



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

50-443/444-06
5/26/88
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USNRC

'88 JUL 19 P6:04

October 5, 1987

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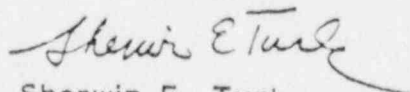
Dr. Jerry Harbour
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

In the Matter of
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, ET AL.
(Seabrook Station, Units 1 and 2)
Docket Nos. 50-443, 50-444 Off-Site Emergency Planning

Dear Administrative Judges:

In a filing dated September 4, 1987, the NRC Staff advised the Board and parties that it may wish to submit rebuttal testimony with respect to the beach shelter issue. In accordance with the Licensing Board's "Memorandum and Order (Clarifying Presentation of Rebuttal Testimony)", dated September 9, 1987, the Staff hereby submits a draft outline of the areas it may wish to address in its rebuttal testimony, in the event the Staff determines following cross-examination that such rebuttal testimony is appropriate.

Sincerely,


Sherwin E. Turk
Counsel for NRC Staff

cc: Service List

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NUCLEAR REGULATORY COMMISSION

Docu. No. 50-443/4 2 ex 37
In the matter of
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REJECTED
DATE 5/26/88
WITNESS in person et al
Miss Atty Gen KZ

Proposed Rebuttal Testimony of NRC Staff
Concerning NHRERP Protective Actions For
Seabrook Area Seasonal Beach Populations

- I. Introduction: The Function and Objectives of Emergency Planning.
 - A. The Goal of Emergency Planning Is To Mitigate the Radiological Impacts of An Accident If A Release of Radiation Should Occur.
 - B. The Overall Objective of Emergency Planning Is To Provide Dose Savings (and in Some Cases, Immediate Life Saving) for A Spectrum of Accidents That Could Produce Doses in Excess of the Protective Action Guides.
 - C. The Planning Basis Requires Applicants and Governmental Organizations to Demonstrate A Capability for Prompt Notification of the Public.
 - D. Planning Is Not Pequired for Any Particular Accident, Nor Is Planning Required to Assure the Avoidance of Any Particular Dose Or to Demonstrate That Any or All of the EPZ Can Be Evacuated Within Any Particular Time Frame.
 - E. The Provision of 10 C.F.R. § 50.47(b)(10) That There Be "A Range of Protective Actions" Does Not Require That There Be A Range of Protective Actions For All Accidents at All Times and at All Locations Within the EPZ.
- II. The Provisions Contained in NHRERP Revision 2 for Protection of Seabrook Area Seasonal Beach Populations Comply With the Guidance Contained in NUREG-0654, Except to the Extent that Deficiencies Otherwise Exist In the NHRERP.
 - A. The NHRERP Provides A Range of Protective Actions for Beach Areas During Most of the Year.
 - B. During the Beach Season, the NHRERP Provides for Early Consideration, At the "Alert" Level, As to Whether to Restrict Public Access to the Beaches or Close the Beaches and Commence Early Evacuation of Beach Areas Before a General Evacuation Would Commence.
 - C. The Beach Areas Are Equipped With Sirens Capable of Providing Both Tone Alerts and Public Address (Voice) Messages, In Order to Afford Seasonal Beach Populations With Prompt Notification and Instructions to Follow in An Emergency.

- D. The NHRERP Provides for Traffic Control and Other Emergency Response Personnel to Assist the Public in Evacuating Beach Areas.
 - E. Evacuation Is the Preferred Protective Response for Seabrook Area Seasonal Beach Populations.
 - F. The Absence of Sheltering As An Alternative Protective Response for Seabrook Area Seasonal Beach Populations Does Not Contravene NRC Regulations and Guidance, and Is Consistent With the Level of Planning In Place at Other Nuclear Plant Sites.
- III. Conclusion: The NHRERP Provides Dose Savings for A Spectrum of Accidents That Could Produce Doses In Excess of the PAGs. Consistent With 10 C.F.R. § 50.47(a), the NHRERP Provides Reasonable Assurance That Adequate Protective Measures Can and Will Be Taken, With Respect to Seabrook Area Seasonal Beach Populations, In the Event of A Radiological Emergency.