

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the ⁸⁶MAY 2 11:08
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE
(Seabrook Station, Units 1 and 2)

Docket Nos.: 50-443
and
50-444
April 30, 1986

THE STATE OF NEW HAMPSHIRE'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE TOWN OF HAMPTON FALLS ON THE
NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN

I. INSTRUCTIONS

Pursuant to 10 C.F.R. Sections 2.715(c), 2.740(b) and 2.741, the State of New Hampshire requests that the attached Interrogatories be answered fully in writing and under oath by any officials of the Town of Hampton Falls who have personal knowledge thereof. The answer to each Interrogatory should contain the name(s) and identification of the person(s) supplying the answer and whether or not he or she has verified the answer.

As used herein, the term "document" means all original writings of any nature whatsoever and all non-identical copies thereof in the possession, custody, or control of the Town of Hampton Falls and includes but is not limited to the following items: communications, correspondence, notes, field notes, studies, reports, summaries, instructions, charts, schedules, sketches and drawings, records, accounts and accounting records, opinions and reports of consultants.

As used herein, the term "identify" means:

1. In the case of a natural person:

- (a) name;
- (b) last-known address;
- (c) employer or business affiliation; and
- (d) occupation and business position held.

2. In the case of a document:

- (a) identity of the person or persons preparing it;
- (b) its title or a description of the general nature of the subject matter;
- (c) the identity of the addressee;
- (d) date of preparation;
- (e) identity of persons who can identify it; and
- (f) all of the aforementioned information should be supplied with such reasonable particularity as is sufficient for a specific demand for production. In lieu of the foregoing, a copy of the document may be supplied.

3. In the case of oral statements and communications:

- (a) when and where they were made;
- (b) identity of each of the makers and recipients thereof;
- (c) the medium of communication; and
- (d) substance of the statement and/or communication.

Pursuant to 10 C.F.R. Section 2.740(e), responses should be supplemented under circumstances when new or different information becomes available. If the Town of Hampton Falls cannot answer the Interrogatories in full, so state and indicate when the Town of Hampton Falls expects to be able to answer the Interrogatory.

The State of New Hampshire further requests that the Town of Hampton Falls, pursuant to 10 C.F.R. Section 2.741, provide copies of or make available for inspection and copying the documents identified by the Town of Hampton Falls in response to certain of the accompanying Interrogatories.

II. GENERAL INTERROGATORIES

G.1 Please identify those contentions admitted by the Board's Order of April 1, 1986 on which the Town of Hampton Falls intends to introduce evidence in this proceeding.

G.2 For each contention identified in Interrogatory G.1, please identify all persons whom the Town of Hampton Falls intends to call as witnesses. Please include a summary of the educational and professional background of each identified witness.

G.3 Provide a reasonable description of the substance of the testimony of each witness on each of the contentions identified in the answer to Interrogatory G.1. Please also identify all documents which will be relied on in that testimony.

III. INTERROGATORIES RELATED TO SPECIFIC CONTENTIONS

CONTENTION Hampton Falls 1

Hampton Falls 1.1

Is the Town of Hampton Falls developing, or has it developed, its own radiological emergency response plan? If so, please identify all documents relating to the emergency planning undertaken by the Town of Hampton Falls including, without limitation, copies of the plan, draft plans, minutes of planning meetings, and correspondence relating to the Hampton Falls RERP.

Hampton Falls 1.2

If there is no Hampton Falls radiological emergency response plan, please explain how the Town of Hampton Falls will respond in the event of a radiological emergency at Seabrook Station. In particular, please indicate what actions can be taken and which actions will be taken by the following officials in the Town of Hampton Falls in such event:

- A) The Board of Selectmen;
- B) Fire Department employees;
- C) Police Department employees; and
- D) Civil Defense Director.

Hampton Falls 1.3

In the event that officials in the Town of Hampton Falls do not carry out emergency response activities in the event of a radiological emergency at Seabrook Station, please indicate what official or agency should take responsibility for such actions.

CONTENTION Hampton Falls 2

Hampton Falls 2.1

Are the positions of RADEF officer and transportation officer in the Town of Hampton Falls expected to be filled? If so, please indicate when they will be filled. If not, please indicate why they cannot be filled.

Hampton Falls 2.2

Please explain the basis of the Town of Hampton Falls' statement in the basis to Contention 2 that "[t]here is no demonstration that the duties assigned to local authorities in Hampton Falls by the plan can be met on a continuous 24 hour basis".

Hampton Falls 2.3

Please explain how the NHRERP, including the Hampton Falls RERP, should provide for the necessary resources to meet the tasks assigned to local Hampton Falls officials.

Hampton Falls 2.4

Please explain how the Town of Hampton Falls Fire Department employees respond to non-radiological emergencies requiring assistance from the fire department, considering that "most of [its] members work out of town". Please also state whether these same procedures can be used in radiological emergencies, and explain the basis for this response.

Hampton Falls 2.5

Please explain what procedures presently exist for carrying out the duties of the police chief in the event of a non-radiological emergency requiring the assistance of the police department when the chief is not available. Please also state whether these same procedures can be used in radiological emergencies, and explain the basis for the response.

CONTENTION Hampton Falls 4

Hampton Falls 4.1

Who should be the initial point of contact in the event of a radiological emergency in the Town of Hampton Falls.

Hampton Falls 4.2

Who should have the primary responsibility for activation of the public alerting system in the Town of Hampton Falls?

Hampton Falls 4.3

Upon whom are the selectmen in the Town of Hampton Falls willing to rely as backup for the responsibility of activating the public alerting system?

Hampton Falls 4.4

Who, in the opinion of the Hampton Falls Selectmen, should be in direct charge of all emergency operations for the Town of Hampton Falls?

Hampton Falls 4.5

What additional equipment must, in the opinion of the Town of Hampton Falls, be provided for the proper implementation of its radiological emergency response plan? Please include, without limitation, the following in your response:

- (a) How many pocket voice pagers are required;
- (b) What means of activating the alerting system is required;
- (c) What number of tone alert radio receivers is necessary.

Hampton Falls 4.6

Please identify each of the Hampton Falls emergency response organizations and emergency personnel who, in the opinion of Hampton Falls, will not be notified properly in the event of a radiological emergency at Seabrook Station. Please explain the basis for this response, and identify all supporting documents.


Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

STEPHEN E. MERRILL
ATTORNEY GENERAL

Dated: April 30, 1986

By



George Dana Bisbee
Assistant Attorney General
Environmental Protection Bureau
Office of the Attorney General
25 Capitol Street
Concord, New Hampshire 03301
Telephone (603) 271-3678