March 5, 1987

UNITED STATES NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	
Public Service Company of New Hampshire, et al.	Docket Nos. 50-443 OL 50-444 OL
(Seabrook Station, Units 1 & 2)	OFFSITE EMERGENCY PLANNING ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S FIRST SET OF INTERROGATORIES AND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO APPLICANTS ON REVISION 2 TO THE NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLAN

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory. We remind you of your obligation to supplement answers to interrogatories, under 10 C.F.R. § 2.740(e).

The following definitions shall apply to these interrogatories:

1) "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other

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means, computer data, computer printouts, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2) "Identify" with respect to any document shall mean to state the following: the document's title, its date, the author of the document, the person to whom to document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3) "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; and any document recording or documenting such action.

4) "Identify" with respect to an individual shall mean state the individual's name, address, employer, occupation, and title.

5) "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the

substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; and the existence and location of any and all documents relating to such action or matter.

6) "Applicants" shall include any of the Seabrook owners; New Hampshire Yankee; or any contractors retained by the Seabrook owners or New Hampshire Yankee to prepare or evaluate the New Hampshire Radiological Emergency Response Plan.

GENERAL INTERROGATORIES

1) In accordance with 10 C.F.R. § 2.740(e), please supplement your answers to NECNP's First Set of Interrogatories and Requests for the Production of Documents to Applicants on New Hampshire Radiological Emergency Response Plans, filed April 30, 1986.

2) What is Applicants' position on each of the contentions that has been admitted in this proceeding with respect to Revision 2 of the New Hampshire Radiological Emergency Response Plan? What is the basis for your position?

3) On or before March 19, 1987, please produce at the office of Harmon & Weiss all documents on which you rely or intend to rely during this proceeding to support your position on each of the contentions that have been admitted in this proceeding with respect to Revision 2 of the New Hampshire Radiological Emergency Response Plan. This includes but is not limited to all

documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

4) Please identify all persons on whose factual knowledge, opinions, or technical expertise you rely or intend to rely for your position on each of the contentions that has been admitted in this proceeding with respect to Revision 2 of the New Hampshire Radiological Emergency Response Plan.

5) Please identify all persons you may call as witnesses on each of the contentions that has been admitted in this proceeding with respect to Revision 2 of the New Hampshire Radiological Emergency Response Plan. Please describe the substance of their testimony; and identify and describe any documents and the portions thereof that they may rely on for their testimony.

6) On or before March 19, 1987, please produce in the office of Harmon & Weiss all documents in the Applicants' possession which analyze or evaluate in any way the adequacy of the New Hampshire RERP or New Hampshire's state of preparedness in the event of a radiological emergency.

7) Please identify all persons who participated in the development or drafting of Revision 2 to the New Hampshire RERP.

8) Please identify all persons who are responsible for training of emergency response personnel for implementation of Revision 2 to the New Hampshire RERP.

9) Please describe all plans for training emergency response personnel under Revision 2 of the RERP. Identify all individuals who are responsible for that program.

INTERROGATORIES REGARDING SPECIFIC CONTENTIONS

NHLP-6 and HAMPTON REVISED CONTENTION IV TO REVISION 2

10) Identify, describe and/or produce any communications or agreements between the Teamsters Union and its member drivers regarding the NHRERP.

11) Provide copies of regular employment contracts of drivers in the Teamsters Union who will be relied on during a radiological emergency.

12) Provide all agreements or correspondence between the Teamsters Union or Union officials, Applicants, or the State of New Hampshire, regarding the possible provision of transportation services by Teamsters members during a radiological emergency.

HAMPTON REVISED CONTENTION VIII TO REVISION 2

13) NUREG-0654 states that "the overall objective of emergency response plans is to provide dose savings (and in some cases immediate life savings for a spectrum of accidents that could produce offsite doses in excess of Protective Action Guidelines (PAGs)." In this vein, NUREG-0654 requires planners to consider, inter alia, the timing and consequences of potential releases. What spectrum of accidents did Applicants consider in developing Revision 2 to the NHRERP, and what are the characteristics of those accidents? What quantitative dose savings result

from implementation of the protective measures proposed in Revision 2, given each type of accident that was considered? Please provide all data that supports your conclusion.

14) Assuming that dose reductions are achieved, describe the health effects associated with each of the accidents that you considered in developing Revision 2 to the REPP.

15) Identify and provide access to any and all of Applicants' calculations of potential dose consequences to the public in the event of a radiological emergency at Seabrook, and the bases for those calculations.

Respectfully submitted,

Diane Curran
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March 5, 1987

I certify that on March 5, 1987, copies of the foregoing interrogatories were served by Federal Express or by hand on the NRC Staff, the Executive Director for Operations, the Licensing Board, the State of New Hampshire, FEMA, and Applicants; and by first-class mail on all other parties listed on the attached service list.

Diane Curran