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OFFICE OF SECRETARY
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before 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
)	
)	

APPLICANTS' VOLUNTARY RESPONSES TO
MASS AG'S REQUESTS FOR
DOCUMENTS AND INFORMATION ON THE EXERCISE

Applicants respond herein to the letter request of the Attorney General for the Commonwealth of Massachusetts ("Mass AG"), dated March 10, 1989,¹ for documents and information regarding the FEMA graded exercise held on June 28-29, 1988 ("Exercise"). Applicants will produce the documents requested at Seabrook Station during business hours upon reasonable notice to undersigned counsel on the same conditions to which the parties have agreed in the past.

¹ Mass AG's telecopied letter was not sent until after 5:00 p.m. on Friday, March 10, 1989.

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Request No. 1

Please list or produce a copy of the schedule of all drills and exercises conducted since July 1, 1988, for those of ORO's service providers and support organizations who provide (A) manned vehicles to evacuate special facilities, and (B) ambulances to transport contaminated/injured individuals.

Applicants' Response

There were no further drills and exercises conducted since July 1, 1988 for the service providers and support organizations identified in (A) and (B) above.

Request No. 2

Please list or produce a copy of the schedule of all drills and exercises conducted since July 1, 1988, for (A) all SS-ERO members involved in formulating offsite protective action recommendations and (B) all NHY-ORO members involved in formulating offsite protective action recommendations.

Applicants' Response

Applicants object to this Interrogatory, which seeks information not pertaining to the performance during the June 28-29, 1988 FEMA Graded Exercise, of the onsite and offsite emergency response organizations, on the ground that it is not relevant to the admitted exercise contentions. Without waiving the foregoing objection, Applicants respond as follows:

The ORO Command and Control Drill conducted on March 22, 1989 provided: (A) SS-ERO members the opportunity to be

involved in the formulation of offsite protective action recommendations, and (B) NHY-ORO members the opportunity to be involved in the formulation of offsite protective action recommendations.

Request No. 3

Please produce the Quality Assurance Audit Report No. 88-A02-01, "Emergency Preparedness Plan" for Seabrook Station, dated March 9, 1988, and the corresponding audit checklist, both of which are described in NRC Inspection Report No. 50-443/89-02.

Applicants' Response

Applicants object to this Interrogatory on the ground that the information it seeks, an internal audit of Seabrook Station made before the June 28-29, 1988 FEMA Graded Exercise, is not relevant to the admitted exercise contentions.

Request No. 4

Please produce the most current version of the Public Notification Coordinator's Position Packet.

Applicants' Response

The most current revision of the Public Notification Coordinator's Position Packet will be produced. It consists of:

- Implementation Procedure 2.13; "Public Alert and Notification System Including EBS Activation."
- Implementing Procedure 3.1; "NHY Offsite Response EOC Activation and Operation."

- Appendix H; "New Hampshire Yankee Offsite Response Communications Directory."

Request No. 5

Please produce, if they are not all contained in the Position Packet referred to above (#4), a copy of each of the most current pre-written EBS messages.

Applicants' Response

A copy of the most current revisions of pre-written EBS messages, as of December 12, 1988, will be produced.

Request No. 6

Please produce a list of all training sessions, drills and exercises conducted since July 1, 1988, for the ORO's Public Notification Coordinators.

Applicants' Response

DRILLS AND EXERCISES: The Public Notification Coordinator participated in the ORO Command and Control Drill conducted on March 22, 1989.

TRAINING: The Public Notification Coordinators received the following training on the following dates since July 1, 1988,

<u>Training Module</u>	<u>Dates</u>
Module 1 - Emergency Planning Overview	10/3/88 1/23/89 2/21/89
Module 2 - Emergency Management	9/27/88 9/29/88 10/20/88 1/23/89 2/21/89

Module 3 - PANS Activation	10/27/88 2/8/89 3/16/89
Module 8 - EOC Operations	10/20/88 1/31/89 3/8/89
Module 12 - Transportation	9/27/88 9/29/88 10/20/88 1/31/89 2/8/89
Module 16 - Tabletop	10/27/88 2/8/89 3/16/89

Request No. 7

Please produce the most recent version of the following SPMC training modules (including all trainer and trainee materials):

- A. Emergency Management
- B. Public Alert and Notification System
- C. Dose/Accident Assessment
- D. Public Information
- E. Medical Emergency
- F. Bus Driver
- G. Radiological Surveys and Analysis
- H. Communications

Applicants' Response

Applicants object to part "B" of this Interrogatory on the grounds that the information it seeks is not relevant to the admitted exercise contentions and that the subject is not within the jurisdiction of the off-site Board. With the exception of B, the most recent version of the requested SPMC

training modules (including all trainer and trainee materials) will be produced.

Request No. 8

Please produce the most recent version of the SS-ERO's training materials (for both trainers and trainees) which address the subjects of:

- a. making protective action recommendations for offsite officials, and/or
- b. use of the METPAC model in recommending protective actions to appropriate offsite officials.

Applicants' Response

Applicants object to this Interrogatory, which seeks information not pertaining to the performance during the June 28-29, 1988 FEMA Graded Exercise, of the onsite and offsite emergency response organizations, on the ground that it is not relevant to the admitted exercise contentions. Without waiving the foregoing objection, Applicants respond as follows:

The most recent version of the SS-ERO's training materials (for both trainers and trainees) which address items a. and b. above will be produced.

Request No. 9

Please list each protective action recommendation made by the SS-ERO to appropriate offsite officials during day 1 of the Exercise (June 28, 1988), and for each one state or list:

- A. The exact time it was made;

- B. The name of person or persons involved in making it and their titles/positions;
- C. The scenario developments which prompted decisionmakers to consider making a protective action recommendation at that time;
- D. Any reservations or concerns any of the decisionmakers had about making that PAR at that time.
- E. The exact manner in which the PAR was communicated to offsite authorities (Please produce a copy of the communication if it has been reduced to writing);
- F. All follow-up questions or concerns received from the offsite authorities about the PAR, and all responses given to these questions and concerns.

Applicants' Response

Applicants object to part "D" of this Interrogatory on the ground that it is too vague and poorly defined. Without waiving the foregoing objection, Applicants respond as follows:

The SS-ERO made the following protective action recommendations to appropriate offsite officials during Day 1 of the Exercise (June 28, 2988):

- 1. Close Parker River National Wildlife Refuge, Plum Island Beach, and Salisbury Beach.
 - A. 1150
 - B. George S. Thomas, Response Manager
 - C. Declaration of SITE AREA EMERGENCY at 1146
 - D. The recommendation was made to be consistent with actions previously taken for beaches in the State of New Hampshire by NH authorities.

- E. The PAR was communicated to offsite authorities by the Corporate Support Manager via the NAS links in the NH EOC and the ORO EOC and by delivery of the State Notification Fact Sheet to offsite authorities in the ORO EOC and the NH IFO. The State Notification Fact Sheet is attached.
 - F. None indicated by exercise records.
2. Evacuate Seabrook, Hampton Falls, Hampton, Kensington, South Hampton, North Hampton in New Hampshire and Amesbury, Salisbury in Massachusetts. Shelter remaining EPZ communities in New Hampshire and Massachusetts.
- A. 1336
 - B. George S. Thomas, Response Manager
 - C. Declaration of GENERAL EMERGENCY and in-containment Post LOCA monitor reading greater than 10,000 R/hr.
 - D. None indicated by exercise records.
 - E. Via NAS links in the NH EOC and the ORO EOC and by delivery of the State Notification Fact Sheet to offsite authorities in the ORO EOC and the NH IFO. The State Notification Fact Sheet is attached.
 - F. Exercise records show:
 - (1) The ORO EP Advisor called the ERO EOF Coordinator to confirm that the PAR had not changed because of the release at 1346.
 - (2) State of New Hampshire and ORO authorities requested information on and status of forecasted wind shift. Answer was no immediate change based on most recent forecast.
 - (3) Questions were asked about status of the wide range gas monitor sample and field monitoring team results. Answer was that results were not available at the time.

3. In addition to previous PAR, evacuate Brentwood, East Kingston, Exeter, Kingston and Newton in New Hampshire and Merrimac, Newbury, Newburyport and West Newbury in Massachusetts. Continued shelter in remaining EPZ communities.
- A. 1540
 - B. George S. Thomas, Response Manager
 - C. Forecasted wind shift that would potentially cause plume to affect additional communities to the south and the west showed indication of occurring.
 - D. None indicated by exercise records.
 - E. Via NAS links in the NH EOC and the ORO EOC and by delivery of the State Notification Fact Sheet to offsite authorities in the ORO EOC and the NH IFO. The State Notification Fact Sheet is attached.
 - F. None indicated by exercise records.

Request No. 10

Why did the SS-ERO not issue a PAR to evacuate Portsmouth on Day 1 of the exercise?

Applicants' Response

The SS-ERO did not issue a PAR to evacuate Portsmouth on Day 1 of the Exercise because on Day 1 of the Exercise Portsmouth was not within 5 to 10 miles of the plant in a downwind direction. Should information on meteorological conditions show that a different downwind portion of areas subject to a PAR was going to be affected, an additional or expanded PAR would be issued and explained by the SS-ERO.

This condition was not indicated for Portsmouth on Day 1 of the Exercise.

Request No. 11

Please describe what set of ETEs were used in the METPAC model during the Exercise and why that set was used.

Applicants' Response

Attachment 1, Table 5.2.2 of the YAEC Report 1618, dated October 1986 defines the set of ETEs used in the current METPAC model. The ETE values listed on Table 5.2.2 were derived from a 1983 ETE study which was litigated as part of the onsite proceedings. The METPAC program will be updated based on the results of the ASLB litigation on the current ETE study, and the revised evacuation times will be incorporated into the program data base.

Request No. 12

Please describe how the SS-ERO's Procedures for selecting and issuing offsite PARs take into account (A) weather data and weather forecasts (including forecasts for changes in wind direction and speed), and (B) extant circumstances that will likely cause the ETEs to be shorter or longer than the "baseline" ETEs in the METPAC model (e.g., the emergency occurs at a time of day in the summertime when the beach population is known to be substantially smaller than it would be at 1-3 p.m.).

Applicants' Response

Applicants object to this Interrogatory, which seeks information not pertaining to the performance during the June 28-29, 1988 FEMA Graded Exercise, of the onsite and offsite emergency response organizations, on the ground that it is

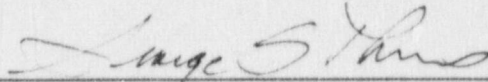
not relevant to the admitted exercise contentions. Without waiving the foregoing objection, Applicants respond as follows:

(A) A PAR selected by the SS-ERO incorporates meteorological conditions that are current as of the time the PAR is made to offsite authorities. One of the actions of the SS-ERO operating at the EOF is to monitor regional meteorological data and be alert to forecasts for changes in meteorological conditions (particularly wind direction) that could affect a PAR being considered or previously made. Should this information show that a different downwind portion of areas subject to a PAR was going to be affected, an additional or expanded PAR would be issued and explained by the SS-ERO.

(B) The role played by ETES in the selection of a PAR by the SS-ERO would most likely be limited. The SS-ERO selects a PAR based mainly on the station accident conditions and prognosis. The SS-ERO thereby arrives at a PAR prior to or independently of an accidental release of radioactive material that is of a magnitude that would require shelter vs. evacuation dose comparisons, and for which ETES would be a factor. The condition postulated in the question would be discussed with the offsite authorities when the PAR was issued by the SS-ERO.

Where a particular ETE value is a determining factor in the PAR decision, an ETE value for a scenario appropriate to the extant circumstances could be selected from the range of scenarios considered in the METPAC model.

As to Answers:



George S. Thomas
Vice President - Nuclear Production
New Hampshire Yankee Division of
Public Service Company of New Hampshire

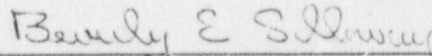
March 24, 1989

STATE OF NEW HAMPSHIRE

Rockingham, ss.

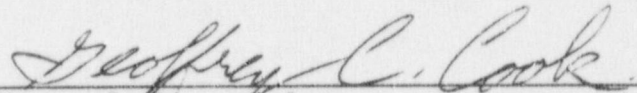
Then appeared before me the above subscribed George S. Thomas and made oath that he is the Vice President - Nuclear Production, New Hampshire Yankee Division of Public Service Company of New Hampshire, authorized to execute the foregoing responses to interrogatories on behalf of the Applicants, and that he made inquiry and believes that the foregoing answers accurately set forth information as is available to the Applicants.

Before me,



My Commission Expires: March 6, 1990

As to objections and responses to request for production of documents:



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CERTIFICATE OF SERVICE

I, Geoffrey C. Cook, one of the attorneys for the Applicants herein, hereby certify that on March 24, 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):

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Adjudicatory File
Atomic Safety and Licensing
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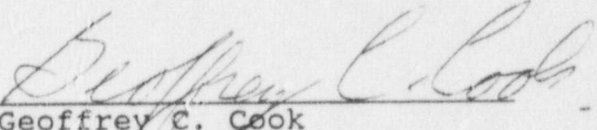
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(* = Ordinary U.S. First Class Mail)