UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOAR

In the Matter of

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2)

Docket Nos.250-443

NECNP MOTION FOR LEAVE TO REPLY

Pursuant to 10 CFR 2.730(c), NECNP moves that it be granted leave to respond to the answers of the Licensee and the Staff to NECNP's Motion to Suspend Construction.

Normally, a moving party has no right to reply to answers to such a motion. However, in this circumstance, NECNP did not have access to the factual information and opinions contained in the affidavits filed by the Licensee and the Staff and was unable to present any judgment on particular facts in its Motion. With the affidavits in hand, we are now able to present such a judgment, just as the Licensee and Staff were able to do in their answers.

Accordingly, we request permission to file a reply. We intend to present an affidavit of an expert who has evaluated the information presented by the Licensee. We also intend to respond briefly to the legal arguments made by both the Licensee and the Staff, and particularly to what we view as a misreading, if not a misrepresentation, of the Commission's Order.

We hope to file this reply by Friday, December 5, 1980. The delay is occasioned by the fact that it took us a few days to locate an expert, and the expert is in California.

Respectfully submitted,

Fllyn-R. Weiss

William S. Jordan, III
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Washington, D.C. 20006 (202) 833-9070

Counsel for New England Coalition on Nuclear Pollution

November 26, 1980

POOR ORIGINAL