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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING
BRANCH

Public Service Company of New
Hampshire, et. al.
(Seabrook Station, Units 1 and 2)

)
)
) Docket Nos.
) 50-443, -444
)
)

260430

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR THE
PRODUCTION OF DOCUMENTS TO THE APPLICANTS
ON THE NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE PLANS

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory. We remind you of your obligation to supplement answers to interrogatories, under 10 C.F.R. § 2.740(e)(1) and (2).

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other

means, computer data, computer printouts, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" with respect to any document shall mean to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

INTERROGATORIES:

1. With respect to each contention and subpart thereof admitted by the Licensing Board's order of April 1, 1986, please provide the following information:

a. What is the Applicants' position with respect to each contention and its subparts? Describe in detail the reasons for your position.

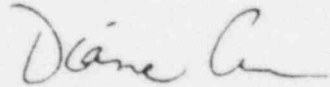
b. Identify and provide access to all documents on which you rely during this proceeding to support your position on each of these contentions. This includes all documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

d. Identify all persons on whose factual knowledge, opinions, or technical expertise you rely for your position on each contention and subpart thereof.

c. Identify all persons you may call as witnesses on each of these contentions during these proceedings; describe the substance of their testimony; and identify and describe any documents and the portions thereof that they may rely on for their testimony.

2. Please identify and provide access to all documents not identified in response to interrogatory 1(b) that evaluate or discuss the adequacy of emergency planning and preparedness with respect to any of the issues admitted for litigation by the Licensing Board's order of April 1, 1986.

Respectfully submitted,



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April 30, 1986