11/10/82

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.	)	Docket Nos. 50-443 OL 50-444 OL
	)	
(Seabrook Station, Units 1 and 2)	)	

NRC STAFF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO THE
NEW ENGLAND COALITION ON NUCLEAR POLLUTION

NRC Staff hereby requests that the New England Coalition on Nuclear Power (NECNP), pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, NECNP file supplemental responses and produce additional documents as required by 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

DESIGNATED ORIGINAL

Certified By _____

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As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind.

I. INTERROGATORY I

For each contention listed in the Specific Interrogatories contained herein (Contentions I.A.2, I.B.1, I.B.2, I.C, I.D.1, I.D.2, I.D.3, I.D.4, I.F, I.G, I.I, I.L, I.M, I.N, I.U, II.B.1, II.B.3, II.B.4, and II.B.5) state the following information separately for each contention:

Q.I(1) Upon what person or persons do you rely to substantiate in whole or in part the view(s) as stated in this contention?

Q.I(2) Provide the addresses and education and professional qualifications of any person(s) named in response to the above interrogatory.

Q.I(3) Identify any person(s) you may call as a witness or witnesses on this contention.

Q.I(4) Provide summaries of the views, positions, or proposed testimony on this contention of all persons named in response to interrogatories (1) and (3) immediately above that you may present during this proceeding.

Q.I(5) State the specific bases and references to any documents upon which the persons named in Interrogatories 1 and 3 immediately above may rely or reference regarding this contention.

Q.I(6) List all documentary or other materials that you may use during this proceeding to support this contention or refer to during examination of witnesses. The list should be by author, title, date of

publication (if applicable), and publisher (if applicable). In addition to listing such documents, provide a copy of all documents (except for those that are NRC documents or documents provided to the NRC in this proceeding, which need only be listed). If you are uncertain as to whether a document was provided to the NRC, provide that document.

II. SPECIFIC INTERROGATORIES

Contention I.A.2

> The Applicants have not complied with GDC 4 standards regarding qualification tests of electric valve operators installed inside the containment.

Interrogatory I(A)(2)(a)

Provide and explain in detail the technical, regulatory, and other reasons for the statement that the qualification tests of electric valve operators installed inside the containment must comply with DOR guidelines and NUREG-0588 rather than IEEE Standards 382-1972 and 323-1974.

Interrogatory I(A)(2)(b)

Describe how the qualification testing of electric valve operators installed inside the containment to ensure compliance with IEEE Standards 382-1972 and 323-1974 differs from the testing necessary to insure compliance with DOR guidelines and NUREG-0588.

Interrogatory I(A)(2)(c)

State the exact requirements of the DOR guidelines and NUREG-0588 with which you contend the qualification of the containment electric valve operators must comply and describe the steps that you contend the Applicants must take to satisfy these provisions.

Interrogatory I(A)(2)(d)

Provide the technical, regulatory, and other reasons for requiring more rigorous environmental qualification testing since the TMI-2 incident and describe the "more rigorous" testing you contend is required.

Contention I.B.1

> The Applicant has not satisfied the requirements of GDC 4 and GDC 34 in that all systems required for residual heat removal, such as steam dump valves, turbine valves and the entire steam dumping system are not safety grade and environmentally qualified.

Interrogatory I(B)(1)(a)

List all the equipment required for residual heat removal that you believe must be environmentally qualified to survive and function in the accident environment under GDC 4.

Interrogatory I(B)(1)(b)

For each piece of equipment identified in response to Interrogatory I(B)(1)(a), state in detail the basis for the assertion that the equipment must be environmentally qualified to survive and function in the accident environment under GDC 4.

Interrogatory I(B)(1)(c)

Explain how the failure to qualify as safety-grade all systems that can be used to remove heat from the steam generators during an accident violates GDC 3. Provide the steps which you believe the Applicant must take to satisfy GDC 3.

Interrogatory I(B)(1)(d)

Define "reliable decay heat removal system" as it is used in NECNP Contention I.B.1.

Interrogatory I(B)(1)(e)

Do you assert that the decay heat removal system at Seabrook is not "reliable?" If so, provide the bases for the assertion and identify the measures you believe must be taken to make the system "reliable."

Contention I.B.2

> The Applicant has not satisfied the requirements of GDC 4 that all equipment important to safety be environmentally qualified because it has not specified the time duration over which the equipment is qualified.

Interrogatory I(B)(2)(a)

Provide and explain the technical and regulatory bases for your assertion that the time duration for which equipment is qualified must be provided in order for equipment important to safety to be environmentally qualified under GDC 4.

Interrogatory I(B)(2)(b)

Identify the specific equipment at the Seabrook site that you assert is important to safety and must, therefore, have specified the time duration over which the equipment is qualified.

Interrogatory I(B)(2)(c)

Provide the bases for characterizing each piece of equipment listed in the answer to Interrogatory I(B)(2)(b) as important to safety.

Interrogatory I(B)(2)(d)

What do you contend are the minimum durational parameters that each piece of equipment listed in the answer to question I(B)(2)(b) must be qualified to meet? Provide the technical and legal bases for your answer.

Contention I.C

ENVIRONMENTAL QUALIFICATION--EMERGENCY FEEDWATER PUMPHOUSE HVAC

> According to Table 1.3-2, Sheet 14, of the FSAR, the Applicant has added a new heating, ventilating, and air conditioning (HVAC) system for the emergency feedwater pump house. Only parts of the HVAC system are considered safety related and environmentally qualified. NECNP contends that the entire system and its function must be environmentally qualified, and that the environmental qualification must take into account the likely duration of an accident during which the HVAC system would be relied upon.

Interrogatory I(C)(a)

Provide in detail the regulatory and technical bases for the assertion that the entire emergency feedwater pumphouse HVAC system must be environmentally qualified.

Interrogatory I(C)(b)

State the duration of accident for which you believe the emergency HVAC system must be environmentally qualified.

Interrogatory I(C)(b)

State the duration of accident for which you believe the emergency feedwater pumphouse HVAC system must be qualified to operate in an emergency sitaution? Provide the basis for your answer.

Interrogatory I(C)(c)

Do you have any reason to believe that the HVAC system would currently be unable to maintain the necessary temperature range in the emergency feedwater pump house over your projected accident duration or any other pertinent time frame? If so, provide these reasons along with their technical bases.

Interrogatory I(C)(d)

Within what temperature range can the emergency feedwater pump house equipment be relied upon to function? Provide the technical basis for this range.

Interrogatory I(C)(e)

How long do you believe the emergency feedwater pump house system can be expected to operate if the temperature is outside the range stated in the answer to question I(C)(d)? Provide the technical basis for this projection.

Contention I.D.1

> The Applicants have not complied with GDC 1 with respect to ultrasonic testing of reactor vessel welds during preservice and inservice examination.

Interrogatory I(D)(1)(a)

Explain in detail your assertion that the Applicants' ultrasonic testing of reactor vessel welds during preservice and inservice examinations fails to satisfy GDC 1.

Interrogatory I(D)(1)(b)

State the provisions and precise language of GDC 1 with which you contend the Applicants' testing program is not in compliance.

Contention I.D.2

> The Applicant's proposed testing of protection systems and actuation devices fails to meet the requirements of GDC 21 and NUREG-0737, Task II.0.1. In particular, the Applicants do not provide for the testing at full power of twelve safety

functions (see FSAR at 1.8-9), justify that omission, or provide for other reliable means of testing them.

Interrogatory I(D)(2)(a)

For each of the twelve safety functions that you specify in this contention, provide the technical and regulatory bases for the assertion that Applicants' proposed testing of these functions does not comply with GDC 21 and NUREG-0737, Task II.0.1.

Interrogatory I(D)(2)(b)

Do you assert that each of the functions identified in Contention I(D)(2) must be tested at full power in order to comply with GDC 21 and NUREG-0737, Task II.0.1? If so, provide the regulatory and technical bases for the assertion. If not, describe the other means by which the testing of these functions could meet the requirements of the GDC and the NUREG.

Interrogatory I(D)(2)(c)

For the 12 identified safety functions, specify: (1) the changes that would be required in the design and operation of the facility in order to allow for testing at full power; (2) whether you assert that these changes are required; and (3) if you do assert the changes are required, the bases for the assertion.

Contention I.D.3

> The Applicant has not provided a reasonable assurance that the leakage detection system for the Seabrook reactor will operate when needed because not all of the system is to be tested during plant operation, as required by GDC 21. Only the airborne radioactivity detector has the capacity to be tested during power operation. FSAR at 1.8-17. The Applicant thereby also fails to satisfy GDC 30, which requires the development of adequate leakage detecting systems.

Interrogatory I(D)(3)(a)

Provide the regulatory and technical bases for your assertion that the entire leakage detection system for the Seabrook reactor must be tested during plant operation in order to comply with GDC 21.

Interrogatory I(D)(3)(b)

Do you contend that GDC 21 can only be satisfied by compliance with the requirements of Reg. Guide 1.22? If not, state in detail why the Applicants' proposed method of satisfying GDC 21 is inadequate.

Interrogatory I(D)(3)(c)

Provide the regulatory and technical bases for your assertion that the Applicants' leakage detection system fails to satisfy GDC 30. Discuss the steps that you feel the Applicant must take to comply with GDC 30.

Interrogatory I(D)(3)(d)

State in detail the technical bases and any other reasons for classifying as safety systems the components of the Applicant's leakage detection system that cannot be tested at power.

Contention I.D.4

> The Applicants have not complied with GDC 21 in that the Applicants indicate compliance with an outdated standard, IEEE 338-1975, which has been superceded by IEEE 338-1977. Furthermore, the Applicants improperly assert that they do not comply with IEEE 338-1975 whenever the standard states that an action should be taken or a requirement should be met. All the provisions of the IEEE standard should be treated as mandatory unless the Applicants can show an alternative means of achieving the same level of safety.

Interrogatory I(D)(4)(a)

Do you assert that compliance with IEEE 338-1975 with regard to the periodic testing of electric power and protection systems is insufficient to meet the requirements of GDC 21? If so, provide the regulatory and technical bases for the assertion. In your response, identify the provisions of IEEE 338-1975 that you contend are inadequate and describe the corrections needed to meet GDC 21.

Interrogatory I(D)(4)(b)

Do you assert that compliance with IEEE 338-1977 instead of IEEE 338-1975 is necessary to meet the requirements of GDC 21? If so, provide and explain in detail the reasons for the assertion. In particular, identify in your response those changing standards, (i.e., those that are

different in IEEE 338-1977 and IEEE 338-1975) you believe are significant in this regard and explain how the 1977 standards meet the requirements of GDC 21 while the 1975 standards do not.

Interrogatory I(D)(4)(c)

Do you assert that Applicants' failure to treat as mandatory IEEE standards stating that an action "should" be taken or a requirement "should" be met violates the requirements of GDC 21? If so, for each standard not treated as mandatory, provide in detail the reasons why you believe the failure to treat the standard as mandatory violates GDC 21.

Contention I.F

> The applicants have not met the requirements of GDC 17 or Criteria III, Appendix B in that it has not indicated compliance with IEEE 323-1974.

Interrogatory I(F)(a)

Do you assert that the qualification testing requirements of IEEE 387-1977 are inadequate to satisfy GDC 17? If so, provide in detail the technical and regulatory bases for the assertion. Identify in your response the specific provisions of IEEE 387-1977 it is contended are inadequate and explain for each such provision why it fails to satisfy GDC 17 and the improvements needed to ensure compliance with GDC 17.

Interrogatory I(F)(b)

Do you assert that the qualification testing requirements of IEEE 387-1977 are inadequate to satisfy Criteria III, Appendix B? If so,

provide in detail the technical and regulatory bases for the assertion. Identify in your response the specific provisions of IEEE 387-1977 it is contended are inadequate and explain for each such provision (1) the portion of Criteria III not satisfied; (2) the reason the provision fails to satisfy Criteria III; and (3) the improvements needed to ensure compliance with Criteria III.

Interrogatory I(F)(c)

Do you assert that the testing requirements of IEEE 323-1974 satisfy GDC 17 and Criteria III while the testing requirements of IEEE 387-1977 do not? If so, identify the differences in the requirements you believe are significant and explain, in detail, why you believe the provisions in IEEE 323-1974 are adequate while the provisions of IEEE 387-1977 are or may not be.

Contention I.G

PRESSURE INSTRUMENT RELIABILITY

> NECNP contends that there is not reasonable assurance that the public health and safety will be protected in light of the RCS wide-range pressure instruments being utilized at Seabrook which cannot be relied upon to provide accurate information. Reliance upon the instruments could result in inappropriate operator actions or premature or late tripping of RCS pumps during the course of a small break loss-of-coolant accident.

Interrogatory I(G)(a)

Do you know of any reasons other than that contained in IE Information Notice 82-11 to believe the Seabrook RCS wide-range pressure

instruments are inadequate? If so, describe and explain the reasons in detail.

Interrogatory I(G)(b)

State and describe in detail the steps that you contend the Applicant must take to insure that the RCS pressure instruments provide the requisite reasonable assurance of the safe operation of the plant. Explain in detail your reasons for each such step.

Contention I.I

INADEQUATE PROVISIONS FOR ACHIEVING COLD SHUTDOWN

NECNP contends that the Applicants must identify and environmentally qualify one path to cold shutdown as per IE Bulletin 79-01B, Supplement 3.

Interrogatory I(I)(a)

Identify the specific provisions of the Commission's Regulations you assert are not being met at Seabrook because of Applicants' asserted failure to comply with Bulletin 79-01B.

Interrogatory I(I)(b)

Explain why you contend that the Seabrook facility does not meet the standards mentioned in Interrogatory I(I)(a) and describe the steps that should be taken to remedy any deficiency.

Interrogatory I(I)(c)

Explain in detail why you believe the Applicants' ability to place and maintain the plant in a safe hot standby condition so that a

restoration of some degree of systems capability would be necessary to achieve cold shutdown is not an adequate alternative method to satisfy the regulatory requirement(s) identified in your response to Interrogatory I(I)(b).

Interrogatory I(I)(d)

In your April 21 Petition for Leave to Intervene (at p. 26), you state: "To the extent that operator actions are relied upon to achieve cold shutdown, the function is not environmentally qualified and does not meet the applicable requirements." Please explain this statement. In particular, are you asserting that operator actions cannot be involved in the "one method (path) of achieving and maintaining a cold shutdown condition" referred to in I&F Bulletin 79-01B? If so, provide the bases for the assertion.

Contention I.L

PORV FLOW DETECTION MONITORING SYSTEM

Applicants have not provided for a direct indication of Power Operated Relief Valve positions and, therefore, have not complied with NUREG-0737 Item II.0.3. A safety grade environmentally qualified System in compliance with GDC 4 should be installed.

Interrogatory I(L)(a)

What do you contend are the NRC or other standards that the Applicants' system to detect flow from the PORVs and safety valves must meet? Provide the basis for this asserted standard.

Interrogatory I(L)(b)

Identify the components of the monitoring system that you contend do not satisfy the NRC's standards and provide the steps that you believe must be taken to correct any deficiencies.

Interrogatory I(L)(c)

Do you assert that the Applicants must discard their present acoustic accelerator system in favor of a monitoring system that directly measures the flow from the power operated relief valves and the safety valves? If so, provide in detail the basis for the assertion.

Interrogatory I(L)(d)

Provide the technical and regulatory bases for requiring that the selected PORV 1 flow detection system be safety-grade and environmentally qualified?

Interrogatory I(L)(e)

Provide any reasons that you have for believing that the PORV flow detection system that the Applicant chooses will not be safety grade and environmentally qualified.

Contention I.M

> The Applicant's fire protection system does not meet the requirements of GDC 3 as implemented by the Commission in CLI-80-21 with respect to the following items:

A. General Guidelines for Plant Protection
   1. Building design
      a. cable spreading rooms
      b. floor drains
      c. floors, walls and ceilings
   2. Control of Combustibles
      a. reactor coolant pump lube oil system
   3. Electric Cable Construction, Cable Trays and Cable Penetrations
      a. cable spreading rooms
      b. cable trays outside cable spreading rooms
      c. control room cabling
   4. Ventilation
      a. discharge of products of combustion
      b. power supply and controls
      c. protection of charcoal filters
      d. stairwells
      e. smoke and heat vents
   5. Lighting
      a. fixed emergency lighting

B. Fire Detection and Suppression
   1. Detection--alarm and annunciation
   2. Water Sprinkler and Hose Standpipe Systems
      a. sprinkler and standpipe layout
      b. supervision of valves

C. Guidelines for Specific Plant Areas
   1. Primary and secondary containment--normal operation
   2. Control room
   3. Cable spreading room
   4. Switchgear rooms
   5. Remote safety related panels
   6. Diesel generator areas
   7. Diesel fuel oil storage areas
   8. Safety related pumps
   9. New fuel area
   10. Spent fuel pool area
   11. Radwaste building
   12. Decontamination areas

D. Special Protection Guidelines
   1. Welding and cutting, acetylene-oxygen fuel gas systems
   2. Storage areas for dry ion exchange resins

Interrogatory I(M)(a)

For each component of the fire protection system listed in Contention 1(M) above, list: (1) the exact provisions of the pertinent

requirements that you contend are not satisfied; (2) the basis for requiring compliance; and (3) the steps that you assert must be taken to correct any deficiency.

Interrogatory I(M)(b)

Specify the information, supplied by the Applicant to the NRC, that you contend is outdated and should be revised.

Interrogatory I(M)(c)

Supply the basis for stating that the information identified in your response to Interrogatory I(M)(b) is outdated as well as the regulatory basis for requiring a revision.

Interrogatory I(M)(d)

Do you contend that Applicants must comply with all the requirements of BTP 9.5-1 in order to meet GDC 3? If your answer is generally affirmative, provide the regulatory basis for your response. If your answer is no, describe in detail why you believe Applicants' fire protection system does not satisfy GDC 3.

Contention I.N

SOLID WASTE DISPOSAL

The Applicant has not provided a means to handle radioactive solid waste produced during normal reactor operations including anticipated operational occurrences as required by GDC 60.

Interrogatory I(N)(a)

List your reasons and bases for believing that the Seabrook design does not include means to handle radioactive solid waste produced during normal reactor operation as required by GDC 60.

Interrogatory I(N)(b)

State the precise provisions of Applicants' proposal for the handling of radioactive waste produced during normal operations you contend do not meet GDC 60, and detail what you believe must be done to correct the deficiency.

Contention I.U

TURBINE MISSILES

The Applicants have not demonstrated that they meet GDC 4 of Appendix A to 10 C.F.R. Part 50 in that they have not provided that Structures, Systems, and components important to safety be protected against the effects of turbine missiles whose launching might occur as a result of equipment failure.

Interrogatory I(U)(a)

Identify the specific structures, systems, and components important to safety that you contend are in need of additional protection from the effects of turbine missiles launched as a result of equipment failure. Provide the technical and regulatory bases for choosing the systems that you list.

Interrogatory I(U)(b)

Provide in detail the bases for your assertion that Applicants have not met GDC 4 with respect to turbine missiles. In your answer, comment upon why the Applicants' treatment of turbine missiles does not provide an acceptable method other than that found in Reg. Guide 1.115 to satisfy GDC 4.

Interrogatory I(U)(c)

Provide and explain the basis for requiring the Applicants to demonstrate that the probability of damage due to low-trajectory missiles is lower than 10^{-3}.

Interrogatory I(U)(d)

State what you believe to be the probability of damage occurring to essential plant systems at Seabrook as a result of low trajectory missiles. Provide and explain the basis for your answer.

II. Quality Assurance Contentions

Contention II.B

Quality Assurance for Operations

FSAR addresses Quality Assurance for plant operation at Section 17.2. Section 17.2 fails to address each of the criteria in Appendix B in sufficient detail to enable an independent reviewer to determine whether or how all of the requirements of Appendix B and the guidance in all applicable regulatory guides will be satisfied.

Interrogatory II(B)(1)(a)

For each of the criteria in Appendix B to 10 C.F.R. Part 50 for which it is contended Section 17.2 of the FSAR lacks sufficient detail, explain in detail the reasons for your belief the criterion is inadequately addressed.

Interrogatory II(B)(1)(b)

State the steps you contend must be followed to remedy any deficiency noted in your answer to Interrogatory 11(B)(1)(a) above. Include in your response a description of the amount of detail you contend is needed to address each of the criteria in Appendix B.

Contention II.B.3

> The Quality Assurance Organization does not have the independence required by Appendix B, Criterion 1.

Interrogatory II(B)(3)(a)

Provide in detail the bases for the assertion that the Nuclear Quality Manager must not report to the Vice President-Production.

Interrogatory II(B)(3)(b)

List and explain any reasons that you have for believing that the Seabrook Quality Assurance Program is not independent as required by 10 C.F.R. Part 50, Appendix B, Criterion 1. In particular, discuss why you feel that this independence is compromised because the Nuclear Quality Manager reports to the Vice President-Production rather than to a separate but equal or higher level officer.

Interrogatory II(B)(3)(c)

List any areas of the plant that you contend do not meet the pertinent regulatory requirements or have been constructed inconsistently with the public health and safety due to the alleged lack of independence of the program. State the steps that you contend should be taken to correct any such deficiencies.

Interrogatory II(B)(3)(d)

List and describe in detail any instances of which you are aware in which you contend that the Vice President-Production overruled the Nuclear Quality Manager and compromised the quality assurance goals in favor of increased production.

Interrogatory II(B)(3)(e)

Describe the level of independence that you would require for the quality assurance program. In particular, describe the level of separation from other plant functions and operations that you contend must be maintained for the officer to whom the Quality Assurance Staff is ultimately responsible. Compare this description with current NRC regulatory requirements.

Contention II.B.4

> The Quality Assurance Program for operations as described in the FSAR does not demonstrate how the Applicant will assure that replacement materials and replacement parts incorporated into structures, systems, or components important to safety will be equivalent to the original equipment, installed in accordance with proper procedures and requirements, and otherwise adequate to protect the public health and safety. Similarly, the Quality Assurance program does not assure or demonstrate how repaired or reworked structures, systems, or components will

be adequately inspected and tested during and after the repair or rework and documented in "as-built" drawings.

Interrogatory II(B)(4)(a)

Provide the regulatory basis for the assertion that Applicants are required to discuss in the FSAR the maintenance, repairs, or rework that will occur over the life of the plant.

Interrogatory II(B)(4)(b)

List and explain any technical and regulatory reasons or bases that you have for believing that replacement materials and replacement parts incorporated into structures, systems, or components important to safety will not be installed in accordance with proper procedures and requirements or might not be adequate to protect the public health and safety.

Interrogatory II(B)(4)(c)

State the steps that you contend should be followed to correct the deficiencies listed in the answer to Interrogatory II(B)(4)(b).

Interrogatory II(B)(4)(d)

Provide the reasons and bases that you have for believing that the Applicants will not adequately test and inspect repaired or reworked structures, systems, or components during and after repair and document these changes in the "as-built" drawings.

Interrogatory II(B)(4)(e)

State the steps that you contend should be followed to correct the deficiencies listed in the answer to Interrogatory II(B)(4)(d). Compare such steps with existing regulatory requirements.

Contention II.B.5

> The Quality Assurance program for operations as described in the FSAR fails to assure the presence on the operating staff of an adequate number of qualified QA/QC personnel, particularly during off-shifts.

Interrogatory II(B)(5)(a)

State the bases for your assertion that the QA program for operations may not be adequately staffed. Discuss separately staffing for on-shifts and off-shifts in your response.

Interrogatory II(B)(5)(b)

State and provide the bases for the minimum QA staffing provisions you believe are required for Seabrook operation. Discuss separately

staffing requirements for on-shifts and off-shifts in your response.

Compare your response with existing regulatory requirements.

Respectfully submitted,

Robert G. Perlis
Counsel for NRC Staff

Roy P. Lessy
Deputy Assistant Chief
Hearing Counsel

Dated at Bethesda, Maryland
this

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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(Seabrook Station, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE NEW ENGLAND COALITION ON NUCLEAR POLLUTION" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 10th day of November, 1982:

Helen Hoyt, Esq., Chairman*
Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry Harbour*
Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Lynn Chong
Bill Corkum
Gary McCool
Box 65
Plymouth, NH 03264

E. Tupper Kinder, Esq.
Assistant Attorney General
Environmental Protection Division
Office of the Attorney General
State House Annex
Concord, NH 03301

Dr. Emmeth A. Luebke*
Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jo Ann Shotwell, Asst. Attorney
Office of the Attorney General
Environmental Protection Division
One Ashburton Place, 19th Floor
Boston, MA 02108

Beverly Hollingworth
7 A Street
Hampton Beach, NH 03842

Nicholas J. Costello
1st Essex District
Whitehall Road
Amesbury, MA 01913

Robert L. Chiesa, Esq.
Wadleigh, Starr, Peters, Dunn & Kohls
95 Market Street
Manchester, NH 03101

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

Ms. Patti Jacobson
3 Orange Street
Newburyport, MA 01950

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Wilfred L. Sanders, Esq.
Lawrence M. Edelman, Esq.
Sanders and McDermott
408 Lafayette Road
Hampton, NH 03842

Thomas G. Dignan, Jr., Esq.
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Atomic Safety and Licensing
Appeal Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jane Doughty
Field Director
Seacoast Anti-Pollution League
5 Market Street
Portsmouth, NH 03801

David R. Lewis*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

William S. Jordan, III, Esq.
Ellyn R. Weiss, Esq.
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Phillip Ahrens, Esq.
Assistant Attorney General
State House Station #6
Augusta, ME 04333

Donald L. Herzberger, MD
Hitchcock Hospital
Hanover, NH 03755

Edward J. McDermott, Esq.
Ann C. Thompson, Esq.
Sanders and McDermott
408 Lafayette Road
Hampton, NH 03842

Sen. Robert L. Preston
State of New Hampshire Senate
Concord, NH 03301

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Brian P. Cassidy
Regional Counsel
FEMA, Region 1
John W. McCormack Post Office &
Courthouse
Boston, MA 02109

Robert G. Perlis
Counsel for NRC Staff