September 14, 1988

UNITED STATES OF AMERICA

NUCLEAR RECULATORY COMMISSION

before the

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ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al.

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

(Seabrook Station, Units 1 and 2)

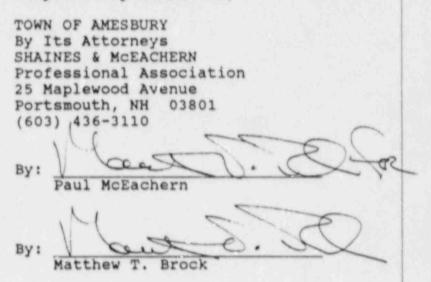
TOWN OF AMESBURY MOTION FOR PROTECTIVE ORDER

NOW COMES Town of Amesbury (TOA) and respectfully moves that the Licensing Board enter a protective order on behalf of TOA prohibiting Applicants from obtaining certain discovery, to the extent objected to by TOA, set forth in APPLICANTS' FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ALL PARTIES AND PARTICIPATING LOCAL GOVERNMENTS REGARDING CONTENTIONS ON THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES dated August 31, 1988. As grounds for this Motion, TOA realleges, and incorporates by reference, those statements and objections set forth in TOA's Answers to Applicants' above-referenced discovery requests, a copy of which is attached hereto.

8809190053 880914 PDR ADOCK 05000443 PDR

SHAINES & MIEACHERN - PROFESSIONAL ASSOCIATION 25 MARLEWOOD AVENUE R C BOX 360 PORTSMOUTH N H 03801

Respectfully submitted,



DATED:

SHAINES & MCEACHERN - PROFESSIONAL ASSOCIATION 25 MARCEWCOD AVENUE - III O BOX 360 - PORTSMOUTH N.H. 03801

DOCKETED

CERTIFICATE OF SERVICE

'88 SEP 15 P12:02

I, Matthew T. Brock, one of the attorneys for the Town of Hampton herein, hereby certify that on September 14, 1988, I made service of the foregoing documents, ANSWERS TO APPLICANTS' FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ALL PARTIES AND PARTICIPATING LOCAL GOVERNMENTS REGARDING CONTENTIONS ON THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES and MOTION FOR PROTECTIVE ORDER by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

*Ivan Smith, Esq., Chairman Atomic Safety & Licensing Board (Off-Site) U.S. Nuclear Regulatory Commission East West Towers Building 4350 East West Highway Bethesda, MD 20814

*Judge Gustave A. Linenberger, Jr. Atomic Safety & Licensing Board (Off-Site) U.S. Nuclear Regulatory Commission East West Towers Building 4350 East West Highway Bethesda, MD 20814

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

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Matthew T. Brock

*UPS Next Day Air