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October 5, 1988

UNITED STATES OF AMERICA

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NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	Docket No. 50-443-OL
PUBLIC SERVICE COMPANY OF)	Docket No. 50-444-OL
NEW HAMPSHIRE, <u>et al.</u>)	(Off-site EP)
(Seabrook Station, Units 1 and 2))	

TOWN OF WEST NEWBURY'S MOTION FOR PROTECTIVE ORDER

The Town of West Newbury (TOWN) respectfully moves that the Licensing Board enter a protective order on behalf of TOWN prohibiting the NRC Staff from obtaining certain discovery, to the extent objected to by TOWN, set forth in NRC Staff's First Set of Interrogatories and First Request for Production of Documents to the Towns of Amesbury, Newbury, Salisbury, West Newbury and Merrimac and the City of Newburyport.

As grounds for this motion TOWN realleges and incorporates by reference those statements and objections set forth in TOWN's Answers to the NRC Staff's above-referenced discovery requests, a copy of which is submitted herewith.

Respectfully submitted,
Town of West Newbury,

By its attorney,

Judith H. Mizner
Judith H. Mizner

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