first-class, postage prepaid a copy of the enclosed.

  
Robert A. Backus