

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'86 MAY -5 AM 1:02

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKET FILED  
BRANCH

860430

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

Docket Nos.  
50-443, -444

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S  
FIRST SET OF INTERROGATORIES AND REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS TO THE NUCLEAR REGULATORY COMMISSION  
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 Nuclear Regulatory Commission ("Commission" or "NRC") 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,

8605070169 860430  
PDR ADOCK 05000443  
G PDR

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 NRC's position with respect to each contention and its subparts? Describe in detail the reasons for your position.

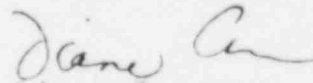
b. Identify and provide access to all documents on which you rely during this proceeding to support your position on each of these contentions. This includes all documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

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,



Diane Curran  
HARMON & WEISS  
2001 S Street, N.W.  
Suite 430  
Washington, D.C. 20009  
(202) 328-3500

April 30, 1986

CERTIFICATE OF SERVICE

I certify that on April 30, 1986, copies of NECNP's Interrogatories and Requests for the Production of Documents to Applicants, the NRC, FEMA, and the State of New Hampshire, were served on the following by first-class mail or as otherwise indicated:

Helen Hoyt, Esq.  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Rep. Roberta C. Pevear  
Drinkwater Road  
Hampton Falls, NH 03844

Dr. Emmeth A. Luebke  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Phillip Ahrens, Esq.  
Assistant Attorney  
General  
State House, Station #6  
Augusta, ME 04333

Dr. Jerry Harbour  
Administrative Judge  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Robert A. Backus, Esq.  
111 Lowell Street  
Manchester, NH 03105

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*\*Thomas G. Dignan, Esq.  
R.K. Gad, III, Esq.  
Ropes and Gray  
225 Franklin Street  
Boston, MA 02110

Mrs. Anne E. Goodman  
Board of Selectmen  
13-15 New Market Rd.  
Durham, NH 03824

Atomic Safety and  
Licensing Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Docketing and Service  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

\*Sherwin E. Turk, Esq.  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

William S. Lord, Selectman  
Town Hall - Friend Street  
Amesbury, MA 01913

Jane Doughty  
SAPL  
5 Market St.  
Portsmouth, NH 03801

Mr. Angie Machiros  
Chairman, Board  
Board of Selectmen

Carol S. Sneider, Esquire  
Assistant Attorney  
General  
Department of the Attorney  
General  
1 Ashburton Place, 19th Floor  
Boston, MA 02108

Edward A. Thomas  
FEMA  
442 J.W. McCormack (POCH)  
Boston, MA 02109

J. P. Nadeu, Selectman  
Town of Rye  
155 Washington Road  
Rye, NH 03870

Sandra Gavutis  
Town of Kensington  
RFD 1 Box 1154  
East Kensington, NH 03827

Richard E. Sullivan, Mayor  
City Hall  
Newburyport, MA 01950

Alfred V. Sargent, Chairman  
Board of Selectmen  
Town of Salisbury, MA 01950

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, D.C. 20510  
(Attn: Tom Burack)

Selectment of Northampton  
Town of Northampton  
New Hampshire 03862

Senator Gordon J. Humphrey  
1 Pillsbury Street  
Concord, NH 03301

Michael Santosuosso, Chairman  
Board of Selectmen  
Jewell St., RFD #2  
South Hampton, NH 03842

\*H. Joseph Flynn, Esq.  
Office of General Counsel  
Federal Emergency  
Management Agency  
500 C Street, SW  
Washington, D.C. 20472

\*\*George Dana Bisbee, Esq.  
Stephen E. Merrill, Esq.  
Assistant Attorneys General  
State House Annex  
Concord, NH 03301

Allen Lampert  
Civil Defense Director  
Town of Brentwood  
Exeter, NH 03833

Richard A. Hampe, Esq.  
Hampe and McNicholas  
35 Pleasant Street  
Concord, NH 03301


Gary W. Holmes, Esquire  
Holmes & Ellis  
47 Winnacunent Rd  
Hampton, NH 03842

William Armstrong  
Civil Defense Director  
10 Front Street  
Exeter, NH 03833

Calvin A. Canney  
City Manager  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

Mathew T. Brock, Esq.  
Shaines & McEachern  
P.O. Box 360  
Maplewood Ave.  
Portsmouth, NH 03801

- \* - By Messenger  
\*\* - By Federal Express

  
Diane Curran