

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

_____)
In the Matter of)
)
PUBLIC SERVICE COMPANY OF) Docket Nos. 50-443
NEW HAMPSHIRE, et al.) 50-444
)
(Seabrook Station, Units 1)
and 2))
_____)

NECNP MOTION TO COMPEL ANSWERS BY APPLICANTS
TO NECNP SECOND SET OF INTERROGATORIES ON CONTENTIONS
I.D.1, I.D.4., I.F., I.I., I.L., AND II. B.

Interrogatory No. 3

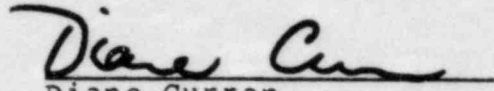
Applicants have refused to provide access to their draft version of the Seabrook Reactor Vessel Examination Plan, but have not applied for a protective order or given any reason why they should not be required to release the draft. Applicants should be ordered to provide NECNP with access to the draft of the Reactor Vessel Examination Plan.

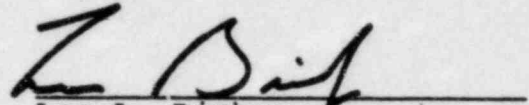
Interrogatory No. 7

The Applicants' answers to Interrogatory 7, which requested the identification of any tests or studies at Seabrook on the interaction of safety functions and control functions, reference FSAR section 7.2.2.2.c.7 and 7.2.2.3. These sections and the references contained therein discuss Reactor Trip and appear to be irrelevant to the interrogatory.

NECNP moves the Board to order Applicants to provide a more accurate and specific answer to this interrogatory.

Respectfully submitted,


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