

October 27, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

JUDGE IVAN W. SMITH, CHAIRMAN  
JUDGE JERRY HARBOUR  
JUDGE GUSTAVE A. LINENBERGER, JR.

In the Matter of )

Public Service Co. of New Hampshire, )  
et al. )

(Seabrook Station, Units 1 & 2) )

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

DECLARATION OF LAURA ANGELO

I, Laura Angelo, do declare, under penalty of perjury, that the following is true:

1. My name is Laura Angelo. I am employed by the Federal Emergency Management Agency (FEMA) as an emergency management specialist in the Office of Natural and Technological Hazards of the State and Local Programs and Support Directorate.

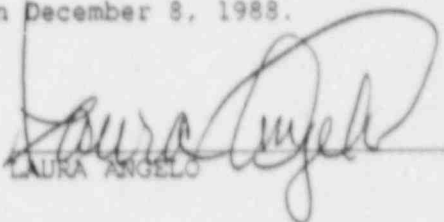
2. At the request of H. Joseph Flynn, Assistant General Counsel of FEMA, I have begun to assemble, catalogue, and examine the documents which have been identified in the Massachusetts Attorney General's Request For Production of Documents dated October 19, 1988. I have also requested that the individuals who have control of or access to similar records in FEMA Regional Offices in Boston, Massachusetts, and Bothell, Washington, and at Argonne National

Laboratory, Argonne, Illinois, and Idaho National Engineering Laboratory, Idaho Falls, Idaho, begin to assemble, catalogue, and send copies to FEMA Headquarters to be examined.

3. At FEMA Headquarters, I have identified 6 files drawers which contain records identified by the Request for Production and I estimate that those 6 drawers contain thirty thousand (30,000) pages. The sorting, cataloguing and preliminary examination is proceeding at the pace of about four and one-half hours per drawer. When this stage of FEMA's search is completed, then the documents must be examined by Attorney Flynn. After duplications and nonresponsive documents are eliminated, assuming that none of the remaining documents will be withheld and taking into account the photocopying which will already have been done by other offices, I estimate that it will require 150 hours of staff time to make the necessary photocopies. Even though there is an office within FEMA which is equipped to handle large photocopying jobs (the print shop), nevertheless, there is no gain in efficiency in having them do this project because of the nonuniformity of the documents. Many of them are stapled or printed on both sides of the page or nonstandard sizes. All of them must be returned to their original files. The project amounts to many dozens of smaller tasks rather than one very large task. Simply as a measure of the magnitude of the undertaking, if these same documents were requested from FEMA Headquarters under the Freedom of Information Act, FEMA would expect advance payment of approximately \$4,500.00.

4. From my discussions with the other offices which are searching their records, I estimate that amount of time and effort which their searches will require is, in the aggregate, approximately equal to that of FEMA Headquarters.

5. I have extensive experience in responding to Freedom of Information Act Requests for the Office of Natural and Technological Hazards. It is my judgment that FEMA cannot comply with the the Massachusetts Attorney General's Request for Production much sooner than December 8, 1988.

  
LAURA ANGELO

Dated October 27, 1988  
at Washington, D.C.

October 27, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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JUDGE IVAN W. SMITH, CHAIRMAN  
JUDGE JERRY HARBOUR  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion For Protective Order, Memorandum in Support of Motion for Protective Order, and Affidavit of Laura Angelo have been served on the following by Express Mail service on this 27th day of October, 1988.

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Dated: October 27, 1988

  
H. JOSEPH FLYNN  
Assistant General Counsel  
Federal Emergency Management Agency