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August 19, 1988

Sheldon J. Wolfe, Esq.
Dr. Emmeth A. Luebke
Dr. Jerry Harbour
Administrative Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Seabrook Operating License case:
Onsite Emergency Planning and Technical Issues

Dear Administrative Judges:

I am enclosing copies of New England Coalition on Nuclear Pollution's Notice Regarding Summary Disposition Motion and New England Coalition on Nuclear Pollution's Answers to Applicants' First Set of Interrogatories and First Request for Production of Documents Regarding New England Coalition on Nuclear Pollution's Contentions Concerning RG-58 Cable. Copies of these pleadings have been served on the parties to the Seabrook proceeding.

It should be noted that in filing these interrogatory answers after the close of discovery, NECNP has not violated the Board's discovery schedule. NECNP was not required to answer Applicants' interrogatories because the NRC's rules did not require NECNP to respond to Applicants' interrogatories (filed August 1, 1988) until August 17, after the close of discovery. See 10 C.F.R. § 2.740b(b) (gives 14 days) and § 2.710 (2 days for express mail added). However, NECNP agreed with Applicants that it would answer the interrogatories, and to provide those answers as soon as possible. We have served the answers on the Board and parties for informational purposes.

Please note that because he is out of town on vacation, we were unable to obtain a signed copy of Mr. Pollard's affirmation in time for this filing. We will serve copies on the Board and parties when we receive it.

Sincerely,

Dean R. Tousley for
Diane Curran

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