

Dated: March 25, 1987

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

In the Matter of)
)
)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
)

(Seabrook Station, Units 1 and 2))
)
)

Docket Nos. 50-443-OL
50-444-OL
Off-site Emergency
Planning Issues

APPLICANTS' MOTION FOR SUMMARY
DISPOSITION OF TOWN OF KENSINGTON
REVISED CONTENTION 2

Pursuant to 10 CFR 2.749, on the basis of the facts set forth in the "Affidavit of Gary J. Catapano (TOK 2)" and for the reasons set forth below, the Applicants move the Board to enter an order granting summary disposition in Applicants' favor with respect to Town of Kensington (TOK) Contention No. 2.

REASON FOR GRANTING THE MOTION

REVISED CONTENTION 2 reads as follows:

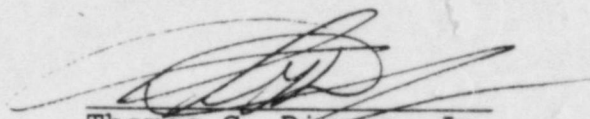
"The NHRERP, Revision 2 for 'TOK' does not provide for adequate notification, by licensee, of State and local response organizations, and for notification of emergency response personnel by organizations, as required by 10 CFR 50.47 (b)(5). Provision for notification of the town emergency response organization is inadequate in that it depends upon notification through the Rockingham County dispatch."

This contention was limited to the means whereby TOK will receive notification of an emergency (ASLB Memorandum and Order of February 18, 1987 at 2). Specifically, the contention as revised in response to the issues of NHRERP Rev. 2 states that the provision for notification of the town emergency response organization is inadequate in that it depends upon notification through the Rockingham County Dispatch Center. TOK states that the town "will no longer be using the Rockingham County Dispatch as of the end of 1986."

A change in plan to no longer use Rockingham County Dispatch can in no way limit the ability of the County to notify Kensington. The communication links between the Rockingham County Dispatch Center and the Town of Kensington consist of a variety of radio systems and frequencies. A detailed description of these systems is included in the attached "Catapano Affidavit." The existing communication links between Rockingham County Dispatch Center and the Town

of Kensington allow notification of the local emergency
response organization by Rockingham County Dispatch Center.

By their attorneys,

A handwritten signature in dark ink, appearing to be 'T. G. Dignan, Jr.', written over a horizontal line.

Thomas G. Dignan, Jr.
R.K. Gad III
Kathryn A. Selleck
Ropes & Gray
225 Franklin Street
Boston, MA 02110
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STATEMENT OF MATERIAL FACTS NOT IN DISPUTE
(TOK REVISED CONTENTION 2)

1. Rockingham County Dispatch is still capable of communicating with TOK and initiating notification, regardless of who provides dispatch services for TOK.
2. Any equipment required to implement the communication link between Rockingham County Dispatch and TOK has been installed and is currently operational.