

5912
RELATED CORRESPONDENCE

DOCKETED
USNRC

March 15, 1988

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

before the

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)

(Seabrook Station, Units 1 and 2))

) Docket Nos. 50-443-OL
) 50-444-OL
) Off-site Emergency
) Planning Issues

APPLICANTS' REQUEST FOR PRODUCTION OF
DOCUMENTS OF FEDERAL EMERGENCY MANAGEMENT AGENCY

Pursuant to 10 CFR § 2.741, Applicants request that the Federal Emergency Management Agency (FEMA) provide copies of, or make available for inspection and copying at a designated time and place, the documents identified below.¹

As used herein, the term "document" or "documents" means all tangible things, whether handwritten, typed, printed, or otherwise produced and all nonidentical copies thereof in the possession, custody, or control of any of FEMA's officials, agents or employees, including, but not limited to, memoranda, communications, correspondence, notes, field notes, worksheets, disks, tapes, studies, reports, summaries,

¹ In accordance with the discussion among the Atomic Safety and Licensing Board and parties on February 10, 1988, Tr. 9701-9710, Applicants request that the manner of production and any other issues that may arise be handled by telephone as expeditiously as possible.

instructions, charts, schedules, photos, sketches, maps, records, accounts, machine readable records and computer translations, and reports or notes of consultants.

As used herein, the term "contact" means any type of communication, written or oral.

As used herein, the term "The Commonwealth of Massachusetts" means all state offices, agencies, and departments, including those of the Executive, Civil Defense, and the Attorney General.

If any privilege or work product immunity is claimed as a ground for not producing any document, state for each such document its preparation date(s), author(s), addressee(s), recipient(s), custodian(s), title(s), number of pages, and subject matter to the extent not privileged, as well as the basis for withholding it.

REQUEST NO. 1

All documents created since July, 1985, relating to any contact between E. A. Thomas and any official, employee, or representative of The Commonwealth of Massachusetts on any matter relating to nuclear power, emergency planning, and/or Seabrook Station.

REQUEST NO. 2

All documents relating to any contact between any official, employee, or representative of FEMA (including E. A. Thomas) and any official, employee, or representative of The Commonwealth of Massachusetts regarding the substance

of FEMA's or E. A. Thomas's testimony in the above-captioned proceeding.

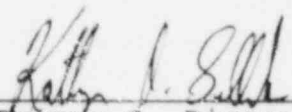
REQUEST NO. 3

All documents created since July, 1985, regarding any contact between any FEMA official, employee, or representative (including E. A. Thomas) and any official, employee, or representative of The Commonwealth of Massachusetts regarding the views of Regional Assistance Committee members on the issue in the above-captioned matter of shelter for the summer beach population.

Applicants do not request production of any of the following documents which may otherwise be called for in the above requests:

1. Transmittal letters or other documents dealing solely with the transmittal of FEMA documents which have been served on the parties in the above-captioned matter.
2. Documents which have been filed with the Docketing and Service Branch of the Office of the Secretary of the Nuclear Regulatory Commission.
3. Documents which fall under one of the above requests solely by virtue of the appearance of a representative of The Commonwealth of Massachusetts on a certificate of service or service list.

By their attorneys,



Thomas G. Dignan, Jr.
George H. Oswald
Kathryn A. Scalleck
Ropes & Gray
225 Franklin Street
Boston, MA 02110
(617) 423-6100

CERTIFICATE OF SERVICE

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I, Kathryn A. Selleck, one of the attorneys for the Applicants herein, hereby certify that on March 15, 1988, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail first class postage paid, addressed to):

MAR 21 P5:28

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Administrative Judge Ivan W. Smith
Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
North Hampton, NH 03862

Judge Gustave A. Linenberger
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Diane Curran, Esquire
Andrea C. Ferster, Esquire
Harmon & Weiss
Suite 430
2001 S Street, N.W.
Washington, DC 20009

Dr. Jerry Harbour
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Stephen E. Merrill
Attorney General
George Dana Bisbee
Assistant Attorney General
Office of the Attorney General
25 Capitol Street
Concord, NH 03301-6397

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Sherwin E. Turk, Esquire
Office of the General Counsel
U.S. Nuclear Regulatory
Commission
One White Flint North, 15th Fl.
11555 Rockville Pike
Rockville, MD 20852

*Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Robert A. Backus, Esquire
116 Lowell Street
P. O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

Paul McEachern, Esquire
Matthew T. Brock, Esquire
Shaines & McEachern
25 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Mrs. Sandra Gavutis
Chairman, Board of Selectmen
RFD 1 - Box 1154
Route 107
Kensington, NH 03827

*Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

*Senator Gordon J. Humphrey
One Eagle Square, Suite 507
Concord, NH 03301
(Attn: Herb Boynton)

Mr. Thomas F. Powers, III
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

H. Joseph Flynn, Esquire
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.
Washington, DC 20472

Gary W. Holmes, Esquire
Holmes & Ells
47 Winnacunnet Road
Hampton, NH 03841

Mr. J. P. Nadeau
Selectmen's Office
10 Central Road
Rye, NH 03870

Carol S. Sneider, Esquire
Assistant Attorney General
Department of the Attorney
General
One Ashburton Place, 19th Flr.
Boston, MA 02108

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

Mr. Angie Machiros
Chairman of the Board of
Selectmen
Town of Newbury
Newbury, MA 01950

Mr. Peter J. Matthews
Mayor
City Hall
Newburyport, MA 01950

Mr. William S. Lord
Board of Selectmen
Town Hall - Friend Street
Amesbury, MA 01913

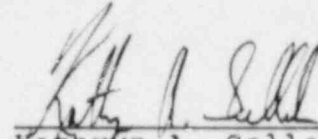
Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

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

Mr. Ed Thomas
FEMA, Region I
442 John W. McCormack Post
Office and Court House
Post Office Square
Boston, MA 02109

Charles P. Graham, Esquire
McKay, Murphy and Graham
100 Main Street
Amesbury, MA 01913

Judith H. Mizner, Esquire
Silvergate, Gertner, Baker,
Fine, Good & Mizner
88 Broad Street
Boston, MA 02110



Kathryn A. Selleck

(* = Ordinary U.S. First Class Mail)