

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

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF)	Docket Nos. 50-443-OL
NEW HAMPSHIRE, et al.)	50-444-OL
)	Off-site Emergency
(Seabrook Station, Units 1 and 2)	Planning Issues
)	
)	

AFFIDAVIT OF JOHN G. ROBINSON

JOHN G. ROBINSON, being on oath deposes and says as follows:

1. My professional qualifications are attached hereto and marked "A".
2. Although a PEPZ of less than one mile is technically justifiable for Seabrook Station, it is prudent to establish a one-mile PEPZ. The one-mile PEPZ will assure that adequate resources and all aspects of emergency planning are in place prior to commencement of operation. The one-mile PEPZ, in effect, optimizes emergency planning by ensuring

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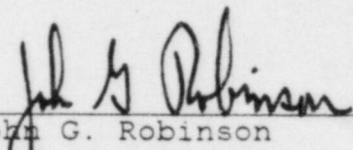
that the focus of emergency response is on those individuals who stand to benefit most from effective emergency response actions. The one-mile PEPZ reduces the competition for emergency planning resources by those members of the public who would not really benefit but would reduce the effectiveness of emergency protective actions for those individuals considered most at risk.

3. The emergency planning regulatory requirements for licensees, states and local governments are specified in 10 CFR 50.47, 10 CFR 50.54, 10 CFR 50, Appendix E and 44 CFR 350. Except with respect to the geographical scope of certain matters, the licensee emergency planning regulatory requirements will not be affected by reducing the plume EPZ because the NRC requirements governing the licensee emergency preparedness program is independent of the size of the plume EPZ. The licensee will still be required to have the necessary plans and procedures to assure that adequate protective measures can and will be taken in the event of a radiological emergency and the health and safety of the public is protected. This will include meeting the planning and preparedness standards set forth in 10 CFR 50.47, 10 CFR 50.54, 10 CFR 50, Appendix E and related criteria contained in NUREG-0654/FEMA-REP-1, Revision 1. In summary, the licensee emergency preparedness program would include having an adequate emergency response plan and procedures; establishing and defining an emergency response

organization; providing adequate emergency response facilities and equipment to support the emergency response; establishing a standard emergency classification system; provisions to notify the appropriate Federal, state and local response organizations; adequate methods for assessing and monitoring actual or potential off-site consequences which include having established protective actions to be implemented to protect the public; arrangements for requesting additional emergency assistance from other facilities and organizations in the local and private sector; performing the required drills and exercises; providing the necessary emergency preparedness training; and maintaining its emergency preparedness program up-to-date.

4. State and local response organizations in the reduced EPZ will still be required to develop radiological emergency plans. The state and local radiological emergency plans must satisfy the emergency planning and preparedness requirements specified in 44 CFR Part 350 and related criteria contained in NUREG-0654/FEMA-REP-1, Revision 1. These state and local plans will be reviewed by the Federal Emergency Management Agency (FEMA) to determine their adequacy and whether there is reasonable assurance that they can be implemented. Therefore, the State of New Hampshire and the local communities within the one-mile plume EPZ will have radiological emergency plans and procedures in place to respond to emergencies at the Seabrook Station.

5. The one-mile PEPZ for Seabrook Station will assure that adequate resources and all other elements of the regulatory planning basis are in place prior to operation. This planning base will establish the emergency management and resources necessary to rapidly extend protective action strategies beyond the one-mile PEPZ on an ad hoc basis should the need ever arise. This emergency planning approach is consistent with the philosophy and guidance established in NUREG-0396 that planning for the 10-mile radius PEPZ would provide a basis for any necessary actions necessitated beyond the planning zone on an ad hoc basis.



John G. Robinson

COMMONWEALTH OF MASSACHUSETTS

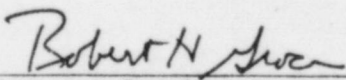
Middlesex
County

, ss.

February 3 , 1986

John G. Robinson, being on oath, deposes and says that he is the author of the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,



Notary Public
My Commission Expires:
August 29, 1991

JOHN G. ROBINSON
DIRECTOR-ENVIRONMENTAL ENGINEERING

My name is John G. Robinson. My business address is Yankee Atomic Electric Company, 1671 Worcester Road, Framingham, Mass. 01701. My present position is Director of Environmental Engineering.

I received my Bachelor of Science Degree in Industrial Education from Central Connecticut State College in 1957; and for the past twenty-seven years, I have served in various radiation protection, reactor operations, emergency planning, environmental protection, and management positions in the nuclear field.

I was employed by the Electric Boat Division of the General Dynamics Corporation from 1958 to 1960. Work assignments involved radiation protection activities associated with the startup, initial testing and refueling of naval nuclear reactor systems. Assignments during this period also included participation in the defueling, removal and disposal of a sodium cooled reactor from a nuclear submarine.

In 1960, I joined the New York Shipbuilding Corporation in Camden, New Jersey, as Assistant Health Physicist. Initially, this assignment involved training at Oak Ridge in preparation for the fueling, startup, and testing of the N.S. Savannah. I was responsible for preparing radiation emergency plans for the fuel loading and startup testing programs, health physics operations procedures and health physics training of the reactor operators. I was a member of the shipboard test crew during the seven-month reactor testing and sea trial program.

In 1961, I transferred to the States Marine Line, operators of the N.S. Savannah. I was responsible for watch supervision of shipboard radiation protection functions. During this period I prepared the "Health Physics Operators Manual for a Nuclear Servicing Vessel."

In 1963, I was transferred to the American Export Lines as Chief Health Physicist for the N.S. Savannah. I was responsible for supervision of the N.S. Savannah Health Physics Department. The functions of this department included radiological surveillance, reactor radiochemistry, film dosimetry programs, bioassay and training of reactor operators. This position required meeting with foreign government officials to discuss shipboard radiological conditions and emergency plans before the ship was authorized to enter each foreign port. During this period, I attended a seven-month reactor training program at the Babcox & Wilcox Company and U.S. Maritime Academy and received a reactor operator's license for the N.S. Savannah.

In November 1964, I joined the Yankee Atomic Electric Company in Rowe, Massachusetts, as Technical Assistant in the Health Physics Department. This eighteen-month assignment was primarily for orientation and training in power plant radiation protection activities associated with operations, maintenance and refueling prior to my transfer to Connecticut Yankee, in 1966, as Plant Health Physicist.

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As Connecticut Yankee Plant Health Physicist, I was responsible for development and supervision of the plant radiation protection programs which included the design of the operational environmental radiation surveillance program and radiation emergency planning.

In 1967, I was transferred to the Safety Analysis Section of the Yankee Engineering Staff and carried out varied assignments in connection with Yankee, Connecticut Yankee, Vermont Yankee, and Maine Yankee related to radiation protection activities. In 1970, I was appointed Section Head of the Radiation Protection Section with primary responsibility for developing environmental radiation surveillance programs, in-plant radiation monitoring, emergency planning, reviewing plant radiation protection activities, and providing internal dosimetry services for plant personnel.

Since 1973, I have served in my present position of Director of Environmental Engineering, and as such, have been responsible for the management and overall coordination of the Environmental Engineering Department. Reporting to me in this function are the managers of the Radiological Engineering Group, the Environmental Sciences Group, Radiation Protection Group and the Environmental Laboratory Department.

I am a member of the Health Physics Society and the American Nuclear Society, and am a past President of the New England Chapter of the Health Physics Society.

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and the

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., attorney for the applicants herein, hereby certify that on December 18, 1986, I made service in conformity with the Commission's regulations of the following documents:

1. Applicants' Petition Under 10 CFR § 2.758 and 10 CFR § 50.47(c) With Respect to the Regulations Requiring Planning for a Plume Exposure Pathway Emergency Planning Zone in Excess of a One-Mile Radius.
2. Applicants' Memorandum in Support of Their Petition Under 10 CFR § 2.758 and 10 CFR § 50.47(c) With Respect to the Regulations Requiring Planning for a Plume Exposure Pathway Emergency Planning Zone in Excess of a One-Mile Radius.
3. Seabrook Station Risk Management and Emergency Planning Study, PLG-0432 (1985).

4. Seabrook Station Emergency Planning Sensitivity Study (SSEPSS).
5. Affidavit of Karl N. Fleming.
6. Affidavit of Dr. Alfred Torri.
7. Affidavit of Robert J. Lutz.
8. Affidavit of Dr. Robert E. Henry.
9. Affidavit of Keith Woodard.
10. Letter of Robert J. Budnitz of November 9, 1985 to New Hampshire Yankee Division of Public Service Company of New Hampshire.
11. Letter of Dr. Robert J. Budnitz of January 17, 1986 to New Hampshire Yankee Division of Public Service Company of New Hampshire.
12. Letter of Dr. Robert J. Budnitz of April 29, 1986, to New Hampshire Yankee Division of Public Service Company of New Hampshire.
13. Affidavit of Dr. Robert J. Budnitz.
14. Affidavit of Dr. David C. Aldrich.
15. Affidavit of Dr. Joseph M. Hendrie.
16. Affidavit of Dr. Norman C. Rasmussen.
17. Affidavit of Dr. Robert L. Ritzman.
18. Affidavit of Dr. William R. Stratton.
19. Affidavit of Dr. Richard Wilson.
20. Licensing Aspects of the Seabrook Emergency Planning Zone Study, YAEK-1502, Yankee Atomic Electric Co. (1985).
21. Affidavit of Dr. Shengdar Lee.
22. Affidavit of Peter S. Littlefield.
23. Affidavit of John G. Robinson.

upon the individuals listed below, by transmission via Federal Express:

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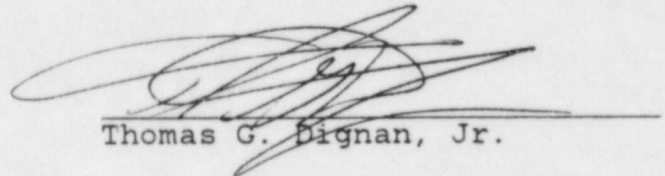
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