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September 19, 1988
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY LICENSING BOARD

'88 SEP 20 P3:08

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	Docket No. 50-443-OL
PUBLIC SERVICE COMPANY OF)	Docket No. 50-444-OL
NEW HAMPSHIRE, <u>et al.</u>)	(Off-site EP)
(Seabrook Station, Units 1 and 2)	


TOWN OF WEST NEWBURY'S MOTION FOR PROTECTIVE ORDER

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

Respectfully submitted,
Town of West Newbury,

By its attorney,


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