

the Massachusetts Attorney General's Amended Contention on Notification System," which purports to be answers to Applicants' interrogatories. Applicants move this Licensing Board to compel answers to be filed under oath or affirmation by the person making them and, further, that Mass AG be compelled to answer certain interrogatories to which he has made objection or otherwise failed fully to respond.

1. Motion to Compel that Answers Be Signed Under Oath by the Person Making Them

The document filed by Mass AG on July 12, 1988 contains an attorney's signature at the end under the phrase "respectfully submitted." As such it is in the form of a lawyer's brief rather than a party's answers to interrogatories. The regulations require that answers to interrogatories be signed by the person making them¹ and that they be signed under oath or affirmation as to their truth and completeness, unless objection is stated. 10 CFR § 2.740b(b). Applicants move that this Board order Mass AG to file answers properly signed and sworn.

¹ Applicants do not know whether the attorney who signed the document generated the answers or is competent to do so, since Mass AG did not either object or respond to Applicants' request for that information. See infra § 2.a.

2. Motion to Compel Answers to Specific Interrogatories

a. Incomplete Answers to Interrogatories 1, 3-5, 8-45

On page 5 of Applicants' interrogatories, Mass AG was asked to "include, with the answer to each of the interrogatories that follow, the name, institutional affiliation and professional qualifications, if any, of the person who is answering." Mass AG appears to have ignored this request and, since he did not object to it, Applicants move that this Board order that the information requested be given. The omission is particularly significant in that no one has signed the answers to interrogatories under oath and Applicants do not know either who generated or takes responsibility for the answers, let alone their affiliation or qualifications.

b. Interrogatories 1, 44, 45

Interrogatories 1, 44, and 45 and their responses read as follows:

"1. With respect to the Mass. AG's answers to each of the interrogatories 6-46 that follow, is that answer based upon reference to or knowledge of the existence of one or more documents? If so, please:

"(a) Identify each such document on which the answer is based.

"(b) Identify the information in each document on which the answer is based.

"(c) Identify all documents possessed by or known to exist by the Mass AG which deal with the same subject matter.

"(d) Produce all identified documents."

"RESPONSE 1: The Mass AG objects to Interrogatory No. 1 as overly broad and seeking material not relevant to the subject matter of these proceedings. Without waiving this objection, the Mass AG will produce all relevant, discoverable and non-privileged documents on which the answers to the interrogatories are based."

"44. Please identify and produce all documents consulted or relied upon by the Mass AG, or by any individuals assisting the Mass AG, in preparing the Amended Contention on Notification System."

"RESPONSE 44: The Mass AG will produce all relevant, discoverable and non-privileged documents within the scope of this request. The Mass AG will not produce the numerous documents on which it consulted or relied that either were prepared by the Applicants or are within their possession as part of the docket of this proceeding."

"45. Please list, identify the source (including preparer's name, institutional affiliation and professional qualifications, if any) of, and produce, all studies, tests, analyses, procedures, methods, instructions, conclusions, recommendations, computer runs or similar scientific reviews, prepared for or possessed by the Mass AG, and all assumptions and data used therein, relating to:

"(a) siren and/or voice mode emergency notification systems;

"(b) sound and/or ambient noise levels in any areas where emergency planning for Seabrook Station is required;

"(c) acoustic range models or analyses;

"(d) road blockage or traffic interruption in connection with the VANS system;

"(e) meteorological conditions, including but not limited to wind speeds, temperature and precipitation, in connection with the VANS system."

"RESPONSE 45: See Response to Interrogatory No. 44."

On page 3 of Applicants' interrogatories, Mass AG was asked that "[i]n the event that it is claimed that any document responsive to any request is privileged, each privileged document should be fully identified in writing, signed by counsel, except that the substance thereof need not be described to the extent said substance itself is claimed to be privileged." To the extent that Mass. AG claims that any document responsive to Interrogatories 1, 44 or 45 is privileged, Mass AG should be compelled to identify the document(s) as requested on page 3.

Furthermore, Mass AG should be compelled to answer Interrogatory 1 in full. He objects that it is "overly broad and seeking material not relevant to the subject matter of these proceedings." The interrogatory simply asks for the identity of documents and information that Mass AG would need to use or be aware of in order to answer these interrogatories. It can hardly be "overly

broad" to request Mass AG to identify these documents and information. The claim of irrelevance of these documents and information upon which Mass AG has based his answers to these interrogatories is self-refuting.

c. Interrogatory 2

Interrogatory 2 and its reponse read as follows:

"2. With respect to the Mass AG's answers to each of the interrogatories 6-46 that follow, is that answer based upon any type of study, calculation, procedure, method, instruction, assumption, conclusion, recommendation or analysis? If so, please:

"(a) Describe the nature of the study, calculation, procedure, method, instruction, assumption, conclusion, recommendation or analysis.

"(b) Identify and produce any documents that constitute, discuss or describe it.

"(c) Identify the person(s) who performed it, including the institutional affiliation and professional qualifications, if any, of the person(s).

"(d) State when and where it was prepared or performed.

"(e) Describe in detail the information or data that was examined.

"(f) Describe the results.

"(g) Explain how it provides a basis for the answer."

"RESPONSE 2: The Mass AG objects to Interrogatory No. 2 as overly broad, duplicative of other, non-objectionable interrogatories and seeking information not

relevant to the subject matter of these proceedings and protected trial preparation materials under 10 C.F.R. § 2.740(b)(2)."

Mass AG refused to answer Interrogatory 2 on the grounds of irrelevance, overbreadth, "protected trial preparation," and duplication. The information sought is not revealed elsewhere, so the duplication argument is meritless. The interrogatory only asks for information upon which Mass AG based his answer to those interrogatories. As this material, by definition, must be available to Mass AG it can hardly be "overly broad" to require Mass AG to provide it. Indeed, in his response to Interrogatory 8 the Mass AG states that at least one such calculation was made, but he then fails to identify and describe it.

Nor can this information be hidden behind "protected trial preparation." Mass AG has the burden of establishing the existence of attorney work product privilege. Public Service Company of New Hampshire (Seabrook Station, Units 1 and 2), LBP-83-17, 17 NRC 490, 495 (1983). The idea that all this information could constitute "trial preparation", that none of it came into existence prior to or independent of these proceedings, is simply not credible.

Furthermore, even if Mass AG were able to meet his burden, he should be compelled to answer this

interrogatory because Applicants have a "substantial need of the materials" and would suffer "undue hardship to obtain the substantial equivalent of the materials by other means." This interrogatory inquires into matters that Mass AG has put into controversy and upon which Mass AG intends to offer evidence and argument. In order effectively to defend against Mass AG's contention, Applicants need access to the information on which the contention is based.

Finally, Mass AG's claim, that the very information upon which Mass AG has based his answers to these interrogatories is irrelevant, is self-refuting.

d. Interrogatory 3

Interrogatory 3 and its response read as follows:

"3. With respect to the Mass. AG's answers to each of the interrogatories 6 - 46 that follow, is that answer based upon conversations, consultations, correspondence or any other type of communication with one or more individuals or entities? If so, please:

"(a) Identify each such individual or entity.

"(b) State the educational and professional background of each such individual, including occupation and institutional affiliates.

"(c) Describe the nature of each communication with each such individual or entity, when it occurred, and identify all other individuals or entities involved.

"(d) Describe in detail the information received from each such individual or entity, and explain how it provides a basis for the answer.

"(e) Identify and produce each letter, memorandum, contract, tape, note or other document related to each conversation, correspondence, or other communication with such individual or entity."

"RESPONSE 3: The Mass AG objects to Interrogatory No. 3 as overly broad, seeking information not relevant to the subject matter of these proceedings and protected trial preparation materials under 10 C.F.R. § 2.740(b)(2) and duplicative of other requests. Without waiving this objection, the Mass AG states that it has had communications with a representative of National Crane in Waverly, Nebraska concerning the crane, Whelan Engineering concerning the siren, Stet Hydraulics, concerning the stabilizers, Rodman Ford concerning the VANS prototype truck, Bell Helicopter Textron Inc. and [name deleted] concerning the Helicopter, and Cavanaugh Tocci Associates, Inc., 327 F Boston Post Road, Sudbury, MA on various acoustic issues."

In response to Interrogatory No. 3, Mass AG reveals that he had communications with various persons concerning "the crane," "the siren," "the stabilizers," "the VANS prototype truck," "the Helicopter" and "various acoustic issues" with respect to Applicants' interrogatories. But Mass AG declines to be more specific, on the grounds of irrelevance, broadness, "protected trial preparation," and duplication. The information sought is not revealed elsewhere, so the duplication argument must fail. The interrogatory is limited to Mass AG's contacts with respect to answering Applicants'

interrogatories. Given that interrogatories must be answered in a short time frame, it is hard to credit that Mass AG had so many contacts that questions concerning them could be "overly broad."

Nor can information about the contacts be hidden behind "protected trial preparation". Mass AG has the burden of establishing the existence of attorney work product privilege. Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), LBP-83-17, 17 NRC 490, 495 (1983). The idea that all documents and information related to these contacts could constitute "trial preparation" is not credible. A complete answer should be compelled in view of Mass AG's failure to establish his basis for refusing to answer beyond the label "protected trial preparation."

Furthermore, even if Mass AG were able to meet his burden, Mass AG should be compelled to answer this interrogatory because Applicants have a "substantial need of the materials" and would suffer "undue hardship to obtain the substantial equivalent of the materials by other means," particularly the contacts with Cavanaugh Tocci Associates, Inc. This interrogatory inquires into matters that Mass AG has put into controversy and upon which Mass AG intends to offer evidence and argument. In order to effectively defend against Mass AG's contention, Applicants need access to the information upon which the contention is based.

The claim of irrelevance for Mass AG's contacts with knowledgeable persons about the very matters he seeks to litigate is self-refuting. Applicants move that Mass AG be compelled to answer fully Interrogatory No. 3.

e. Interrogatories 6 and 7

Interrogatories 6 and 7 and their responses read as follows:

"6. Has any representative of or person employed by the Department of the Attorney General of the Commonwealth been in contact with any selectman, civil defense director or other official of Amesbury, Merrimack, Newbury, West Newbury, Newburyport, Salisbury or Haverhill concerning any actual or proposed siren warning system for Seabrook Station? If so, please:

"(a) Identify each selectman, civil defense director or other official who was contacted, and the official, representative, or employee who contacted them.

"(b) Describe in detail the date, time, manner, place, and substance of the communication.

"(c) Identify and produce every document that reflects, refers to, or relates in any way to any such contact."

"RESPONSE 6: The Mass AG objects to Interrogatory No. 6 because, in light of ALAB-883 and the scope of the Mass AG Amended Contention on Notification System, the interrogatory seeks information not relevant to the subject matter of this proceeding."

"7. Has any other official, representative, or employee of the government of the Commonwealth of Massachusetts been in contact with any selectman, civil defense director or other official of Amesbury, Merrimack, Newbury, West Newbury, Newburyport, Salisbury or Haverhill concerning any actual or proposed siren warning system for Seabrook Station? If so, please:

"(a) Identify each selectman, civil defense director or other official who was contacted, and the official, representative, or employee who contacted them.

"(b) Describe in detail the date, time, manner, place, and substance of the communication.

"(c) Identify and produce every document that reflects, refers to, or relates in any way to any such contact."

"RESPONSE 7: The Mass AG objects to Interrogatory No. 7 because, in light of ALAB-883 and the scope of the Mass AG Amended Contention on notification system, the interrogatory seeks information not relevant to the subject matter of this proceeding."

Mass AG insists that his conversations with the officials of the Massachusetts towns for which the VANS system has been created are not relevant. At the same time, Mass AG insists that unidentified ordinances passed by town officials would be construed as preventing operation of VANS. Mass AG wants the opportunity to argue that town officials will prevent VANS from operating, but seeks to have his role in orchestrating that result shielded from discovery. Mass AG himself put such matters in controversy in his contention; he must live with the consequent exposure.

Mass AG cites ALAB-883 as a basis for not responding to Interrogatories 6 and 7. In ALAB-883 the question was whether Mass AG was precluded from even being heard on the subject of a notification system, given previous involvement in the destruction of the once existing system. That cannot

mean, however, that the question whether he is involved in preventing the operation of the new notification system is irrelevant to the very issues he raises. It may be that his own actions are the foundation of the issues he raises.

The standard for discovery is whether the request is reasonably calculated to lead to the discovery of admissible evidence. Mass AG's communications with town officials may contain probative evidence of how those officials will interpret these unidentified obstructing ordinances, as well as some indication as to the validity of those asserted interpretations. Thus, the information requested in Interrogatories 6 and 7 is reasonably calculated to lead to the discovery of admissible evidence as to whether the current system can be operated legally, independent of whether it might raise any issue of estoppel.² Applicants' Interrogatories 6 and 7 meet that standard, and Mass AG's answers should be compelled.

² Moreover, given that Mass AG in his interrogatories to Applicants demanded that Applicants "[d]escribe any and all attempts made by the Applicants to obtain permission under local laws and ordinances for the operation of the VANS staging areas and acoustic locations and identify all documents relating to such attempts", it is inequitable that Mass AG should protest, on relevance grounds no less, when he is asked to provide the parallel information regarding himself.

f. Interrogatories 13, 14, 15, and 16.

Interrogatories 13, 14, 15, and 16 and the responses thereto follow:

"13. Please state in detail all the facts underlying the Mass AG's assertion that "the [VANS] vehicles cannot withstand and will not operate properly with the weights, amount and nature of equipment intended to be carried by the vehicles," and explain exactly how these facts support the assertion."

"RESPONSE 13: As the Applicants themselves acknowledge in their response to Mass AG's Interrogatory No. 7, the VANS fleet has not even been constructed. Therefore, the Applicants can provide no assurance, and only speculation, that the VANS vehicles will not fail in the fashion described in paragraph A(4) of the Mass AG Amended Contention on Notification System for Massachusetts."

"14. Please state in detail all the facts underlying the Mass AG's assertion that 'the weight distribution with the siren fully extended will cause the equipment to fall and/or the lifting mechanism to bend or break under heavy wind or precipitation conditions,' define precisely what is meant by 'heavy wind' and 'heavy . . . precipitation', and explain exactly how those facts support the assertion."

"RESPONSE 14: As the Applicants themselves acknowledge in their response to Mass AG's Interrogatory No. 7, the VANS fleet has not even been constructed. Therefore, the Applicants can provide no assurance, and only speculation, that the VANS vehicles will not fail in the fashion described in paragraph A(4) of the Mass AG Amended Contention on Notification System for Massachusetts."

"15. Please state in detail all the facts underlying the Mass AG's assertion that "the telescopic crane will not reliably lift the siren to its fully extended position because of the

weight of the siren and the capacity of the crane", define exactly what is meant by "reliably", and explain exactly how those facts support the assertion."

"RESPONSE 15: As the Applicants themselves acknowledge in their response to Mass AG's Interrogatory No. 7, the VANS fleet has not even been constructed. Therefore, the Applicants can provide no assurance, and only speculation, that the VANS vehicles will not fail in the fashion described in paragraph A(4) of the Mass AG Amended Contention on Notification System for Massachusetts."

"16. Please state in detail every fact, not discussed in a previous answer, underlying the Mass AG's assertion that "the VANS vehicles are inadequate for their intended use," and explain exactly how those facts support the assertion."

"RESPONSE 16: See Responses to Interrogatories Nos. 13, 14, 15."

As Mass AG did not object to answering Interrogatories No. 13-16, he should answer them fully, including, but not limited to, providing his definitions of the terms "heavy wind", "heavy . . . precipitation", and "reliably". Mass AG's present answer is unresponsive. If there is indeed no factual basis for the Mass AG's assertions about the adequacy of the VANS vehicles, the Mass AG should so state. If the assertions do have a basis in fact, be it the VANS prototype, Mass AG's contacts with the VANS manufacturers, or other sources, Mass AG should state those facts. Full answers to each of these interrogatories should be compelled.

g. Interrogatory 20

Interrogatory 20 and its response follows:

"20. Please state in detail how long the Mass AG contends it will require to perform each of the following functions, for (1) optimum weather conditions and (2) poor weather, heavy traffic, or nighttime conditions, and state in detail all the facts underlying each answer and how those facts support the answer:

"(a) notification of VANS driver;

"(b) VANS driver proceeds to vehicle;

"(c) VANS driver checks out vehicle and equipment;

"(d) VANS driver starts vehicle and leaves staging area;

"(e) VANS vehicle proceeds to acoustic location;

"(f) setup and activation of siren at acoustic location."

"RESPONSE 20: See Responses to Interrogatories No. 18 and 19. The Mass AG further states, to the extent it is able given the unreasonable withholding of information by the Applicants, that it believes, based in part on information from the June 28 and 29, 1988 SPMC exercise, that notification (a) will take at least 2 minutes; proceeding to the vehicles (b) will take at least 30 seconds; checking out the vehicle and equipment (c) will take at least one minute; vehicle startup and leaving of staging area (d) will take at least 30 seconds; and setup and activation of the siren (f) will take at least 5 minutes."

Mass AG, by reference to Interrogatory 18, objects to this interrogatory on the basis that Applicants have refused to disclose the staging areas and preselected acoustic locations for the VANS system. Mass AG then states how long

he contends each of the functions listed will require. Mass AG, however, does not indicate whether these times are based on "optimum weather conditions" or "poor weather, heavy traffic, or nighttime conditions," as requested in the interrogatory.

Applicants take exception to Mass AG's statements concerning Applicants' motion for a protective order covering the staging areas and preselected acoustic locations for the VANS system.³ Moreover, even though Mass AG may be unable to assert what some of those times would be, most of the information requested in this interrogatory does not require the disclosure of the staging areas and preselected acoustic locations. This information for both "optimum weather" and "poor weather, heavy traffic, or nighttime conditions," as well as all the facts underlying each answer and how those facts support the answer, should be compelled.

h. Interrogatory 23

Interrogatory 12 and its response read as follows:

"23. Please state exactly how much each level of snow, of icy weather, and of cold weather will impede each of (i) the extension of the sirens to their operational position, (ii) the rotation and oscillation of the sirens during the tone and message modes, (iii) the operation of the sirens

³ From June 22, 1988 on, Applicants have offered that Mass AG may have and use the information and pass it among his agents and consultants as long as he does not publish it to the general public, at least until Applicants' motion for protective order is decided.

themselves, and state in detail all the facts underlying the answer for each level and function."

"RESPONSE 23: Snow and ice will gather under extreme weather conditions in the sections of the crane through which its extension takes place and in the mechanism designed to rotate and oscillate the sign (see Design Report at 2-12, 2-14, 2-16 for definition of those terms). Once that occurs the mechanisms will not function in the manner designed by the Applicants."

Inasmuch as Mass AG did not object to Interrogatory 23, he should be compelled to answer as to the exact quantities, as requested.

i. Interrogatory 40

Interrogatory 40 and its response read as follows:

"40. Please state in detail all the facts underlying the Mass AG's assertion that "any attempted informational messages for the airborne siren will be garbled and unintelligible because of the strength and size of the speaker array and amplifier system, the height of the aircraft and the effect of the helicopter's rotary blades," define exactly what is meant by "garbled and unintelligible," and explain exactly how those facts support the assertion."

"RESPONSE 40: "Garbled" means to be so distorted as to be unintelligible. Unintelligible means unable to be understood or lacking the capacity to be understood. The informational messages of the airborne siren will be garbled and unintelligible because, among other things, the rotary action of the helicopter blades will cause air to flow past the speakers in a pulse. This results in a modulated, and thus, distorted sound. In addition, the background noise of the helicopter itself will result in further distortion."

Inasmuch as Mass AG did not object to Interrogatory 40,

he should be compelled to answer fully, stating exactly what the "other things" are that he fails to disclose.

j. Interrogatory 42

Interrogatory 42 and its response read as follows:

"42. Please list and produce all documents possessed by the government of the Commonwealth of Massachusetts or any department, agency, office, commission, authority, official, employee or representative thereof that reflect, refer to, or relate in any way to any emergency warning sirens installed or contemplated within the Commonwealth of Massachusetts, other than sirens installed by Public Service Company of New Hampshire."

"RESPONSE 42: The Mass AG objects to this interrogatory as seeking information not relevant to the subject matter of this proceeding. Without waiving this objection the Mass AG states that no emergency warning sirens in the Commonwealth are installed or contemplated for use in an emergency at Seabrook Station."

Mass AG answers only a part of Interrogatory 42, avoiding the issue of emergency warning systems installed or contemplated within the Commonwealth including but not limited to systems in the very towns of the Seabrook EPZ, and not just those "installed or contemplated for use in an emergency at Seabrook Station." The existence of other systems and communications regarding those systems as well as the enforcement of policies or ordinances concerning those systems could lead to the discovery of admissible evidence and therefore the full answer should be compelled.

k. Interrogatories 44 and 45

Interrogatories 44 and 45 and their responses read as follows:

"44. Please identify and produce all documents consulted or relied upon by the Mass AG, or by any individuals assisting the Mass AG, in preparing the Amended Contention on Notification System."

"RESPONSE 44: The Mass AG will produce all relevant, discoverable and non-privileged documents within the scope of this request. The Mass AG will not produce the numerous documents on which it consulted or relied that either were prepared by the Applicants or are within their possession as part of the docket of this proceeding."

"45. Please list, identify the source (including preparer's name, institutional affiliation and professional qualifications, if any) of, and produce, all studies, tests, analyses, procedures, methods, instructions, conclusions, recommendations, computer runs or similar scientific reviews, prepared for or possessed by the Mass AG, and all assumptions and data used therein, relating to:

"(a) siren and/or voice mode emergency notification systems;

"(b) sound and/or ambient noise levels in any areas where emergency planning for Seabrook Station is required;

"(c) acoustic range models or analyses;

"(d) road blockage or traffic interruption in connection with the VANS system;

"(e) meteorological conditions, including but not limited to wind speeds, temperature and precipitation, in connection with the VANS system."

"RESPONSE 45: See Response to Interrogatory No. 44."

As Mass AG did not object to answering Interrogatory Nos. 44 and 45, he should answer it fully and identify the information requested.

1. Interrogatory 46

Interrogatory 46 and its response read:

"46. Please identify all studies, analyses or other work which Mass AG currently intends to perform or have performed in connection with any matter raised by his Amended Contention on Notification System or bases thereunder."

"RESPONSE 46: The Mass AG objects to this interrogatory as beyond the scope of permissible discovery under 10 C.F.R. §2.740."

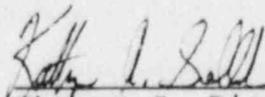
Mass AG's objection to this interrogatory is unclear and seems ill-founded. If he is asserting that the information sought is privileged, then he should comply with Instruction No. 4, by identifying the privilege and the specific material covered. If, on the other hand, the objection is based on relevance, then Mass AG's own demand that Applicants "[i]dentify all future tests of the VANS route times" demonstrates the fallacy of that argument.⁴ In either case, a full answer should be compelled.

⁴ Indeed, earlier in these licensing proceedings Mass AG served an interrogatory on Applicants asking whether they "will rely on any study, calculation, or analysis to support your position on each of these contentions," and asking for detailed information about all such studies, calculations, and analyses. See Applicants' Response to Interrogatories Re: NHRERP Rev. 2 (March 18, 1987), Mass AG's interrogatory 3.

CONCLUSION

Mass AG should be ordered to file answers properly signed and sworn and should be further ordered to answer Interrogatories 1, 2, 3, 6, 7, 13, 14, 15, 16, 20, 23, 40, 42, 44, 45 and 46, and should be further ordered to provide the requested information about the claims of privilege and the generator(s) of the answers.

By their attorneys,



Thomas G. Dignan, Jr.
Kathryn A. Selleck
Jeffrey P. Trout
Jay Bradford Smith
Ropes & Gray
225 Franklin Street
Boston, MA 02110
(617) 423-6100

Counsel for Applicants

CERTIFICATE OF SERVICE

I, Kathryn A. Selleck, one of the attorneys for the Applicants herein, hereby certify that on July 20, 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) the individuals listed below.

Administrative Judge Sheldon J. Wolfe, Esq., 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

Administrative Judge Emmeth A. Luebke
4515 Willard Avenue
Chevy Chase, MD 20815

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

Adjudicatory File
Atomic Safety and Licensing Board Panel Docket (2 copies)
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Sherwin E. Turk, Esquire
Office of 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
Backus, Meyer & Solomon
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 Floor
Boston, MA 02108

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

R. Scott Hill-Whilton, Esquire
Lagoulis, Clark, Hill-Whilton &
McQuire
79 State Street
Newburyport, 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 01911

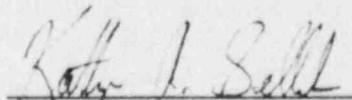
Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

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
Murphy and Graham
33 Low Street
Newburyport, MA 01950

Judith H. Mizner, Esquire
79 State Street, 2nd Floor
Newburyport, MA 01950



Kathryn A. Selleck