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RELATED CORRESPONDENCE

Filed: July 3, 1986
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' ANSWER TO
TOWN OF AMESBURY MOTION TO COMPEL

Under date of July 1, 1986, the Town of Amesbury has filed a pleading entitled "Response to Order of the ASLB to Compel Responses to Applicants' Interrogatories and Motion for Protective Order." Insofar as that pleading is a motion, the Applicants say that for the reasons set forth herein the motion should be denied.

1. As observed by this Board in its order dated June 24, 1986, the Town of Amesbury failed to respond

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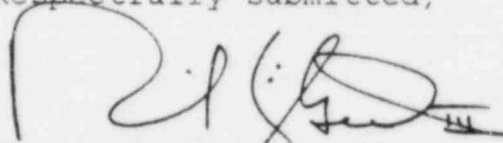
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to the interrogatories served upon it by the Applicants; Amesbury neither answered nor objected nor filed a motion for a protective order. On May 16, 1986 the Applicants therefore filed a motion to compel in respect of the Town of Amesbury. Amesbury filed no response to that motion, either. On June 24, 1986 the Board allowed the motion to compel. Amesbury's belated motion for a protective order, raised only after a motion to compel has been allowed, is untimely. See 10 CFR 2.740(f) (last sentence).

2. It would appear from the matters asserted in paragraph 4 of Amesbury's July 1, 1986, pleading that Amesbury does not intend to "litigate" (as defined in the interrogatories propounded to it) any of the presently admitted contentions in this proceeding. Indeed, the lack of any such intention to litigate is set out as the predicate for Amesbury's objection. If this be so, it is an easy enough matter for Amesbury so to state in response to the first of each of the interrogatories propounded with respect to each of the admitted contentions, and there is no sound reason why

Amesbury should not be required so to indicate on the record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. G. Digman, Jr.", written in a cursive style.

Thomas G. Digman, Jr.
K. K. Gad III
Ropes & Gray
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Telephone: 423-6100

Dated: July 3, 1986

CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on July 3, 1986, I made service of the within Applicants' Answer to Town of Amesbury Motion to Compel by mailing copies thereof, postage prepaid, to:

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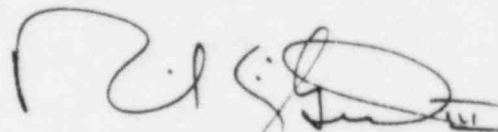
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