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September 16, 1988

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 SEP 20 P3:07

before the

OFFICE OF PUBLIC AFFAIRS
DOCKETING & SERVICE
BRANCH

ATOMIC SAFETY AND LICENSING BOARD

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

TOWN OF NEWBURY MOTION FOR PROTECTIVE ORDER

NOW COMES Town of Newbury (TON) and respectfully moves that the Licensing Board enter a protective order on behalf of TON prohibiting Applicants from obtaining certain discovery, to the extent objected to by TON, 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, TON realleges, and incorporates by reference, those statements and objections set forth in TON's

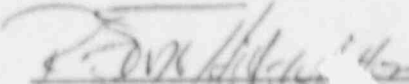
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PDR ADDCK 05000443
G PDR

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Answers to Applicants' above-referenced discovery requests, a copy of which is attached hereto.

Dated: July 19, 1988


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