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

'88 SEP 19 P:

DOCKET
BRAND

In the matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

Dockets Nos. 50-443-OL
50-444-OL

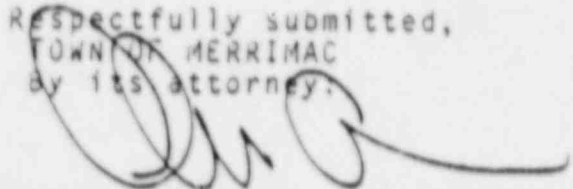
Off-site Emergency
Planning Issues

(Seabrook Station, Units 1 and 2)

TOWN OF MERRIMAC MOTION FOR PROTECTIVE ORDER

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

Respectfully submitted,
TOWN OF MERRIMAC
by its attorney:



DATED: September 16, 1988

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