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RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 SEP 15 A11:54

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges:
Sheldon J. Wolfe, Chairman
Emmeth A. Luebke
Dr. Jerry Harbour

In the Matter of)
)
)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, ET AL.)
(Seabrook Station, Units 1 and 2))
)
_____)

Docket No.(s)
50-443/444-OL-1
On-site EP
September 13, 1988

MASSACHUSETTS ATTORNEY GENERAL'S FURTHER
RESPONSE TO INTERROGATORIES 6 AND 7

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.

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Response 6: The Mass AG has already produced a town ordinance (pertinent to the town of Amesbury) and a communication related thereto. Other than this, the Mass AG knows of no other such ordinance. In addition, the Mass AG knows of no communication with a town official which would contain probative evidence bearing on the interpretation of any ordinance.

At sometime prior to March 7, 1988, Stephen Jonas of the Mass AG's Office communicated with William Lord from Amesbury. The Mass AG does not recall the date or time of the conversation or whether it was over the phone. The full substance of the communication with respect to sirens was an inquiry from Mr. Jonas whether an alternative notification system of the Applicants might violate local ordinances or laws. There may have been more than one such conversation and if there was more than one, the substance was identical. The result of this conversation or conversations was the March 7, 1988 letter from William Lord to Stephen Jonas, a copy of which has been provided to the Applicants. The Mass AG does not recall a conversation of March 7, 1988 identified in the letter. The Mass AG had no communications after the March 7, 1988 letter with William Lord or any other town official of Amesbury concerning the Amesbury ordinance.

The Mass AG has never had a conversation with any town official of Amesbury at all bearing on the interpretation of the Amesbury zoning by-law.

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: See Response to Interrogatory Number 6.

JAMES M. SHANNON
ATTORNEY GENERAL

COMMONWEALTH OF MASSACHUSETTS

By: Stephen A. Jonas PT
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Dated: September 13, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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PUBLIC SERVICE COMPANY OF NEW)
HAMPSHIRE, et al.)
(Seabrook Station, Units 1 and 2))
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OFFICE OF SPECIALIST
DOCKETING & SERVICE
BRANCH
Docket No.(s)
50-443/444-OL-1
(On-site EP)

CERTIFICATE OF SERVICE

I, Stephen A. Jonas, hereby certify that on September 13, 1988, I made service of the within Massachusetts Attorney General's Further Responses To Interrogatories 6 And 7, by first class mail, or by Federal Express as indicated by [*], or by hand delivery as indicated by [**], to:

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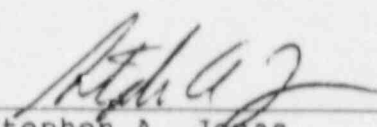
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Dated: September 13, 1988