

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board *amt*

In the Matter of
Public Service Company of New Hampshire,
et al, (Seabrook Station, Units 1 and 2)

Docket Nos. 50-443OL
50-444OL

Motion to Amend Petition to Intervene
Filed by the Seacoast Anti-Pollution League
Pursuant to 10 C.F.R. §2.714(a)(3)

NOW COMES the Seacoast Anti-Pollution League ("SAPL")
and respectfully requests that the Atomic Safety and
Licensing Board allow it to amend its Petition to Intervene
dated November 13, 1981 by filing as a part of its Petition
the following information and affidavits:

I. THE INTERVENORS: Two members of SAPL join
in the Petition and file the attached affidavits. The
members are:

Peter Randall, 36 Mace Road, Hampton, NH 03842

Edward Dumaine, 23 Dumas Avenue, Hampton Beach, NH 03842

Specific contentions are raised in the affidavits.

This amendment is hereby submitted and requested to be
incorporated with and made a part of SAPL's original Petition.

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE
By Its Attorneys,

LAW OFFICES OF ROBERT A. BACKUS

8202100350 820204
PDR ADOCK 05000443
G PDR

BY: _____

Robert A. Backus

DATED: February 4, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

82 FEB - 1982

Before the Atomic Safety and Licensing Board

emp

In the Matter of
Public Service Company of New Hampshire,
et al, (Seabrook Station, Units 1 and 2)

Docket Nos. 50-4430L
50-4440L

AFFIDAVIT OF EDWARD DUMAINE

I, Edward Dumaine, being duly sworn, depose and say that I am a resident of Hampton Beach, County of Rockingham, State of New Hampshire. I presently reside at 23 Dumas Avenue.

My property is situated within 1.5 miles of the proposed Seabrook Nuclear Power Plant and I live within the Emergency Planning Zone. The proposed Seabrook Plant will affect my health and safety during its operation and in the event of an accident, such as a Class 9 event, emergency procedures may be necessary such as the evacuation of my family and my personal property.

Furthermore, as a member of SAPL, I contend that the proposed plant will cause injury to the environment of the seacoast area.

I hereby authorize SAPL to represent me in the hearings before the Nuclear Regulatory Commission.

Witness
DATE:

Edward Dumaine

1/21/82

Edward Dumaine

EDWARD DUMAINE

Subscribed and sworn to, before me, this 21st day of January, 1982.

Justice of the Peace

Justice of the Peace/Notary Public

Ms. 1/21/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

emp

Before the Atomic Safety and Licensing Board

In the Matter of
Public Service Company of New Hampshire,
et al, (Seabrook Station, Units 1 and 2)

Docket Nos. 50-4430L
50-4440L

AFFIDAVIT OF PETER RANDALL

I, Peter Randall, being duly sworn, depose and say that I am a resident of Hampton, County of Rockingham, State of New Hampshire. I presently reside at 36 Mace Road.

My property is situated within 3 miles of the proposed Seabrook Nuclear Power Plant and I live within the Emergency Planning Zone. The proposed Seabrook Plant will affect my health and safety during its operation and in the event of an accident, such as a Class 9 event, emergency procedures may be necessary such as the evacuation of my family and my personal property.

Furthermore, as a member of SAPL, I contend that the proposed plant will cause injury to the environment of the seacoast area.

I hereby authorize SAPL to represent me in the hearings before the Nuclear Regulatory Commission.

Witness

Peter Randall

DATE:

Subscribed and sworn to, before me, this 4th day of January, 1982.

Justice of the Peace/Notary Public

CERTIFICATE OF SERVICE

82 FEB - 4 1981

This is to certify that on this 4th day of February *emp*
1982, the undersigned sent copies of the within
by first-class mail, postage prepaid, to all parties
indicated below:

Roy Lessey, Esq.
Office of the Executive Legal Director
U. S. Nuclear Regulatory Comm.
Washington, DC 20555

Thomas Dignan, Esq.
Ropes and Gray
225 Franklin Street
Boston, MA 02110

Robert A. Backus