

7242-

DOCKET NUMBER 50-443/444-0C  
PROB. & UTIL. FAC.

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION '88 OCT 11 A9:59

ATOMIC SAFETY AND LICENSING BOARD

Before the Administrative Judges:  
Ivan W. Smith, Chairman  
Gustave A. Linenberger, Jr.  
Dr. Jerry Harbour

OFFICE OF GENERAL  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	Docket Nos. 50-443-OL-1
	)	50-444-OL-1
PUBLIC SERVICE COMPANY	)	(Off-Site EP)
OF NEW HAMPSHIRE, ET AL.	)	
	)	
(Seabrook Station, Units 1 and 2	)	October 6, 1988

MOTION OF THE MASSACHUSETTS ATTORNEY GENERAL,  
NEW ENGLAND COALITION ON NUCLEAR POLLUTION,  
SEACOAST ANTI-POLLUTION LEAGUE AND TOWN OF HAMPTON  
TO EXTEND TIME WITHIN WHICH TO REPLY TO THE NRC STAFF  
AND APPLICANTS RESPONSES TO THE EXERCISE CONTENTIONS

Pursuant to 10 C.F.R. § 2.711, the Massachusetts Attorney General, New England Coalition on Nuclear Pollution, Seacoast Anti-Pollution League and Town of Hampton (Joint Intervenors) hereby request that the time for them to reply to the Responses to Exercise Contentions of the NRC Staff and Applicants, be extended to October 21, 1988. As grounds for this motion the Joint Intervenors state:

1. The Board has extended the time for the NRC Staff to file its response to the exercise contentions to October 13, 1988;
2. The Joint Intervenors believe it is more efficient to file one document in reply to both the NRC Staff and Applicants responses to the exercise contentions;
3. The NRC Staff and the Applicants have assented to this motion.

8810180177 881006  
PDR ADOCK 05000443  
G PDR

DS03

Respectfully Submitted,

JAMES M. SHANNON  
ATTORNEY GENERAL

John Traficante  
John Traficante  
Assistant Attorney General  
Nuclear Safety Unit  
Department of the Attorney General  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Matthew T. Brock (Esq)  
Matthew T. Brock, Esq.  
Shains & McEachern  
25 Maplewood Avenue  
P.O. Box 360  
Portsmouth, NH 03801  
(603) 436-3110

Diane Curran (Esq)  
Diane Curran, Esq.  
Harmon, Curran & Towsley  
Suite 430  
2001 S. Street, N.W.  
Washington, DC 20009  
(202) 328-3500

Robert A. Backus (Esq)  
Robert A. Backus, Esq.  
Backus, Meyer & Soloman  
116 Lowell Street  
P.O. Box 516  
Manchester, NH 03106  
(603) 668-0730

ASSENTED TO:

Thomas Dignan (Esq)  
Thomas Dignan  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110  
(617) 422-6100

Elaine Chan (Esq)  
Elaine Chan, Esq.  
U.S. Nuclear Regulatory Commission  
Office of General Counsel  
15th Floor 11555 Rockville Pike  
Rockville, MD 20852  
(301)492-7510

DATED: October 6, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'88 OCT 11 A9:59

OFFICE OF TELETYPE  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, ET AL. )  
(Seabrook Station, Units 1 and 2) )

Docket No.(s)  
50-443/444-OL  
(Off-site EP)

CERTIFICATE OF SERVICE

I, John Traficonte, hereby certify that on October 6, 1988 I made service of the within MOTION OF THE MASSACHUSETTS ATTORNEY GENERAL, NEW ENGLAND COALITION ON NUCLEAR POLLUTION, SEACOAST ANTI-POLLUTION LEAGUE AND TOWN OF HAMPTON TO EXTEND TIME WITHIN WHICH TO REPLY TO THE NRC STAFF AND APPLICANTS RESPONSES TO THE EXERCISE CONTENTIONS and NOTICE OF DEPOSITION by First Class Mail, by Federal Express as indicated by [\*], on October 5, 1988 and by hand as indicated by [\*\*] to the following parties:

\*Sherwin E. Turk, Esq.  
U.S. Nuclear Regulatory Commission  
Office of General Counsel  
15th Floor  
11555 Rockville Pike  
Rockville, MD 20852

\*Docketing and Service  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

\*Ivan Smith, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory  
Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

\*Gustave A. Linenberger, Jr.  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

\*Dr. Jerry Harbour  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory  
Commission  
East West Towers Building  
4350 East West Highway

\*Robert R. Pierce, Esq.  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory  
Commission  
East West Towers Building  
4350 East West Highway

H. Joseph Flynn, Esq.  
Assistant General Counsel  
Office of General Counsel  
Federal Emergency Management  
Agency  
500 C Street, S.W.  
Washington, DC 20472

\*Docketing and Service  
U.S. Nuclear Regulatory  
Commission  
Washington, DC. 20555

Roberta C. Pevear  
State Representative  
Town of Hampton Falls  
Drinkwater Road  
Hampton Falls, NH 03844

Atomic Safety & Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Matthew T. Brock, Esq.  
Shaines & McEachern  
25 Maplewood Avenue  
P.O. Box 360  
Portsmouth, NH 03801

Sandra Gavutis, Chairperson  
Board of Selectmen  
RFD 1, Box 1154  
Rte. 107  
Kensington, NH 03827

Stephen E. Merrill  
Attorney General  
George Dana Bisbee  
Assistant Attorney General  
Office of the Attorney General  
25 Capitol Street  
Concord, NH 03301

Paul A. Fritzsche, Esq.  
Office of the Public Advocate  
State House Station 112  
Augusta, ME 04333

Diana P. Randall  
70 Collins Street  
Seabrook, NH 03874

Robert A. Backus, Esq.  
Backus, Meyer & Solomon  
116 Lowell Street  
P.O. Box 516  
Manchester, NH 03106

Jane Doughty  
Seacoast Anti-Pollution League  
5 Market Street  
Portsmouth, NH 03801

J. P. Nadeau  
Board of Selectmen  
10 Central Road  
Rye, NH 03870

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

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

Senator Gordon J. Humphrey  
1 Eagle Square, Suite 507  
Concord, NH 03301  
(Attn: Herb Boynton)

Donald E. Chick  
Town Manager  
Town of Exeter  
10 Front Street  
Exeter, NH 03833

Brentwood Board of Selectmen  
RFD Dalton Road  
Brentwood, NH 03833

Philip Ahrens, Esq.  
Assistant Attorney General  
Department of the Attorney  
General  
State House Station #6  
Augusta, ME 04333

\*\*Thomas G. Dignan, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

Beverly Hollingworth  
209 Winnacunnet Road  
Hampton, NH 03842

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

Robert Carrigg, Chairman  
Board of Selectmen  
Town Office  
Atlantic Avenue  
North Hampton, NH 03862

Allen Lampert  
Civil Defense Director  
Town of Brentwood  
20 Franklin Street  
Exeter, NJ 03833

Angelo Machiros, Chairman  
Board of Selectmen  
25 High Road  
Newbury, MA 10950

Edward J. Molin  
Mayor  
City Hall  
Newburyport, MA 01950

William Lord  
Board of Selectmen  
Town Hall  
Friend Street  
Amesbury, MA 01913

Gary W. Holmes, Esq.  
Holmes & Ellis  
47 Winnacunnet Road  
Hampton, NH 03841

Ellyn Weiss, Esq.  
Harmon & Weiss  
Suite 430  
2001 S Street, N.W.  
Washington, DC 20009

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

Ashod N. Amirian, Esq.  
376 Main Street  
Haverhill, MA 01830

Michael Santosuosso, Chairman  
Board of Selectmen  
Jewell Street, RFD 2  
South Hampton, NH 03827

Anne E. Goodman, Chairperson  
Board of Selectmen  
13-15 Newmarket Road  
Durham, NH 03824

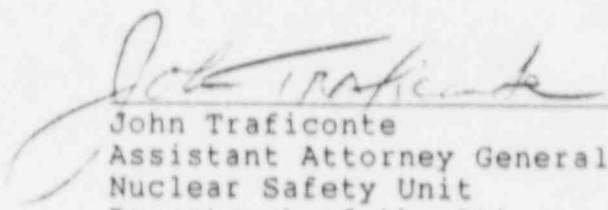
Sholdon J. Wolfe, Chairperson  
1110 Wimbledon Drive  
McLean, VA 22101

Charles P. Graham, Esq.  
Murphy & Graham  
33 Low Street  
Newburyport, MA 01950

Barbara St. Andre, Esq.  
Kopelman & Paige, P.C.  
77 Franklin Street  
Boston, MA 02110

Judith H. Mizner, Esq.  
Lagoulis, Clark, Hill-Whilton  
& McGuire  
79 State Street  
Newburyport, MA 01950

R. Scott Hill-Whilton, Esq.  
Lagoulis, Clark, Hill-Whilton  
& McGuire  
79 State Street  
Newburyport, MA 01950



---

John Traficante  
Assistant Attorney General  
Nuclear Safety Unit  
Department of the Attorney General  
One Ashburton Place  
Boston, MA 02108-1698  
(617) 727-2200

DATED: October 6, 1988