

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
PUBLIC SERVICE COMPANY OF NEW)
HAMPSHIRE, et al.)
)
(Seabrook Station, Units 1 & 2))
_____)

Docket Nos. 50-443 OL
50-444 OL

APPLICANTS' MOTION TO COMPEL
ANSWERS TO INTERROGATORIES
BY SEACOAST ANTI-POLLUTION LEAGUE

Pursuant to C.F.R. §§ 2.740(f), 2.740b, the Applicants move that the Board issue an order compelling Seacoast Anti-Pollution League ("SAPL") to answer interrogatories propounded to SAPL by the Applicants on December 8, 1982.

In support of this motion, the Applicants say as follows:

1. The Applicants filed and served their "Applicants' Interrogatories and Request for the Production of Documents to Seacoast Anti-Pollution League" on December 8, 1982.

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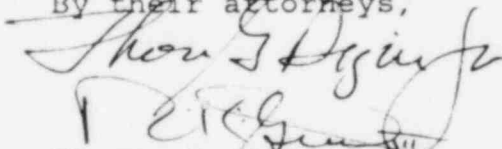
2. The time within which SAPL was required to file and serve its answers to those interrogatories elapsed on December 28, 1982.

3. SAPL neither sought nor obtained any enlargement of the time for answering these interrogatories from the Board nor did it seek or obtain the Applicants' consent to a late filing of answers to these interrogatories. Nor has SAPL applied for or obtained any protective order.

4. As a consequence of the foregoing, SAPL is wholly in default of its obligations as an admitted party to this proceeding.

WHEREFORE, the Applicants move that this Board enter an order compelling Seacoast Anti-Pollution League to answer the interrogatories propounded to it by the Applicants on December 8, 1982 forthwith.

By their attorneys,



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Dated: January 14, 1983.

CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on January 14, 1983 I made service of the within "APPLICANTS' MOTION TO COMPEL ANSWERS TO INTERROGATORIES BY SEACOAST ANTI-POLLUTION LEAGUE" by mailing copies thereof, postage prepaid, to:

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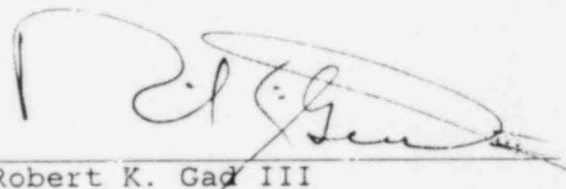
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