

998

RELATED CORRESPONDENCE

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



In the Matter of	)	
	)	
PUBLIC SERVICE COMPANY OF NEW	)	Docket Nos. 50-443 OL
HAMPSHIRE, et al.	)	50-444 OL
	)	
(Seabrook Station, Units 1 & 2)	)	(Off-Site EP)

APPLICANTS' OFF-SITE EP INTERROGATORIES  
AND REQUEST FOR THE PRODUCTION OF DOCUMENTS  
TO  
Town of Seabrook  
(Set No. 1)

Pursuant to 10 C.F.R. § 2.740 and 2.740b, the  
Applicants hereby propound the following  
interrogatories to Town of Seabrook ("TOS").

DS03

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### Definitions

As used in these interrogatories, the following terms have the following meanings:

"Litigate" with regard to a topic or contention means to offer direct testimony relating to, to cross-examine on, to offer proposed findings or rulings regarding, or to urge the denial (or allowance subject to conditions) of the pending application on the basis of the topic or contention.

"Identify" with respect to an expert witness means to state:

(a) The name, mailing address, age and present professional or employment affiliation of the person;

(b) The profession or occupation and field of claimed expertise of the person;

(c) The history of formal education or training of the person, including, but not limited to, (i) the name and address of each school where the person received special education or training, (ii) the date those schools were attended, and (iii) a description of each degree earned, including the date and granting institution;

(d) The history of specialized training in the area of claimed expertise, including, but not limited to,



(i) the type of training received, (ii) the name and address of the institution providing this training, and (iii) the dates of such training;

(d) The history of membership of the person in any professional or trade association in the area of claimed expertise, including, but not limited to, (i) the name of each professional or trade association, (ii) the dates of membership, and (iii) a description of each office held in each association;

(f) A list of publications of any kind by the person in the area of claimed expertise, including, but not limited to, (i) the title and subject matter, (ii) the name and address of the publisher, and (iii) the date of publication;

(g) A list of any and all licenses in the area of claimed expertise, including, but not limited to, (i) the designation of the authority by which the license was issued, (ii) the date(s) of the licensing, (iii) the requirements for obtaining each license, and (iv) the manner by which these requirements were met;

(h) The amount of time the person has worked in the field of claimed expertise, stating periods where work was other than on a full-time basis;

(i) The name and address of every person, or every corporation or other institution, that has employed the person within the last ten years of employment;

(j) All periods of claimed self-employment, including a description of all duties and responsibilities thereof;

(k) All previous experience in the field of claimed expertise which involved problems, analyses or studies similar to those concerning which the person is expected to testify in this proceeding;

(l) All other litigation in which the person has been consulted, specifying those matters in which the person has testified, including the name of the case or matter and the court or other forum in which testimony was given; and

(m) Any other experience in the field of claimed expertise.

Wherever appearing in these interrogatories, the masculine form is defined to include the feminine and/or the neuter and the singular form is defined to include the plural wherever necessary to apply the context to any factual situation that may exist or to render the interrogatory more inclusive in scope.

Notice Regarding Supplementation

Your attention is called to the provisions of 10 CFR § 2.740(3)(1)(ii) regarding your obligation to supplement interrogatories calling for information regarding proposed expert witnesses.

Request for the Production of Documents

Pursuant to 10 C.F.R. § 2.741, TOS is hereby requested to produce, for inspection and copying, each document identified by TOS in response to these interrogatories and each document required to be identified in response to these interrogatories, at the offices of Ropes & Gray, 225 Franklin Street, 24th Floor, Boston, Massachusetts 02110 on Friday, May 23, 1986, at 10:00 o'clock in the forenoon. Each document produced in response to this request should be labeled to indicate the interrogatory or interrogatories in response to which it is produced.

General Interrogatories

G-1. With respect to your answers to each of the specific interrogatories that follow (other than the last interrogatory in each series, relating to expert witnesses), is your answer based upon one or more documents? If so, please:

- (a) Identify each such document on which your answer is based.
- (b) Identify the information in each document on which your answer is based.

G-2. With respect to your answers to each of the specific interrogatories that follow (other than the last interrogatory in each series, relating to expert witnesses), is your answer based upon any type of study, calculation or analysis? If so, please:

- (a) Describe the nature of the study, calculation or analysis and identify any documents that discuss or describe the study, calculation or analysis.
- (b) Identify the persons who performed the study, calculation or analysis.
- (c) State when and where the study, calculation or analysis was performed.
- (d) Describe in detail the information or data that was studied, calculated or analyzed.
- (e) Describe the results of the study, calculation or analysis.

- (f) Explain how such study, calculation or analysis provides a basis for your answer.

G-3. With respect to your answers to each of the specific interrogatories that follow (other than the last interrogatory in each series, relating to expert witnesses), is your answer based upon conversations, consultations, correspondence or any other type of communication with one or more individuals? If so, please:

- (a) Identify each such individual.
- (b) State the educational and professional background of each such individual, including occupation and institutional affiliates.
- (c) Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.
- (d) Describe in detail the information received from each such individual and explain how it provides a basis for your answer.
- (e) Identify each letter, memorandum, tape, note or other record related to each conversation, correspondence, or other communication with such individual.

G-4. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Has TOS conducted, or is TOS aware that anyone else has conducted, any study or survey to ascertain whether town officials and employees having an emergency role would respond to his or her assigned duty in the event of an emergency at Seabrook Station?
- (b) If so, please identify the person or organization that conducted the study.
- (c) Please identify each town official or employee who provided input into the study.
- (d) Please state whether the study is reflected or discussed in any documents of which TOS is aware and, if so, please identify the documents.

G-5. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Does the town presently have, or has it at any time had, a plan for dealing with public disturbances and emergencies (without regard to whether the plan might or might not have had applicability to radiological emergencies or to Seabrook Station)?
- (b) If so, please identify the plan(s).
- (c) Has the town prepared, or is it in the process of preparing, its own plan for dealing with radiological emergencies at Seabrook Station?
- (d) If so, please identify the plan (or partial or draft plan) and supply the further information: (i) the name(s) of the author(s) of the plan; (ii) the date on which development of the plan commenced and the date on which the plan was (or is expected to be) completed; and the identity of any consultant or professional who contributed to or assisted in the development of the plan.

G-6. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Has any selectman, civil defense director or other official of the town directed, requested or encouraged individuals, institutions, businesses or other entities to refuse or decline to cooperate with representative of the New Hampshire Civil Defense Agency ("NHCDCA") in developing an emergency plan for the town?
- (b) If so, please identify each selectmen, director or official who has so directed, requested or encouraged, and describe in detail the nature of the direction, request or encouragement, including the date(s) and place(s) on which it occurred and the identity of the persons directed; requested or encouraged.

G-7. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Has any selectmen, civil defense director or other official of the town suggested or requested that citizens of the town not response to the NHCDA questionnaire regarding special needs?
- (b) If so, please identify each selectman, director or town official who so suggested or requested, provide the date(s) on which the suggestion or request was made, and identify all persons known to TOS who witnesses or heard the suggestion or request.



G-8. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Has any person, including legal counsel, advised any official of the town that he or she or the town should not cooperate with NHCDA in the development of an emergency response plan for the town?
- (b) If so, please identify the person(s) who gave such advice.
- (c) If so, please identify each official to whom such advice was given, identify the person who gave the advice, and state the date(s) and place(s) on which the advice was given.
- (d) In the event you claim that any communication of which TOS is aware need not be revealed by reason of the attorney-client privilege, please supply the following information with respect to each such claimed privileged communication: (i) the identity of the person TOS asserts was the attorney, (ii) the identity of the person whom TOS asserts was the client, (iii) the nature of the matters in which TOS asserts attorney was retained by client for the purpose of rendering professional representation to client, and (iv) all of the facts upon which TOS relies to support the assertion of the privilege.

G-9. Please answer this interrogatory separately for each of the New Hampshire towns within the Seabrook Station EPZ:

- (a) Has any selectman, civil defense director, other town official or citizen of the town received any advice, counsel or assistance in this course of matters relating to emergency planning in respect of Seabrook Station from any representative of or person employed by

the Department of the Attorney General of the Commonwealth of Massachusetts?

- (b) If so, please identify the representative or person providing the advice, counsel or assistance.
- (c) If so, please identify the person receiving the advice, counsel or assistance.
- (d) If so, please state the date(s) and place(s) on which the advice, counsel or assistance was rendered and describe the same in detail.

Specific Interrogatories

I-1. Does TOS intend to litigate Contention Hampton Falls 1 (Implementation of Local Plans)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory II-1.)

I-2. Please list each and every respect in which TOS contends that the local plan for Hampton Falls is not workable assuming that the local officials designated in that plan were willing to perform the duties assigned by it to them.

I-3. Separately for each respect identified in your response to the foregoing interrogatory, set forth each and every reason why you contend that that respect of the plan is not workable.

I-4. Please supply the definition of "workable" that you have employed in responding to the two prior interrogatories.

I-5. Does Hampton Falls have (or has it ever had) a response plan or plans for dealing with any sort of emergency or public safety contingency other than in connection with the operation of Seabrook Station? Please identify each such plan.

I-6. Is TOS aware of any instance in the past in which a police officer of Hampton Falls has refused to perform any official duty assigned to him? If so, then separately for each such incident please: (i) identify the officer, (ii) identify any written reports or accounts of the incident of which TOS is aware, and (iii) please set forth all of the facts concerning the incident of which TOS is aware?

I-7. Is TOS aware of any instance in the past in which a Fire Fighter or other employee of the Hampton Falls fire department has refused to perform any official duty assigned to him? If so, then separately for each such incident please: (i) identify the person, (ii) identify any written reports or accounts of the incident of which TOS is aware, and (iii) please set forth all of the facts concerning the incident of which TOS is aware?

I-8. Is TOS aware of any instance in the past in which a teacher or other school employee of Hampton Falls has refused to perform any official duty assigned to him? If so, then separately for each such incident please: (i) identify the person, (ii) identify any written reports or accounts of the incident of which

TOS is aware, and (iii) please set forth all of the facts concerning the incident of which TOS is aware?

I-9. Does TOS contend that any teacher or classroom monitor presently employed by Hampton Falls would, in the event of a radiological emergency involving Seabrook Station, abandon the children in his care? If so, then separately for each such person please (i) identify the person, (ii) set forth all of the reasons why TOS contends such person would abandon the children, (iii) state the date upon which TOS first came into possession of information leading it to the conclusion that such person would abandon the children, and (iv) state what, if anything, TOS has done to cause the removal of the person from his position of responsibility for the care of children.

I-10. Does TOS contend that each teacher or classroom monitor who would abandon his responsibilities in the event of a radiological emergency involving Seabrook Station would also, in the event of an emergency other than a radiological emergency involving Seabrook Station (such as and specifically including a chlorine spill), abandon the children in his care? If so, then separately for each such person please (i) identify the person, (ii) set

forth all of the reasons why TOS contends such person would abandon the children, (iii) state the date upon which TOS first came into possession of information leading it to the conclusion that such person would abandon the children, and (iv) state what, if anything, TOS has done to cause the removal of the person from his position of responsibility for the care of children.

I-11. For each person who, in reponse to the two foregoing interrogatories, TOS contends would abandon the children in the event of a radiological emergency but would not abandon the children in the event of a chlorine spill or other non-radiological emergency, please state the reasons who TOS so contends.

I-12. Does TOS rely for any portion of its answers to the foregoing interrogatories upon information or opinion supplied to it by any person? If so, please (i) identify the person, (ii) identify the medium of communication by which the person's information or opinions were transmitted to TOS, (iii) state the date(s) on which the information or opinions were provided to TOS, (iv) describe the information or opinion supplied and (v) identify any documents

constituting, describing or analyzing such information or opinion.

I-13. Has the NHCDA or its representatives contacted or attempted to contact responsible officials (e.g., Selectmen, CD Director, Police Chief, Fire Chief) to obtain their assistance and cooperation in developing the emergency response plan for Hampton Falls? If so, then please state:

- (i) the number of contacts,
- (ii) the dates of any meetings which resulted,
- (iii) the subjects discussed at these meetings, and
- (iv) any changes made to the plan as a result of the discussions.

I-14. If representatives of Hampton Falls did not work with NHCDA or its representatives in developing the radiological emergency response plan, identify the reasons for the absence of a jointly developed plan.

I-15. Notwithstanding the absence of approval of the plan by the Town of Hampton Falls or the unwillingness of the Town to implement the plan, could the Town implement the plan if it chose to do so? Please explain the answer.

I-16. If the answer to the preceding interrogatory is "no," identify with specificity all additional resources required in order to enable the Town to implement the plan.

I-17. Does TOS contend that, notwithstanding the absence of approval of the local plan for Hampton Falls by the town, the selectmen, the police chief, any police officer, the fire chief, any fire fighter, or any other town official or employee would, in the event of an actual emergency at Seabrook Station, refuse to cooperate with and assist in dealing with the emergency? If so, please identify each person whom TOS contends would so respond, and for each such person state: (i) his position, (ii) the number of years he has had the position, (iii) whether the Selectmen of the town are aware of the person's intention in the event of actual emergency, (iv) whether the Selectmen approve of the person's intention in the event of an actual emergency, and (v) what TOS contends the person would do in the event of an actual emergency.

I-18. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:



- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

II-1. Does TOS intend to litigate Contention Hampton Falls 2 (24-Hour Endurance Capability)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory III-1.)

II-2. Describe the performance record of the Hampton Falls volunteer Fire Department. In this response please identify each incident known to TOS where the Fire Department did not respond to a fire alarm or other emergency call, and for each such incident set forth the reasons.

II-3. Have fires or other emergencies occurred which exceeded the capabilities of the Hampton Falls volunteer Fire Department? If so, was support from outside Hampton Falls requested and was the support provided?

II-4. What are the reasons that Hampton Falls has not RADEF Officer?

II-5. Has the NHCDA offered to provide training to qualify individuals to be RADEF Officers?

II-6. What are the reasons that Hampton Falls has no Transportation Coordinator?

II-7. Have instances occurred which exceeded the ability of the Hampton Falls police force to deal with? If so, was support from outside Hampton Falls requested and was the support provided?

II-8. Does TOS believe that if requested, NHCDA would provide training for emergency response personnel

in Hampton Falls? If the answer is no, fully explain the reasons for the response.

II-9. Does TOS believe that, in the event of an emergency situation at Seabrook Station, the State of New Hampshire would provide assistance in the form of equipment and/or personnel to assist the Town of Hampton Falls in coping with the emergency? If the answer is no, explain the basis for the response.

II-10. Please identify each official or employee of the town of Hampton Falls whom TOS contends would, under the local plan for Hampton Falls and in the event of an emergency at Seabrook Station, be required to man his position for 24-hours in order to discharge the functions assigned to him under the plan; and for each such person please state (i) the functions that TOS contends could require 24-hour manning in order to be accomplished and (ii) in detail any accident scenario on which TOS relies in supplying its response.

II-11. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;

- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

III-1. Does TOS intend to litigate Contention

Hampton Falls 4 (Notification of Response

Organization)? (If the answer to this interrogatory is

an unqualified negative, you may proceed to

Interrogatory IV-1.)

III-2. Please list each and every telephone owned or operated by the Town of Hampton Falls or any department or agency thereof, or which is capable of being answered at any location at which town business is conducted (including any private homes from which town business is ever transacted or of which meetings of town officials are ever conducted), and for each such telephone state: (i) the telephone number, (ii) the location of each extension from which that number is capable of being accessed, (iii) the person who is recorded as the subscriber in respect of the number, and (iv) the occasions or purposes for which such telephone is used.

III-3. Please provide the make, model, frequency(ies) (both transmit and receive), rated power, control or console location, and antenna location of each radio transceiver, radio repeater, radio monitor, radio scanner and radio paging device owned or operated by the Town of Hampton Falls or any official or department thereof.

III-4. Does the town of Hampton Falls regularly rely upon any radio station or frequency for communications with other police departments and governmental agencies (including for "intercity")

broadcasts)? If so, please list each frequency so used and each department or agency with whom Hampton Falls is capable of communicating via that frequency.

III-5. Has the Town of Hampton Falls made any recommendations or suggested alternatives to the policeman on duty or on call as the initial point of contact in case of an emergency? If not, why not?

III-6. Has the Town of Hampton Falls made any recommendations or suggested alternatives to the Fire Chief for activating the public alerting system? If not, why not?

III-7. Please state each and every reason why the Town of Hampton Falls considers volunteer firemen to be insufficiently reliable to function as backups for the Fire Chief in activating the public alerting system?

III-8. Has the Town of Hampton Falls made any recommendations or suggested alternatives to the Chairman of the Board of Selectmen as the individual in charge of emergency operations for the Town? If so, please, for each such recommendation or alternative state (i) the nature of the recommendation or suggested alternative, (ii) the date made, (iii) the person to whom made, (iv) whether it is recorded in a document

and, if so, the identity of the document, and (v) all of the reasons known to TOS why the suggestion or alternative was not adopted.

III-9. Have offers been made to provide emergency communications equipment to the Town of Hampton Falls? If the answer is yes, why hasn't the Town accepted the equipment?

III-10. If the answer to the preceding interrogatory is no, would the Town accept emergency communications equipment if it were offered?

III-11. Is TOS aware that emergency communications equipment (e.g., pocket pagers and two-way radios) has been offered to and accepted by other towns in New Hampshire located in the plume exposure pathway EPZ?

III-12. Please provide the name, residence address and residence telephone number of each member of the Hampton Falls Board of Selectmen.

III-13. Please provide the name, name of employer, place of employment, address and telephone number, and hours of employment for each member of the Hampton Falls Board of Selectmen who is also employed in any other capacity or by any other person or entity.



III-14. Please provide the name, residence address and residence telephone number of each member of the Hampton Falls Police Department.

III-15. Please provide the name, name of employer, place of employment, address and telephone number, and hours of employment for each member of the Hampton Falls Police Department who is also employed in any other capacity or by any other person or entity.

III-16. Please provide the name, residence address and residence telephone number of each member of the Hampton Falls Fire Department.

III-17. Please provide the name, name of employer, place of employment, address and telephone number, and hours of employment for each member of the Hampton Falls Fire Department who is also employed in any other capacity or by any other person or entity.

III-18. Have the Selectmen of Hampton Falls, or any other town official or board, ever investigated or conducted any study of the time required for any Hampton Falls police officer or fire department member to respond to an emergency? If so, please identify the study.

III-19. Insofar as TOS is aware, are the Selectmen of Hampton Falls satisfied with the ability



of the Hampton Falls Police and Fire Departments to handle such matters as they may be required or expected to handle? If not, what steps have the Selectmen taken to enhance the capacity of either department?

III-20. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

(h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

IV-1. Does TOS intend to litigate Contention Hampton 4 (Inadequate Equipment)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory V-1.)

IV-2. Does TOS have any reason to believe that, having been advised of a shortfall of vehicles to evacuate schools, other special facilities and non-auto owning residents, the State will not make arrangements to obtain the additional vehicles? If the answer is yes, explain why.

IV-3. Has TOS conducted any study or studies to determine the number of tourists and transients who come to Hampton but do not have access to an automobile or other vehicle? If so, provide the study report or, in the absence of a report, describe the study and its results.

IV-4. If the answer to the preceding interrogatory is no, is TOS aware of a study or survey performed by others which addresses the subject of availability of a vehicle to tourist or transients who come to Hampton? If so, please provide a copy of the

study or survey report. In the absence of a report describe the study or survey and its results.

IV-5. If the answers to the preceding two interrogatories are no, explain the basis for the assertion that with regard to "tourists and transients coming to Hampton during the summer months, it is only reasonable to assume that a significant number of additional public transportation vehicles will be required in the event of evacuation."

IV-6. Does TOS contend that any two-way roads will be converted to one-way traffic flow during an emergency involving Seabrook Station? If so, please (i) identify each road that TOS contends will be so converted, and (ii) identify the basis on which TOS relies for its contention that the conversion will occur.

IV-7. If, in the event of an evacuation, roads in the plume exposure pathway EPZ were operated in the normal manner (e.g., two-way roads remain two-way roads), does TOS contend that there would be a likelihood of substantial delay or impossibility of evacuation vehicles reaching Hampton? Explain your answer in detail.

IV-8. Has survey been conducted to ascertain whether town employees or others having an emergency role would respond in the event of an emergency at Seabrook Station? If so provide a description of and results of the survey and indicate the date on which the survey was taken.

IV-9. Explain the basis of the population estimates in Mr. French's affidavit. Include a description of the methodology used to derive the numbers.

IV-10. Do the estimates in Mr. French's affidavit represent the population at an instant in time or do they include people who may come and go on a given day?

IV-11. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;

- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

V-1. Does TOS intend to litigate Contention Hampton 6 (Inadequate Local Personnel)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory VI-1.)

V-2. Is TOS aware of any support for the assertion by Glen French that 250,000 people can be expected within the Town of Hampton on each day of the Fourth of July weekend? In particular, is TOS aware of any studies, surveys or analyses to provide a foundation for this estimate? If so, produce them.

V-3. How did the State terminate all discussion on the issue of population estimates?

V-4. Has the Town of Hampton requested the continuation of discussions on the subject of population estimates?

V-5. Has TOS reviewed studies sponsored by the Applicants and by the State which led to estimates of peak population in Hampton? If so, provide all of the reasons why TOS contends that these studies result in inaccurate estimates. In addition, please identify each population number that TOS contends is inaccurate, specify what TOS contends is the accurate number, and provide the basis that TOS contends supports its number.

V-6. Provide all data relied on by local officials including legal and illegal parking availability, business receipts and seasonal shifts in the demand for services on which TOS relies to support a conclusion that the estimated peak population is less than one-half the actual value.

V-7. What are the routine duties of "special officers?"

V-8. What training do "special officers" receive?

V-9. What equipment is provided to "special officers?"

V-10. How are "special officers" incapable of properly implementing adequate protective responses in the event of a radiological emergency? In particular, what actions does the plan call on them to perform which they are not able to do?

V-11. How do the deficiencies identified in response to the preceding question relate to the ability of "special officers" to perform their routine duties?

V-12. What are the normal duties and responsibilities of "temporary public works employees?"

V-13. Are any qualifications required of persons who seek employment as "temporary public works employees?"

V-14. What training do "temporary public works employees" receive?

V-15. What equipment is issued to "temporary public works employees?"

V-16. What duties during an emergency would "temporary" employees be incapable of performing and why?

V-17. In the event specific deficiencies are identified with respect to "special officers" or "temporary public works employees," does TOS have any basis for making the assumption that training could not and would not be provided to enable the "temporary" workers to satisfactorily perform their assigned tasks? If so, please set forth in detail the basis for this conclusion.

V-18. Under the provisions of the Hampton RERP, what specific responsibilities are placed on Department of Public Works personnel for "evacuation of all individuals without automobiles, families without the use of their vehicles, and people with special transportation needs?"

V-19. What is the basis for the assumption that the "thousands of individuals who may be located on the beach at the time an evacuation is implemented" would be unable to leave the beach area without requiring the assistance of the Department of Public Works in view of the fact that they were able to go to the beach without similar assistance?

V-20. What is the basis for the assertion that the Public Works Department personnel would be unable to ensure that "all evacuation routes are serviceable



throughout the course of an evacuation?" In particular on what data or studies does TOS rely to presume that accidents, breakdowns, driver disobedience, panic and gas shortages will occur to the extent that an orderly evacuation cannot be implemented?

V-21. Must all Selectmen be available to direct operations during a radiological emergency?

V-22. Identify by name any Selectman who is not competent to direct such operations.

V-23. If no Selectman can be relied on to direct operations of the Town during a radiological emergency, who would be capable of providing the requisite management function?

V-24. Does TOS have a basis for assuming that training could not or would not be provided to newly elected Selectmen in a timely manner? If so, please describe the basis in detail.

V-25. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;

- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

VI-1. Does TOS intend to litigate Contention Hampton 8 (Shelter at the Beach)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory VII-1.)

VI-2. Has TOS performed any analyses or studies of Seabrook Station which TOS contends support the conclusion that "RERP measures for evacuation are a

wholly inadequate protective response to meet an emergency?" If so, produce the analyses and/or studies.

VI-3. Is TOS aware of any studies of Seabrook Station performed by and other person or organization which TOS contends support the conclusion that "RERP measures for evacuation are a wholly inadequate protective response to meet and emergency?" If so, produce the analyses and/or studies.

VI-4. Does TOS contend that there are any accident scenarios involving Seabrook Station for which sheltering should be the recommended protective action for people at the beach? If so, please describe each such scenario in detail (including time of the week, weather conditions and meteorological conditions) and provide all of the bases on which TOS relies in contending that such a scenario is valid for Seabrook Station.

VI-5. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;

- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

VII-1. Does TOS intend to litigate Contention Kensington 1 (Response Organization Staffing)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory VIII-1.)

VII-2. Please provide the name, residence address and residence telephone number of the Police

Chief, each police officer and police department employee, the Fire Chief, each firefighter and each fire department employee of the town of Kensington.

VII-3. For each person in any of the foregoing classes of persons who is also employed in any other capacity or by any other person or entity, please provide the name of the person, the name of the employment, the address and telephone number at which the person is employed, and the hours during which such person is employed.

VII-4. Please list each and every telephone owned or operated by the town of Kensington or any department or agency thereof, or which is capable of being answered at any location at which town business is conducted (including any private homes from which town business is ever conducted or at which meetings of town officials ever occur), and for each such telephone state: (i) the telephone number, (ii) the location of each extension from which that number is capable of being accessed, (iii) the person who is recorded as the subscriber in respect of the number, and (iv) the occasions or purposes for which such telephone is used.

VII-5. Please provide the make, model, frequency(ies) (both transmit and receive), rated

power, control or console location, and antenna location of each radio transceiver, radio repeater, radio monitor, radio scanner and radio paging device owned or operated by the Town of Kensington or any official or department thereof.

VII-6. Please describe any and all measures taken by the Town of Kensington to identify and qualify alternates for the position of Civil Defense Director, Fire Chief and RADEF Officer. For example, have the town residents been requested to volunteer to fill these positions?

VII-7. If the volunteer fire department cannot be relied on to respond to a radiological emergency, how is it the department can be relied on to provide fire protection services to the Town of Kensington?

VII-8. What is the performance record of the Kensington volunteer fire department in responding to fire emergencies?

VII-9. How does the ability of the Kensington volunteer fire department to respond to a radiological emergency fundamentally differ from the department's ability to respond to a fire emergency?

VII-10. What are the "common arrangements" for ad hoc assistance by private contractors?

VII-11. Why are these "common arrangements" insufficient to assure the road agent's responsibilities will be met during a radiological emergency?

VII-12. Has TOS considered that State resources could be provided to the road agent during a radiological emergency, if required? If not, why not?

VII-13. Does TOS have any reason to believe that the State would not provide assistance to the road agent during a radiological emergency if such resources were requested? If so, provide the basis.

VII-14. Is the Kensington Police Chief on call for non-radiological emergencies during his off-duty hours?

VII-15. If so, what is his performance record in responding to such emergency calls?

VII-16. If so, please identify all means employed for communication with the Chief. In the case of two-way radio, monitor radio, or radio pager, supply the frequency or frequencies employed and transmit power.

VII-17. Does the town of Kensington regularly rely upon any radio station or frequency for communications with other police departments and governmental agencies (including for "intercity")

broadcasts)? If so, please list each frequency so used and each department or agency with whom Kensington is capable of communicating via that frequency.

VII-18. If the Police Chief is unable to respond to a non-radiological emergency for some reason, how would the Town deal with the situation in his absence?

VII-19. Are there any alternates for the Police Chief?

VII-20. If so, is there some reason to believe that the alternates could not perform the required duties?

VII-21. If the answer to the preceding interrogatory is yes, identify all unqualified alternates by name and position.

VII-22. Has Kensington appointed any special police officers or constables, or conferred law enforcement powers (in whole or in part) upon any other person? If so, please identify each by name, residential and employment address and residential and employment telephone number.

VII-23. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:



- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

VIII-1. Does TOS intend to litigate Contention Kensington 2 (Response Organization Notification)? (If the answer to this interrogatory is an unqualified

negative, you may proceed to Interrogatory IX-1.)

VIII-2. Provide a regulatory basis (i.e., reference to a specific provision in the Commission's regulations, to a regulatory guide or to a NUREG document) which TOS contends requires:

1. direct contact between the site and the Town, and/or
2. a dedicated telephone line to a location where an individual will always be on duty to receive the communication and then take action.

VIII-3. Has the Town of Kensington recommended any specific changes in the Kensington RERP to the NHCDA to clarify the notification procedure?

VIII-4. Does TOS believe that all volunteer firemen are capable of receiving initial notification and subsequently notifying other members of the emergency response organization?

VIII-5. If the answer to the preceding interrogatory is no, provide the names of all volunteer firemen who are not capable of receiving initial notification and subsequently notifying members of the emergency response organization?

VIII-6. Does TOS have reason to believe that volunteer firemen could not be trained in the

notification procedure? If so, state any and all reasons?

VIII-7. Does TOS have any reason to believe that training referred to in the preceding interrogatory could not or would not be provided? If the answer is yes, provide a full explanation.

VIII-8. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise,

and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

IX-1. Does TOS intend to litigate Contention Kensington 4 (Shelter Maps)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory X-1.)

IX-2. Has TOS conducted any detailed study of the sheltering adequacy of the Kensington elementary school? Provide a copy of the report of any study, or in the absence of a report provide a description of the study and its conclusion.

IX-3. Has TOS considered areas within the Kensington Elementary School other than classrooms (e.g., corridors, rest rooms, etc.) as shelter locations? If not, why not?

IX-4. Has TOS evaluated the air exchange characteristics of the Kensington Elementary School to assess its adequacy in mitigating inhalation exposure?

IX-5. Apart from the Elementary School, what other shelter does TOS consider to be inadequate?

IX-6. Is TOS aware of any adequate shelters close (e.g., within a ten minute walk) to the Kensington Elementary School? List all shelter locations considered in reaching this conclusion.

IX-7. Has TOS considered early dismissal of the school (e.g., at the ALERT level) as an alternative which might obviate the need for sheltering? Whether or not early dismissal has been evaluated previously, explain whether it is considered a prudent action.

IX-8. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any

scientific rule or principle, and, if so, set forth such rule or principle;

- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

X-1. Does TOS intend to litigate Contention Kensington 6 (Letters of Agreement)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XI-1.)

X-2. Is TOS aware of any instance in the past in which a teacher or other school employee of Kensington has refused to perform any official duty assigned to him? If so, then separately for each such incident please: (i) identify the person, (ii) identify any written reports or accounts of the incident of which TOS is aware, and (iii) please set forth all of the facts concerning the incident of which TOS is aware?

X-3. Does TOS contend that any teacher or classroom monitor presently employed by Kensington would, in the event of a radiological emergency involving Seabrook Station, abandon the children in his care? If so, then

separately for each such person please (i) identify the person, (ii) set forth all of the reasons why TOS contends such person would abandon the children, (iii) state the date upon which TOS first came into possession of information leading it to the conclusion that such person would abandon the children, and (iv) state what, if anything, TOS has done to cause the removal of the person from his position of responsibility for the care of children.

X-4. Does Kensington presently require, or has Kensington ever required, teachers to execute letters of agreement attesting to the teacher's willingness to discharge his obligations with respect to the safety of children entrusted to his care?

X-5. In light of the responses to the three preceding interrogatories explain why TOS contends that letters of agreement for teachers are required.

X-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;



- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XI-1. Does TOS intend to litigate Contention Kensington 7 (KI)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XII-1.)

XI-2. Is TOS aware that radioprotective drugs for use by emergency workers have been provided to



those towns which are participating in the planning process?

XI-3. If the Town of Kensington's plan were changed to state that radioprotective drugs will be provided for emergency workers would the Town accept the radioprotective drugs for that use?

XI-4. Please set forth each an every addition to, deletion from, or modification of the existing New Hampshire emergency plans that TOS contends would be required respecting radioprotective drugs that TOS contends would be required in order to bring the plans into compliance with the applicable regulations.

XI-5. How many institutionalized persons are there in Kensington who TOS contends might require radioprotective drugs in the event of a radiological emergency involving Seabrook Station.

XI-6. What is meant by institutionalized persons?

XI-7. Are there any hospitals, nursing homes or similar facilities located in Kensington? If so, then for each such institution please: (i) identify the institution, (ii) provide the address and telephone number of the institution and the name and title of the administrator or other person in charge thereof, (iii)

describe the level of care or other services provided to the institution, and (iv) state the maximum and average number of people at the institution during the last five years.

XI-8. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

(h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XII-1. Does TOS intend to litigate Contention Kensington 10 (Communications)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XIII-1.)

XII-2. Please list each and every telephone owned or operated by the Town of Kensington or any department or agency thereof, or which is capable of being answered at any location at which town business is conducted (including any private homes from which town business is ever transacted or at which meetings of town officials are ever conducted), and for each such telephone state: (i) the telephone number, (ii) the location of each extension from which that number is capable of being accessed, (iii) the person who is recorded as the subscriber in respect of the number, and (iv) the occasions or purposes for which such telephone is used.

XII-3. Please provide the make, model, frequency(ies) (both transmit and receive), rated power, control or console location, and antenna location of each radio transceiver, radio repeater,

radio monitor, radio scanner and radio paging device owned or operated by the Town of Kensington or any official or department thereof.

XII-4. Is TOS aware of the fact that communications equipment has been provided to towns within the plume exposure EPZ and that the equipment includes a two-way radio operating on the Civil Defense frequency, a short wave radio (RACES), and telephones?

XII-5. If equipment similar to that identified in the preceding interrogatory were provided to Kensington, would that solve the problems of communication with the State government?

XII-6. If the answer to the preceding interrogatory is no, explain what additional or different communication equipment that TOS contends would be required in order to solve the communications deficiencies. Explain the basis for your response.

XII-7. If communications equipment similar to that identified in Interrogatory XII-2 were provided to the Town of Kensington would the Town accept it and put it to use for emergencies including any future emergency situation at Seabrook Station? If not, why not?

XII-8. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XIII-1. Does TOS intend to litigate Contention NECNP RERP-2 (Federal Assistance)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XIV-1.)

XIII-2. Please list each and every respect in which TOS contends that New Hampshire intends to rely upon federal assistance for which there is no description contained in the NHRERP. Please describe each and every basis upon which TOS relies for its assertion that New Hampshire intends to rely upon federal assistance in such respect.

XIII-3. Please identify each respect in which TOS contends that New Hampshire intends to rely upon federal assistance for which TOS contends the materials contained in the NHRERP are inadequate to comply with the applicable regulations. For each such respect, describe each and every addition to, deletion from or modification of the NHRERP that TOS contends is required in order to bring the NHRERP into compliance.

XIII-4. If the State of New Hampshire obtains a letter of agreement from the U.S. Coast Guard indicating the Coast Guard's agreement to regulate boat traffic within the plume exposure EPZ, would that

letter eliminate the concern of TOS regarding contention NECNP RERP-2?

XIII-5. If the answer to the preceding interrogatory is no, identify additional letters which are required. In this enumeration, relate the need for any such letter to the New Hampshire RERP and, in particular, to resources identified in the RERP which are inadequate and require backup from a Federal agency.

XIII-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any



scientific rule or principle, and, if so, set forth such rule or principle;

- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XIV-1. Does TOS intend to litigate Contention NECNP RERP-3(d) (French Speaking)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XV-1.)

XIV-2. Has TOS conducted any study or survey to determine the number of French-speaking people (who do not speak or understand English) who may be in the plume exposure EPZ? If so, provide a copy of the study or survey, or in the absence of a report, describe the study or survey and its conclusions.

XIV-3. Is TOS aware of any studies or surveys conducted by others which provide estimates of the number of French-speaking people (who do not speak or understand English) who may be in the plume exposure EPZ? Provide copies of any such studies or surveys or,



in the absence of reports, describe the study(ies) or survey(s) and its (their) conclusions.

XIV-4. On what other data does TOS rely for its assertion that "a significant proportion of summer tourists in the Seabrook area are French-speaking Canadians . . ." ? Please quantify what TOS contends is "a significant proportion."

XIV-5. Of the French-speaking Canadians who may be in the Seabrook area, provide an estimate of the fraction which understands English and provide all bases on which TOS relies for the estimate.

XIV-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing

to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XV-1. Does TOS intend to litigate Contention NECNP RERP-8 (Shelters)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XVI-1.)

XV-2. Has TOS reviewed Appendix F to the NHCDA procedures, "Protective Action Decision Criteria?"

XV-3. If the State relied on a whole body shielding factor of 0.9 in its evaluation of sheltering effectiveness, would TOS acknowledge that use of such a factor conservatively characterizes the nature of the structures in the Seabrook Station plume exposure EPZ? Explain the basis for the response.

XV-4. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XVI-1. Does TOS intend to litigate Contention NECNP RERP-10(a) (Monitoring: Staffing)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XVII-1.)

XVI-2. How many monitoring teams does TOS contend is necessary to determine ground level radiation in the EPZ? Explain the basis for the response.

XVI-3. If TOS has no basis for estimating the number of monitoring teams required (see question XVI-2), how is it concluded that three teams are "woefully inadequate?"

XVI-4. Has TOS considered in its evaluation that teams from Seabrook Station would be available to conduct offsite monitoring? If not, why not?

XVI-5. Does consideration of the availability of monitoring teams from Seabrook Station influence the judgment of TOS about adequacy of monitoring capability? If so, in what way? If not, why not?

XVI-6. Does TOS contend that monitoring to determine potential ingestion exposure is required to be conducted on the same time scale as monitoring for the purpose of determining exposure from airborne radioactivity? Explain the reasons for the response.

XVI-7. Does TOS contend that, with respect to monitoring to determine potential ingestion exposure, the NHRERP is inadequate (either "woefully" or otherwise)?

XVI-8. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XVII-1. Does TOS intend to litigate Contention NECNP RERP-10(b) (Monitoring: Locations)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XVIII-1.)

XVII-2. Would TOS agree that a technique other than predesignated monitoring locations could result in adequate monitoring of the EPZ? If not, why not?

XVII-3. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XVIII-1. Does TOS intend to litigate Contention NECNP RERP-10(d) (Monitoring: Response Times)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XIX-1.)

XVIII-2. With respect to monitoring to determine potential plume exposure, what does TOS consider to be the minimum acceptable time to deploy monitoring teams from the time a decision is made to do so? Provide a basis for your response.

XVIII-3. With respect to monitoring to determine potential plume exposure, what does TOS understand to be the purpose of monitoring?

XVIII-4. With respect to monitoring to determine potential plume exposure, is it possible to reach

rational decisions on protective actions without data from field monitoring? If not, why not?

XVIII-5. With respect to monitoring to determine potential plume exposure, in determining the deployment time of monitoring personnel, did TOS consider the availability of monitoring teams constituted from personnel at Seabrook Station? If not, why not?

XVIII-6. With respect to monitoring to determine potential ingestion exposure, what does TOS consider to be the minimum acceptable time to deploy monitoring teams from the time a decision is made to do so? Provide a basis for your response.

XVIII-7. With respect to monitoring to determine potential ingestion exposure, what does TOS understand to be the purpose of monitoring?

XVIII-8. With respect to monitoring to determine potential ingestion exposure, is it possible to reach rational decisions on protective actions without data from field monitoring? If not, why not?

XVIII-9. With respect to monitoring to determine potential ingestion exposure, in determining the deployment time of monitoring personnel, did TOS consider the availability of monitoring teams



constituted from personnel at Seabrook Station? If not, why not?

XVIII-10. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other

publication, and, if so, identify the book or publication.

XIX-1. Does TOS intend to litigate Contention NECNP RERP-12 (KI)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XX-1.)

XIX-2. Define what is meant by "institutionalized persons" in this contention.

XIX-3. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;

- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XX-1. Does TOS intend to litigate Contention NECNP NHLP-2(a) (Police Personnel)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXI-1.)

XX-2. Does TOS have evidence of instances where police in any of the EPZ towns have been unable to fulfill their assigned responsibilities due to lack of personnel? Provide the details of each incident.

XX-3. If the answer to the preceding interrogatory is yes, did police seek support from (i) neighboring towns, (ii) the State, or (iii) other sources? Provide details of each occurrence.

XX-4. Of what relevance is the 1980 evacuation analysis by Alan M. Voorhees and Associates since it precedes the existence of the local emergency plans?

XX-5. Separately for each of the police departments in the Towns of Greenland, New Castle,

Newfields, Rye, Hampton Falls, South Hampton, Kensington, Stratham, East Kingston, Brentwood, Kingston and Exeter please state: (i) does TOS contend that the department is unable to perform the duties specified in their respective emergency response plans and (ii) each and every reason why TOS so contends.

XX-6. For each of the towns listed in the foregoing interrogatory, state the number of police officers that TOS contends is necessary for the police department to carry out the functions assigned to it under the New Hampshire emergency plans.

XX-7. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing

to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXI-1. Does TOS intend to litigate Contention NECNP NHLP-2(d) (Response of Private Support Organizations)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXII-1.)

XXI-2. Has TOS contacted or had communication with any of the organizations referred to in this contention? If so, please list each such contact, and for each such contact please state: (i) the date of the contact, (ii) the identity of the person contacted, (iii) whether the communication was oral or in writing, (iv) if in writing, please identify the writing, (v) if oral, please identify all parties to the communication

and provide in as much detail as TOS possesses what was said by each.

XXI-3. Does TOS contend that any of the bus companies referred to in the New Hampshire plans were unaware of their being included therein? If so, identify each bus company as to which TOS so contends and provide the basis (including all information required above regarding communications) upon which TOS relies for its contention.

XXI-4. Does TOS contend that any towing company referred to in the New Hampshire plans does not have its own vehicle? If so, identify the towing company as to which TOS so contends and provide the basis (including all information required above regarding communications) upon which TOS relies for its contention.

XXI-5. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;

- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXII-1. Does TOS intend to litigate Contention NECNP NHLP-2(g) (Fire Department Personnel)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXIII-1.)

XXII-2. Identify all instances known to TOS in which fire department personnel in the Towns of Kingston, Greenland, New Castle, Newfields, Stratham, East Kingston, Brentwood, Hampton Falls, Seabrook, Rye,



Kensington or Hampton were not reachable in the event of a fire or other emergency.

XXII-3. Provide any evidence known to TOS from fire chiefs in the towns identified in interrogatory XXII-2 that their departments are incapable of performing the duties assigned to them in their respective radiological emergency response plans.

XXII-4. Provide any evidence known to TOS from any other source in the towns identified in interrogatory XXII-2 that their departments are incapable of performing the duties assigned to them in their respective radiological emergency response plans.

XXII-5. Provide the names of all fire department employees known to TOS of any of the towns identified in interrogatory XXII-2 who have stated they will not return to the town in a radiological emergency.

XXII-6. Of what relevance to this Contention is the Voorhees Report which predates the Town RERPs by several years?

XXII-7. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;



- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXIII-1. Does TOS intend to litigate Contention NECNP NHLP-2(h) (Other Local Personnel)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXIV-1.)

XXIII-2. Separately for each of the towns in the Seabrook EPZ, please list each and every telephone

owned or operated by the town or any department or agency thereof, or which is capable of being answered at any location at which town business is conducted (including any private homes from which town business is ever transacted or at which meetings of town officials are ever conducted), and for each such telephone state: (i) the telephone number, (ii) the location of each extension from which that number is capable of being accessed, (iii) the person who is recorded as the subscriber in respect of the number, and (iv) the occasions or purposes for which such telephone is used.

XXIII-3. Separately for each of the towns in the Seabrook EPZ, please provide the make, model, frequency(ies) (both transmit and receive), rated power, control or console location, and antenna location of each radio transceiver, radio repeater, radio monitor, radio scanner and radio paging device owned or operated by town or any official or department thereof.

XXIII-4. Does TOS contend that any portion of the Seabrook EPZ has weak or inadequate coverage via the initial notification paging system? If so, then for each such area, please identify the area either by

supplying a map with the area depicted or outlined or by supplying sufficient geographic data as to permit the area to be located on a topographic map. In addition, for each area, Please describe the engineering theories and rational or survey method(s) utilized by TOS, or by any other person or organization on which TOS relies, to identify the asserted area of poor coverage. Please also identify by name, address and telephone number any person of whom TOS is aware who claims to have knowledge of such asserted poor coverage.

XXIII-5. Has the South Hampton Board of Selectmen taken action to appoint a Civil Defense Director who is more likely to be readily available? If not, why not?

XXIII-6. If the South Hampton Board of Selectmen have not yet taken steps such as the example cited in the preceding interrogatory, does TOS know of any reason why such action could not be taken in the reasonably near future?

XXIII-7. Would it be possible to identify and train one or more alternates for the position of CDD in Kensington to provide greater assurance that someone will be available to fill that position in an emergency? If not, why not?

XXIII-8. In the event of an emergency in the Town of Kensington, would it be possible for any single selectman to direct emergency operations? Identify by name any selectman who TOS contends is incapable of managing the emergency situation.

XXIII-9. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or

regulation and the specific section or portion thereof relied upon; and

- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXIV-1. Does TOS intend to litigate Contention NECNP NHLP-2(i) (Backup Personnel)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXV-1.)

XXIV-2. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any

scientific rule or principle, and, if so, set forth such rule or principle;

- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXV-1. Does TOS intend to litigate Contention NECNP NHLP-2(j) (Designations)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXVI-1.)

XXV-2. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other

transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXVI-1. Does TOS intend to litigate Contention  
NECNF NHLP-3(a) (Response Organization Notification)?

(If the answer to this interrogatory is an unqualified  
negative, you may proceed to Interrogatory XXVII-1.)

XXVI-2. With regard to notification by Rockingham  
County Dispatch during off-duty hours of the Fire or  
Police Dispatcher on duty or on call in the Towns of  
Brentwood, East Kingston, New Castle, Newton and  
Newfields: (i) provide all data known to TOS regarding  
any instance known to TOS where the individual on duty  
or on call could not be contacted; (ii) provide all  
data known to TOS regarding any instances when a



responsible official has not been available in an emergency (e.g., fire or police action).

XXVI-3. Has South Hampton made any recommendations to improve the reliability of notification? If not, why not?

XXVI-4. Has Kensington made any recommendations to improve the reliability of notification? If not, why not?

XXVI-5. List those towns which TOS contends have no pagers. If pagers were provided to those towns, would the towns accept them and use them during an emergency?

XXVI-6. Please identify by name, residence and business address and residence and business telephone number each individual whom TOS contends: (A) is a person to whom notification is to be given under any plan, and (B) who lives or resides outside of the broadcast range of all of: (i) the Rockingham County Dispatch Center radio system, (ii) the Seacoast region fire network radio system, (iii) the City of Portsmouth police radio system, (iv) the New Hampshire State Police High-Band radio system, (v) the New Hampshire Civil Defense radio systems, and (vi) the radio paging systems of the commercial radio common carriers



operating in the states of New Hampshire, Maine and/or Massachusetts.

XXVI-7. Has TOS conducted any study or experiment for the purpose of determining the range at which broadcasts transmitted by the Rockingham County Dispatch Center are capable of being received? Has TOS conducted a study for the purpose of determining the range at which the broadcasts of any radio system are capable of being received? If so, please describe the study or experiment and identify any document in which the study or experiment or the results thereof is described or referred to.

XXVI-8. Is TOS aware of any study of the type described in the foregoing interrogatory performed by any person? If so, please supply the same information.

XXVI-9. Please identify each and every case in which TOS contends that commercial telephone lines are intended to function as the primary communications link in the local plan for any town in the Seabrook EPZ. For each such case, please explain in detail why TOS contends that commercial telephone lines are the primary link.

XXVI-10. Please describe in detail each and every instance in which TOS contends that telephone service

in any of the Seabrook EPZ towns was interrupted, cutoff, overloaded or performed in some manner other than normal during the last five years. For each such instance, provide:

- (a) The time and date that the problem occurred.
- (b) The duration of the problem.
- (c) The extent of the area affected by the problem.
- (d) The actual central offices affected by the problem.
- (e) The length of time required to restore normal service.
- (f) All reasons why TOS contends that the instance is relevant to conditions that might occur during an emergency involving Seabrook Station.
- (g) Identify any documents of which TOS is aware that report, describe or refer to the instance.
- (h) The identity of any persons or records consulted by TOS with respect to the instance or which provided information regarding the instance to TOS.

XXVI-11. Separately for each instance described in response to the foregoing interrogatory please state whether TOS contends that the instance resulted in the implementation of "line load control," and for each such instance state: (i) the starting and ending time of "line load control," (ii) each central office that

TOS contends was affected by "line load control," and (iii) any effect that TOS contends that the implementation of "line load control" had upon emergency or law enforcement communications or response. Please also identify any and all documents of which TOS is aware that describe, evaluate or refer to any instance of the implementation of "line load control" and identify each and every source of data or information relied upon by TOS with respect to this topic.

XXVI-12. Does TOS contend that there has occurred any instance in the last five years in which a law enforcement person or agency has been unable to communicate with the Rockingham Dispatch Center because of the failure of established modes of communication therewith? If so, then separately for each such instance state:

- (a) The agency affected and the individuals who TOS were unable to communicate.
- (b) The time and date of the occurrence and the duration of the asserted inability to establish communications.
- (c) The location, with sufficient specifics as to permit an assessment of geographic parameters, of the person unable to communicate with the Dispatch Center.

- (d) The identification, by make, model, type (e.g., base station, mobile, portable, simplex, repeater), frequency(cies), power, antenna type and antenna site(s) or repeater site(s) of the equipment or system that TOS contends failed.

XXVI-13. Does TOS contend that a loss of AC-power in the Seabrook EPZ would affect the functioning of the commercial telephone system in any respect? If so, then for each such respect please state: (a) the central office(s) that TOS contends would be affected (b) whether, and if so how, TOS contends the effect would affect residential customers, (c) whether, and if so how, TOS contends the effect would affect commercial or industrial customers, and (d) whether, and if so how, TOS contends the effect would affect public safety agencies or personnel.

XXVI-14. Does TOS contend that a loss of AC-power in the Seabrook EPZ would affect the functioning of any law-enforcement or public safety radio system in any respect? If so, then separately for each such respect state: (a) the agency(cies) that TOS contends would be affected, (b) the manner in which TOS contends the system would be affected, and (c), if TOS contends that the agency lacks the means to respond to any such effect promptly and without significant interruption of

communications capability, each and every reason why TOS contends the agency lacks such means.

XXVI-15. Has TOS undertaken any study or other effort to update or to determine the continuing validity of the Voorhees Report, which predates the publication of the local emergency plans by several years? Is TOS aware of any such study or effort undertaken by any other person? If so in either case, please (a) describe the study or effort, (b) identify the person(s) by whom it was performed, (c) identify any source of information regarding the study or effort upon which TOS relies, and (d) identify each and every document known to TOS that describes, analyzes, or refers to the study or effort or the results thereof.

XXVI-16. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;

- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXVII-1. Does TOS intend to litigate Contention NECNP NHLP-4(e) (Special Needs)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXVIII-1.)

XXVII-2. Characterize people who TOS contends have special notification needs.

XXVII-3. Does TOS know if notification systems, equipment or procedures have been planned or implemented at any other nuclear plant site for individuals with special notification needs? If so,

describe all such systems, equipment or procedures known to TOS.

XXVII-4. For each system described in response to the foregoing interrogatory state whether TOS would regard the same system adequate if employed in the Seabrook EPZ and, if not, why not.

XXVII-5. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise,



and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and

- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXVIII-1. Does TOS intend to litigate Contention NECNP NHLP-6 (Special Needs Populations)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXIX-1.)

XXVIII-2. Provide all data which TOS contends supports the proposition that "the telephone system in the EOC may be overloaded." In particular, indicate whether this assertion is supported by experience in any of the towns within the EPZ. If so, provide the details of each occurrence.

XXVIII-3. Does the Transportation Coordinator in each of the local emergency response organizations have responsibilities for coordinating transportation needs?

XXVIII-4. If the answer to the preceding interrogatory is yes, explain any shortcomings that TOS contends exist in "orchestrat[ing] the evacuation of people with special needs."

XXVIII-5. Provide estimates of the number of tourists who are bussed to the beaches for summer day



trips. Explain the bases and identify all documentation for these estimates.

XXVIII-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other

publication, and, if so, identify the book or publication.

XXIX-1. Does TOS intend to litigate Contention Rye 2 (Rannie Webster Nursing Home)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXX-1.)

XXIX-2. When did the Rannie Webster Nursing Home begin operation?

XXIX-3. Has the Town of Rye made the New Hampshire Civil Defense Agency (NHDCDA) aware of the fact that the Rye RERP does not address the Rannie Webster Nursing Home prior to filing its contentions on the Rye RERP? If so, when and by what means. If not, why not?

XXIX-4. Does TOS have reason to believe that the Rye RERP will not be revised by NHCDA to address the special needs of the Rannie Webster Nursing Home? If the answer is yes, explain in full.

XXIX-5. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;

- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXX-1. Does TOS intend to litigate Contention South Hampton 1 (Letters of Agreement)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXI-1.)

XXX-2. For which local agencies having an emergency response role in the EPZ does the Town of

South Hampton believe letters of agreement are required?

XXX-3. Has the Town of South Hampton assisted the New Hampshire Civil Defense Agency in any way in obtaining these letters of agreement? If not, why not?

XXX-4. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or

regulation and the specific section or portion thereof relied upon; and

- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXI-1. Does TOS intend to litigate Contention South Hampton 2 (24-Hours Endurance Capability)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXII-1.)

XXXI-2. List the names, home address and home telephone numbers of all South Hampton police and fire department personnel indicating whether the individual is a volunteer.

XXXI-3. In the case of all South Hampton police and fire personnel who have other employment, list the name of the employer, the address at which he or she is employed, the employer's telephone number at that address, and the hours during the day when he or she is at work.

XXXI-4. Provide an estimate of the number of police and fire department personnel that TOS contends would be required to support emergency operations in South Hampton assuming two 12-hour shifts per day.

XXXI-5. List the names of all South Hampton police and fire department personnel who TOS contends are unwilling or unable to respond to an emergency for a 12-hour shift each day. Provide reasons for the lack of willingness or inability to respond in each case.

XXXI-6. Has there been any instance in the past known to TOS where South Hampton fire and police volunteers failed to report when summoned to respond to an emergency? Provide a detailed explanation of each instance cited.

XXXI-7. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXII-1. Does TOS intend to litigate Contention South Hampton 3 (Letters of Agreement)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXIII-1.)

XXXII-2. Has TOS reviewed the letters of agreement included in Volume 5 of the New Hampshire RERP?

XXXII-3. If the answer to the preceding interrogatory is yes, explain why TOS contends that transportation agreements are inadequate.

XXXII-4. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;



- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXIII-1. Does TOS intend to litigate Contention South Hampton 6 (EOC)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXIV-1.)



XXXIII-2. What accommodations does TOS contend are inadequate at the designated EOC?

XXXIII-3. Has the Town of South Hampton requested NHCDA to correct the inadequacies? If not, why not?

XXXIII-4. Has the Town of South Hampton recommended alternative locations for the EOC to NHCDA? If not, why not?

XXXIII-5. Please identify each location that TOS acknowledges would, if provided with suitable equipment, constitute an acceptable EOC for South Hampton, and, separately for each such location, please list each item of equipment that TOS contends is required to be provided.

XXXIII-6. If TOS contends that there is no suitable location for an EOC has the Town of South Hampton provided recommendations to NHCDA for modifying an existing facility to use as an EOC? If not, why not?

XXXIII-7. Is TOS aware that two-way radio communications equipment has been provided to other towns in the EPZ?

XXXIII-8. If two-way radio communications equipment were provided to the Town of South Hampton, would the Town accept the equipment for general use as well as

for use during an emergency at Seabrook Station? If not, why not?

XXXIII-9. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other

publication, and, if so, identify the book or publication.

XXXIV-1. Does TOS intend to litigate Contention South Hampton 8 (Mobility Impaired Population)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXV-1.)

XXXIV-2. Has TOS made available to NHCDA its knowledge of the number of people with special needs and the nature of those needs? If not, why not?

XXXIV-3. How many people with special needs does TOS contend require consideration in the South Hampton RERP? Please identify (either individually or by group) the persons whom TOS contends require such consideration.

XXXIV-4. To what extent has the Town of South Hampton cooperated with NHCDA in developing plans for special needs and transportation dependent people? Explain the answer in detail.

XXXIV-5. Does TOS contend that there are any people confined to institutions in South Hampton for whom special planning consideration should be given? Identify the institutions.

XXXIV-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXV-1. Does TOS intend to litigate Contention SAPL 5 (Monitoring)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXVI-1.)

XXXV-2. What does TOS contend is the purpose of field monitoring? Explain the bases, including regulatory references, for the response.

XXXV-3. Please set forth each and every reason why TOS contends that monitoring is required for developing a protective action recommendation?

XXXV-4. Identify the regulatory criteria which TOS contends determine that a time period of one and one-half hours for field teams to reach a point of readiness is unacceptable.

XXXV-5. If an evacuation were ordered:

- (i) Explain why TOS contends monitoring teams would have difficulty in getting to their monitoring locations in view of the plan that inbound traffic lanes will remain open for inbound traffic.
- (ii) Explain why TOS contends field monitoring is important since people would already be leaving the EPZ.

XXXV-6. How many field monitoring teams does TOS contend are required for the New Hampshire portion of the EPZ? In your answer provide regulatory references or technical bases for your conclusions.

XXXV-7. What does TOS contend makes field monitoring so demanding that a twelve-hour shift is not practicable?

XXXV-8. On the assumption that sufficient personnel were not available for protracted field monitoring operations, explain why TOS contends assistance could not be obtained from the Department of Energy or other Federal agencies under the provisions of the Federal Radiological Monitoring and Assessment Plan? (See Section 1.4 of the NH RERP).

XXXV-9. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXVI-1. Does TOS intend to litigate Contention SAPL 7 (Decontamination)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXVII-1.)

XXXVI-2. On what study, event, or other basis does TOS rely to support the assertion that "the available medical facilities described in the plans are likely to be overburdened in a radiological emergency if there are large numbers of evacuees?"

XXXVI-3. Identify what TOS contends are the applicable criteria for storage volume for contaminated waste and other contaminated materials.

XXXVI-4. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If



so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXVII-1. Does TOS intend to litigate Contention  
SAPL 8 (24-Hour Endurance Capability)? (If the answer



to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXVIII-1.)

XXXVII-2. Cite occurrences known to TOS where notification of any town in the Seabrook Station Plume Exposure EPZ from either the State Police Communications or Rockingham County Dispatch during any emergency situation was not accomplished due to the absence of an individual within the Town to receive the notification.

XXXVII-3. For each occurrence cited in response to the foregoing interrogatory, describe all of the facts concerning the occurrence known to TOS.

XXXVII-4. For each such occurrence, identify the source(s) of the knowledge asserted by TOS.

XXXVII-5. Describe each and every step known to TOS that has been taken by Police Chief Christie to obtain assistance in the form of manpower and equipment so that he would be able to fulfill the duties designated to him in the plan.

XXXVII-6. Describe each and every recommendation known to TOS that has been made by Police Chief Christie or any other officials in Hampton Falls to cope with the situation of lack of backups for the Police Chief of which TOS is aware. For example, were

recommendations made to reassign responsibilities to other positions for which more backup personnel are available?

XXXVII-7. Describe all efforts of which TOS is aware that officials in Hampton Falls have made to identify candidates for the positions of RADEF Officer and Transportation Coordinator.

XXXVII-8. Insofar as TOS is aware, have officials in Hampton Falls made constructive recommendations to revise the plan (e.g., reassign some responsibilities to State agencies) in a way that it can be implemented with the personnel resources available in the Town? If so, describe these recommendations.

XXXVII-9. Insofar as TOS is aware, have officials in Hampton made constructive recommendations to revise the plan (e.g., reassign some responsibilities to State agencies) in a way that it can be implemented with the personnel resources available in the Town? If so, describe these recommendations.

XXXVII-10. Insofar as TOS is aware, have officials in Rye made constructive recommendations to revise the plan (e.g., reassign some responsibilities to State agencies) in a way that it can be implemented

with the personnel resources available in the Town? If so, describe these recommendations.

XXXVII-11. Insofar as TOS is aware, have officials in Kensington made constructive recommendations to revise the plan (e.g., reassign some responsibilities to State agencies) in a way that it can be implemented with the personnel resources available in the Town? If so, describe these recommendations.

XXXVII-12. Please identify each function which the State is to perform for which TOS contends the State has inadequate manpower. Provide the bases for each example cited.

XXXVII-13. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;

- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXVIII-1. Does TOS intend to litigate Contention SAPL 14 (French Speaking)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XXXIX-1.)

XXXVIII-2. Please describe all of the evidence that TOS contends supports the assertion that there are "serious language barrier problems with French-Canadian visitors" and that "these people are known to visit the EPZ area in large numbers and would be unable to respond to any emergency notifications provided in

English." In particular, quantify what is meant by "large numbers."

XXXVIII-3. Has TOS reviewed the draft public information materials (including French language materials) provided by the New Hampshire Civil Defense Agency?

XXXVIII-4. If the answer to the preceding interrogatory is yes, does TOS acknowledge that these materials preclude the necessity to litigate this contention?

XXXVIII-5. If the answer to the preceding interrogatory is no, identify any deficiencies in the materials which TOS contends require the litigation of this contention.

XXXVIII-6. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;

- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XXXIX-1. Does TOS intend to litigate Contention SAPL 16 (Shelters)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XL-1.)

XXXIX-2. In view of the fact that Appendix F to NHCDA procedures provides representative dose reduction factors for sheltering and evacuation time estimates for use in protective action decisionmaking, please describe each and every reason why TOS contends that the requirements of NUREG 0654 II.J.10.m. have not been satisfied?

XXXIX-3. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.



XL-1. Does TOS intend to litigate Contention SAPL 17 (Response Organization Communications)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XLI-1.)

XL-2. Provide what TOS contends are criteria for determining an adequate number of phone lines for a local EOC.

XL-3. Provide what TOS contends are the regulatory references which specify that the ability for individuals to contact the EOC by telephone must be guaranteed.

XL-4. Would TOS agree that it is reasonable to assume that if faced with (i) a recommendation to evacuate, (ii) no family vehicle, and (iii) inability to contact the EOC by telephone, most individuals would seek a ride from a neighbor? If not, why not?

XL-5. Would TOS agree that a system of designated pickup locations within a town would eliminate the need to contact an EOC for a ride in the event an evacuation were recommended and no household vehicle were available?

XL-6. Provide all details known to TOS concerning the implementation of line load control for the aircraft accident referred to in the basis offered

for this contention. In particular for how long was line load control in place. For each detail provided, describe the source(s) of information upon which TOS has relied.

XL-7. Have changes occurred in telephone systems or equipment since the aircraft accident referred to which would cast doubt on the applicability of that experience to the present time?

XL-8. Identify alternative actions which people might take if they were unable to reach the EOC by telephone to request a ride.

XL-9. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing

to produce the same without the necessity of a notice to produce;

- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XLI-1. Does TOS intend to litigate Contention SAPL 18 (Transportation Dependent Population)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XLII-1.)

XLI-2. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;

- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;
- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

XLII-1. Does TOS intend to litigate Contention SAPL 25 (Mobility Impaired Population)? (If the answer to this interrogatory is an unqualified negative, you may proceed to Interrogatory XLIII-1.)

XLII-2. Is TOS aware of the survey currently being taken to identify mobility impaired individuals who will require transportation?

XLII-3. With regard to the person at Curtis Rest Home (as cited in the basis offered in support of this

contention), insofar as TOS is aware did the responsible official in the Town of Hampton Falls identified this need to NHCDA in the course of the planning process? If not, why not?

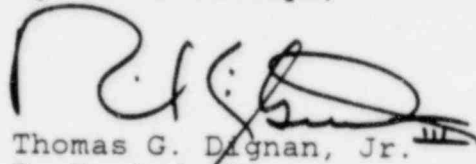
XLII-4. Identify specific manpower limitations within State government which TOS contends would preclude the ability to supplement local emergency organizations.

XLII-5. Does TOS intend to offer the testimony of any expert witness with respect to this contention? If so, please:

- (a) identify each expert witness whom TOS intends to present with respect to this contention;
- (b) state the substance of the facts to which each expert witness is expected to testify;
- (c) state the substance of the opinion or opinions to which each expert witness is expected to testify;
- (d) provide a summary of the grounds for each opinion to which each expert witness is expected to testify;
- (e) state whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether TOS is willing to produce the same without the necessity of a notice to produce;
- (f) state whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle;

- (g) state whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon; and
- (h) state whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

By its attorneys,



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CERTIFICATE OF SERVICE

I, R. K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on April 28, 1986, I made service of the within "Applicants' Off-Site EP Interrogatories and Request for the Production of Documents to Town of Seabrook (Set No. 1)" by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated by an asterisk, by depositing in the United States mail, first class postage paid, addressed to):

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(\*=Ordinary U.S. First Class Mail.)

  
R. K. Gad III