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December 1, 1988

UNITED STATES OF AMERICA '88 DEC -5 A11:43
before the
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
PUBLIC SERVICE COMPANY)	Docket Nos. 50-443-OL-1
OF NEW HAMPSHIRE, <u>et al.</u>)	50-444-OL-1
)	
(Seabrook Station, Units 1)	(Onsite Emergency
and 2))	Planning and Safety
)	Issues)

APPLICANTS' RESPONSE TO MOTION OF
MASSACHUSETTS ATTORNEY GENERAL JAMES M. SHANNON
FOR LEAVE TO FILE A DOCUMENT NOT AUTHORIZED BY
THE COMMISSION'S RULES OF PRACTICE

Under date of November 25, 1988, the Attorney General for The Commonwealth of Massachusetts has filed a Motion for Leave to File a Document not Authorized by the Commission's rules of Practice (The Motion). The document, the acceptance of which The Motion seeks, is entitled Reply of Massachusetts Attorney General James M. Shannon to the Filings of the Staff and the Joint (sic) Applicants in Response to his November 2, 1988 Motions Under 10 C.F.R. § 2.734 to reopen the Record.

The title of The Motion itself reveals that the document is unauthorized by the rules of practice. Moreover, it is an unauthorized and late filing in a situation where this

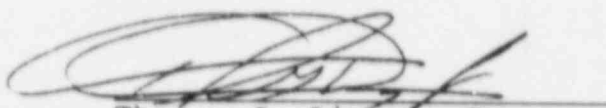
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Commission has stated its objective to be "to resolve [the cognizant motions to reopen] on an expedited basis."¹ Finally, it seeks acceptance of a document which contains no argument that could not have been, or should not have been, made in the Attorney General's original and authorized filings of November 2, 1988.

For all of the forgoing reasons, The Motion should be denied.

Respectfully submitted,



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¹Public Service Company of New Hampshire (Seabrook Station, Units 1 and 2), CLI-88-07, ___ NRC ___ (Sept. 22, 1988) at 3 (emphasis added).

FOKRETFD
17-11-88

CERTIFICATE OF SERVICE

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I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on December 1, 1988, I made service of the within document by mailing copies thereof, postage prepaid, to:

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Adjudicatory File
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Board Panel Docket (2 copies)
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