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February 23, 1988

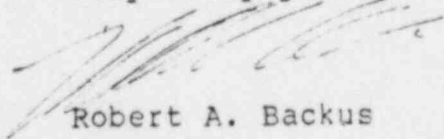
Ivan W. Smith, Chairman
Dr. Jerry Harbour
Gustave A. Linenberger
Atomic Safety and Licensing Board
U. S. NRC
Washington, DC 20555

Re: Public Service Company of New Hampshire, et al
Seabrook Station, Units 1 and 2
Docket Nos. 50-443-OL
50-444-OL

Dear Administrative Judges:

Pursuant to the Board's Protective Order of February 17, 1988, please find enclosed two affidavits of non-disclosure signed by Jane Doughty, Field Director of SAPL and Jacqueline Reader, my legal secretary. SAPL continues in its objection to this procedure that the Board has imposed in order to obtain the information referenced in the enclosed affidavits. SAPL does not, in complying with the protective order, waive any future rights to challenge said order.

Very truly yours,



Robert A. Backus

RAB:jsr

Enclosures

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PDR ADOCK 05000443
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AFFIDAVIT OF NON-DISCLOSURE

I, Jacqueline S. Rivelle, being duly sworn, state:

1. "Protected information" as used in this Affidavit is those documents, whether redacted or unredacted, which comprise Enclosures 3, 4 and 6 as referenced in a letter denominated NYN-87149 dated December 30, 1987 to U.S. NRC from T. C. Feigenbaum, a copy of which is attached hereto and marked "A".

2. An "authorized person" is (1) an employee of the Nuclear Regulatory Commission entitled to access to protected information or (2) an attorney at law appearing as counsel to one of the active parties to this proceeding. An "authorized person" is also a person who has executed and served upon counsel for Applicants an Affidavit of Non-Disclosure and is (3) a non-lawyer representative of an active party to this proceeding, approved by the Atomic Safety and Licensing Board (unless prior approval has been waived by counsel for Applicants) or (4) a technical expert or advisor to a lawyer or non-lawyer representative of an active party to this proceeding.

3. I shall not disclose protected information to anyone except an authorized person, unless that information has previously been disclosed in the public record of this proceeding. I will safeguard protected information in written form so that it remains at all times under the control of an authorized person only and is not disclosed to anyone else.

4. I will not reproduce any protected information by any means without the Atomic Safety and Licensing Board's express approval or direction. So long as I possess protected information, I shall continue to take these precautions until further order of the Atomic Safety and Licensing Board.

5. I shall safeguard and hold in confidence any data, notes, or copies of protected information and all other papers which contain any protected information.

6. If I prepare papers containing protected information in order to participate in further proceedings in this case, I will ensure that any secretary or other individual who must receive protected information in order to help me prepare those papers has executed an affidavit in this form and has agreed to abide by its terms. Copies of any such affidavit will be filed with the Atomic Safety and Licensing Board and served on counsel to active parties before any protected information is revealed to any such person.

7. I shall use protected information solely for the purpose of participation in proceedings in this case directly involving offsite emergency planning for Massachusetts communities within the Seabrook Station Emergency Planning Zone and any further proceedings in this case directly involving that matter, and for no other purposes and specifically shall not use any protected information to

further the goal of having any person or entity withdraw its support of the Seabrook Plan for Massachusetts Communities.

8. I shall keep a record of all protected information in my possession and shall account for and deliver that information to the Atomic Safety and Licensing Board or its designee no later than the conclusion of this proceeding.

9. I will not corroborate the accuracy or inaccuracy of information obtained outside this proceeding by using protected information gained through the hearing process.

Joseph S. Reiter

Subscribed and sworn to before me this 23 day of February, 1988.

Sharon L. Ducharme
Notary Public
My Commission Expires:

Sharon Ducharme, Notary Public
My Commission Expires November 12, 1991

AFFIDAVIT OF NON-DISCLOSURE

I, Jane Daugherty, being duly sworn, state:

1. "Protected information" as used in this Affidavit is those documents, whether redacted or unredacted, which comprise Enclosures 3, 4 and 6 as referenced in a letter denominated NYN-87149 dated December 30, 1987 to U.S. NRC from T. C. Feigenbaum, a copy of which is attached hereto and marked "A".

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8. I shall keep a record of all protected information in my possession and shall account for and deliver that information to the Atomic Safety and Licensing Board or its designee no later than the conclusion of this proceeding.

9. I will not corroborate the accuracy or inaccuracy of information obtained outside this proceeding by using protected information gained through the hearing process.

Jane Frances Doughty

Subscribed and sworn to before me this 23 day of February, 1988.

Sharon L. Ducharme
Notary Public
My Commission Expires:

Sharon Ducharme, Notary Public
My Commission Expires November 12, 1991