

5650

RELATED CORRESPONDENCE

February 19, 1988  
DOCKETED  
USNRC

UNITED STATES NUCLEAR REGULATORY COMMISSION FEB 22 P4:17  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

\_\_\_\_\_  
In the Matter of )  
 )  
Public Service Company of )  
New Hampshire, et al. )  
 )  
(Seabrook Station, Units 1 & 2) )  
 )  
\_\_\_\_\_)

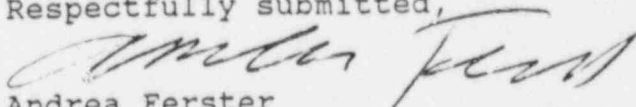
Docket No. 50-443 OL-1/444-d-1  
ONSITE EMERGENCY  
PLANNING & TECHNICAL  
ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S  
REQUEST FOR ENTRY UPON LAND FOR INSPECTION AND OTHER PURPOSES

Pursuant to 10 C.F.R. § 741(a)(2), the New England Coalition Against Nuclear Pollution (NECNP) hereby requests that the Applicants permit NECNP's counsel and experts to inspect and take notes, samples, and photographs at Applicants' plant known as Seabrook, Unit 1, including the following areas:

- containing piping and heat-exchangers that are susceptible to biofouling or microbiologically induced corrosion;
- laboratories where testing for biofouling or microbiologically induced corrosion is performed.

It is requested that the entry upon land for inspection and other purposes be permitted at a time to be mutually agreed upon by the parties.

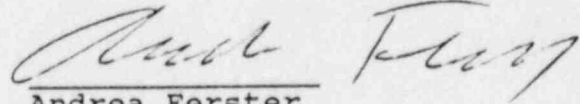
Respectfully submitted,  
  
Andrea Ferster  
HARMON & WEISS  
2001 "S" Street N.W. Suite 430  
Washington, D.C. 20009  
(202) 328-3500

8802240017 880219  
PDR ADOCK 05000443  
G PDR

DSG 3

CERTIFICATE OF SERVICE

I certify that on February 19, 1988, copies of the foregoing pleading was served by first-class mail on all parties listed on the attached service list.

  
Andrea Ferster

DOCKETED  
USMHC

88 FEB 22 P4:17

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

SEABROOK SERVICE LIST -- ONSITE LICENSING BOARD

\*Sheldon J. Wolfe, Chairman  
Office of General Counsel  
U.S. NRC  
Washington, D.C. 20555

\*Dr. Jerry Harbour  
Office of General Counsel  
U.S. NRC  
Washington, D.C. 20555

\*Dr. Emmeth A. Luebke  
5500 Friendship Blvd.  
Apartment 1923N  
Chevy Chase, MD 20815

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

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

Docketing and Service  
U.S. NRC  
Washington, D.C. 20555

Mrs. Anne E. Goodman  
Board of Selectmen  
13-15 New Market Road  
Durham, NH 03842

William S. Lord, Selectman  
Town Hall -- Friend Street  
Amesbury, MA 01913

Jane Doughty  
SAPL  
5 Market Street  
Portsmouth, NH 03801

Carol S. Sneider, Esquire  
Assistant Attorney General  
1 Ashburton Place, 19th Floor  
Boston, MA 02108

Stanley W. Knowles  
Board of Selectmen  
P.O. Box 710  
North Hampton, NH 03826

J.P. Nadeau  
Town of Rye  
155 Washington Road  
Rye, New Hampshire 03870

Richard E. Sullivan, Mayor  
City Hall  
Newburyport, MA 01950

Alfred V. Sargent, Chairman  
Board of Selectmen  
Town of Salisbury, MA 01950

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, D.C. 20510  
(Attn. Tom Burack)

Selectmen of Northampton  
Northampton, New Hamp-  
shire 03826

Senator Gordon J. Humphrey  
1 Eagle Square, Ste 507  
Concord, NH 03301

Michael Santosuosso,  
Chairman  
Board of Selectmen  
Jewell Street, RFD # 2  
South Hampton, NH 03842

Judith H. Mizner, Esq.  
Silvergate, Gertner, et al.  
88 Broad Street  
Boston, MA 02110

Rep. Roberta C. Pevear  
Drinkwater Road  
Hampton, Falls, NH 03844

Phillip Ahrens, Esq.  
Assistant Attorney General  
State House, Station # 6  
Augusta, ME 04333

\*\*Thomas G. Dignan, Esq.  
R.K. Gad II, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

Robert A. Backus, Esq.  
Backus, Meyer & Solcmon  
111 Lowell Street  
Manchester, NH 03105

\*Greg Bery  
Office of General Counsel  
U.S. NRC  
Washington, D.C. 20555

Mr. Angie Machiros,  
Chairman  
Town of Newbury  
Town Hall, 25 High Road  
Newbury, MA 01951

George Dana Bisbee, Esq.  
Geoffrey M. Huntington, Esq.  
Office of the Attorney General  
State House Annex  
Concord, NH 03301

Allen Lampert  
Civil Defense Director  
Town of Brentwood  
Exeter, NH 03833

Richard A. Hampe, Esq.  
Hampe and McNicholas  
35 Pleasant Street  
Concord, NH 03301

Gary W. Holmes, Esq.  
Holmes & Ellis  
47 Winnacunnent Road  
Hampton, NH 03842

William Armstrong  
Civil Defense Director  
10 Front Street  
Exeter, NH 03833

Calvin A. Canney  
City Manager  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

Matthew T. Brock, Esq.  
Shaines & McEachern  
P.O. Box 360  
Maplewood Ave.  
Portsmouth, NH 03801

Sandra Gavutis  
RFD 1 Box 1154  
East Kensington, NH 03827

Charles P. Graham, Esq.  
McKay, Murphy and Graham

100 Main Street  
Amesbury, MA 01913

\* By hand

\*\* By Overnight Mail