

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



In the matter of: )  
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 )  
 PUBLIC SERVICE COMPANY OF )  
 NEW HAMPSHIRE )  
 (Seabrook Station, Units 1 and 2 )

Docket Nos.: 50-443 OL  
 and  
 50-444 OL  
 May 6, 1986

STATE OF NEW HAMPSHIRE'S ANSWERS TO SEACOAST  
 ANTI-POLLUTION LEAGUE'S INTERROGATORIES AND REQUESTS  
 FOR DOCUMENTS TO THE STATE OF NEW HAMPSHIRE ON  
EMERGENCY PLANNING FOR THE STATE OF NEW HAMPSHIRE

The State of New Hampshire hereby responds to Seacoast  
 Anti-Pollution League's Interrogatories and Requests for Documents to  
 the State of New Hampshire on Emergency Planning for the State of New  
 Hampshire.

ANSWERS TO INTERROGATORIES

Interrogatory No. 1

In the opinion of the State of New Hampshire, does the New  
 Hampshire Radiological Emergency Response Plan adequately provide for  
 continuous 24-hour radiological monitoring of the plume exposure  
 pathway EPZ for a protected period? Please state in detail the  
 factual bases upon which the response rests, including answers,  
 supported by appropriate documentation for the following:

Response:

It is the opinion of the State of New Hampshire (State) that the New Hampshire Radiological Emergency Response Plan (NHRERP) adequately provides for continuous 24-hour radiological monitoring of the plume exposure pathway EPZ for a protracted period.

This opinion is based on the availability of a pool of thirteen individuals who are appropriately trained and who would be, in the event of an emergency, constituted as two shifts of three two-person teams each. Though the State considers that this pool is sufficient to meet the State's responsibilities under the NHRERP, the State's field monitoring activities are augmented by the presence of additional trained monitoring personnel fielded by the utility. See NHRERP Vol. 1 at 2.5-16. Finally, while the State considers that additional monitoring personnel are not necessary beyond these levels, further monitoring personnel can be secured from other states by invoking the New England Radiological Assistance Compact. See Appendix M, DPHS Procedures, NHRERP, Vol. 4.

Interrogatory 1(a) How many monitoring staff people are available?

Response:

There are thirteen monitoring personnel in the Division of Public Health Services, (DPHS) who are identified in Appendix A, DPHS Procedures, Vol. 4, NHRERP.

Interrogatory 1(b) What are their ages and states of physical health?

Response:

The State objects to this interrogatory as being irrelevant to SAPL's contention on monitoring teams. Without waiving this objection, the State offers the following response.

None of the identified DPHS personnel suffers from any physical handicap or condition due to age and/or poor health which would prevent their full participation in an emergency response.

Interrogatory 1(c) What educational qualifications do they have for this task?

Response:

The State has not established specific educational qualifications for field monitoring personnel. However, their educational background and/or experience provide them with a technical awareness sufficient to serve as a basis for training in field monitoring procedures. Five are staff in the DPHS Office of Waste Management, working in the area of environmental protection; two are staff in the State's Air Resources Agency; one is from the DPHS Environmental Health Risk Assessment unit; three are from the DPHS Office of Disease Prevention and Control (two are in the Environmental Health unit and the third being a laboratory scientist); and the last two are from the DPHS Office of Health Protection, both serving as field inspectors. All have at least a college-level education.

Interrogatory 1(d) What additional training have they had?

Response:

Training provided to the State's field monitors has included orientation to Seabrook Station and the IFO/EOF, and instruction in the following:

- \* Health physics and nuclear power generation;
- \* Use of radiological and meteorological monitoring equipment;
- \* Use of radio and training in radio procedures for the relay of information and data; and
- \* Map reading and the topography of the EPZ.

Classroom training for monitoring team members totaled 13 1/2 hours at DPHS and 10 1/4 hours at Seabrook Station and the IFO/EOF. A total of 36 1/2 hours were spent in field training and practical exercises (this does not include the graded exercise on 2/26/86).

In addition to classroom presentations and field training practical work and orientation, the members have participated in training exercises to test individual and team abilities to carry out their responsibilities. Training schedules are on file with the Assistant Director for Planning, Office of the Director, DPHS.

Interrogatory 1(e) What specific methods will they employ?

Response:

The specific methods employed by field monitoring personnel for radiological monitoring are described in Appendix C, DPHS Procedures, Vol. 4, NHRERP. The specific methods employed by field monitoring personnel for meteorological monitoring are also described at the same location. A general description is presented in Vol. 1, NHRERP, at 2.5.3 e.

Interrogatory 1(f) What specific survey instruments will they use?

Response:

The specific survey instruments used by the field monitors for radiation monitoring are identified in Appendix G, DPHS Procedures, Vol. 4, NHRERP. The specific survey instruments used by the field monitors for meteorological monitoring are identified on a single sheet titled "CONTENTS OF MET KITS," on file with the Assistant Director for Planning, Office of the Director, DPHS.

Interrogatory 1(g) What are the specific detection capabilities of each of the survey instruments to be employed?

Response:

The equipment used for radiological monitoring has been provided by the utility and is stored, in kit form and ready for use, at the IFO/EOF. The technical specifications as to "...specific capabilities of each of the survey instruments..." is on file with the utility, and on file with DPHS.

Interrogatory 1(h) What assurances are there that each staff person is committed to fulfill his/her functions?

Response:

The State objects to the relevance of this interrogatory. See Board's Order dated April 29, 1986 at 90-91 (Disallowing Contention SAPL 13 which alleged potential for emergency workers' refusal to perform their duties.) Without waiving this objection, the State answers as follows.

The DPHS monitoring personnel were recruited or volunteered. Each is a professional in his/her field, and, as such, each is aware of the importance of radiological monitoring to protecting the health of the public. This responsibility is not incidental to, nor any less important than, their daily responsibilities. All DPHS monitoring personnel have indicated their intention of carrying out their assigned duties in the event of a radiological emergency at Seabrook Station.

Interrogatory 1(i) What contingency plans have been made to get radiological monitors to their sampling locations if they cannot make their way to designated sampling locations because of impairment of their progress into the EPZ due to an outgoing flow of evacuating vehicles?

Response:

None. There are no such specific contingency plans, as evacuation should not interfere with established two-way traffic flows.

Interrogatory 1(j) For how many days (24 hours per day) does the State anticipate that monitoring can be carried on on a continuous basis?

Response:

The State anticipates that radiological monitoring can be carried out for an indefinite period. The initial task for the monitoring personnel is to confirm calculations made at the IFO/EOF

on the size, radiological content and drift of a plume. The second task, carried out after plume tracking is completed, is collecting environmental samples to determine levels of particulate contamination, if appropriate given the nature of the release. Collecting samples will also be done by other State agencies, at the request of DPHS. See NHRERP, Vol. 1, 1.3-11 and 2.5-15, for additional details.

Interrogatory 1(k) How long does the State estimate it will take to deploy the radiological monitoring teams to the first monitoring location following a decision that monitoring is necessary?

Response:

If the initial Emergency Action Level (EAL) is Alert, i.e., there has not been a radioactive release, the State estimates that it will take at most thirty minutes to deploy the monitoring personnel from the IFO/EOF (where the monitors are staged at the Alert EAL) to appropriate monitoring points if and when the EAL moves to Site Area Emergency. If the initial EAL is Site Area Emergency, the State estimates that it will take approximately two hours to deploy monitoring personnel from Concord to monitoring points. Such a time lapse, however, would have no impact on the State's ability to assess the accident or to make protective action decisions. See NHRERP, Vol. 1, Section 2.5 for additional discussion on Accident assessment.

Interrogatory 1(l) How long does the State estimate it will take to get the first samples to Concord for laboratory analysis?

Response:

Air samples will be analyzed in the field or at the IFO/EOF, not in Concord, if that is what is meant by "first samples." All other samples will be sent to Concord when available, and the time involved depends on the travel time from the collection point to Concord. This can be done by vehicle, in approximately one and a half hours, or by aircraft in a much shorter period. See NHRERP Vol. 1, pages 1.3-12 and 1.3-13, for a description of Civil Air Patrol responsibilities.

Interrogatory 1(m) What specific provisions have been made for aerial monitoring of the plume?

Response:

In order to identify the center line of a plume with a radioactive level too high to warrant exposure of ground monitoring personnel, DPHS will carry out aerial monitoring using State resources from both DPHS and the Civil Air Patrol. Aerial monitoring may also be carried out if DPHS determines that the information to be gained is necessary for Accident Assessment. See NHRERP, Vol. 1, 2.5-7.

Interrogatory 1(n) How many State employees have been trained to do aerial monitoring? Please detail the nature of that training.

Response:

Two of the identified monitoring personnel have volunteered to carry out aerial monitoring using Civil Air Patrol aircraft.



Additional training specific to aerial monitoring has not yet been, but will be provided for DPHS and Civil Air Patrol personnel.

Interrogatory No. 2

In the opinion of the State of New Hampshire, does the N.H.RERP adequately provide means for the radiological decontamination of emergency personnel, wounds, supplies and equipment? Please state in detail the factual bases upon which the response rests, including detailed citations to supporting documents and/or informational sources relied upon for the response and also including answers to the following?

It is the opinion of the State that the NHRERP adequately provides the means for the radiological decontamination of emergency personnel, wounds, supplies and equipment.

Interrogatory 2(a) Where are emergency personnel to be decontaminated?

Response:

Emergency personnel will, in the event that there is a contaminating release and if they are contaminated, go through decontamination at the IFO/EOF, if they are dispatched from that location, or at one of the decontamination centers established for the general public at the reception facilities.

Interrogatory 2(b) How will emergency personnel be segregated from others at the decontamination locations to avoid the spread of contaminants?

Response:

All individuals arriving at a reception station will go through a screening to determine which vehicles and individuals, in the event there has been a contaminating release, need decontamination. The initial screening is given to vehicles, with contaminated vehicles (i.e., vehicles with a monitoring level of at least 0.15 mR/hr (100 cpm)) segregated from other vehicles and personnel.

The second screening is for individuals. Those with no contamination, or with a monitoring level less than 0.15 mR/hr (100 cpm), will be allowed to continue with reception center processing. Those with a monitoring level equal to or greater than 0.15 mR/hr (100 cpm) will be isolated and kept from reception center processing until decontamination is completed. If the evacuation was completed prior to a contaminating release, then any contaminated emergency personnel will be the sole users of the decontamination process.

Appendix F, DPHS Procedures, Vol. 4, NHRERP, and the Manchester Host Community Plan, Vol. 36, NHRERP (both as revised by inclusion of additional material submitted by Richard H. Strome to the Federal Emergency Management Agency on April 16, 1986) contains a general description of the decontamination process. Other NHRERP Host Community Plans will be amended as the details for decontamination centers at those locations are completed.

Interrogatory 2(c) How many showers or other washing facilities are available at the decontamination locations for emergency personnel?

Response:

At least the following number of showers available for decontamination at the reception centers are:

*Manchester	25
*Dover	20
*Salem	11
*Rochester	11

There is one shower available for decontamination at the IFO/EOF.

Interrogatory 2(d) Who will monitor the emergency personnel to be certain they have been completely decontaminated?

Response:

Monitoring of individuals who have undergone decontamination will be carried out by local personnel, drawn from fire departments. If the fire department staff do not include women monitoring personnel, women will be recruited from other local resources and trained for decontamination activities. Supervisors for each reception center decontamination facility will be drawn from an existing pool of DPHS management personnel.

Interrogatory 2(e) What are the qualifications and training of those individuals who are to assess the adequacy of the decontamination of emergency personnel?

Response:

Fire department personnel were chosen as staff for reception center decontamination activities because of their ready availability and training in other emergency procedures, particularly with regard

to hazardous material emergencies. DPHS decontamination center supervisors were selected on the basis of their ability to routinely carry out management and coordination functions. Additional training relative to radiological decontamination is provided to both the staff and supervisors. Such training is specific to the facilities and procedures to be used at each location. See Appendix F, DPHS Procedures, previously cited, for additional information, and the Manchester Host Community Plan, previously cited.

Interrogatory 2(f) How is the contaminated waste water, resulting from the decontamination of emergency personnel, to be isolated?

Response:

Contaminated water resulting from decontamination activities is not going to be isolated. The water will be allowed to travel through the municipal sewage systems, provided that the level of contamination, as measured at the nearest accessible monitoring point downstream from the facilities, is within the limits established by New Hampshire Administrative Rule He-P 2020. Should the limit be exceeded, additional water will be released as necessary to assure adequate dilution. Additional monitoring will occur at municipal outflow and processing points. Deposits of contaminated waste products in solid or semi-solid form will be handled in accordance with New Hampshire Administrative Rule He-P 2067. New Hampshire Administrative Rules He-P 2020 and He-P 2067 are on file at the Office of Legislative Services, Administrative Procedures Division, Roo. 113, State House, Concord, and are available for inspection at DPHS. See also Appendix F to the DPHS procedures, NHRERP, Vol. 4, and the Manchester Host Plan.

Interrogatory 2(g) What medical personnel will provide treatment for any wounds incurred by emergency personnel and at what medical facilities will this treatment take place?

Response:

Injuries, including wounds, will be handled according to their degree of severity. Life-threatening medical emergencies will be handled by local paid or volunteer emergency medical personnel and hospital-employed emergency medical personnel. Other injuries may be handled by either emergency medical personnel or hospital emergency medical personnel, depending on where and from whom the emergency personnel seek treatment. The medical facilities will be the hospitals to which the emergency personnel go to or are taken by emergency medical personnel.

Treatment of contaminated injured individuals will depend on the seriousness of the injury. Life threatening injuries will be treated prior to any decontamination. Other injuries will be treated prior to or after decontamination, as warranted. Emergency medical treatment will be rendered by the same personnel identified above, with due caution to avoid any spread of contamination. Pease AFB Hospital, Nashua Memorial Hospital, Frisbee Memorial Hospital (Rochester), Exeter Hospital, Portsmouth Hospital, Elliot Hospital (Manchester), and Wentworth Douglas Hospital (Dover) are among those New Hampshire facilities that have indicated the ability to provide treatment to contaminated injured individuals. Letters from these facilities are on file with the Assistant Director for Planning, Office of the Director, DPHS, and are available for inspection.

Interrogatory 2(h) What decorporation agents will be employed if emergency personnel suffer excessive internal contamination?

Response:

The State cannot offer an opinion as to what decorporation agents will be used by hospitals treating emergency personnel who suffer excessive internal contamination.

With regard to treatment of impaired individuals, contaminated and non-contaminated, see NHRERP, Vol. 1, Section 2.8.

Interrogatory 2(i) Have decorporation agents been stockpiled by the State of New Hampshire? Will they be?

Response:

The State has not stockpiled any decorporation agents. There is no plan to stockpile such agents at any time in the future.

Interrogatory 2(j) What supplies and equipment does the State of New Hampshire anticipate might become contaminated?

Response:

In the event of a radiation release from Seabrook Station, any of the vehicles and equipment routinely used by state, municipal and other workers in the course of their duties as emergency personnel could become contaminated.

Interrogatory 2(k) What are the plans for decontamination of these supplies and equipment should that prove necessary?

Response:

The State will wash off the contamination when appropriate to the item. For other items, the State will isolate for the period necessary for natural decay of the radioactive material, unless the level of contamination makes such action infeasible. In that case, the equipment and supplies will be disposed of in accordance with New Hampshire Administrative Rule He-P 2023 and He-P 2067. See Appendix F, DPHS Procedures, cited previously, and the Manchester Host Community Plan, also cited previously, for additional information. New Hampshire Administrative Rule He-P 2023 and He-P 2067 are on file at the Office of Legislative Services, Administrative Procedures Division, Room 113, State House, Concord, and available for inspection at DPHS. See also Appendix F, DPHS procedures, and the Manchester Host Plan.

Interrogatory 2(1) How will any effluents resulting from decontamination of supplies and equipment be isolated?

Response:

Effluents from decontamination of washable supplies and equipment will be handled in the same manner as described at c), above.

Interrogatory No. 3

In the opinion of the State of New Hampshire, does the N.H.RERP adequately provide means for the radiological decontamination of

evacuees and their vehicles and belongings? Please state with particularity the detailed bases upon which the answer to the above rests, including citations to supporting documents and/or sources of information relied upon in the answer.

Response:

It is the opinion of the State that the NHRERP adequately provides the means for the radiological decontamination of evacuees and their vehicles and belongings.

This opinion is explained in the following answers.

Interrogatory 3(a) How many showers are available in each of the decontamination facilities and how long does the State assume it will take to decontaminate each individual on the average?

Response:

At least the following number of showers available for decontamination at the reception centers are:

*Manchester	25
*Dover	20
*Salem	11
*Rochester	11

The State has made no assumption relative to the time necessary to decontaminate individuals. The time taken depends on the levels and extent of contamination on each person.

Interrogatory 3(b) Who will be available to instruct individuals as to the method of thorough washing and scrubbing needed to effect an adequate external decontamination?



Response:

Instructions to contaminated individuals will be provided verbally and in a written handout by the staff of the facility described at e), below. See Appendix F, DPHS Procedures, previously cited, and the Manchester Host Community Plan, also previously cited, for additional information.

Interrogatory 3(c) How will contaminated individuals be segregated from the non-contaminated at reception centers in order to avoid the spread of contaminants?

Response:

All arrivals at a reception center will go through a screening to detect vehicles and individuals, if there has been a contaminating release. The initial screening is given to all incoming vehicles, with contaminated vehicles (i.e., vehicles with a monitoring level of at least 0.15 mR/hr (100 cpm)) parked away from other vehicles.

The second screening is for all individuals. Those with no contamination, or with a monitoring level less than 0.15 mR/hr (100 cpm), will be allowed to continue with reception center processing. Those with a monitoring level equal to or greater than 0.15 mR/hr (100 cpm) will be isolated and kept from reception center processing until decontamination is completed. See Appendix F, DPHS Procedures, previously cited, and the Manchester Host Community Plan, also previously cited, for additional information.

Interrogatory 3(d) Who will monitor the individuals concluding their showering to be certain that all surface contamination has been removed?

Response:

Monitoring of individuals who have undergone decontamination will be carried out by local personnel, drawn from fire departments. If the fire department staff do not include women monitoring personnel, women will be recruited from other local resources and trained for decontamination activities. Supervisors for each reception center decontamination facility will be drawn from an existing pool of DPHS management personnel.

Interrogatory 3(e) What are the qualifications and training of those individuals [sic] who are to do the monitoring described in part d?

Response:

Fire department personnel were chosen as staff for reception center decontamination activities because of their ready availability and training in other emergency procedures, particularly with regard to hazardous material emergencies. DPHS decontamination center supervisors were selected on the basis of their ability to routinely carry out management and coordination functions. Additional training relative to radiological decontamination is provided to both the staff and supervisors. Such training is specific to the facilities and procedures to be used at each location. See Appendix F, DPHS Procedures, previously cited, and the Manchester Host Community Plan, also previously cited, for additional information.

Interrogatory 3(f) How is the contaminated waste water resulting from the decontamination of evacuees to be isolated?

Response:

Contaminated water resulting from decontamination activities is not going to be isolated. The water will be allowed to travel through the municipal sewage systems, provided that the level of contamination, as measured at the nearest available monitoring point downstream from the facilities, is within the limits established by New Hampshire Administrative Rule He-P 2020. Should the limit be exceeded, additional water will be released as necessary to assure adequate dilution. Additional monitoring will occur at municipal outflow and processing points. Deposits of contaminated waste products in solid or semi-solid form will be handled in accordance with New Hampshire Administrative Rule He-P 2067. New Hampshire Administrative Rules He-P 2020 and He-P 2067 are on file at the Office of Legislative Services, Administrative Procedures Division, Room 113, State House, Concord, and available for inspection at DPHS. See Appendix F, DPHS procedures, and the Manchester Host Plan.

Interrogatory 3(g) Who is to assess whether or not an evacuee is internally contaminated and to refer to appropriate medical facilities those who are so contaminated?

Response:

Assessment of internal contamination and any necessary referral to a medical facility is to be carried out by the same personnel described at e), above. See the response to c), above, for information on the monitoring process.

Interrogatory 3(h) What personnel are to monitor the vehicles of evacuees for possible contamination?

Response:

See the response to 3(c) and 3(e), above.

Interrogatory 3(i) What vehicle washing facilities are available at the reception centers for vehicle decontamination and how many vehicles can be handled per unit of time?

Response:

Vehicle washing in Manchester is to be carried out using Manchester Transit Authority facilities. Facilities for decontaminating vehicles have not yet been, but will be, identified for the other host communities. The State has not assessed the time needed for vehicle decontamination, as it considers that as much time as necessary will be used.

Interrogatory 3(j) What personnel will monitor the vehicles following the washing process to assure that no contamination remains?

Response:

See response to 3(e), above.

Interrogatory 3(k) How will effluents from vehicle washing activities be isolated?

Response:

Effluents from decontamination of vehicles will be handled in the same manner as described at f), above.

Interrogatory 3(1) Where will contaminated belongings be isolated until they can be disposed of?

Response:

Contaminated belongings will be stored at the reception centers, appropriately bagged, marked, and isolated until arrangements are made for their return or disposal. Appendix F to the DPHS Procedures provides information with regard to handling such material.

Interrogatory No. 4

In the opinion of the State of New Hampshire, do adequate means and provisions for the disposal of wastes that would result from an adequate radiological emergency response to an accident on the more serious end of the spectrum of potential accidents, which would include decontamination of people and vehicles, exist? Please detail the factual basis upon which the State's response is founded and provide documented answers to the following:

Response:

The State objects to this interrogatory on the grounds of vagueness in reference to "an accident on the more serious end of the spectrum of potential accidents". Without waiving its objection, the State offers the following response.

It is the opinion of the State that there are adequate means available for the disposal of contaminated wastes that might result from a contaminating accident at Seabrook Station.

The State's opinion is based on the utility's commitment to dispose of all material that cannot be decontaminated that may result from a contaminating accident. Documentation of this commitment is

on file with the Assistant Director for Planning, Office of the Director, DPHS, and is available for inspection. With regard to the "local brokerage" noted at page 2.7-10, Vol.. 1, NHRERP, the arrangement with the utility had not been made at the time of that writing. The option to use a "local brokerage" remains available. With respect to the "local brokerage," see the answers to Interrogatories 4(a)-(j) below.

Interrogatory 4(a) What is the name of the "local brokerage" noted at page 2.7-10 of the State plan which is to dispose of waste materials?

Interrogatory 4(b) Where is the above-mentioned "local brokerage" located?

Interrogatory 4(c) How much waste is this brokerage prepared to accept? Please provide this answer in terms of both volume and curie content.

Interrogatory 4(d) What is the licensed status of this brokerage?

Interrogatory 4(e) When was it first licensed?

Interrogatory 4(f) Has the license ever been suspended for any reason?

Interrogatory 4(g) What contractual arrangement does the State of New Hampshire have with this brokerage to ensure its acceptance of the wastes?

Interrogatory 4(h) How are the wastes to be transported to the brokerage?

Interrogatory 4(i) What entity will have responsibility for the transport of the wastes?

Interrogatory 4(j) What contracts or agreements support the expectation that this transport of wastes will be effected and that the applicable Federal, state and local regulations affecting such transport will be complied with?

Response to Interrogatories 4(a)-(j)

The State has no contract or arrangement at this time, with any "local brokerage," to accept for disposal any wastes that might result from an accident at Seabrook Station. The State anticipates that, should any such wastes ever be generated and which the utility cannot dispose of, bids would be placed through normal State purchasing channels for its disposal by a brokerage. The State would assure that the selected brokerage is capable of compliance with applicable Federal regulations governing interstate shipments of radioactive wastes, and with any State statutes and administrative rules that may apply to interstate transport of such material. In addition, the State would stipulate compliance with such Federal and State statutes, regulations, and rules in the request for bids and resulting contract.

Interrogatory No. 5

In the opinion of the State of New Hampshire, is there adequate manpower for a 24-hour per day emergency response for a protracted period, including 24-hour per day manning of communications links? Please cite the bases supporting the State's response and provide answers, supported by the appropriate documentation, for the following:

Response:

Yes, the State's opinion is that there is adequate manpower to sustain 24-hour per day emergency response for a protracted period.

Interrogatory 5(a) How many State Civil Defense employees are there in total?

Response:

The New Hampshire Civil Defense Agency (NHCDA) has a total of 40 full-time employees.

Interrogatory 5(b) Provide a description of how these employees are to be deployed during a general emergency at Seabrook Station (i.e. how many will remain at the State EOC, how many will be dispatched to the EOF/IFO, how many will be sent into the EPZ, etc.)

Response:

Deployment of NHCDA employees is outlined in Volume 4, Section 2 of the NHRERP (the NHCDA procedures). A concise description is provided by the Emergency Response Organization Roster included in Appendix C of the NHCDA procedures.



Interrogatory 5(c) What is the total number of Division of Public Health Services employees?

Response:

The Department of Public Health Services (DPHS) has a total of 267 full-time employees from 290 full-time positions authorized.

Interrogatory 5(d) Provide a description of how these DPHS employees are to be deployed during a general emergency at Seabrook Station (i.e. how many will be stationed at the State EOC, how many will be analyzing field samples in the laboratory, how many will report to reception centers to do monitoring of evacuees, etc.)

Response:

The deployment of 44 DPHS personnel and 4 non-DPHS personnel assisting DPHS is described in Volume 4 Section 3 of the NHRERP (i.e. DPHS procedures). Appendix A of DPHS Procedures contains a description of assignments.

Interrogatory 5(e) How many employees are there in the Department of Resources and Economic Development (DRED)?

Response:

The Department of Resources and Economic Development (DRED) has 151 permanent employees. In addition DRED has approximately 400 seasonal employees in the spring, and approximately 800 seasonal employees during the summer.

Interrogatory 5(f) Please state with particularity the location to which these DRED employees will be dispatched, including the number to each location, in the event of a general emergency at Seabrook Station.

Response:

One DRED official is dispatched to the State EOC in Concord and one DRED official is dispatched to the IFO/EOC upon the declaration of an ALERT at Seabrook Station. Additional DRED employees may be assigned to state parks within the plume exposure EPZ depending upon the nature of the emergency at the Seabrook Station and the time of year. Decisions on assigning supplementary manpower to DRED facilities that are open will be made by the DRED official at the EOC, in cooperation with NHCDA officials, after the DRED official has contacted each facility to discuss its status with the local DRED personnel. A total of eighteen facilities are contacted by DRED. These are listed, together with the names and telephone numbers of their DRED supervisors, in Appendix A of the DRED procedures. The DRED procedures are contained in Vol. 4 of the NHRERP.

Interrogatory 5(g) How many State Police officers are there in Troop A?

Response:

Troop A has 37 officers assigned at present.

Interrogatory 5(h) Specifically, how does the State plan to assist the municipalities in which emergency response is impaired due to lack of manpower? What State personnel will be drawn upon to assist municipalities lacking personnel? Please answer in terms of numbers and the agencies from which the State personnel will be drawn.

Response:

Local liaison officers at the IFO have the responsibility of calling the local community contact and determining whether that community has any resource needs. Any identified needs will be addressed as necessary with State resources.

Personnel from the DPHS, Fish and Game Department, DRED, New Hampshire National Guard, Department of Transportation, and State Police can be drawn upon to supplement local manpower. None of these additional personnel has been assigned any specific task in the NHRERP.

Interrogatory No. 6

In the opinion of the State of New Hampshire, are there adequate provisions for the sheltering of various segments of the populace in the plume exposure pathway EPZ? Please state with particularity the facts forming the bases of the State's opinion and provide answers, supported by appropriate documentation, for the following:

Response:

The State objects to the relevance of this interrogatory insofar as it focuses on the sole protective action of shelter, rather than the range of protective actions available in the event of an

emergency at Seabrook Station. See Board's April 29, 1986 Memorandum and Order at 44; NHRERP, Vol. 1 at 2.6-5 and Section 2.6.7. Without waiving its objection, the State responds to the specific interrogatories as follows.

Interrogatory 6(a) Where does the State anticipate that beach populations will be able to take shelter in a radiological emergency if closing the beaches and/or evacuation cannot be implemented quickly enough to effect dose reductions for the populations?

Response:

The State does not anticipate that the transient beach population will be ordered to take shelter as a protective action. The State relies on early beach closings to ensure that the transient population is out of the area prior to any release of radioactivity from Seabrook Station. More specifically, the State will close the beaches at the alert level and at all successive levels. See NHRERP, Vol. 4 DRED Procedures; local RERPs for the Towns of Seabrook and Hampton; Appendix F to Civil Defense Procedures, NHRERP, Vol. 4, and Appendix U to DPHS Procedures, NHRERP, Vol. 4.

The summer or year round residents who are part of the beach population may remain in the beach area with access to the shelter of their homes, cottages or hotel rooms. Therefore, this segment of the beach population would have access to shelter in the event an order to take shelter were issued. (Please note that the decision-making criteria for shelter assume a dose reduction factor (DRF) for the typical seacoast wood-framed house with no basement, or a DRF of .9.) See NHRERP, Vol. 1 at 2.6-24, 2.6-28, NHRERP, Vol. 4, DPHS Procedures, Appendix U at p. 2 of Figure 1A.

Interrogatory 6(b) Does the State plan to construct shelters at the beaches?

Response:

No.

Interrogatory 6(c) If the answer to part b. above is in the affirmative, at what specific locations does the State anticipate that such shelters would be constructed? Please provide any designs that may exist for beach shelters?

Response:

Not applicable.

Interrogatory 6(d) Are maps of shelter areas being developed by the State as NUREG-0654 II.J.10.a. requires?

Response:

No. The "shelter-in-place" concept effectively precludes the need for maps to shelter sites.

Interrogatory 6(e) Are expected levels of protection to be afforded in residential and other units (schools, nursing homes, etc.) for direct and inhalation exposure being evaluated as required by NUREG-0654 II.J.10.m?

Response:

Yes. As indicated at page 7.6-24 of the NHRERP, the dose reduction factor for typical structures in the Seabrook EPZ is based on the two following documents:

- Protective Action Evaluation, Part I, the Effectiveness of Sheltering as a Protective Action Against Nuclear Accidents Involving Gaseous Releases (EPA 520/1-78-001A)

- Protective Action Evaluation, Part II, Evacuation and Sheltering as Protective Actions Against Nuclear Accidents Involving Gaseous Releases (EPA 520/1-78-001B).

As stated above in the answer to Interrogatory 6, the conservative DRF of .9 (as indicated in these two documents) has been assumed for the Seabrook EPZ.

Furthermore, a survey has been conducted to determine the DRF of the health care facilities in the Seabrook EPZ. The results of that survey are included in the NHRERP, Vol. 4, Civil Defense Procedures, Appendix F, Figure 5, and DPHS Procedures, Appendix U, Figure 5.

Interrogatory 6(f) If the answer to part e. above is in the affirmative, what entity or entities are performing the evaluations?

Interrogatory 6(g) What are the qualifications of the entity or entities, named in response to part f, to perform shelter evaluations?

Response to Interrogatories 6(f) and 6(g)

Manio Vigliani of HMM Associate and Michael A. Nawoj of the New Hampshire Civil Defense Agency conducted this survey. Mr. Vigliani is a health physicist/planner. Mr. Nawoj is the director of the Technical Hazards Division of the NHCDA.

Interrogatory No. 7

Is it the opinion of the State of New Hampshire that the N.H. State and local plans make adequate provisions for prompt communications among principal response organizations to emergency personnel?

Response:

Yes, it is the opinion of the State of New Hampshire that the State and local plans make adequate provisions for prompt communications among principal response organizations. The communications provisions are outlined in detail in Volume 1, Section 2.2 of the NHRERP and in Section II-c of the local plans.

Interrogatory 7(a) How many phone lines are there serving each of the 17 New Hampshire local EOC's?

Response:

There are at least the following number of phone lines installed or proposed for the local EOCs:

<u>Town</u>	<u>Installed</u>	<u>Proposed</u>
Brentwood	3	
East Kingston	5	
Exeter	9	
Greenland	7	
Hampton	13	
Hampton Falls		3
Kensington		4
Kingston	7	
New Castle	5	
Newfields	3	
Newton	4	
North Hampton	6	
Portsmouth		6
Rye		8
Seabrook	12	
South Hampton		3
Stratham	4	

Interrogatory No. 8

In the opinion of the State of New Hampshire, do the N.H. State and local radiological emergency response plans reasonably assure that those persons whose mobility is impaired due to institutional or other confinement will be adequately protected in the event of a radiological emergency? Please state with particularity the bases for the State's response and include answers to the following questions with appropriate supporting documentation:

Response:

In the opinion of the State of New Hampshire the State and local plans provide adequate protection for mobility impaired personnel. Mobility impaired personnel may take shelter-in-place, or they may be evacuated, as deemed appropriate by DPHS.

The local plans provide that local officials will develop and maintain a current list of mobility-impaired and transit-dependent individuals in each municipality. The State has assisted the EPZ communities by processing the "Special Emergency Help" survey referred to below.

Interrogatory 8(a) How many "Special Emergency Help" surveys sent out to residents of the EPZ under cover letter of March 20, 1986 by Richard H. Strome, Director, N.H. CDA, were returned?

Response:

As of April 28, 1986 the State has received 2697 "Special Emergency Help" surveys or returns from the 33,812 sent out to residents of the EPZ on March 20, 1986.



Interrogatory 8(b) What percentage of the surveys sent out were returned?

Response:

Those returned represent approximately 8% of those distributed.

Interrogatory 8(c) Judging from the results of the survey, how many people does the State anticipate will need special transportation assistance?

Response:

Results from the survey indicate that 366 individuals have requested special transportation assistance. Of this amount, 134 have requested assistance because of sight impairment, 151 have requested assistance because of being wheel chair bound, 38 have requested assistance because of being bedridden and 43 have requested ambulance transportation for other reasons. The requests from this survey will be verified by State and local officials, and appropriate resources allocated. At a minimum, the NHRERP will provide for transportation for those identified by this survey.

Interrogatory 8(d) What vehicles does the State assume will be available to transport those whose mobility is impaired who are not in institutions?

Response:

The State has agreements that reflect the availability of approximately 600 buses and 40 ambulances. In addition, the resources of all state agencies can be made available in the event of an emergency to transport those whose mobility is impaired whether institutionalized or not.

Interrogatory 8(e) Does the State assume that the ambulance services for which letters of agreement are included in Volume 5 in the State plan will be able to provide assistance to the individuals described in part d. above?

Response:

Yes.

Interrogatory 8(f) If the answer to part e. is in the affirmative, how many people does the State estimate will be provided transportation by these ambulance services, and upon what basis is this assumption founded?

Response:

Based on the returns of the special needs survey, 81 individuals have indicated a need for transportation by ambulance. It is likely that some of those requesting ambulance transportation will be afforded transportation by those ambulances. The resources available to the local municipalities, the State of New Hampshire, and private organizations will be made available to address each and every request for assistance in the event of an emergency.

Interrogatory No. 9

In the opinion of the State of New Hampshire, has sufficient funding been made available to the State for an effective emergency planning process and accompanying development of emergency planning documents?

Response:

The State objects to the relevance of this interrogatory. The amount of money spent on the development of the NHRERP has no bearing on the issues raised in this proceeding relative to the adequacy of the State plan. Without waiving its objection, the State responds as follows.

Yes, the State feels sufficient funding has been made available for emergency planning. Past, present and future resource needs for the development and implementation of a radiological emergency response plan have been and will continue to be met by the mechanism provided by RSA Ch. 107-B.

Interrogatory 9(a) Has the State ever been denied, for any reason(s), funds that it has requested for emergency planning purposes?

Response:

The PUC chairman denied in part one request.

Interrogatory 9(b) If the answer to part a. is in the affirmative, please detail in full the circumstances of the denial, including the scope of the request, the grounds for the denial and who authorized the denial.

Response:

See Appeal of Hollingworth, 122 N.H. 1028 (1982).

Interrogatory 9(c) How much money has the State of New Hampshire spent on the emergency planning process for Seabrook Station?

Response:

The State has spent the following approximate amounts:

Fiscal Year 1982	\$ 205,600
Fiscal Year 1983	380,377
Fiscal Year 1984	125,319
Fiscal Year 1985	243,469
Fiscal year to date 3/31/86	<u>292,281</u>
	\$1,247,048

Interrogatory 9(d) How much money did the State of New Hampshire spend over the course of 1985?

Response:

See answer to 9(c) above.

Interrogatory 9(e) How much money has the State of New Hampshire spent to date this year?

Response:

See answer to 9(c) above.

Interrogatory 9(f) Describe in detail the procedure by which funding requests are made and authorized.

Response:

RSA Ch. 107-B outlines the procedure for funding the State's emergency planning efforts. Some of the funds expended, however, have not been assessed under RSA Ch. 107-B.

Interrogatory 9(g) What consultants and/or consulting firms are or have been hired by the State for work related to the development of emergency plans and procedures for Seabrook Station? (Please indicate which are still involved in the planning process.)

Response:

Costello, Lomasney & DiNapoli - Planning

Gerald Coogan - Planning

Richard Hampe - Legal

Eric Falkenham - Legal

All but Costello, Lomasney and DiNapoli are still involved in the planning process.

Interrogatory 9(h) Were the hirings referred to in part g. the result of competitive bidding processes?

Response:

The Costello firm was retained after the State solicited the work through a Request For Proposals. The other three consultants are retained on personal service contracts which did not result from a "competitive bid process".

MOTION FOR PROTECTIVE ORDER

The State of New Hampshire hereby moves the Board for a protective order that no further answers to certain of the SAPL interrogatories dated April 22, 1986 and served on the State are required. As grounds therefore the State asserts as follows:

Interrogatory 4

The State objected to this general interrogatory insofar as the inquiry relates to "an accident in the more serious end of the spectrum of potential accidents." Although the State did provide an answer as to the specific questions raised under the rubric of this general interrogatory; this vaguely stated interrogatory cannot be answered further. No additional response should be required.

Interrogatory 6

The State objected to this general interrogatory on the grounds of relevance, insofar as the interrogatory focuses only the shelter as a protective action, and not on the range of protective actions available in the event of an emergency at Seabrook Station. As the Board noted on page 44 of its April 29, 1986 Memorandum and Order, "... we believe that the Commission's intent for emergency planning is to provide that any one or combination of responses within the range of protective responses will provide reasonable assurance that protective measures can and will be taken." Although the State did answer each of the specific questions raised in this interrogatory, no further response as to the adequacy of shelter alone should be required.

Interrogatory 9

The State objected to this interrogatory on the grounds that the amount of money expended by the State of New Hampshire on the development and implementation of its radiological emergency plan is irrelevant to the issue of the adequacy of the plan. In this proceeding, the Applicant must demonstrate that the NHRERP itself, standing alone and regardless the funds spent on it, provides adequately for the public health and safety. Although the State has answered each of the questions in this interrogatory, no further response should be required.

Signatures

As to Answers to Interrogatories 1-4:

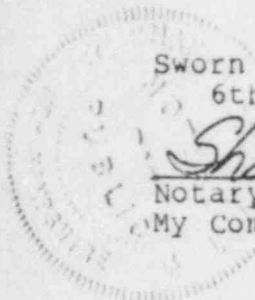
I, William T. Wallace, Jr., M.D., M.P.H., being first duly sworn, do depose and say that the foregoing answers are true, except insofar as they are based on information that is available to the State but not within my personal knowledge, as to which I, based on such information, believe them to be true.

*William T. Wallace, Jr.*

William T. Wallace, Jr., M.D., M.P.H.  
Director, DPHS  
Division of Public Health Services

Sworn to before me this  
6th day of May, 1986:

*Sharon E. DeHart*  
Notary Public  
My Commission Expires: 8-15-89



As to Answers to Interrogatories 5-9:

I, Richard H. Strome, being first duly sworn, do depose and say that the foregoing answers are true, except insofar as they are based on information that is available to the State but not within my personal knowledge, as to which I, based on such information, believe them to be true.

*Richard H. Strome*

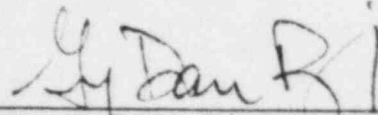
Richard H. Strome  
Director, Civil Defense Agency

Sworn to before me this  
6th day of May, 1986:

*Gene Trigg III*  
~~Notary Public~~ JUSTICE OF THE PEACE & NOTARY  
My Commission Expires: SEPT 29, 1989



As to Objections and Motion for Protective Order:



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CERTIFICATE OF SERVICE

I, George Dana Bisbee, hereby certify that on the 6<sup>th</sup> day of May, 1986, I made service of the within document by mailing copies thereof, postage prepaid, to:

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Board Panel  
U.S. Nuclear Regulatory  
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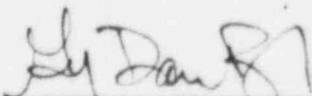
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