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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

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

In the Matter of)	Docket Nos. 50-443-OL
)	50-444-OL
PUBLIC SERVICE COMPANY)	(ASLBP No. 82-471-02-OL)
OF NEW HAMPSHIRE, et al)	(Offsite Emergency Planning)
)	
(Seabrook Station,)	
Units 1 and 2))	October 11, 1988

MOTION OF THE SEACOAST ANTI-POLLUTION LEAGUE FOR PARTIAL
RECONSIDERATION OF THE BOARD'S MEMORANDUM AND ORDER
APPROVING STIPULATION AS TO CONTENTIONS AMONG JOINT
INTERVENORS, APPLICANTS AND NRC STAFF FOR THE
SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES

NOW COMES the Seacoast Anti-Pollution League and moves the Board for partial reconsideration of its Memorandum and Order of September 30, 1988, which approved the stipulation as to contentions among the Joint Intervenor, Applicants and NRC Staff for the Seabrook Plan for Massachusetts communities (SPMC). That part of the Board's Order of which SAPL is seeking reconsideration is the Board's ruling as to Contention JI-8. The Board has ruled that it will be its practice during the litigation of the SPMC to narrow the scope of contentions to cover only those locales particularized in intervenor contentions and bases. Contention JI-8 was formed in part from SAPL's Contention 6 on the SPMC. The

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first sentence in the basis of SAPL Contention 6 stated: "There are no time factors provided in the SPMC for the traversing of the bus routes in the 6 Massachusetts communities." The etymology of SAPL Contention JI-8 very clearly included SAPL Contention 6, which in turn very clearly included a concern about the bus routes in all six of the Massachusetts communities.

WHEREFORE, SAPL moves that the Board adopt the wording for Contention JI-8 that was proposed by the Joint Intervenors and is recorded at page 5 of the "Stipulation as to Contentions" dated September 19, 1988.

Respectfully submitted,

Seacoast Anti-Pollution League
By its Attorneys,

BACKUS, MEYER & SOLOMON

By: Michael E. Power, Esq., per -
Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105
(603) 668-7272

DATED: 10/11/88

I hereby certify that copies of the foregoing have been furnished by first-class mail, postage prepaid, to the parties on the attached service list.

Michael E. Power, Esq., per -
Robert A. Backus, Esquire

Ivan W. Smith, Chairman
Atomic Safety and Licensing
Board
U.S. NRC
Washington, DC 20555

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

Thomas Dignan, Esquire
Ropes & Gray
225 Franklin Street
Boston, MA 02110

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Dr. Jerry Harbour
Atomic Safety and Licensing
Board
U.S. NRC
Washington, DC 20555

Docketing & Service Sec.
Office of the Secretary
U.S. NRC
Washington, DC 20555

Jane Doughty
SAPL
5 Market Street
Portsmouth, NH 03801

Office of Selectmen
Town of Hampton Falls
Hampton Falls, NH 03844

Gustave A. Linenberger
Atomic Safety and Licensing
Board
U.S. NRC
Washington, DC 20555

George Dana Bisbee, Esquire
Attorney General's Office
State of New Hampshire
Concord, NH 03301

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

Joseph Flynn, Asst. Gen. Cnsl.
Fed. Emerg. Mgmt. Agcy.
500 C Street SW
Washington, DC 20472

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

Carol Sneider, Esquire
Assistant Attorney General
One Ashburton Place
19th Floor
Boston, MA 02108

Sherwin E. Turk, Esquire
Office of Exec. Legal Dr.
U.S. NRC
Washington, DC 20555

Charles P. Graham, Esquire
McKay, Murphy and Graham
100 Main Street
Amesbury, MA 01913

R. Scott Hill-Whilton, Esquire
79 State Street
Newburyport, MA 01950

Judith H. Mizner, Esquire
79 State Street
Newburyport, MA 01950

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

Ellyn Weiss, Esquire
Harmon & Weiss
20001 S Street NW
Suite 430
Washington, DC 20009

Paul McEachern, Esquire
Matthew Brock, Esquire
25 Maplewood Avenue
P.O. Box 360
Portsmouth, NH 03801

Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
Attn: Janet Coit

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

Adjudicatory File
Atomic Safety and Licensing
Board Panel
U.S. NRC
Washington, DC 20555

Richard R. Donovan
FEMA
Federal Registry Center
130 228th Street, SW
Bothell, WA 98021-9796

Robert R. Pierce, Esquire
Atomic Safety and Licensing
Board Panel
U. S. NRC
Washington, DC 20555