

Massachusetts Attorney General's Second Set of Interrogatories Regarding Siren Contentions."

Due to the confidential information they contain, the supplemental responses to these interrogatories will be redacted on all copies except those being served on this Atomic Safety and Licensing Board, the Nuclear Regulatory Commission Staff (the "Staff"), the Federal Emergency Management Agency, and the Mass AG. Pursuant to the protective order in these proceedings, Mass AG may not disclose the confidential information except to authorized persons.

In addition, Applicants are transmitting to Mass AG and the Staff herewith copies of other confidential documents, reflecting additional route times run for Applicants' acoustic locations, which reflect runs made after the return date of Mass AG's previous discovery requests.

INTERROGATORY NO. 10

Identify all of the staging areas, preselected routes and acoustic locations for the Massachusetts portion of the Emergency Planning Zone.

SUPPLEMENTAL RESPONSE

Satellite Staging Area (for VL-01) =

INTERROGATORY NO. 19

For each staging area and for every hour of the day, state how many drivers will be stationed at the staging area.

SUPPLEMENTAL RESPONSE

The Satellite Staging Area will be manned, by one VANS vehicle and driver, from early evening Friday to late evening Sunday during the period from May 15 to September 15, and all day on Memorial Day, July Fourth, and Labor Day.

INTERROGATORY NO. 1

Please identify each person, whether a commercial entity or an individual with whom the Applicants or their agent(s) contracted or agreed in writing or orally for the sale, procurement, lease or other use of any and all of the pre-selected acoustic areas and staging areas.

SUPPLEMENTAL RESPONSE

As to answers:

Ted C. Feigenbaum

Ted C. Feigenbaum
Vice President of Engineering,
Licensing, and Quality Programs
New Hampshire Yankee Division of
Public Service Company of
New Hampshire

September 15, 1988

State of New Hampshire
Rockingham County, ss.

Then appeared before me the above subscribed Ted C. Feigenbaum and made oath that he is the Vice President of Engineering, Licensing, and Quality Programs of New Hampshire Yankee Division, authorized to execute the foregoing responses to interrogatories on behalf of the Applicants, that he made inquiry and believes that the foregoing answers accurately set forth information as is available to the Applicants.

Before me,

Beverly E. Silkey

My Commission Expires 3/6/90

As to objections:

Jeffrey P. Trout

Thomas G. Dignan, Jr.
Kathryn A. Selleck
Jeffrey P. Trout
Jay Bradford Smith
Ropes & Gray
225 Franklin Street
Boston, MA 02110
(617)423-6100

Counsel for Applicants

CERTIFICATE OF SERVICE

I, Jeffrey P. Trout, one of the attorneys for the Applicants herein, hereby certify that on September 15, 1988, I made service of the within documents by depositing copies thereof with Federal Express, prepaid, for delivery to (or where indicated, by depositing in the United States mail, first class postage paid, addressed to) the individuals listed below.

Administrative Judge Sheldon J. Wolfe, Esq., Chairman, Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
North Hampton, NH 03862

Administrative Judge Emmeth A. Luebke
4515 Willard Avenue
Chevy Chase, MD 20815

Diane Curran, Esquire
Andrea C. Ferster, Esquire
Harmon & Weiss
Suite 430
2001 S Street, N.W.
Washington, DC 20009

Dr. Jerry Harbour
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
East West Towers Building
4350 East West Highway
Bethesda, MD 20814

Stephen E. Merrill
Attorney General
George Dana Bisbee
Assistant Attorney General
Office of the Attorney General
25 Capitol Street
Concord, NH 03301-6397

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

Sherwin E. Turk, Esquire
Office of General Counsel
U.S. Nuclear Regulatory Commission
One White Flint North, 15th Fl.
11555 Rockville Pike
Rockville, MD 20852

*Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert A. Backus, Esquire
Backus, Meyer & Solomon
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

Paul McEachern, Esquire
Matthew T. Brock, Esquire
Shaines & McEachern
25 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Mrs. Sandra Gavutis
Chairman, Board of Selectmen
RFD 1 - Box 1154
Route 107
Kensington, NH 03827

*Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

*Senator Gordon J. Humphrey
One Eagle Square, Suite 507
Concord, NH 03301
(Attn: Herb Boynton)

Mr. Thomas F. Powers, III
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

H. Joseph Flynn, Esquire
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.
Washington, DC 20472

Gary W. Holmes, Esquire
Holmes & Ells
47 Winnacunnet Road
Hampton, NH 03841

Mr. J. P. Nadeau
Selectmen's Office
10 Central Road
Rye, NH 03870

Carol S. Sneider, Esquire
Assistant Attorney General
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

Mr. Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

R. Scott Hill-Whilton, Esquire
Lagoulis, Clark, Hill-Whilton &
McQuire
79 State Street
Newburyport, MA 01950

Mr. Peter J. Matthews
Mayor
City Hall
Newburyport, MA 01950

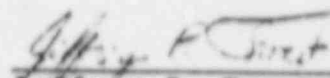
Mr. William S. Lord
Board of Selectmen
Town Hall - Friend Street
Amesbury, MA 01913

Charles P. Graham, Esquire
Murphy and Graham
33 Low Street
Newburyport, MA 01950

Richard A. Hampe, Esquire
Hampe and McNicholas
35 Pleasant Street
Concord, NH 03301

Mr. Richard R. Donovan
Federal Emergency Management
Agency
Federal Regional Center
130 228th Street, S.W.
Bothell, WA 98021-9796

Judith H. Mizner, Esquire
79 State Street
Second Floor
Newburyport, MA 01950



Jeffrey P. Trout

- (*=Ordinary U.S. First Class Mail.)