

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

ATOMIC SAFETY AND LICENSING BOARD

'88 OCT 11 P5:01

Before Administrative Judges:
Sheldon J. Wolfe, Chairman
Emmeth A. Luebke
Dr. Jerry Harbour

OFFICE OF LEGAL COUNSEL
DOCKETING & SERVICE
BRANCH

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In the Matter of)	
))	
PUBLIC SERVICE COMPANY OF)	Docket No.(s)
NEW HAMPSHIRE, ET AL.)	50-443/444-OL-1
(Seabrook Station, Units 1 and 2))	On-site EP
_____)	

JOINT INTERVENORS MOTION FOR LEAVE TO FILE REPLY
TO THE RESPONSES OF THE APPLICANTS AND STAFF
TO THE ON-SITE EXERCISE CONTENTION

The Massachusetts Attorney General, the New England Coalition Against Nuclear Pollution, the Seacoast Anti-Pollution League, and the Town of Hampton, New Hampshire ("Joint Intervenors") move for leave to file the accompanying reply to the responses of the Staff and the Applicants to the Joint Intervenors On-site Exercise Contention. As grounds for this motion, the Joint Intervenors state:

1. The procedural issues presented by this contention are complex and further briefing will throw additional light on the matter.
2. The Staff and the Applicants have disagreed on the appropriate standard to be applied to this contention.

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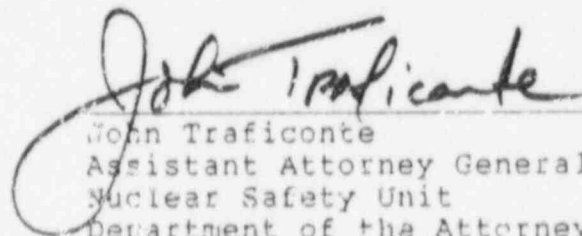
3. The Joint Intervenors believe they have a right to file a contention arising out of the June 1988 on-site exercise without meeting any additional procedural barrier. As a consequence, they believe they have a right to reply to the responses of the Applicants and Staff.

4. No delay is involved. The Joint Intervenors received the Staff's response on October 5, 1988 and file this reply on the Board by Facsimile on October 7, 1988.

For all the reasons set forth above, this Board should grant the Joint Intervenors' Motion for Leave to File the accompanying Reply.

Respectfully Submitted

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Dated: October 7, 1988