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September 14, 1988

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

'88 SEP 15 P12:02

before the

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

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
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D503

Respectfully submitted,

TOWN OF AMESBURY
By Its Attorneys
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By:



Paul McEachern

DATED:

By:



Matthew T. Brock

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:

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*UPS Next Day Air