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DOCKETED  
September 23, 1988

UNITED STATES OF AMERICA

'88 SEP 26 P5:26

NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

\_\_\_\_\_ )  
 In the Matter of )  
 )  
 PUBLIC SERVICE COMPANY OF )  
 NEW HAMPSHIRE, et al. )  
 )  
 (Seabrook Station, Units 1 and 2) )  
 \_\_\_\_\_ )

Docket Nos. 50-443-OL  
 50-444-OL  
 Off-site Emergency  
 Planning Issues

TOWN OF AMESBURY MOTION FOR PROTECTIVE ORDER

NOW COMES Town of Amesbury (TOA) and respectfully moves that the Licensing Board enter a protective order on behalf of TOA prohibiting NRC Staff from obtaining certain discovery set forth in NRC STAFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE TOWN OF AMESBURY, NEWBURY, SALISBURY, WEST NEWBURY, AND MERRIMAC, AND THE CITY OF NEWBURYPORT dated September 6, 1988. As grounds for this Motion, TOA realleges, and incorporates by reference, those statements and objections set forth in TOA's Answers to NRC Staff's above-referenced discovery requests, a copy of which is attached hereto.

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 PDR ADOCK 05000443  
 G PDR

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Respectfully submitted,

TOWN OF AMESBURY  
By Its Attorneys  
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DATED: September 23, 1988

By:



Paul McEachern  
Matthew T. Brock