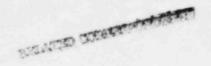
Filed: January 14, 1983



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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 & 2)

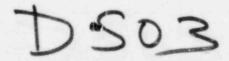
Docket Nos. 50-443 OL 50-444 OL

APPLICANTS' MOTION TO COMPEL ANSWERS TO INTERROGATORIES BY COASTAL CHAMBER OF COMMERCE OF NEW HAMPSHIRE

Pursuant to C.F.R. §§ 2.740(f), 2.740b, the Applicants move that the Board issue an order compelling Coastal Chamber of Commerce of New Hampshire ("CCCNH") to answer interrogatories propounded to CCCNH 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 Coastal Chamber of Commerce of New Hampshire" on December 8, 1982.



- 2. The time within which CCCNH was required to file and serve its answers to those interrogatories elapsed on December 28, 1982.
- 3. CCCNH 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 CCCNH applied for or obtained any protective order.
- 4. As a consequence of the foregoing, CCCNH 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 Coastal Chamber of Commerce of New Hampshire to answer the interrogatories propounded to it by the Applicants on December 8, 1982 forthwith.

By their attorneys

Thomas G. Dignan, Jr.

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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 COASTAL CHAMBER OF COMMERCE OF NEW HAMPSHIRE" by mailing copies thereof, postage prepaid, to:

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