ATTACHMENT A

August 10, 1989

UNITED STATES OF AMERICA

before the

NUCLEAR REGULATORY COMMISSION

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 (Emergency Planning Issues)

AFFIDAVIT OF EDWARD A. BROWN

I, Edward A. Brown, hereby depose and say as follows:

1. I am President and Chief Executive Officer of the New Hampshire Yankee Division (NHY) of Public Service Company of New Hampshire. I have held this position since 1984. Among my duties are those executive responsibilities and management authorities commensurate with directing the licensing, start up and operation of Seabrook Station while ensuring that safety and quality remain at the highest level and in keeping with all license requirements.

2. I am also Chairman and Chief Executive Officer of Yankee Atomic Electric Company (YAEC), which operates the

Yankee plant in Rowe, Massachusetts and has demonstrated its competence through 28 years of safe, efficient operation of that plant. YAEC's President and Chief Operating Officer reports to me and he has the direct responsibility for the continued safe, high quality operation of the Yankee-Rowe plant.

3. I graduated from the United States Military Academy at West Point in 1952 with a Bachelor of Science Degree in Engineering. After completing my military service in 1956, I joined New England Power Service Company (NEPS). I held a wide variety of engineering, administrative, and management positions at NEPS from 1956 to 1976. In 1976, I was elected President of NEPS, and in 1982 I was appointed Chairman and Chief Executive Officer of that company. In 1984, I was elected Chairman of YAEC, and President and Chief Executive Officer of New Hampshire Yankee Division (NHY) of Public Service Company of New Hampshire. In 1989, I assumed the additional responsibilities of Chief Executive Officer of YAEC. I am also a graduate of the Advanced Management Program of the Harvard Graduate School of Business Administration.

4. The Seabrook Station Emergency Response Organization (ERO) is the integrated collection of station and other personnel trained in and responsible for implementing the Seabrook Station Radiological Emergency Plan

(hereinafter referred to as the onsite plan). Initially established in 1985, the organization includes onshift personnel, other station personnel, corporate personnel, and Yankee Nuclear Services Division personnel. The purpose of this affidavit is to describe the manner in which the onsite plan and the ERO have already been demonstrated to be adequate and to fully meet NRC regulations; state the unjustifiable hardships that would be incurred if another onsite exercise is conducted and additional litigation and delay follows; and further state why the public interest of the people of New England will be served by avoiding unnecessary litigation.

5. In October, 1986, Seabrook Unit 1 received a 40-year operating license from the NRC with a restriction to zero power operation. Fuel was loaded in the reactor and Seabrook Unit 1 became an operational plant. Since that time Seabrook Station has been operating in accordance with its licensed Technical Specifications, with required shift coverage in the Control Room, and with the operating organization and corporate support elements in place to assure public health and safety. The NRC Staff had provided its evaluation of the operational organization in Supplement 5 to the Seabrook Station Safety Evaluation Report, Chapter 13, dated July, 1986. On May 26, 1989 Seabrook received a

low power operating license and in June, low power physics testing was completed.

6. NRC evaluation of the ERO and the onsite plan began as early as late 1985 with the Emergency Plan Implementation Appraisals. Conducted by the NRC Staff from December 9-13, 1985, and from March 24-28, 1986 with a follow-up inspection from June 9-13, 1986, the appraisals consisted of selective examinations of the emergency response program. The NRC Staff reviewed procedures and representative records; inspected facilities, training, and equipment; conducted interviews; and made observations. The results of these appraisals are documented in NRC Inspection Reports Nos. 50-443/85-32, 50-443/86-18 and 50-443/86-30 respectively. No violations were cited and all open items have been addressed and closed out.

7. Most significantly, the onsite plan has undergone three NRC graded exercises conducted in February 1986, December 1987 and June 1988. In each exercise all major facilities related to the onsite emergency plan were activated and drilled, including the Control Room, the Technical Support Center, the Emergency Operations Facility, the Operational Support Center and the Media Center. In the evaluation of each exercise, the NRC determined that the emergency response actions were adequate to provide

protective measures for the health and safety of the public (see NRC Inspection Report Nos. 50-443/86-10, 50-443/87-25, and 50-443/88-09). No violations were ever noted by the NRC during these exercises and all their comments were addressed and closed out.

8. Excluding security, there are over 500 individuals currently members of the Emergency Response Organization assigned to either the Control Room, the Technical Support Center, the Emergency Operations Facility, the Operational Support Center or the Media Center. The average experience level of these individuals is over two and one-half years. Over half have participated in one of three graded onsite exercises, and a quarter have participated in two. Many of the newer ERO members are in less critical positions as part of large staffs, such as EOF Administrative Support (47), Auxiliary Operator (47), Control Room Communicator (46) and others. As one focuses on the decisionmaking positions, which are tabulated in Attachment A to this affidavit, the experience level therefor is even greater. They are all at least three deep with an overall ERO experience level of about three and one-third years. At least one person currently assigned to each position listed on Attachment A participated in the June, 1988 graded exercise, with additional substantial participation in the two earlier graded onsite exercises.

9. The matrix provided as Attachment B to this affidavit depicts a breakdown of the drills and exercises related to the onsite plan, the minimum frequencies with which they are required to be conducted according to NHY procedures, and the actual frequencies with which they have been conducted since receipt of the fuel load license in October 1986. It shows that by the end of 1989, NHY will have conducted four exercises, 13 combined functional drills and numerous other facility and functional drills. In addition to the drills and exercises, training of the ERO is conducted on a procedurally prescribed schedule. Each ERO member has received initial qualification training and must receive annual requalification training.

10. Since receipt of the fuel load license in October, 1986, NHY has also actually had to implement portions of the onsite plan in response to two situations that were classified as "Unusual Events." Both involved minor equipment failures. The first instance occurred in February, 1987, and in the NRC Inspection Report (Inspection No. 50-443/87-08) which examined the event and NHY's response, the NRC criticized NHY for taking too long to notify the Commonwealth of Massachusetts. The second "Unusual Event" occurred on December 19, 1988. This time the NRC reported that "[a] licensee strength was identified on December 19,

1988 when it was discovered that meteorological tower data was lost for a period of six minutes. Operator actions were prudent and in accordance with procedures . . ." and further noted that "[a]ll notifications to the Commonwealth of Massachusetts, State of New Hampshire and the NRC were made promptly and in accordance with NRC Regulations and the SSREP" (NRC Inspection Report No. 50-443/88-17 at ii and 3).

11. Finally, in a Safety Evaluation Report (SER) written by the NRC on Emergency Planning and Preparedness (attached to NRC Letter from Victor Nerses to Edward A. Brown dated July 28, 1989), the NRC states in Section 13.3.3 of the SER that "[t]he results of these inspections and observations of exercises, which are documented in pertinent exercise reports, verify the continued adequacy of the Seabrook onsite emergency preparedness program." In the cover letter accompanying the SER, the NRC concludes that "the Staff review has found that onsite emergency preparedness continues to be acceptable and is adequate for full power operation."

12. In summary, the Seabrook Station organization completed the transition from the posture needed to support a plant under construction to that needed to assure safe operation of the facility approximately three years ago. Construction of Seabrook Station was completed in July, 1986, and Seabrook has actually been functioning as an operational

facility since it received its zero-power license in October 1986. The Emergency Response Organization, which is an important element of the overall operational organization, has been in place for approximately three and one-half years and in that period has been continuously trained, drilled, exercised and evaluated. It is an experienced, well-trained organization, that has already proven itself capable of providing an adequate response to protect the health and safety of the public.

13. Any further delay in obtaining a full power license and reaching commercial operations which might be caused by litigation of an onsite plan, besides being unnecessary, will also be very costly. Each day that full power commercial operation is delayed equates to an additional plant cost of $1.7 million, which must ultimately be borne by the companies, their shareholders, or their customers. Further, each day of delay results in a loss in revenue to the Seabrook Joint Owners of about $2.8 million to $3.6 million per day.

14. However, it will not only be the Joint Owners and their ratepayers and shareholders who will be hurt by unnecessary delay. The power that Seabrook Station can produce is needed now to satisfy New England's growing demand for power. New England is experiencing one of the highest

rates of growth in the nation. Since August of 1987, New England has experienced severe shortages of electrical power during both the summer and winter peak demand periods. It has only been through aggressive action by the New England Power Pool (NEPOOL), which manages the power supply for New England, that service throughout the area was maintained. During 1988, challenges in power system operation occurred frequently, whether it was generation shortage throughout the region or a transmission limitation. Emergency actions taken to meet these challenges and decrease the high demand included enforcement of interruptible power contracts with industrial users, voltage reductions, and public appeals to cut back on electricity usage. A study commissioned by the Greater Boston Chamber of Commerce in September, 1988, estimated that the total impact of non-accidental energy supply shortages on the Massachusetts business community alone, during the preceding 12 month period, was approximately $86.8 million.

15. The electricity capacity shortage situation is not likely to change for the better anytime soon. New England's economy has been growing significantly, with a parallel increase in electrical energy consumption (KWH) and peak electrical power demand (MW). In fact, as recently as July 27, 1989, NEPOOL reported a new summer peak power demand. It was only because all available power plants were running

steadily, with no unplanned outages occurring, that this peak demand was met. This growth has placed an unprecedented strain on the New England electric system, since there has not been a corresponding increase in electric generating facilities. With the decrease in electrical reserve margin has come an increase in the frequency of use of NEPOOL emergency operating procedures. During the oil crisis of the early 1970's, these emergency operating procedures were used on many occasions. As that crisis eased and non-oil generating facilities were brought into production, emergency operating procedures were not used again in New England from 1974 through 1983. Emergency load relief measures were implemented by NEPOOL more times in 1988 than at any time since the early 1970's.

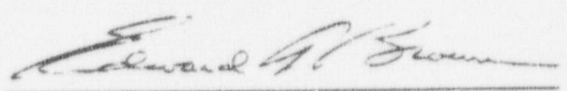
16. New England's electrical energy consumption increased 5.2% in 1988, nearly equaling the 5.3% growth experienced in 1987. Since 1983, electric energy consumption has grown at a compound annual growth rate of 4.6%. Along with growth in energy consumption, winter and summer peak demand has been increasing at an average rate of 4.5% per year since 1983.

17. With the continuation of sustained load growth in New England during 1988 and into 1989, NEPOOL and New England utilities were required to make optimum use of virtually

every generator and transmission line in the New England region.

18. Based on a NEPOOL draft 1990 Annual Maintenance Schedule, it is projected that, in 1990, New England will experience capacity deficiencies in 35 of 52 weeks without power from Seabrook. In some cases the deficiencies range as high as 1300 MW, which corresponds to a power plant larger than the size of Seabrook Station. New England is in a severe capacity shortage situation. NEPOOL is very restricted in scheduling planned outages during the summer and winter peak periods. This places heavy maintenance demands in the spring and fall, which results in additional capacity deficiencies within this time period and thus results in capacity shortages throughout the entire year.

19. A report published in November, 1988, by the State of New Hampshire, State Electrical Energy Needs Planning Committee, recognized the importance of Seabrook operation in meeting the electrical demands. As stated under their recommendations, "[t]he Committee urges the Nuclear Regulatory Commission to promptly resolve all outstanding questions relating to the Seabrook Nuclear Power Plant".



Edward A. Brown

STATE OF NEW HAMPSHIRE

Rockingham, ss. August 10, 1989

Edward A. Brown, 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,

Beverly E. Brown
Notary Public

My Commission Expires: March 6, 1990

ATTACHMENT A

SUMMARY OF KEY POSITIONS IN EMERGENCY RESPONSE ORGANIZATION (JULY 1989)

Position Title	No. Qualified and Assigned as of this report	Avg Experience in any ERO Position (YRS)	Avg Experience in Position Listed (YRS)	Assigned Player Participation in Exercises in any ERO Position	Assigned Player Participation in Exercise in Current Position	No. Participated in 1988 Exercise
CONTROL ROOM:						
Short Term Emergency Director	8	3.67	3.61	4 of 8	4 of 8	1
TECHNICAL SUPPORT CENTER:						
Site Emergency Director	4	3.67	3.00	4 of 4	2 of 4	2
Emergency Operations Manager	4	3.67	3.40	3 of 4	2 of 4	2
Technical Services Coordinator	5	2.97	2.43	2 of 5	1 of 4	1
Health Physics Coordinator	3	3.67	3.11	3 of 3	2 of 3	2
Reactor Engineer	5	2.90	2.90	2 of 5	2 of 5	2
EMERGENCY OPERATIONS FACILITY:						
Response Manager	3	3.50	2.81	3 of 3	1 of 3	1
Emergency Communications Coordinator	3	2.16	1.52	2 of 3	2 of 3	2
EOF Coordinator	3	3.67	2.61	3 of 3	1 of 3	1
Dose Assessment Specialist	3	2.42	2.19	1 of 3	1 of 3	1

Position Title	No. Qualified and Assigned as of this report	Avg Experience in any ERO Position	Avg Experience in Position Listed	Assigned Player Participation in Exercises in any ERO Position	Assigned Player Participation in Exercise in Current Position	No. Participated in 1988 Exercise
OPERATIONAL SUPPORT CENTER:						
OSC Coordinator	8	3.67	3.35	4 of 8	3 of 8	2
Radiological Controls Coordinator	3	3.67	3.61	3 of 3	3 of 3	2
	Overall Average	3.35	3.00			

ATTACHMENT B
SHEET 1 OF 3

DRILL AND EXERCISE DESCRIPTIONS AND FREQUENCIES

The following are minimum frequencies required. Additional drills may be held as determined by the Director of Emergency Response and Implementation.

TYPE	DESCRIPTION	FREQUENCY	DRILLS ACTUALLY HELD 1989	1988	1987
Communications Drills	Numerous drills of various offsite and onsite emergency communications systems to ensure capability in accordance with requirements.	Weekly, Monthly, Quarterly, Semi-annually, Annually	137(1)	140	-
Augmentation (Call-Out) Drill	This drill will test the ability to make shift augmentation as specified in the SSREP.	Semi-annually	2(1)	3	2
Medical Emergency Drill	This drill involves the response to simulated contaminated injured/ill individuals including participation by offsite ambulance services and medical treatment facilities. The drill tests the capabilities of emergency vehicle access to plant areas, on-site Health Physics support, first aid, off-site services and on-site and off-site communications.	Annually	1(1)	1	4
Post Accident Sampling Drill	This drill involves the use of the Post-Accident Sampling System (PASS) and alternate means of analysis and sampling, and the response to actual radiation levels associated with sampling procedures and Rad/Chem response personnel. Scheduled as part of a Health Physics Drill.	Annually	1	1	1
Health Physics Drill	This drill involves the response to, and analysis of, simulated elevated airborne and liquid samples, and direct radiation measurements. The drill tests the capabilities of Health Physics response personnel and equipment.	Semi-annually	2(1)	2	3

DRILL AND EXERCISE DESCRIPTIONS AND FREQUENCIES (CONT'D)

TYPE	DESCRIPTION	FREQUENCY	DRILLS ACTUALLY HELD 1989	1988	1987
Radiological Monitoring Drill	This drill involves on-site and off-site monitoring including the collection and analysis of environmental samples and provisions for communications and record keeping. The drill tests Health Physics monitoring communications and analysis capabilities.	Annually	1	1	1
Fire Drill	This drill tests the response of the Fire Brigade and is conducted periodically in accordance with the Seabrook Station Fire Protection Manual. One drill including off-site fire support will be conducted annually.	In accordance with the Seabrook Station Fire Protection Manual. Annually for off-site support.	6	26	12
Control Room Drill (2)	This drill tests the response of the on-shift emergency organization and should include simulated emergency notifications, callout and communications. Response by emergency teams and dose assessment personnel may also be tested.	As needed to support the Emergency Preparedness Training Program.	2(1)	3	3
Technical Support Center (TSC) Drill (2)	This drill tests the response of personnel assigned duties in the TSC. Group drills may be held independently to test responses by individual groups (e.g., dose assessment, communications, technical assessment) and then integrated to exercise TSC operations as a whole.	As needed to support the Emergency Training Program.	3(1)	4	3
Operational Support Center (OSC) Drill (2)	This drill tests the response of personnel assigned duties in the OSC. The drill includes formation, briefing, dispatching and debriefing of emergency teams and associated Health Physics support. Actual communications with the teams should be conducted.	As needed to support the Emergency Preparedness Training Program.	2(1)	4	3

DRILL AND EXERCISE DESCRIPTIONS AND FREQUENCIES (CONT'D)

TYPE	DESCRIPTION	FREQUENCY	DRILLS ACTUALLY HELD 1989	1988	1987
Emergency Operations Facility (EOF) Drill (2)	This drill tests the response of personnel assigned duties in the Emergency Operations Facility.	As needed to support the Emergency Preparedness Training Program.	2(1)	6	4
Media Center (MC) Drill (2)	This drill tests the response of personnel assigned duties in the Media Center.	As needed to support the Emergency Preparedness Training Program.	1(1)	5	3
Combined Functional Drills (3)	A combination of one or more drills described above which test different facets of NHY emergency response to ensure a coordinated effort.	As needed to support the Emergency Preparedness Training Program.	2(1)	5	3
Exercise (3)	The Exercise tests the integrated capability of the NHY Emergency Response Organization to respond to an emergency.	Annually	1(1)	1	1

(1) Numbers include activities that are currently planned to be held prior to the end of 1989.

(2) If the facility was drilled as part of a combined functional drill or drilled individually, credit is given for a drill in the drills actually held column.

(3) Three additional combined functional drills and one graded exercise were also conducted in 1988.

Shannon's Seabrook challenge spurned

Board says attorney general tried to 'manufacture' evidence to block plant opening

By Larry Tye
Globe Staff

A federal licensing board has denied a challenge by Attorney General James Shannon to evacuation plans for the Seabrook nuclear plant, charging that Shannon "attempted to manufacture the evidence he now seeks to use as a license impediment."

The attorney general's "ill-conceived effort this time died of its own evidentiary infirmities," the Atomic Safety and Licensing Board said in a strongly worded ruling released Monday and made public yesterday. "Thus we need not take any additional action to restore fairness to the litigation.

"We address the matter now simply because we are too offended by the effort to ignore it," added administrative law Judge Ivan Smith, writing for the three-judge panel that is reviewing the Seabrook evacuation plan.

Shannon yesterday called the ruling "crazy," adding that "if the question is are we going to do everything we can to gain an advantage in this litigation to stop Seabrook, the answer is yes. We're pulling out all the stops."

"This plant threatens the people of Massachusetts and we're going to do everything we can to stop it. Judge Smith and everyone else at the NRC should reads my lips on that," Shannon added in a telephone interview.

Yesterday's ruling was in response to Shannon's bid in June to get the Nuclear Regulatory Commission to consider concerns raised by the Massachusetts Department of Public Health about an evacuation plan drafted by Seabrook's owners.

The evacuation plan calls for four firms from New Hampshire and Maine to furnish ambulances to move Bay State residents after an accident. Massachusetts health officials said their regulations prevent out-of-state ambulance companies from operating here, and they wrote the firms asking them to cancel their contracts with Seabrook.

"We have far more rigorous standards apparently than some of our neighboring jurisdictions," said Suzanne L. Mager, deputy general counsel at the health department. She added that her agency never heard back from the ambulance companies and referred the matter to Shannon's office for possible enforcement action.

Shannon said last night that his office is investigating what action to take against the firms.

In June, the attorney general asked the NRC licensing board to consider the health department's concerns as part of its review of Seabrook's evacuation plan, which is the last major hurdle to opening the $6 billion reactor. A decision from the board is expected this fall.

But the licensing board this week denied that motion, saying Shannon had failed to prove that the concerns were "relevant to any contention. They also are not rel-

The attorney general strongly disagreed. He said Smith "seems to be saying that because the NRC is sitting on this case, we don't have a right to enforce our own laws with regard to the licensure of ambulances. That's crazy, absolutely crazy."

The NRC panel's "intemperate language is par for the course both with this judge and this agency," Shannon added. "I'm not bothered by that. It's the bizarre reasoning that seems to suggest the state should be precluded from its own laws that is what's going to win this case on appeal."

Ronald Sher, spokesman for Seabrook's owners, said the NRC decision "speaks for itself ... It doesn't make any sense for the Massachusetts attorney general to attempt to restrict or limit any type of response by an out-of-state public safety vehicle during an emergency in any incident.

"In any other emergency, would the state of Massachusetts close down the borders to an emergency response?"

Sher declined to name the ambulance companies included in Seabrook's evacuation plan.

JAMES SHANNON
Slams ruling as "crazy"

ATTACHMENT B

CERTIFICATE OF SERVICE

I, Jeffrey P. Trout, one of the attorneys for the Applicants herein, hereby certify that on August 11, 1989, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or where indicated, by depositing in the United States mail, first class postage paid, addressed to) the individuals listed below:

Lando W. Zech, Jr., Chairman
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Thomas M. Roberts, Commissioner
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Kenneth M. Carr, Commissioner
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

James R. Curtiss, Commissioner
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Kenneth C. Rogers, Commissioner
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

William C. Parler, Esquire
General Counsel
Office of the General Counsel
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

G. Paul Bollwerk, III, Chairman
Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Howard A. Wilber
Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Alan S. Rosenthal, Esquire
Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Marjorie Nordlinger, Esquire
Office of the General Counsel
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Administrative Judge Ivan Smith
Chairman, Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Administrative Judge Kenneth A. McCollom
1107 West Knapp Street
Stillwater, OK 74075

Administrative Judge Richard F. Cole, Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

H. Joseph Flynn, Esquire
Office of General Counsel
Federal Emergency Management Agency
500 C Street, S.W.
Washington, DC 20472

Mr. Richard R. Donovan
Federal Emergency Management Agency
Federal Regional Center
130 228th Street, S.W.
Bothell, WA 98021-9796

Diane Curran, Esquire
Andrea C. Ferster, Esquire
Harmon, Curran & Tousley
Suite 430
2001 S Street, N.W.
Washington, DC 20009

Robert R. Pierce, Esquire
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

John P. Arnold, Esquire
Attorney General
George Dana Bisbee, Esquire
Assistant Attorney General
Office of the Attorney General
25 Capitol Street
Concord, NH 03301-6397

Adjudicatory File
Atomic Safety and Licensing Board Panel Docket (2 copies)
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Sherwin E. Turk, Esquire
Office of General Counsel
U.S. Nuclear Regulatory Commission
One White Flint North
15th Floor
11555 Rockville Pike
Rockville, MD 20852

*Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert A. Backus, Esquire
Backus, Meyer & Solomon
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney General
Augusta, ME 04333

Paul McEachern, Esquire
Shaines & McEachern
Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Mrs. Sandra Gavutis
Chairman, Board of Selectmen
RFD 1 - Box 1154
Route 107
Kensington, NH 03827

*Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

*Senator Gordon J. Humphrey
One Eagle Square, Suite 507
Concord, NH 03301
(Attn: Herb Boynton)

Mr. Thomas F. Powers, III
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

Ashod N. Amirian, Esquire
145 South Main Street
P.O. Box 38
Bradford, MA 01835

Gary W. Holmes, Esquire
Holmes & Ells
47 Winnacunnet Road
Hampton, NH 03842

Mr. J. P. Nadeau
Selectmen's Office
10 Central Road
Rye, NH 03870

John Traficonte, Esquire
Assistant Attorney General
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

Mr. Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

R. Scott Hill-Whilton, Esquire
Lagoulis, Hill-Whilton & Rotondi
79 State Street
Newburyport, MA 01950

Barbara J. Saint Andre, Esquire
Kopelman and Paige, P.C.
77 Franklin Street
Boston, MA 02110

Mr. William S. Lord
Board of Selectmen
Town Hall - Friend Street
Amesbury, MA 01913

Judith H. Mizner, Esquire
79 State Street, 2nd Floor
Newburyport, MA 01950

Richard A. Hampe, Esquire
Hampe and McNicholas
35 Pleasant Street
Concord, NH 03301

Jeffrey P. Trout