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~~RELATED TO OTHER PROCEEDINGS~~

DOCKETED  
11/11/88

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 OCT 11 P4:46

Before the  
ATOMIC SAFETY AND LICENSING BOARD

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

TOWN OF AMESBURY'S FIRST SET OF INTERROGATORIES AND  
REQUEST FOR THE PRODUCTION OF DOCUMENTS TO THE  
NUCLEAR REGULATORY COMMISSION  
ON THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES (SPMC)

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 CFR §2.740(e)(1) and (2).

All documents identified in answer to these interrogatories shall be produced within thirty (30) days after service of this Request at the offices of SHAINES & McEACHERN, 25 Maplewood Avenue, Portsmouth, New Hampshire 03801. Alternatively, production of documents may be made within thirty (30) days after service of this Request by

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PDR ADOCK 05000443  
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forwarding copies to the offices of SHAINES & McEACHERN, P.A., 25 Maplewood Avenue, Portsmouth, NH 03801.

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter or 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; to identify any document recording or documenting such action, conduct or matter.

4. "Identify" when used in reference to a natural person means to set forth the following:

- (1) his name;
- (2) his last known residential address;
- (3) his last known business address;
- (4) his last employer;
- (5) his title or position;
- (6) his area of responsibility;
- (7) his business or profession;
- (8) the nature of his association with NRC; and
- (9) if any of the above information is changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time period referenced in the interrogatory.

5. "Identify" when used in reference to a corporation or other entity that is not a natural person shall mean to set forth the following:

- (1) the full name of such person, including its legal name and any assumed or trade names under which it transacts or has transacted business;
- (2) the nature or form of such a person, if known;

(3) the address of its principal place of business or the principal place where such person is to be found;

(4) whether NRC has or has had any relationship or affiliation with such person, its affiliates or subsidiaries, and, if so, a description of such relationship; and

(5) if any of the above information has changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time referenced in the interrogatory.

6. If NRC objects to or claims a privilege (attorney-client, work product, or other) with respect to any interrogatory or document request, in whole or in part, or seeks to withhold documents or information because of the alleged proprietary nature of the data, please set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Licensing Board to determine the validity of the objection or claim of privilege. This description by NRC should include with respect to any document: (1) author, addressor, addressee, recipients of indicated and "blind" copies together with their job titles; (2) date of preparation; (3) subject matter; (4) purpose of which the document was prepared; (5) all persons to whom distributed, shown, or explained; (6) present custodian; (7) all persons believed to have a copy of the document; and (8) the nature of the privilege or objection asserted.

If an objection to any portion of an interrogatory or document request is made, the remaining portion, not deemed objectionable, shall be fully answered.

INTERROGATORIES

1. With respect to each contention and basis admitted by the Licensing Board regarding the SPMC, please provide the following information: , . . . - -

a. What is the NRC's position with respect to each contention and basis? For each, identify the reasons for taking your position.

b. If the NRC has not yet taken a position on any contention or basis, identify, for each, the information which must be provided, and/or the conditions or contingencies which must be satisfied, before NRC may take a position.

c. Identify all persons you may call as witnesses concerning the SPMC litigation; the particular contention or basis on which each will testify; the subject matter on which each will testify; the substance of each witness' testimony; the grounds for each opinion or testimony; and identify any documents, indicating the relevant portion and citation, that each witness will rely upon to support his testimony, and any documents which NRC will offer into evidence through each witness.

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

contention and basis. For each, state the substance of the knowledge, opinions, or technical expertise relied on.

2. Please identify and produce all documents that NRC, or its agents or contractors, has authored or compiled, and that discuss the adequacy or inadequacy of the SPMC, or any of the contentions or bases admitted for litigation by the Licensing Board on the SPMC.

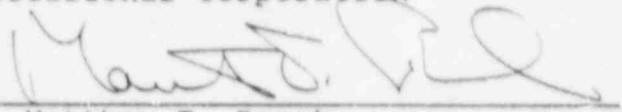
3. As referenced in 10 C.F.R. §50.47(c)(1)(iii)(B), identify the "best efforts" that, in NRC's opinion, the Town of Amesbury will make in the event of a severe, fast-release radiological emergency. Identify and produce all documents and state all facts and opinions, upon which NRC relies to support this answer.

4. Identify and produce all documents (1) on which you rely to answer these interrogatories or (2) which you intend to offer as exhibits in this proceeding for any purpose.

Respectfully submitted,

TOWN OF AMESBURY  
By Its Attorneys  
SHAINES & McEACHERN  
Professional Corporation

DATED: 10/6/88

By   
Matthew T. Brock  
25 Maplewood Avenue  
Portsmouth, NH 03801  
(603) 436-3110

DOCKETED  
11-11-88

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CERTIFICATE OF SERVICE

OFF  
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I, Matthew T. Brock, one of the attorneys for the Town of Amesbury herein, hereby certify that on October 6, 1988, I made service of the foregoing document, TOWN OF AMESBURY'S FIRST SET OF INTERROGATORIES AND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO THE NUCLEAR REGULATORY COMMISSION ON THE SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES (SPMC), by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

Ivan Smith, Esq., Chairman  
Atomic Safety & Licensing Board  
(Off-Site)  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Dr. Jerry Harbour  
Atomic Safety & Licensing Board  
(Off-site)  
U.S. Nuclear Regulatory Comm.  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Judge Gustave A. Linenberger, Jr.  
Atomic Safety & Licensing Board  
(Off-Site)  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

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

Adjudicatory File  
Atomic Safety & Licensing Board  
Panel Docket (2 copies)  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

\*Thomas Dignan, Esq.  
George H. Lewald, Esq.  
Kathryn A. Selleck, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

Stephen E. Merrill, Esq.  
George Dana Bisbee, Esq.  
Office of the Attorney General  
State House Annex  
Concord, NH 03301

Carol S. Sneider, Esq.  
Stephen H. Oleskey, Esq.  
Allan R. Fierce, Esq.  
Department of the Atty. General  
One Ashburton Place  
Boston, MA 02108

Diane Curran, Esq.  
Andrea C. Ferster, Esq.  
Harmon & Weiss  
2001 S Street, N.W., Suite 430  
Washington, DC 20009-1125



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

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

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

William S. Lord, Chairman  
Board of Selectman  
Town of Amesbury  
Town Hall, Friend Street  
Amesbury, MA 01913

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

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

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

\*Richard R. Donovan  
Federal Emergency Mgmt. Agency  
Federal Regional Center  
130 228th Street, S.W.  
Bothell, Washington 98021-9796

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

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

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

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

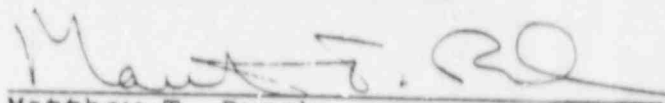
Judith H. Mizner, Esq.  
79 State Street  
2nd Floor  
Newburyport, MA 01950

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



Leonard Kopelman, Esquire  
Barbara J. Saint Andre, Esquire  
Kopelman & Paige, P.C.  
77 Franklin Street  
Boston, MA 02110

Robert R. Pierce, Esq.  
Atomic Safety & Licensing Board  
Panel  
U.S. Nuclear Regulatory Comm.  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

  
Matthew T. Brock

\*UPS Next Day Air