



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

'82 APR 26 P1:1

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Before Administrative Judges:
Helen F. Hoyt, Chairperson
Dr. Emmeth A. Luebke
Dr. Oscar H. Paris

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

) April 21, 1982

SUPPLEMENT TO PETITION TO INTERVENE PURSUANT TO 10 C.F.R. §2.714(b)
CONTENTIONS WHICH PETITIONER SEEKS TO HAVE LITIGATED

NOW COMES THE SOCIETY FOR THE PROTECTION OF THE ENVIRONMENT OF SOUTH-EASTERN NEW HAMPSHIRE, by its Attorneys, Wadleigh, Starr, Peters, Dunn & Kohls, and pursuant to 10 C.F.R. §2.714(b) states as follows:

1. On November 10, 1981 said Society filed a Petition to Intervene in the License Application for the Seabrook, New Hampshire Station.
2. On November 25, 1981 the NRC Staff Response to the Petition to Intervene and Request for Hearing of The Society for the Protection of the Environment of Southeastern New Hampshire was filed stating that the petitioners should file Affidavits of the members of the Society who wished to be heard.
3. On December 23, 1981 the Society filed a Motion to Amend the Petition to Intervene setting forth Affidavits of approximately fifteen members of the Society and their interest in the matter being heard before

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the Nuclear Regulatory Commission.

4. On January 12, 1982, the NRC Staff filed a Response to the Amendments to the Petition for Leave to Intervene by The Society for the Protection of the Environment of Southeastern New Hampshire concluding that the Society's amended Petition satisfies the interest requirements of 10 C.F.R. §2.714 as well as designates an aspect of this operating license proceeding with respect to which it wishes to intervene.

5. On March 15, 1982, counsel for the Society received a Memorandum and Order Setting Special Prehearing Conference stating in Paragraph 4 of said Memorandum and Order that copies of any Amended Petitions to Intervene will be filed not later than thirty (30) days prior to the Special Prehearing Conference. That counsel did not wish to amend its Petition and did not believe that said Paragraph 4 of said Order designation of issues as set forth in 10 C.F.R. §2.714(b).

WHEREFORE your Petitioner prays that this Honorable Court allow it to file the following contentions to be litigated:

A. The Society wishes to litigate the proposed route of transmission lines through the Town of South Hampton, and more particularly, as they relate to the historic sites which are located in said Town; the effect that the transmission route would have on an archeological site known as "Indian Ground Hill" which archeologists say represents a wealth of information concerning the indians who occupied the land prior to its colonization; the effect the proposed transmission line would have as it crosses the Pow Wow River into our neighboring state of Massachusetts and the effect that it would have as a recreation site as well as its esthetic beauty.

B. The effect that the proximity of the proposed transmission lines to present dwellings in the Town of South Hampton and the effect that such proximity would have on the health of the inhabitants of the dwellings.

C. The esthetic effect which the proposed transmission line route would have on the Town.

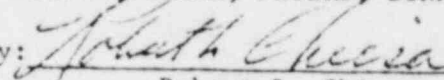
Respectfully submitted,

THE SOCIETY FOR THE PROTECTION OF
THE ENVIRONMENT OF SOUTHEASTERN
NEW HAMPSHIRE

By its Attorneys,

WADLEIGH, STARR, PETERS, DUNN & KOHLS

By:


Robert L. Chiesa

CERTIFICATE OF SERVICE

I, Robert L. Chiesa, hereby certify that a copy of the foregoing
Supplement to Petition to Intervene Pursuant to 10 C.F.R. §2.714(b)
Contentions which Petitioner Seeks to have Litigated has been mailed this
21st day of April, 1982, by first-class mail, postage prepaid, to:

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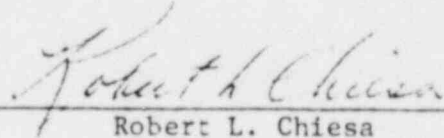
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