

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD



(Seabrook Station, Units 1 and 2

Docket Nos. 50-443-OL  
50-444-OL  
Off-site Emergency  
Planning Issues

1. On April 28, 1986, the applicants filed and served (in hand or by Federal Express) interrogatories upon the following:

Town of Brentwood  
Town of Seabrook  
Town of North Hampton  
Town of Salisbury  
City of Newburyport  
Town of Amesbury  
New England Coalition on Nuclear Pollution  
Town of Rye  
Town of Newbury  
Attorney General of the Commonwealth  
of Massachusetts  
City of Portsmouth

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2. Copies of these interrogatories were also distributed to the Board and, for purposes of this motion are incorporated herein by reference.

3. Pursuant to both NRC regulations and a prior scheduling order of this Board, responses were due to these interrogatories on or before May 14, 1986.

4. No responses of any kind to the interrogatories have been received from any of the entities listed in Paragraph 1 hereof. Nor was any request for a protective order pursuant to 10 CFR § 2.740(c) filed by any such entity.

WHEREFORE, pursuant to 10 CFR § 2.740(f), applicants move the Board to enter an order compelling those entities listed in Paragraph 1 hereof to respond to the interrogatories.

By their attorneys,



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CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on May 16, 1986, I made service of the within Applicants' Motion to Compel Response to Interrogatories by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

Helen Hoyt, Chairperson  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Robert Carrigg, Chairman  
Board of Selectmen  
Town Office  
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Chairman, Board of Selectmen  
RFD 1 - Box 1154  
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Mr. 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)

Mr. Angie Machiros  
Chairman of the  
Board of Selectmen  
Town of Newbury  
Newbury, MA 01950

\*Senator Gordon J. Humphrey  
1 Pillsbury Street  
Concord, NH 03301  
(Attn: Herb Boynton)

Mr. Peter J. Matthews  
Mayor  
City Hall  
Newburyport, MA 01950

Mr. Thomas F. Powers, III  
Town Manager  
Town of Exeter  
10 Front Street  
Exeter, NH 03833

Mr. William S. Lord  
Board of Selectmen  
Town Hall - Friend Street  
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Brentwood Board of Selectmen  
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(\* = Ordinary U.S. First Class Mail.)



Thomas G. Dignan, Jr.