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RELATED CORRESPONDENCE September 16, 1988

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UNITED STATES NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '88 SEP 21 P4:22

In the Matter of _____
Public Service Company of _____
New Hampshire, et al. _____
(Seabrook Station, Units 1 & 2) _____

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-443 OL
50-444 OL
OFFSITE EMERGENCY
PLANNING

NECNP'S ANSWERS TO APPLICANTS' FIRST SET OF
INTERROGATORIES AND FIRST REQUEST FOR
PRODUCTION OF DOCUMENT TO ALL PARTIES AND
PARTICIPATING LOCAL GOVERNMENTS REGARDING
THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES

The New England Coalition on Nuclear Pollution ("NECNP")
hereby responds to Applicants' First Set of Interrogatories and
First Request for the Production of Documents, etc., on the
Seabrook Plan for the Massachusetts Communities ("SPMC").

1) Please identify the person(s) answering or substan-
tially contributing to the answer to each of the following
interrogatories.

ANSWER: Diane Curran

2) Please identify and produce all documents, and describe
in detail all conversations not otherwise reflected in such
documents, which reflect or refer to what actions any Massa-
chusetts state or local government entity or official would,
could, might, would not, could not, or might not take in the
event of an actual radiological emergency at Seabrook Sta-
tion.

ANSWER: NECNP objects to this interrogatory because it is vague
and over-broad. Without waiving the objection, NECNP states that

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it does not possess any such documents, nor it is privy to any such conversations.¹

3) Please identify and produce all documents, and describe in detail all conversations not otherwise reflected in such documents, which reflect, refer to, or relate in any way to any action by any Massachusetts state or local government official or entity to block, hinder or delay the licensing of Seabrook Station.

ANSWER: NECNP objects that this interrogatory is irrelevant to the litigation at hand. Without waiving the objection, NECNP states that it does not possess any such documents, nor it is privy to any such conversations.

4) Please identify and produce all documents generated after January 1, 1980, that reflect or refer to any emergency planning (other than that engaged in by Applicants) conducted or contemplated for the Massachusetts EPZ or any portion thereof, including but not limited to emergency planning required pursuant to the Emergency Planning Act. Such documents should include, but not be limited to, documents that reflect or refer to whether the SPMC or any other plan for dealing with a radiological emergency at Seabrook Station has or has not been, or will or will not be, used in planning for emergency situations other than those involving Seabrook Station.

ANSWER: NECNP does not possess any such documents.

5) Please list every admitted SPMC contention which you do not intend to participate in litigating, i.e., concerning which you will not take discovery, present evidence, make arguments, conduct cross-examination, or submit proposed findings.

¹ It should be noted with respect to all document requests that NECNP does not include in its answers any documents that have already been filed with the Licensing Board and served on the parties to this proceeding.

ANSWER: At this time, NECNP intends to litigate all of the admitted contentions.

6) For every admitted SPMC contention that you submitted and do not hereby withdraw, and for every other admitted SPMC contention that you did not list in response to Interrogatory 5 above, individually for each such contention please:

(a) State in detail all the facts underlying each assertion contained in the contention.

ANSWER: The contentions sponsored by NECNP are based entirely in the facts that are alleged in the bases of those contentions, and on the documents that are cited in those contentions. As for contentions submitted by other parties, NECNP relies on the factual information contained in those contentions and the documents cited therein, and is not aware of other facts or documents that may have been used to support them.

(b) State the source of each such fact. If the source is the personal knowledge of one or more persons, identify the person(s). If the source is one or more documents, identify and produce the document(s).

ANSWER: The sources of the facts contained in NECNP's contentions are the documents cited therein. NECNP does not know the sources of other contentions, other than what is stated in their bases.

(c) Identify any expert witness who is to testify concerning the contention, and state the substance of the facts, opinions, and grounds for opinions to which the expert is expected to testify.

ANSWER: NECNP has not yet chosen expert witnesses for this litigation. This answer will be updated if and when such experts are identified.

(d) Identify any non-expert witness who is to testify concerning the contention, and state the substance of the facts to which the witness is expected to testify.

ANSWER: NECNP has not yet chosen non-expert witnesses for this litigation. This answer will be updated if and when such experts are identified.

(e) Identify and produce any documents which reflect or refer to any type of study, calculation or analysis bearing upon the substance of the contention.

ANSWER: NECNP possesses no such documents.

Respectfully submitted,

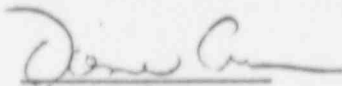


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September 16, 1988

CERTIFICATE OF SERVICE

I certify that on September 16, 1988, copies of this pleading were served by first-class mail on the parties to the attached service list, and that a copy was also sent to Applicants by telecopier.


Diane Curran

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