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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)	Docket Nos. 50-443 OL
HAMPSHIRE, et al.)	50-444 OL
)	
(Seabrook Station, Units 1 & 2))	
)	

APPLICANTS' SIXTEENTH MOTION FOR
SUMMARY DISPOSITION
(CONTENTION NECNP I.M)

Pursuant to 10 CFR § 2.749, the Applicants hereby
move for summary disposition of contention NECNP I.M

This motion is submitted upon the affidavit of
Edward A. Sawyer, attached hereto. As is set forth in
the affidavit of Mr. Sawyer, the Seabrook Fire
Protection Plan satisfies the requirements of GDC 3 as
implimented by the Commission is CLI-80-21. The FPP

meets all the specifics of Branch Technical Position 9.5-1, Appendix A or provides equivalent alternative protection, which has been reviewed by and accepted by the Staff. The FPP also meets all the applicable requirements of 10 CFR, Part 50, Appendix R or provides equivalent alternative protection, which has also been reviewed by and accepted by the Staff.

For these reasons, there is no needs of evidentiary hearings and Contention I.M should be dismissed.

Respectfully submitted,
15 / Thomas G. Dignan, Jr.
15 / R. K. Gad III

Thomas G. Dignan, Jr.
R. K. Gad III
Ropes & Gray
225 Franklin Street
Boston, Massachusetts 02110
Telephone: 423-6100

Dated: February 9, 1983

STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE IS NO DISPUTE

1. The Seabrook Fire Protection Plan ("FPP") meets all the technical requirements of Branch Technical Position 9.5-1, Appendix A, or provides equivalent alternative protection. The Staff has reviewed the FPP against BTP 9.5-1 and accepted it.
2. The Seabrook Fire Protection Plan ("FPP") meets all the technical requirements of 10 CFR, Part 50, Appendix R, or provides equivalent alternative protection. The Staff has reviewed the FPP against Appendix R and accepted it.
3. The FPP meets the requirements of General Design Criterion 3, as implemented by the Commission in CLI-80-21.

CERTIFICATE OF SERVICE

I, R. K. Gad II^r, one of the attorneys for the Applicants herein, hereby certify that on February 9, 1983, I made service of the within "Applicants' Sixteenth Motion for Summary Disposition (Contention NECNP I.M)" by mailing copies thereof, postage prepaid, to:

Helen Hoyt, Chairperson
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Rep. Beverly Hollingworth
Coastal Chamber of Commerce
209 Winnacunnet Road
Hampton, NH 03842

Dr. Emmeth A. Luebke
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

Dr. Jerry Harbour
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

E. Tupper Kinder, Esquire
Assistant Attorney General
Office of the Attorney General
208 State House Annex
Concord, NH 03301

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Roy P. Lessy, Jr., Esquire
Office of the Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

David L. Lewis
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Rm. E/W-439
Washington, DC 20555

Mr. John B. Tanzer
Designated Representative of
the Town of Hampton
5 Morningside Drive
Hampton, NH 03842

Roberta C. Pevear
Designated Representative of
the Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844


Mrs. Sandra Gavutis
Designated Representative of
the Town of Kensington
RFD 1
East Kingston, NH 03827

Edward J. McDermott, Esquire
Sanders and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

Jo Ann Shotwell, Esquire
Assistant Attorney General
Environmental Protection Bureau
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

Ms. Olive L. Tash
Designated Representative of
the Town of Brentwood
R.F.D. 1, Dalton Road
Brentwood, NH 03833

Edward F. Meany
Designated Representative of
the Town of Rye
155 Washington Road
Rye, NH 03870



R. K. Gad III