

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE
DOCKETED
NRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD -1 A11:13
02 NOV

In the Matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.

Docket Nos. 50-443
50-444

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

(Seabrook Station, Units 1
and 2)

SAPL FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE NUCLEAR REGULATORY COMMISSION STAFF


Pursuant to 10 C.F.R. §2.744, the Intervenor SAPL requests that the attached Interrogatories be answered fully in writing and under oath by an employee, representative or agent of the NRC Staff with personal knowledge of the facts or information requested in each interrogatory.

1. Identify the relevant site features, including population density associated with accident risk at Seabrook, in comparison to site features at presently operating plants as required by the Interim Policy Statement of June 13, 1980.
2. Identify and provide any study in which the Staff considered the likelihood that substantive changes in the Seabrook plant design would compensate for adverse site features.
3. State the basis for the Commission's determination of a reasoned consideration of environmental risks and the methodology used to determine such a reasoned consideration as required in the Interim Policy Statement of June 13, 1980.
4. In the Interim Policy Statement of June 13, 1980 the Commission's Staff identified that in certain cases unique circumstances warranted more extensive and detailed consideration of Class 9 events citing the Clinch River Breeder Reactor Plant and the Perryman site. The Seacoast Anti-Pollution League requests the Staff to specifically identify the analysis and the basis on which they made or are making an assessment of unique circumstances.
5. What methodology was used to make this assessment?

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE
By Its Attorneys,

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