



George S. Thomas
Vice President-Nuclear Production

Public Service of New Hampshire

New Hampshire Yankee Division

NYN-87113

September 18, 1987

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

References: (a) Facility Operating License NPF-56 and Construction Permit
CPPR-136, Docket Nos. 50-443 and 50-444

(b) PSNH Letter (NYN-87046), dated April 8, 1987, "Radiological
Emergency Response Plan for Commonwealth of Massachusetts,"
G. S. Thomas to Document Control Desk

Subject: Seabrook Plan for Massachusetts Communities

Dear Sir:

In recent discussions with the NRC Staff (i.e., meetings of July 30 and September 16, 1987), New Hampshire Yankee (NHY) has stated that a comprehensive utility plan would be submitted for that portion of the Seabrook Station Emergency Planning Zone (EPZ) within the Commonwealth of Massachusetts. Enclosed please find nine (9) copies of this utility plan, entitled "Seabrook Plan for Massachusetts Communities", which consists of ten (10) volumes of material. The enclosed Plan supersedes that previously submitted via Reference (b) and is being submitted for NRC Staff and FEMA review pursuant to 10CFR50.33(g) and 10CFR50.47(c)(1).

This Plan was developed in recognition of, and to compensate for, the fact that the Commonwealth of Massachusetts and the local Massachusetts municipalities located within the plume exposure pathway emergency planning zone for Seabrook Station are not currently participating in emergency planning. The compensatory actions which are delineated in the enclosed Plan can range from supporting requests for augmented personnel and resources to performing emergency response actions or implementing the total response in place of State and local organizations. The Plan provides a number of features, including (1) added plans and procedures providing compensating actions; (2) early contacts and close communications with Massachusetts State and local government emergency response infrastructures and organizations to overcome the potential for delay from the lack of governmental preplanning; (3) added personnel specifically to accompany, advise, and directly provide resources to State and local officials in an actual emergency; (4) added personnel to provide protective action support that otherwise would have been provided through State and local governmental preplanning; (5) formalized

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PDR ADOCK 05000443
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agreements providing facilities, equipment, and supporting services that otherwise would have been provided through State and local government planning; and (6) early, close, and continuing communications with members of the public in the EPZ to ensure that they are kept informed of the status and provisions for response. The plan is intended to be implemented by NHY's Offsite Response Organization and does not rely on previously-developed State and local government resources. The extent to which NHY has developed the required personnel and resources to implement this plan is detailed in Attachment 1 provided herewith. It is NHY's intention to continue developing and obtaining resources in excess of plan requirements to assure the capability to implement the plan under all circumstances.

In addition to identifying personnel and resources, the Plan describes the training program for offsite organization members to implement its concept of operations. The experience and qualifications of each NHY Offsite Response Organization member was considered in placing an individual within the response organization. This consideration of an individual's experience and qualification during the response organization placement process supports the training program and plan implementation. As recently discussed with the NRC Staff, classroom training began on September 14 and is expected to be completed in October. Following this classroom training, NHY will initiate a program of drills and exercises supplemented as needed by additional classroom training. All these training activities will culminate in a graded exercise which NHY expects to hold in the Spring of 1988.

The enclosed Plan was developed to address the sixteen (16) planning standards of 10CFR50.47(b) and NUREG-0654/FEMA REP-1 as well as other planning concerns such as integration of utility, state, local and federal government response and interfacing with contiguous states. To ensure a smooth integration of response, the Plan was developed to be consistent with the Commonwealth of Massachusetts Radiological Emergency Response Plan used for the operating nuclear power plants located in, or within 10 miles of, the Commonwealth's boundaries, and to be consistent with accepted principles of emergency planning with regard to event classification, protective action guides, basis of protective action recommendations, EPZ access control, termination of protective action and recovery/re-entry. This Plan was also subjected to numerous technical reviews which were conducted independent of the planning organization.

An additional feature of the enclosed Plan is to coordinate emergency response efforts in Massachusetts with those in the State of New Hampshire. To accomplish this, the NHY Offsite Response Organization maintains extensive communications links between its key emergency response facilities and personnel and those of the New Hampshire State Emergency Response Organization; and the procedures to implement this plan delineate steps for contacting and interfacing with the key New Hampshire personnel. This provides for coordination of such crucial emergency functions as accident and dose assessment, activating the prompt notification system and the Emergency Broadcast System, issuing news releases, implementing protective

actions, requesting Federal assistance, and focusing personnel and resources where most needed. The continuous exchange of information between the two organizations and the coordination of key emergency response actions ensures that the health and safety of the citizens of both states are protected.

NHY, as recently discussed with the Staff, will be continuing planning efforts in a few areas following submittal of the enclosed Plan. These activities involve verifying and updating, as necessary, ingestion pathway data provided in the Plan, obtaining a Letter of Agreement from the Department of the Interior, developing route maps for traveling from reception centers to congregate care centers, and assisting in the development, as necessary, of internal facility plans for schools, hospitals, and other special facilities. It should be recognized that none of these items will require additional personnel, facilities or equipment, nor will they impact any ongoing training of emergency responders required to implement the concept of operations described in the Plan.

The Letter of Agreement and production of route maps are straightforward activities and should be completed in the near future. The ingestion pathway data included in the plan was extracted from the information contained in the Radiological Emergency Response Plan for the Commonwealth of Massachusetts. This data base is being verified for completeness by NHY and will be updated where necessary.

The detailed plans for special facilities such as schools, nursing homes and hospitals were drafted as part of the original Commonwealth of Massachusetts planning efforts in 1985 and 1986. Coordination with these facilities is needed to update, revise and finalize these plans. These plans deal with the facility's internal shelter and evacuation efforts and may utilize their own existing resources. The enclosed Plan already includes the necessary information flow, coordination, assignment of resources and actions needed to evacuate if no other facility planning arrangements have been made. This includes letters of agreement for buses, ambulances, vans and host facilities. Should the special facilities not cooperate in the planning effort, the NHY Offsite Response Organization, through the actions of the School Liaisons and Special Population Liaisons, can successfully implement an evacuation effort. Because this capability currently exists in the Seabrook Plan for Massachusetts Communities, there is not a pressing need for explicit facility plans at this time, and these plans will be submitted prior to the graded exercise.

We recently have been informed that a local Massachusetts community has initiated the removal of certain community-owned sirens which are part of the prompt notification system. These are the only community-owned sirens within the notification system for Seabrook Station. NHY is evaluating the impact of the communities' action and is in the process of developing suitable alternative provisions (e.g.; mobile sirens). NHY will advise the NRC of the action to be taken in response to this development.

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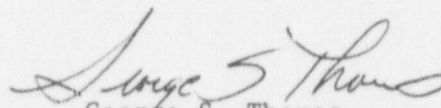
September 18, 1987
Page 4

Based on the foregoing and the Plan itself, NHY believes that the Seabrook Plan for the Massachusetts Communities fully compensates for the absence of governmental participation in emergency planning for Massachusetts. This Plan in combination with our commitment to provide the necessary personnel, training, resources, facilities and equipment provides a reasonable basis and framework by which the health and safety of the public will be protected. Accordingly, NHY will implement this Plan and herewith submits it, in accordance with 10CFR50.30, 50.33 and 50.47(c)(1), for NRC staff and FEMA review. NHY will, through its counsel, request the Atomic Safety and Licensing Board to establish a hearing schedule for the Plan and will also request the Commission to lift its stay on issuance of a low power license.

Finally it should be noted that the enclosed Plan contains redactions. These redactions have been made to assure that there will not be any unwarranted invasion of personal privacy of individuals and organizations needed to implement the Plan and certain members of the general public.

One (1) copy of the enclosed redacted plan is being transmitted to each of the interested parties and to each member of the ASLB Panel. Subsequent distributions will be made to appropriate Massachusetts State and local governmental organizations.

Very truly yours,


George S. Thomas

Enclosure

cc: Atomic Safety and Licensing Board Service List

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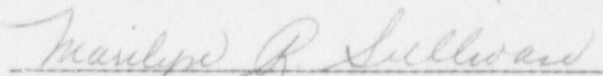
Mr. A. C. Cerne (w/o enclosure)
NRC Senior Resident Inspector
Seabrook Station
Seabrook, NH 03874

STATE OF NEW HAMPSHIRE

Rockingham, ss.

September 18, 1987

Then personally appeared before me, the above-named George S. Thomas who, being duly sworn, did state that he is Vice President - Nuclear Production of Public Service Company of New Hampshire, that he is duly authorized to execute and file the foregoing information in the name and on behalf of Public Service Company of New Hampshire, and that the statements therein are true to the best of his knowledge and belief.



Marilyn R. Sullivan, Notary Public

My Commission Expires: April 29, 1992

ATTACHMENT 1 TO NYN-87113

RESOURCE SUMMARY

PERSONNEL

Offsite Response Organization Positions Required	-	810
Emergency Responders Available	-	1221

FACILITIES

All facilities under Contract or Letter of Agreement

- o Emergency Operations Center - located at utility-owned facility
- o Staging Areas-located at utility-owned facilities
- o Reception Centers-located at utility-owned facilities
- o Transfer Points-located at utility-owned facilities
- o Congregate Care Centers-over 935,000 sq. ft. available which will shelter in excess of 20,000 evacuees
- o Hospital-MS-1 Hospital and Backup
- o Emergency Broadcast System Station

EQUIPMENT

	<u>Number Required</u>	<u>Number Purchased/ Requisitioned</u>	<u>Number Under Contract or Letter of Agreement</u>
Portable Radios	200	200	
TLD's	1275	2500	
Pencil Dosimeters	1275	2500	
Monitoring Trailers	3	3	
Buses	375		827
Ambulances	46		64
Tow Trucks	12		31
Wheelchair Vans	59		85

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*Letter of Transmittal Only



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Vice President-Nuclear Production

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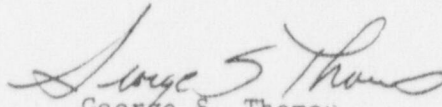
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STATE OF NEW HAMPSHIRE

Rockingham, ss.

September 18, 1987

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Marilyn R. Sullivan, Notary Public
My Commission Expires: April 29, 1992

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