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UNITED STATES OF AMERICA

'86 AUG 29 P4:41

NUCLEAR REGULATORY COMMISSION

Before Administrative Judges: Sheldon J. Wolfe, Chairperson Emmeth A. Luebke Jerry Harbour OFFICE OF SEUR-TARY DOCKETING & SERVICE BRANCH

In the Matter of

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, ET AL. (Seabrook Station, Units 1 and 2)

Docket Nos. 50-443/444-OL-/ (On-Site EP and safety issues) August 25, 1986

ATTORNEY GENERAL FRANCIS X. BELLOTTI'S RESPONSE TO NRC STAFF'S INTERROGATORIES

Attorney General Francis X. Bellotti hereby responds to the NRC Staff's interrogatories, dated August 8, 1986, as follows:

CONTENTIONS NH-20 AND NECNP 111.1

 Will the Attorney General be offering any direct testimony on Contentions NH-20 and/or NECNP III.1?

ANSWER: No.

2. Does the Attorney General intend to cross-examine any witnesses on Contentions NH-20 and/or NECNP III.1 with regard to the documents submitted by the Staff and Applicants in response to the Board Order of November 4, 1985?

ANSWER: No.

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CONTENTION NECNP I.B.2 Will the Attorney General be offering any direct testimony on Contention NECNP I.B.2? ANSWER: No. Does the Attorney General intend to cross-examine any witnesses on Contention NECNP I.B.2 with regard to the documents submitted by the Staff and Applicants in response to the Board Order of November 4, 1985? ANSWER: No. CONTENTION SAPL SUPP. 6 Will the Attorney General be offering any direct testimony on Contention SAPL Supp. 6? ANSWER: The Attorney General does not yet know whether he will be offering any direct testimony on Contention SAPL Supp. 6. The expert the Attorney General would have relied on for testimony and expert advice on such contention will be in Europe until September. The Attorney General is therefore presently trying to locate other experts to offer testimony and to advise him on such contention. The Attorney General will supplement his response to this Interrogatory, and to Interrogatories Nos. 3-8, as soon as he knows whether he will be offering any direct testimony. Does the Attorney General intend to cross-examine any witnesses on Contentions SAPL Supp. 6? ANSWER: The Attorney General does not yet know whether he will cross-examine any witnesses on Contention SAPL Supp. 6.; that depends on whether he is able to retain an expert to - 2 -

advise him on such contention. The Attorney General will therefore supplement his response to this Interrogatory, and to Interrogatories Nos. 3-8, as soon as he knows whether he will be cross-examining any witnesses on Contention SAPL Supp. 6. Respectfully submitted, FRANCIS X. BELLOTTI By: Carol S. Sneider Assistant Attorney General Environmental Protection Division Department of the Actorney General One Ashburton Place, Room 1902 Boston, MA 02108 (617) 727-2265 Dated: August 25, 1986 - 3 -

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

'86 AUG 29 P4:39

In the Matter of PUBLIC SERVICE COMPANY OF NEW HAMPSHIPE, ET AL. (Seabrook Station, Units 1 and 2)

OFFICE DOCKETING A FUICE Docket No. (5) 150-433/444-OL-/

CERTIFICATE OF SERVICE

I, Carol S. Sneider, hereby certify that on August 25, 1986 I made service of the within document by mailing copies thereof, postage prepaid, by first class mail, or as indicated by an asterisk by express mail, to:

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August 25, 1986