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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE
ATOMIC SAFETY AND LICENSING BOARD

'88 SEP 26 P5:27

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

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

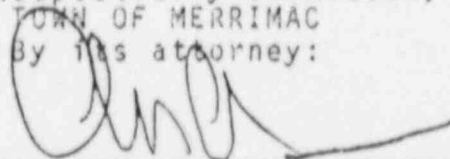
(Seabrook Station, Units 1 and 2)

TOWN OF MERRIMAC MOTION FOR PROTECTIVE ORDER
AND OBJECTION TO NRC STAFF'S INTERROGATORIES

NOW COMES Town of Merrimac (TOM) and respectfully moves that the Licensing Board enter a protective order on behalf of TOM prohibiting NRC Staff's from obtaining certain discovery, to the extent objected to by TOM, set forth in STAFF'S 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 September 6, 1988. As grounds for this Motion, TOM states the request is unduly burdensome and costly to TOM, is disruptive of record keeping maintained by the Town, and for further reason the Town of Merrimac has submitted no contentions and has merely the status of contentionless intervener.

NOW COMES town of Merrimac (TOM) and respectfully declines to answer any interrogatories submitted to it unless required to by order of the Nuclear Regulatory Commission for reason that it is a contentionless intervener.

Respectfully submitted,
TOWN OF MERRIMAC
By its attorney:



DATED: September 23, 1988

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