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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 SEP 14 P2:42

ATOMIC SAFETY AND LICENSING BOARD

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BRANCH

Before Administrative Judges:  
Ivan W. Smith, Chairman  
Gustave A. Lineberger, Jr.  
Dr. Jerry Harbour

In the Matter of	)	Docket Nos. 50-443-OL
	)	50-444-OL
PUBLIC SERVICE COMPANY	)	
OF NEW HAMPSHIRE, et al	)	(Offsite Emergency Planning)
	)	
(Seabrook Station,	)	
Units 1 and 2	)	September 12, 1988

SEACOAST ANTI-POLLUTION LEAGUE'S ANSWERS TO THE  
APPLICANTS' FIRST SET OF INTERROGATORIES REGARDING  
THE SPMC AND MOTION FOR PROTECTIVE ORDER

- 1) Jane Doughty, SAPL's Field Director, is the respondent providing the answers to these interrogatories. SAPL's business address is SAPL, 5 Market Street, Portsmouth, N.H. 03801.
- 2) SAPL is in possession of no documents responsive to this interrogatory. The conversations SAPL has had relative to the subject matters described in this interrogatory have been with counsel to the various parties to this proceeding and are, therefore, deemed privileged. Conversations with town officials have been in the presence of their counsel and are also deemed privileged. The only other conversations outside of the above-described have been with Bill Lord, Chairman of the Board of Selectmen of the Town of Amesbury. Those

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conversations have generally been in the nature of poking fun at the idea that utility workers could adequately perform functions required in a local community emergency response and have revolved around the basic theme that the SPMC is not going to work to adequately protect the Town of Amesbury's citizens.

- 3) All conversations referred to in this interrogatory related to opposing Seabrook Station's licensing have been with counsel to this proceeding and are therefore deemed privileged.
- 4) SAPL has no knowledge of any such documents.
- 5) For purposes of reducing the length of the listing, SAPL will provide the contentions it may litigate. They are SAPL contentions Nos. 2, 3, 4, 5, 6, 7 and 11, MA AG contentions 26, 48, 54 and 55, NECNP Contention No. 5 and Town of Salisbury Contention 19.
- 6) (a) Insofar as SAPL knows, the facts underlying the assertions in these contentions are set forth in the bases of the contentions.  
(b) SAPL can speak with any knowledge only to the sources of the facts in the contentions SAPL drafted. Those facts were all drawn from information contained in the SPMC except for additional facts in SAPL Contention No. 2 which were learned from Ashod N. Amirian, Esquire, the

Assistant City Solicitor for the City of Haverhill, 376  
Main Street, Haverhill, MA 01830.

- (c) No expert witnesses have yet been chosen.
- (d) No non-expert witnesses have yet been chosen.
- (e) SAPL has no documents and no calculations apart from those in the contention bases.

MOTION FOR PROTECTIVE ORDER

Pursuant to 10 CFR §2.740(c), SAPL moves that there be granted no motions to compel further response to Applicants' interrogatories 2 and 3 since, as stated in its answers, SAPL deems conversation with counsel to the various parties to be privileged and hence shielded from discovery.

As to Answers to Interrogatories

DATE: September 12, 1988

Respectfully submitted,  
SEACOAST ANTI-POLLUTION LEAGUE

By: Jane Frances Doughty  
Jane Doughty

STATE OF NEW HAMPSHIRE  
COUNTY OF HILLSBOROUGH

September 12, 1988

Then personally appeared the above-named Jane Doughty and acknowledged that the foregoing statements by her subscribed are true and correct to the best of her knowledge and belief.  
Before me,

ARLENE C. WEINSTEIN  
Notary Public/Justice of the Peace  
ARLENE C. WEINSTEIN, Notary Public  
My Commission Expires November 12, 1990


As to Motion for Protective Order

Respectfully submitted,


Seacoast Anti-Pollution League  
By its Attorneys,

BACKUS, MEYER & SOLOMON

DATE: 9/12/88

By:   
Robert A. Backus, Esquire  
116 Lowell Street  
P.O. Box 516  
Manchester, NH 03105  
(603) 668-7272

I hereby certify that copies of the foregoing Answers to Interrogatories and Motion for Protective Order have been forwarded, first-class, postage prepaid, to all parties indicated on the attached service list.

  
Robert A. Backus

Ivan W. Smith, Chairman  
Atomic Safety and Licensing  
Board  
U.S. NRC  
Washington, DC 20555

Roberta Pevear  
State Representative  
Town of Hampton Falls  
Drinkwater Road  
Hampton Falls, NH 03844

Thomas Dignan, Esquire  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

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Dr. Jerry Harbour  
Atomic Safety and Licensing  
Board  
U.S. NRC  
Washington, DC 20555

Docketing & Service Sec.  
Office of the Secretary  
U.S. NRC  
Washington, DC 20555

OFFICE OF THE SECRETARY  
DOCKETING & SERVICE  
BRANCH  
Jane Doughty  
SAPL  
5 Market Street  
Portsmouth, NH 03801

Office of Selectmen  
Town of Hampton Falls  
Hampton Falls, NH 03844

Gustave A. Linenberger  
Atomic Safety and Licensing  
Board  
U.S. NRC  
Washington, DC 20555

George Dana Bisbee, Esquire  
Attorney General's Office  
State of New Hampshire  
Concord, NH 03301

Ashod N. Amirian, Esquire  
Assistant City Solicitor  
376 Main Street  
Haverhill, MA 01830

Joseph Flynn, Asst. Gen. Cnsl.  
Fed. Emerg. Mgmt. Agcy.  
500 C Street SW  
Washington, DC 20472

Sandra Gavutis  
Town of Kensington  
Box 1154  
East Kensington, NH 03827

Carol Sneider, Esquire  
Assistant Attorney General  
One Ashburton Place  
19th Floor  
Boston, MA 02108

Sherwin E. Turk, Esquire  
Office of Exec. Legal Dr.  
U.S. NRC  
Washington, DC 20555

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

R. Scott Hill-Whilton, Esquire  
79 State Street  
Newburyport, MA 01950

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

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

Ellyn Weiss, Esquire  
Harmon & Weiss  
20001 S Street NW  
Suite 430  
Washington, DC 20009

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

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, DC 20510  
Attn: Janet Coit

Atomic Safety and Licensing  
Board  
U.S. NRC  
Fourth Floor Reception Area  
East West Towers, West Bldg.  
4350 East West Highway  
Bethesda, MD 20814

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

Adjudicatory File  
Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, DC 20555

Richard R. Donovan  
FEMA  
Federal Registry Center  
130 228th Street, SW  
Bothell, WA 98021-9796

Robert R. Pierce, Esquire  
Atomic Safety and Licensing  
Board Panel  
U. S. NRC  
Washington, DC 20555