

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

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In the Matter of )  
 )  
 )

PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, et al. )

Docket Nos. 50-443  
50-444

(Seabrook Station, Units 1 )  
and 2) )  
\_\_\_\_\_)

NECNP MOTION TO COMPEL ANSWERS  
BY APPLICANTS TO NECNP THIRD  
SET OF INTERROGATORIES ON  
CONTENTIONS I.A.2., I.B.1., I.B.2., and I.C.

Interrogatory No. 7

The answer to this interrogatory is non-responsive. NECNP asked Applicants to describe in detail the process by which they have determined that equipment at seabrook is safety related. Applicants merely responded that a determination was made. The answer should be amended to provide the information requested.

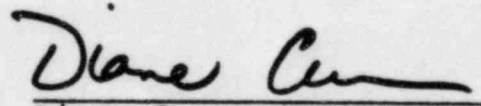
Interrogatory No. 17


Applicants did not answer this interrogatory in the affirmative or negative, as requested. A yes or no answer must be given. Applicants also failed to answer Question 17(a). NECNP moves to compel answers to Interrogatory 17.

Interrogatory 21

Interrogatory 21(b) asked Applicants, inter alia, to describe the previous experience of individuals responsible for Quality Assurance at Seabrook with former construction projects of PSNH. Applicants have objected to this interrogatory as "unintelligible." The objection is groundless. The question is a simple one, and should be answered. Applicants also object to the interrogatory on the ground that it is "not relevant to the admitted contention". The interrogatory is intended to determine the qualifications and experience of Applicants'. QA personnel, and is therefore highly relevant to Contentions II B 1 and II.B.3.

Respectfully submitted

  
Diane Curran

  
Lee L. Bishop

HARMON & WEISS  
1725 I Street, N.W.  
Suite 506  
Washington, D.C. 20006  
(202) 833-9070

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