

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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  
January 7, 1983

THE STATE OF NEW HAMPSHIRE'S THIRD SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO THE NUCLEAR REGULATORY COMMISSION STAFF

Pursuant to 10 C.F.R., Section 2.740(b) and 2.720(h)(2)(II), the Intervenor State of New Hampshire requests that the attached Third Set of Interrogatories be answered fully in writing and under oath by any members of the Nuclear Regulatory Commission Staff ("Staff") who have personal knowledge thereof. The answer to each Interrogatory should contain the name(s) and identification of the person(s) supplying the answer and whether or not he or she has verified the answer.

As used herein, the term "document" means all original writings of any nature whatsoever and all non-identical copies thereof in the possession, custody, or control of Staff and includes but is not limited to the following items: communications, correspondence, notes, field notes, studies, reports, summaries, instructions, charts, schedules, sketches and drawings, records, accounts and accounting records, opinions and reports of consultants.

As used herein, the term "identify" means:

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1. In the case of a natural person:
  - (a) name;
  - (b) last-known address;
  - (c) employer or business affiliation; and
  - (d) occupation and business position held.
  
2. In the case of a document:
  - (a) identity of the person or persons preparing it;
  - (b) its title or a description of the general nature of the subject matter;
  - (c) the identity of the addressee;
  - (d) date of preparation;
  - (e) identity of persons who can identify it; and
  - (f) all of the aforementioned information should be supplied with such reasonable particularity as is sufficient for a specific demand for production. In lieu of the foregoing, a copy of the document may be supplied.
  
3. In the case of oral statements and communications:
  - (a) when and where they were made;
  - (b) identity of each of the makers and recipients thereof;
  - (c) the medium of communication; and
  - (d) substance of the statement and/or communication.

Pursuant to 10 C.F.R., Section 2.740(e) and 2.720(h)(2)(II), responses must be supplemented under circumstances when new or different information becomes available. If Staff cannot answer the Interrogatories in full, so state and indicate when Staff expects to be able to answer the Interrogatory. The State of New Hampshire further requests that Staff, pursuant to 10 C.F.R., Section 2.741, provide copies of or make available for inspection and copying the documents identified by Staff in response to the accompanying Interrogatories within thirty (30) days after service hereof.

Production of such documents shall be at the Office of the Attorney General in Concord, New Hampshire, or at a mutually convenient place.

INTERROGATORIES RELATED TO SPECIFIC CONTENTIONS

CONTENTION NECNP I.B.1

The Applicant has not satisfied the requirements of General Design Criteria 4 and General Design Criteria 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.

NECNP I.B.1.1

Please state the Staff's position on the Applicant's proposed use of the steam generator for residual heat removal in the event of an accident. Identify and produce, pursuant to 10 C.F.R., 2.741 all documents prepared by or for the NRC relating to the generic issue of the use of steam generators for residual heat removal or for this proposed use at the Seabrook plant specifically.

NECNP I.B.1.2

Please state the Staff's position on the adequacy of the chemical water treatment process used for the steam generator. Please identify and produce pursuant

to 10 C.F.R., 2.741 all documents prepared by or for  
the NRC relating to this issue.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

GREGORY H. SMITH  
ATTORNEY GENERAL

By E. Tupper Kinder

E. Tupper Kinder  
Assistant Attorney General  
Environmental Protection Div.  
Office of Attorney General  
State House Annex  
Concord, New Hampshire 03301  
Tel. (603) 271-3678

Dated: January 7, 1983

By George Dana Bisbee

George Dana Bisbee  
Attorney  
Environmental Protection Div.  
Office of Attorney General  
State House Annex  
Concord, New Hampshire 03301  
Tel. (603) 271-3678

NUCLEAR REGULATORY COMMISSION

Dated: \_\_\_\_\_ By \_\_\_\_\_

Its \_\_\_\_\_

DISTRICT OF COLUMBIA

Personally appeared \_\_\_\_\_, before me,  
the undersigned officer, and made oath that the foregoing  
statements are true to his best knowledge and belief.

\_\_\_\_\_  
Notary Public/Justice of the  
Peace

Dated: \_\_\_\_\_

CERTIFICATE OF SERVICE

I, E. Tupper Kinder, Esquire, hereby certify that a copy of  
the foregoing State of New Hampshire's Third Set of  
Interrogatories and Request for Production of Documents to the  
Nuclear Regulatory Commission Staff and The State of New  
Hampshire's Third Set of Interrogatories and Request for  
Production of Documents to Public Service Company of New  
Hampshire, Inc. have been mailed this 7th day of January, 1983,  
by first class mail, postage prepaid, to:

Helen F. Hoyt, Chm.  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, D.C. 20555

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

Dr. Jerry Harbor  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, D.C. 20555

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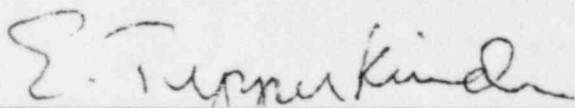
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Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, D.C. 20555

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

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E. Tupper Kinder

Dated: January 7, 1983