

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

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NRC

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SECRETARY
PUBLIC SERVICE
BRANCH

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

Docket Nos. 50-443 OL
50-444 OL

ANSWER TO MEMORANDUM AND ORDER FROM THE
HAMPTON BEACH AREA CHAMBER OF COMMERCE

On September 13, 1982, the Atomic Safety and Licensing Board, under Administrative Judge Helen F. Hoyte, Chairwoman, admitted the Hampton Beach Area Chamber of Commerce (HBACC, formerly the Coastal Chamber of Commerce of New Hampshire) accepted three contentions for litigation. On February 14, 1983, the Applicant filed a motion to compel answers to their interrogatories as did the NRC Staff on February 4, 1983. At this same time the Staff filed to dismiss the HBACC if it had not filed answers to the Staff's interrogatories. While it is true that the HBACC has not responded to these motions, it is also true that the representative was not aware that the Chamber could be dismissed. The Chamber representative has been trying very hard over these many weeks to glean from the many correspondences of intervenors, Staff and Applicant how to begin to tackle what to her seemed an impossible task. The representative admits to a lack of expertise in this area, but soon realized that other intervenors also were overwhelmed by the task before them! The representative, when entering into this process for the Chamber believed the process of licensing was to bring all matters of concern before this Board. The representative for HBACC admits to confusion when the NRC Staff informed her that the "NRC Staff must do what is fair for their client", and the inference is that the Applicant is that client. The Representative for the Chamber was under the impression that the American taxpayer was the "client", paying for the safety and protection of its people.

The HBACC has no resources and therefore no expert witness which it planned to have testify. The HBACC has not relied on experts for its previously filed contentions. The HBACC's knowledge (limited), views, positions, and proposed testimony (which it cannot give until all the facts are in) are the representative's. All

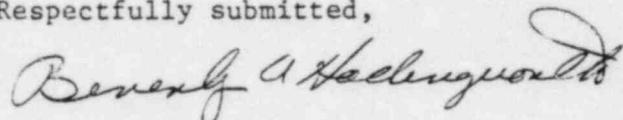
Document materials come from the NRC, the UNH Library, the State Library, Franklin Pierce, and newspapers.

As to what may be used during procedure, it is impossible to determine at this time. What the HBACC representative had intended when it filed its three accepted contentions, not the Emergency Planning Contentions, was to present a case through cross examination and/or to urge denial (or allowance) of the pending application on the basis of the topic or contention.

Now the problem comes that the representative fears that she cannot be more specific than she has been in this letter to the Board. The representative is taking steps to become more informed on the licensing process, but this will not correct her inability to answer those interrogatories from Staff and Applicant anymore specifically than it has to this Board.

If the Board so orders, the representative would like to continue with its intervention on the Emergency Planning as well as, if possible, on its three contentions. It is not the attempt of this representative to be anything but truthful and to continue to intervene for the HBACC.

Respectfully submitted,



Beverly A. Hollingworth
for the Hampton Beach Area
Chamber of Commerce

BAH:LG

cc: To All Parties to Proceeding