

7001

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE  
ATOMIC SAFETY AND LICENSING BOARD

'88 SEP 19 P3:38

OFFICE OF THE  
DOCKET CLERK  
BRANCH

In the matter of

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

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

(Seabrook Station, Units 1 and 2)

CITY OF HAVERHILL MOTION FOR PROTECTIVE ORDER

NOW COMES City of Haverhill (COH) and respectfully moves that the Licensing Board enter a protective order on behalf of COH prohibiting Applicants from obtaining certain discovery, to the extent objected to by COH, 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, COH realleges, and incorporates by reference, those statements and objections set forth in COH's Answers to Applicants' above-referenced discovery requests, a copy of which is attached hereto.

Respectfully submitted,  
CITY OF HAVERHILL  
By its attorney:



DATED: September 16, 1988

Asnod N. Amirian, Esquire  
Asst. City Solicitor  
376 Main Street  
Haverhill, MA 01830  
508-372-8531

8809210017 880916  
PDR ADOCK 05000443  
PDR  
G

1503