

7320

10/12/88

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 OCT 19 P4:23

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF REGULATORY
DOCKETING & NEWBURY
BRANCH

In the Matter of)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
(Seabrook Station, Units 1 and 2))

Docket No. 50-443 OL
50-444 OL
Offsite Emergency Planning

NRC STAFF'S MOTION TO COMPEL ANSWERS
TO INTERROGATORIES AND PRODUCTION
OF DOCUMENTS BY THE TOWN OF NEWBURY

Pursuant to 10 C.F.R. § 2.740(f), the NRC Staff hereby move that the Town of Newbury ("TON") be compelled to answer certain interrogatories and produce certain documents requested in "NRC Staff's First Set of Interrogatories and First Request for Production of Documents to the Towns of Amesbury, Newbury, Salisbury, West Newbury, and Merrimac, and the City of Newburyport" (September 6, 1988) (hereinafter "Staff's Interrogatories"). On September 23, 1988, TON filed its interrogatory answers. TON produced no documents and objected to many of the Staff's Interrogatories. While TON did provide partial answers to the Staff's interrogatories, its responses were often incomplete, evasive, misleading or ambiguous. For the reasons set forth below, TOA should be compelled to provide a proper and complete response to the Staff's discovery request.

1. Motion to Compel Production of Documents at the Office of the General Counsel at the NRC

The NRC Staff prefaced its Interrogatories by asking that documents requested be produced "at the Hearing Division, Office of the

8810240242 881012
PDR ADOCK 05000443
G PDR

DS07

General Counsel, Nuclear Regulatory Commission, 11555 Rockville Pike, Rockville, Maryland." To this, TON responded that the resources of the NRC Staff greatly exceed those of TON and that it was therefore appropriate that the Staff inspect any relevant documents at TON. TON based this response on the alleged undue burden and cost attendant to production of documents at the NRC.

The objection is without valid foundation, and TON should be required to produce responsive documents in accordance with the Staff request. Pursuant to 10 C.F.R. § 2.741(c), document production shall occur at "a reasonable time, place, and manner." There is nothing reasonable in requiring the Staff to travel to TON, and presumably to every other Intervenor and Governmental entity's many different offices, to inspect relevant documents. Consideration of time and travel expense versus the relative burden on TON resultant from sending its documents to the Staff in compliance with the subject request weigh overwhelmingly in favor of the request's reasonableness. Indeed, TON makes no attempt to identify or enumerate the number of documents involved in justification of its objection but, rather, refers in the most general terms to undue burden and cost. Such unsubstantiated and conclusory assertions should be disregarded, and TON should be compelled to produce documents at the Staff's offices as indicated. Nonetheless, the Staff notes that it is willing to receive TON's document production at a central document depository, should the Intervenors and interested State and local governments agree to establish the same.

2. Motion to Compel Answers to Specific Interrogatories

a. Interrogatory 1.

Interrogatory 1 and TON's response read as follows:

1. Identify and supply each document containing procedures, plans, orders, instructions, directions, and training materials of the Intervenor for any action in the event of:

a) a radiological emergency or disaster stemming from a nuclear plant accident whether the plant is located inside or outside of Massachusetts;

b) other radiological emergencies or disasters;
and

c) all other "emergencies" or disasters as defined in paragraph 4 of the above definitions.

ANSWER:

1 (a-c). TON objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. In addition, the interrogatory is objected to on the grounds that, on information and belief, the Staff is already in possession of all planning documents concerning Seabrook Station, which were generated in conjunction with Applicants and the Commonwealth. No such documents were produced by TON and TON is in possession of no documents concerning radiological emergency planning generated since that date. TON has not approved any emergency or disaster plan for the town. Moreover, this interrogatory and others, see e.g. answers to Interrogatories 8 and 9, seeks facts which are not known to TON. TON will make available for inspection and review documents consisting of GENERAL CONSIDERATIONS AND GUIDELINES pertaining to fires and traffic accidents, and a Hazardous Materials Emergency Planning Guide dated March 16, 1987 which TON received from the National Response Team. In addition, TON will make available TON's documents relating to plans prepared pursuant to the Emergency Planning Act, which are contemplated to be prepared in approximately two weeks.

TON's response, while partially responsive, fails on several grounds.

First, it misreads the Interrogatory, which concerns applicable data

pertaining to both radiological emergencies and disasters generally, and is not confined to emergencies involving Seabrook Station. Further, the Interrogatory is not confined to documents generated following the decision of the Commonwealth and TON not to participate in further emergency planning for Seabrook Station. In addition, subsection (c) requests relevant information and documents regarding all "emergencies," irrespective of whether TON has approved any emergency or disaster plan. Accordingly, TON's response to subsection (c) must be considered evasive. Finally, TON's assertions of overbreadth and undue burdensomeness regarding this Interrogatory must be rejected. A request for documents should not be deemed objectionable solely because there might be some burden attendant to their production. Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), LBP-82-82, 16 NRC 1144, 1155 (1982). In any event, the assertion that undue burden is involved in searching for the defined documents is utterly groundless. With respect to TON's allegation of overbreadth, it is pertinent to cite the provisions of 10 C.F.R. § 2.740(b)(1):

Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the proceeding . . . including the existence, description, nature, custody, condition, and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of any discoverable matter.

Answers to interrogatories or requests for documents which do not comply with this provision are inadequate. Illinois Power Co. (Clinton Power Station, Unit 1), LBP-81-61, 14 NRC 1735, 1737-1738 (1981). Further, a Board may require a party, who has been served with a discovery request which it believes is overly broad, to explain why the request is too broad

and, if feasible, to interpret the request in a reasonable fashion and supply documents (or answer interrogatories) within the realm of reason. Texas Utilities Electric Co. (Comanche Peak Steam Electric Station, Units 1 and 2), LBP-85-41, 22 NRC 765, 768 (1985). TON fails to demonstrate in what respect Interrogatory 1 is overly broad. In sum, TON should be compelled to respond to this Interrogatory in its entirety.

b. Interrogatory 2

Interrogatory 2 and TON's response read as follows:

2. With regard to each document set out in response to Interrogatory 1, describe the functions in emergencies of any of the following categories of personnel:

- a) State and local police, to include persons employed full or part time, and both private and public security personnel, such as special officers and deputies;
- b) Civil Defense personnel;
- c) Professional or volunteer fire-fighting personnel;
- d) First aid and rescue personnel;
- e) Local support services personnel including Civil Defense/Emergency Service personnel;
- f) Medical support personnel;
- g) Emergency Service personnel;
- h) Health and Environmental Department personnel;
- i) National Guard, Militia or Reserve personnel;
- j) Boards of Education, School Boards or Departments, and teachers;
- k) Employees of all other State, local or municipal departments or agencies;
- l) Individuals obligated to provide assistance pursuant to agreements to aid between municipalities or

other government units, or pursuant to other agreements;
and

m) Individuals available to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements.

ANSWER:

2. See Answer to Interrogatory 1. TON further objects to Interrogatory 2 on the grounds that the documents speak for themselves and the Staff has greater resources to analyze these documents than TON. Without waiving said objections, the GENERAL CONSIDERATIONS AND GUIDELINES identified in TON's answer to Interrogatory 1 merely pertain to police officers and provide only the broadest of criteria to consider during fires or traffic accidents, e.g. "[p]olice officers must also be aware of the possibility of arson;" "...the officer's primary duty is to give prompt attention to the needs of any injured persons."

TON has not produced any documents in response to this request, and its assertion that "the documents speak for themselves" is of necessity incomprehensible. Further, TON has objected to producing the requested documents, and Staff resources are irrelevant for reviewing documents which have not been produced. Absent a complete production of documents, TON's other assertions cannot be evaluated. For the reasons discussed regarding Interrogatory 1, supra, TON should be compelled to respond to Interrogatory 2, and to provide specific data requested by the Staff regarding personnel functions and availability in the event of an emergency.

c. Interrogatory 3

Interrogatory 3 and TON's response read as follows:

3. Set out the training each of the category of personnel set out in Interrogatory 2 has to perform its function in "emergency."

ANSWER:

3. See Answer to Interrogatory 2. Without waiving its objections, full-time police officers have full-time academy training through the Massachusetts Criminal Justice Training Council. All such officers are certified in the use of firearms and some have specialized training regarding accident investigations, fingerprinting, and related police activities. Reserve officers have reserve academy training through the Massachusetts Criminal Justice Training Council. All reserve officers receive annual training as first responders and in the use of firearms.

TON's answer to this Interrogatory is too sparse and fragmentary to be deemed adequate. Apart from its brief discussion of "full-time police officers", no information has been provided concerning any other category of emergency workers listed in Interrogatory 2. For the reasons set forth with regard to TON's failure to respond to Interrogatories 1 and 2, TON should be compelled to answer this Interrogatory completely.

d. Interrogatories 8 to 15

Interrogatories 8 to 15, and TON's responses thereto, read as follows:

8. Identify the number and location of Massachusetts National Guard Units in each of the Intervenor jurisdictions, the number of members of each unit, their distance from the Seabrook plume exposure EP2, and the number and location of the following resources available for use by the National Guard in emergencies: (a) cars; (b) trucks; (c) vans; (d) helicopters; (e) other means of transportation; and (f) communication facilities, including radios and other means of public notification. Supply the same information for any Militia or Reserve unit in such jurisdiction. (Footnote: If any of the data sought under Interrogatory 8 are withheld on the ground they are classified, please indicate the type of data so withheld.)

ANSWER:

8. See Answer to Interrogatory 1.

9. Identify any plans made for radiological monitoring in the event of a radiological emergency from any cause, including (a) the number and location of

personnel trained and available to accomplish such monitoring, and (b) a description and enumeration of radiological monitoring equipment available for use in such an emergency, along with identification of the equipment's location.

ANSWER:

9. See Answer to Interrogatory 1.

10. Identify any provisions made for handling of individuals contaminated in a radiological emergency stemming from any cause, including (a) the number and location of personnel trained and available to assist in decontamination of contaminated individuals, and (b) a description and enumeration of equipment available for use in decontamination, along with identification of the equipment's location.

ANSWER:

10. See Answer to Interrogatory 1.

11. Identify any provisions made by the Massachusetts Department of Agriculture, or other state or local governmental agency, concerning protective measures to be used for the 50-mile ingestion pathway from any nuclear plant, including the methods for protecting the public from consumption of contaminated foodstuffs; and identify any procedures for detecting contamination, for imposing protective measures such as interdiction of food supply, impoundment, or quarantine, and for public notification concerning food contamination and the protective measures to be followed.

ANSWER:

11. See Answer to Interrogatory 1.

12. Identify the number of Massachusetts Civil Defense personnel according to location within the Commonwealth, and identify the amount and location of equipment available for their use to protect the public in the event of an emergency. Set out the training of Civil Defense personnel.

ANSWER:

12. See Answer to Interrogatory 1.

13. Identify the location of stations authorized to broadcast under Federal Emergency Broadcast System (EBS)

regulations and the Massachusetts EBS Operational Plan ("Operational Plan"). Provide a copy of the Operational Plan.

ANSWER:

13. See Answer to Interrogatory 1.

14. Identify all documents, agreements and communications dated within the last five years concerning the operation of the EBS. Produce a copy of all such documents, agreements and communications.

ANSWER:

14. See Answer to Interrogatory 1.

15. Identify the provisions of federal or state law which preclude activation of the EBS at the discretion of management of AM, FM, and television stations, in connection with day-to-day emergency situations posing a threat to the safety of life and property, such as hurricanes, floods, icing conditions, heavy snows, fires, toxic gases, power failures, industrial explosions, and civil disorders.

ANSWER:

15. See Answer to Interrogatory 1. Answering further, this interrogatory is objected to as calling for a legal conclusion.

TON has failed to provide any response to these interrogatories. TON should be compelled to respond to these interrogatories, for the reasons discussed herein regarding TON's failure to respond to Interrogatory 1. Further, TON's objection that Interrogatory 15 calls for a "legal conclusion" is erroneous for reasons presented below in the Staff's analysis of TON's responses to interrogatories 17 to 20.

e. Interrogatories 17 to 20

Interrogatories 17 to 20, and TON's responses thereto, read as follows:

17. With respect to each document identified in Interrogatory 1, identify any Federal or state law or

regulation pursuant to which each such document was prepared.

ANSWER:

17. See answer to Interrogatory 1.

18. Identify all Massachusetts statutes and regulations, and all local regulations, ordinances or other provisions, (a) concerning actions to be taken by state or local authorities, or those acting in their behalf, in the event of emergencies, including the preparation of plans for actions to be taken in emergencies; (b) concerning any prohibitions on any such actions or plans; and (c) concerning any prohibitions on any person or organization other than state or local authorities with respect to any such actions or plans.

ANSWER:

18. See Answer to Interrogatory 1. The Interrogatory is objected to as calling for a legal opinion or conclusion. The Staff may inspect TON's by-laws in accordance with the conditions set forth in OBJECTION TO PRODUCTION OF DOCUMENTS, [sic] supra.

19. Set out the conditions, including citations to all applicable provisions of state and local laws and regulations, (a) under which state and local authorities may permit private individuals or organizations to take action on their behalf in an emergency; and (b) under which state and local authorities are precluded from authorizing private individuals or organizations from taking action on their behalf in an emergency.

ANSWER:

19. See Answer to Interrogatory 18. Answering further, TON is unaware of any conditions under which local authorities may permit private individuals or organizations to take action on TON's behalf in an emergency. The Staff is as fully capable of researching the law as is TON and the Staff has far greater resources for doing so than does TON.

20. Set out examples illustrating the conditions described in Interrogatory 19(a) and (b).

ANSWER:

20. See Answer to Interrogatory 18.

The Staff requests that TON be compelled to respond to Interrogatories 17 to 20 for the reasons discussed above with respect to TON's responses to Interrogatory 1. Further, the statutes, regulations, and ordinances referred to in Interrogatories 17 and 18 cannot be so numerous as to make a response to these Interrogatories unduly onerous. The same is true with respect to the conditions and examples requested under Interrogatories 19-20. As regards Interrogatory 18, there is no merit in TON's assertion that the identification of statutes and regulations which TON may rely upon in challenging the SPMC's legal authority calls for a "legal opinion or conclusion." The Staff does not seek TON's legal conclusions, but only an identification of the bases for the challenge made by TON to the SPMC. Only after those bases are identified can the Board and other parties determine whether there is merit to the challenge. The answers sought by Interrogatories 17, 19 and 20 likewise seek answers of fact as to the legal support relied upon by TON for challenging the Applicants' emergency planning activities. The issues involved in Interrogatories 17 to 20 are relevant to this proceeding, and TON should be compelled to respond to them.

f. Interrogatory 22

Interrogatory 22 and TON's response read as follows:

22. Using the definition of "the beach" you supplied in answer to Interrogatory 21, provide the following data along with a copy of any study or other document relevant to the following information: (a) the maximum number of cars at the beach on the 10 busiest days within the last five years, along with indication of the time and date of such maxima; (b) the number of cars remaining at the beach following each 1/2-hour interval for the 8 hours after the aforementioned maxima; (c) the number of cars entering and leaving the beach during each 1/2-hour interval within the 8-hour period. If you do not have data for 1/2-hour intervals, supply such data

for the periods you have. Indicate whether the foregoing computations were made manually or automatically.

ANSWER:

22. See answers to Interrogatories 1 and 21. TON is informed and believes that evidence was submitted by Intervenor in the NHRERP litigation which is applicable to this interrogatory. TON adopts said testimony. The interrogatory is further objected to as seeking work product. Without waiving any objections, TON has conducted no such studies.

Interrogatory 22 directly relates to issues raised by the Intervenor in this proceeding, and seeks to obtain a proper definition of the issues and areas encompassed by admitted contentions. See Stipulation As To Contentions (September 19, 1988), at 1-4. The test as to whether particular matters are discoverable is one of "general relevancy." This test will be easily satisfied unless it is clear that the evidence sought can have no possible bearing on the issues. Commonwealth Edison Co. (Zion Station, Units 1 & 2), ALAB-185, 7 AEC 240 (1974). Interrogatories 21 and 22 clearly meet the test of "general relevancy." Further, TON's broad reference to all of the evidence submitted by Intervenor in the NHRERP litigation fails to provide reasonable notice of the particular matters encompassed in this response. TON's reference to its response to Interrogatory 1 should be rejected, for the reasons discussed concerning TON's objection to Interrogatory 1. TON has misinterpreted Interrogatory 22 as only pertaining to studies TON conducted; rather, any responsive document in its possession, irrespective of origin, is sought.

In addition, TON's assertion of the "work product" doctrine is unsupported. An attorney's mere assertion that the material it is withholding constitutes attorney work product is insufficient to meet the burden of proving it is entitled to protection from discovery.

Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2),
LBP-83-17, 17 NRC 490, 495 (1983).

In sum, TON's response to Interrogatory 22 should be compelled.

g. Interrogatories 23 and 24

Interrogatories 23 and 24, and TON's responses, read as follows:

23. Identify all studies conducted during the last five years concerning improving the movement of traffic in and out of "the beach" area. Provide a copy of all such studies.

ANSWER:

23. TON has conducted no such studies. See Answer to Interrogatories 1 and 22.

24. Identify all studies conducted during the last five years concerning improving the movement of traffic in the event of emergencies within the Seabrook Station EPZ which include estimates of the volume of traffic or the time within which traffic can be evacuated. Provide a copy of all such studies.

ANSWER:

24. TON has conducted no such studies. See answers to Interrogatories 1 and 22.

TON has misconstrued Interrogatories 23 and 24, which request identification of "all" studies conducted, not "all studies conducted by TON." Further, the studies sought are clearly relevant to the issues to be litigated in this proceeding. For these reasons, and for the reasons discussed above concerning TON's objections to Interrogatories 1 and 22, TON should be compelled to respond to these interrogatories.

h. Interrogatory 25

Interrogatory 25, and TON's response, read as follows:

25. Identify all State and local laws and regulations concerning the following actions to be taken in the event of radiological or other emergencies (see definition 4): (1) guiding traffic; (2) blocking roadways,

erecting barriers in roadways, and channeling traffic; (3) posting traffic signs on roadways; (4) removing obstructions from public roadways, including towing private vehicles; (5) activating sirens and directing the broadcast of EBS' messages; (6) making decisions and recommendations to the public concerning protection actions for the ingestion exposure pathways; (8) making decisions and recommendations to the public concerning recovery and reentry; (9) dispensing fuel from tank trucks to automobiles along roadsides; and (10) performing access control at the Emergency Operations Center, the relocation centers, and the EPZ perimeters.

ANSWER:

25. See Answer to Interrogatory 18.

TON should be compelled to respond to Interrogatory 25, for the reasons set forth in the Staff's motion to compel a response to Interrogatory 18.

i. Interrogatory 26

Interrogatory 26, and TON's response, are:

26. Identify all studies performed during the last five years concerning the availability and possible use of sirens and other means of emergency communication to the public in the event of emergencies. Provide a copy of all such studies.

ANSWER:

26. See answers to Interrogatory 1 and 22. TON has conducted no such studies. TON incorporates by reference all information proffered by the Commonwealth concerning sirens and siren contentions.

TON has misconstrued this Interrogatory as it did Interrogatories 23 and 24, to refer only to studies conducted by TON. Further, TON fails to identify the information "proffered by the Commonwealth", which it cites herein; and TON's answer therefore fails to provide any reasonable degree of specificity sufficient to inform the Staff of the

particular documents referenced by TON's answer. A response to Interrogatory 26 is merited and should be compelled.

j. Interrogatory 27

Interrogatory 27, and TON's response are:

27. Identify all sirens or other means of emergency communication in the Seabrook EPZ which can be heard by the general public.

ANSWER:

27. See Answer to Interrogatories 1, 7 and 26.

TON's reference to its answer to Interrogatory 1, again, should be rejected. Further, TON's reference to its response to Interrogatory 7 does not provide the information sought. Finally, TON's reference to its answer to Interrogatory 26 should be rejected, for the reasons discussed above in response to TON's objection to that Interrogatory. Since no valid objection to Interrogatory 27 remains, TON's response should be compelled.

k. Interrogatory 28

Interrogatory 28, and TON's response, are as follows:

28. Identify all studies performed by Intervenors during the last five years concerning planning for emergencies. Produce a copy of all such studies.

ANSWER:

28. See Answer to Interrogatory 1.

TON's refusal to respond to Interrogatory 28 is objectionable for the reasons stated by the Staff with regard to Interrogatory 1. A response to Interrogatory 28 should be compelled.

SUMMARY

TON has failed to provide satisfactory responses to virtually all of the Staff's interrogatories, thus precluding the discovery of potentially critical facts in this proceeding. Given the rebuttable nature of the presumption inherent in the "realism rule", production of this information is of vital importance for this litigation as to the adequacy of the SPMC. TON's unsupported allegations of burdensomeness, overbreadth, and irrelevancy should be rejected, and TON should be compelled to respond to the Interrogatories identified herein.

Respectfully submitted,

Stephen A. Bergquist
Stephen A. Bergquist
Counsel for NRC Staff

Dated at Rockville, Maryland
this 12th day of October, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

INDEXED
U-NRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD ~~1988~~ OCT 19 P4:23

In the Matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2)

}
Docket Nos. ^{OFF} 50-443 OL ^{RECEIVED}
 50-444 OL
} Off-site Emergency Planning

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS BY THE TOWN OF NEWBURY" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, this 12th day of October 1988:

Ivan W. Smith, Chairman *
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gustave A. Linenberger, Jr.*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

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

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

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

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

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

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

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

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

Ellyn R. Weiss, Esq.
Diane Curran, Esq.
Harmon & Weiss
2001 S Street, NW
Suite 430
Washington, DC 20009

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Richard R. Donovan
Federal Emergency Management Agency
Federal Regional Center
130 228th Street, S.W.
Bothell, Washington 98021-9796

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

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

Ashod N. Amirian, Esq.
Town Counsel for Merrimac
376 Main Street
Haverhill, MA 08130

Robert R. Pierce, Esq.*
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Stephen A. Bergquist
Stephen A. Bergquist
Counsel for NRC Staff