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2001 S STREET, N.W.

SUITE 430

WASHINGTON, D.C. 20009-1125

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GAIL MCGREEVY HARMON  
ELLYN R. WEISS  
DIANE CURRAN  
DEAN R. TOUSLEY  
ANDREA C. FERSTER

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH  
TELEPHONE (202) 328-3500

January 22, 1988  
BY HAND

Sherwin Turk, Esq.  
U.S. Nuclear Regulatory Commission  
White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

Re: Seabrook

Dear Sherwin,

As you know, NECNP has outstanding discovery requests to you concerning the staff's position on the New Hampshire emergency plans. Without rehearsing the full history of this, there is no question but that your obligation to respond continues.

At the last hearing session, you represented that it would not be possible for you to answer questions or produce documents regarding the bases for the staff's position because the position has not yet been developed or approved by NRC management.

There are certain materials which are necessary for me to prepare which NRC can clearly produce now.

Therefore, I request that you provide me with all material written by Mr. Boves dealing with the subjects of emergency planning, risk assessment and/or accident consequences, as well as a description of all jobs held by Mr. Boves at NRC and the general tasks which he performed while in these jobs.

Given that we will have only a few days after receipt of the NRC testimony before the beginning of hearings, please provide these materials as soon as possible.

Very truly yours,

*Ellyn Weiss*

Ellyn R. Weiss

ERW/psed

cc: Seabrook Service List

8802020017 880122  
PDR ADOCK 05000443  
G PDR

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