

DOCKETED
USNR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '83 MAR 21 AIO:12
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

SECRET
PROCESSING & SERVICE
BRANCH

In the Matter of)
)
)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
)
(Seabrook Station, Units 1)
and 2))
_____)

Docket Nos. 50-443
50-444

NECNP MOTION TO RELOCATE PREHEARING CONFERENCE TO SEABROOK AREA

On March 16, 1983, the Licensing Board issued an order setting a prehearing conference for April 7 and 8, 1983, at the U.S. Tax Court in Boston, Massachusetts. The subjects of the prehearing conference include technical contentions and emergency planning. NECNP objects to the location of the prehearing conference at such a distance from the Seabrook plant site, and moves that it be relocated to the Seabrook area.

It is neither fair nor consistent with Commission practice to hold a prehearing conference fifty miles from the area where the affected public resides. NECNP has numerous members in the Seabrook area, many of who live only a few miles from the plant. See NECNP Petition to Intervene, filed November 18, 1981. As members of an Intervenor organization, they have a vested interest in observing the conduct of th Seabrook licensing proceedings.

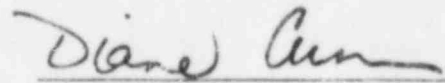
DS03

Furthermore, the Seabrook licensing hearings constitute the only public forum in which the public can influence and become aware of the safety issues which will affect them as long as the plant is in operation. The public interest in observing these licensing proceedings is particularly high where the issues discussed relate to emergency planning--a process which every local citizen will be required to understand and participate in. In this case, where a FEMA representative is being asked by the Board to discuss emergency planning for the localities surrounding the Seabrook plant, the residents of those towns have a special interest in attending the hearing. Those people without access to transportation or the time to drive to Boston will be effectively barred from the hearing.

Finally, local residents of the Seabrook area, including members of NECNP, are entitled to a reasonably accessible hearing location. NRC regulations require that licensing hearings be "public." 10 C.F.R. §2.751. This guarantee is hardly meaningful where the people who are most affected by the issuance of the license must travel long distances and therefore may be prevented from attending the hearings.

For the foregoing reasons, NECNP moves that the April 7 and 8 prehearing conference be moved to a location within approximately ten miles of the Seabrook site, and that all future hearings be conducted at a location within that distance from the site.

Respectfully submitted,


Diane Curran


William S. Jordan, III

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

DATED: March 18, 1983

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 1983, copies of NECNP Motion to Extend Emergency Planning Discovery Deadline and NECNP Motion to Relocate Prehearing Conference to Seabrook Area were sent by first class mail to the following:

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

Phillip Ahrens, Esq.
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

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

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

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

Andra Gavutis
RD 1
East Kensington, NH 03847

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

* Thomas G. Dignan, Esq.
R. K. Gad, III, Esq.
Ropes and Gray
225 Franklin Street
Boston, MA 02110

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

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

Docketing and Service
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Roy F. Lessy, Jr., Esq.
Robert G. Perlis, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Com-
mission
Washington, D.C. 20555

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

Edward J. McDermott, Esq.
SanJers and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

Wilfred H. Sanders, Jr., Esq.
Sanders and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

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

John B. Tazzer
5 Morningside Drive
Hampton, NH 03842

Letty Hett, Selectman
RFD Dalton Road
Brenwood, NH 03833

Edward F. Meany
153 Washington Road
Rye, NH 03870

David R. Lewis
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Room E/W-439
Washington, D.C. 20555

Ruth Ann Miller
Law Clerk to the Board
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Calvin A. Cannery
City Manager
City Hall
Portsmouth, NH 03801

Diane Curran