

'86 FEB 24 A11:37

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF THE
DOCKET CLERK
BRAND

In the Matter of

PUBLIC SERVICE COMPANY
OF NEW HAMPSHIRE
(Seabrook Station, Units I and II

Docket Nos. 50-443-OL
50-444-OL

MOTION TO EXTEND DEADLINE
FOR FILING CONTENTIONS
ON EVACUATION TIME STUDY

Now comes Intervenor, Town of Hampton, and moves this Board to enter an order extending the deadline within which the parties to this proceeding may file contentions concerning the evacuation time study to be submitted to the Board by the State of New Hampshire as part of the Radiological Emergency Response Plan for the State and effected local governments. In support of this motion, the Town of Hampton states:

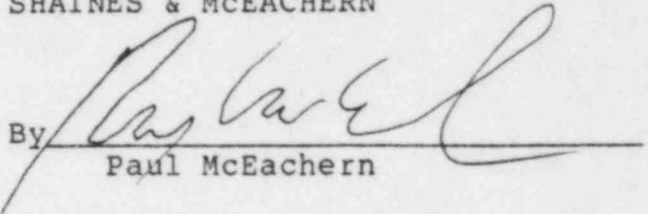
1. That on January 17, 1986, this Board issued a Memorandum and Order which established a deadline of February 24, 1986 for filing contentions against the New Hampshire Radiological Emergency Response Plan (RERP), and against RERP for local governments filed with the State plan.
2. That said Order of the Board further provided an opportunity to file new contentions "based upon the latest draft of New Hampshire's plans (to) provide for all parties a fairer opportunity for full participation in these proceedings."
3. That as part of the latest draft of the State and local plans prepared by the State, an updated and amended Evacuation Time Study, the KLD 3rd Revision so called, is currently being prepared as part of the mandatory requirements for the State RERP. NUREG, Protective Response, pg. 63, Appendix 4.
4. That as of the date of this filing, the latest draft of the Evacuation Time Study under preparation by KLD has not been provided to the Town of Hampton and, on information and belief, has not been provided to this Board.
5. That pursuant to this Board's Order of January 17, 1986, the Town of Hampton should be granted an extension of 30 days from the date of receipt of the latest draft of the Evacuation Time Study in order to provide the Town with a full and fair opportunity for comment and for filing contentions on the ETS.

6. That alternatively this Board should decline to consider any Evacuation Time Study subsequently filed by the State in reaching its determination whether the State and local RERP provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. 10 CFR, Section 50.47(a).


Dated: February 19, 1986

SHAINES & McEACHERN

By


Paul McEachern

By


Matthew T. Brock
Attorneys for the Town of
Hampton, New Hampshire

CERTIFICATE OF SERVICE

DOCKETED
USNRC

I, Matthew T. Brock, one of the attorneys for the Applicants herein, hereby certify that on the 21st day of ~~Feb 86~~ **FEB 24 11:37** 1986, I made service of the within document by mailing copies thereof, postage prepaid, to:

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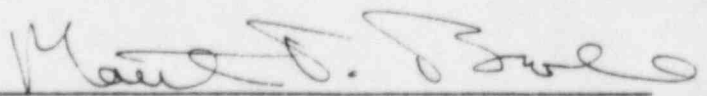
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