

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the
ATOMIC SAFETY AND LICENSING BOARD

In the matter of:)

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE)
ET AL.)

(Seabrook Station, Units 1 and 2))
_____)

Docket Nos.: 50-443
and
50-444

March 16, 1983

THE STATE OF NEW HAMPSHIRE'S SUPPLEMENTAL RESPONSE
TO THE APPLICANT'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS FILED DECEMBER 8, 1982

Pursuant to the Order of the Atomic Safety and Licensing Board dated March 1, 1983, relative to Applicant's Motion to Compel Answers to Interrogatories to the State of New Hampshire, New Hampshire offers the following answers.

- A. Interrogatories XI-2 through XI-6, XIV-2 through XIV-8, XVI-2 through XVI-8, XX-2 through XX-4, XXI-2 through XXI-7, XXXII-2 through XXXII-13, and XXXIII-2 through XXXIII-20

New Hampshire retains an interest in litigating the contentions which are the subject of the above enumerated interrogatories. At this time, however, New Hampshire has no position on these contentions. This constitutes the complete answer to each of the above-listed interrogatores.

- B. Interrogatories II-8 and II-9

As it has stated previously,^{1/} New Hampshire maintains that it is placed in the untenable position of being required to provide specific comments on an incomplete project. By the Applicant's admission, its Detailed Control Room Design Review is approximately 50% complete, and the Safety Parameter Display System design is not yet developed. It is for this reason that New Hampshire has not as yet performed an in depth analysis of the control room design, and has, therefore, not yet developed any proposed changes to the present design.

New Hampshire can state at this time, however, that one "change" that must be incorporated into the Seabrook design is the development of a design for the Safety Parameter Display

^{1/} See New Hampshire's February 9, 1983 Answer to Applicant's Motion to Compel, at pages 7-8.

System, as required by NUREG-0737, Item I.D.2. This is required for all nuclear power plants in the United States.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

GREGORY H. SMITH
ATTORNEY GENERAL

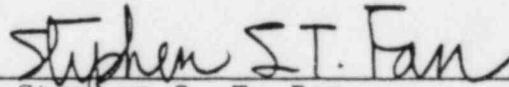
Dated: March 16, 1983

By:



George Dana Bisbee
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Environmental Protection Division
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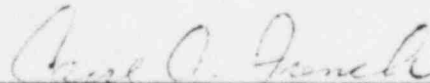
I, the undersigned, being first duly sworn, do depose and say that the foregoing answers are true except insofar as they are based on information that is available to the State of New Hampshire and the New Hampshire Attorney General, but not within my personal knowledge as to which we, based on such information, believe them to be true.



Dr. Stephen S. T. Fan
Chairman and Professor
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Physical Sciences
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THE STATE OF NEW HAMPSHIRE
STRAFFORD, SS.

Personally appeared this 16th day of March, 1983, Dr. Stephen S.T. Fan, before me, the undersigned officer, and made oath that the foregoing statements are true to the best of his knowledge and belief.



Notary Public/Justice of the Peace

CERTIFICATE OF SERVICE

I, George Dana Bisbee, Esquire, do hereby certify that a copy of the foregoing State of New Hampshire's Supplemental Response to the Applicant's Interrogatories and Requests for Production of Documents Filed December 8, 1982 has been mailed this 16th day of March, 1983, by first class mail, postage prepaid, to:

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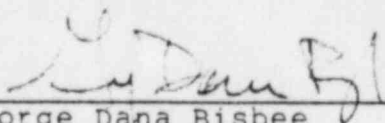
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Dated: March 16, 1983