## United States of America Nuclear Regulatory Commission before the Atomic Safety and Licensing Board

In the Matter of

•99 APR 12 P4:51

DOCKETED

USHRC

Docket # 50-029-LA

(Yankee Nuclear Power Station)

YANKEE ATOMIC ELECTRIC COMPANY

Opposition to Objection to and Motion for Reconsideration of Portion of Prehearing Conference Order Filed by Yankee Atomic Electric Company

1. The Franklin Regional Council of Governments (FRCOG) firmly opposes the Motion for Reconsideration and Objection filed by Yankee Atomic Electric Company (YAEC) in the above entitled matter. The FRCOG seeks to move forward expeditiously with the rights granted it under the Atomic Safety and Licensing Board (ASLB)'s Prehearing Conference Order, and would request that the Board reject the legal arguments posed by YAEC. The Board acted properly using a reasonable methodology and its broad discretion in framing Contention 4.

II. The FRCOG would support a reconsideration of the Board's action if and only if such reconsideration strengthened the TEDE criteria by referencing women and children rather than adult males.

III. The FRCOG requests the Board deny this Motion and proceed expeditiously with Discovery.

Respectfully submitted,

Samuel H. Lovejov

٢

502

20232

c/o Franklin Regional Council of Governments 425 Main Street Greenfield, MA 01301 413-367-0071

Dated: April 8, 1999

SECY-041

OCT HE OGWIMUSION Document Statistics

Postmark Date <u>4/9/99</u> Copies Received <u>3</u> Add'l Copies Reproduced <u>5</u> Special Distribution <u>06 C</u>, <u>RIDS</u> Faxed on <u>4/9/99</u>

\_\_\_\_

## **CERTIFICATE OF SERVICE**

DOCKETED USNRC

I, Samuel H. Lovejoy, hereby certify that on April 9, 1999, I made service of the within document in conformity with the Commission's Regulations upon:

'99 APR 12 P4:51

Hon. Charles Bechhoefer Administrative Judge Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington D.C. 20555 FAX: 301-415-5599

Hon. Thomas D. Murphy Administrative Judge Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington D.C. 20555 FAX: 301-415-5599

Hon. Thomas S. Elleman, Ph.D. Administrative Judge 704 Davidson Street Raleigh, NC 27609 FAX: 919-782-7975

Office of the Secretary U.S. Nuclear Regulatory Commission Washington D.C. 20555 FAX: 301-415-1672 Office of Commission Appellate Adjudication U.S. Nuclear Regulatory Commission Washington D.C. 20555 FAX: 301-415-1672

Ann P. Hodgdon, Esquire Office of the General Counsel U.S. Nuclear Regulatory Commission Washington D.C. 20555 FAX: 301-415-3725

Thomas G. Dignan, Jr., Esquire Ropes & Gray One International Place Boston, MA 02110-2624 FAX: 617

Jonathan M. Block, Esquire P.O. Box 566 Putney, VT 05346 FAX: 802-387-2646

Deborah B. Katz Citizen's Awareness Network, Inc. P.O. Box 3023 Charlemont, MA 01339 FAX: 413-339-8768

Samuel H. Lovejoy c/o Franklin Regional Council of Governments 425 Main Street Greenfield, MA 01301