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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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UNRC

October 14, 1988

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Ivan W. Smith, Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Jerry Harbour  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

OFFICE OF THE CLERK  
DUCKETING & SERVICE  
BRANCH

Gustave A. Linenberger, Jr.  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

Dear Administrative Judges:

Enclosed is a copy of page six of the "NRC Staff's Motion To Compel Answers To Interrogatories and Production of Documents by the Town of Amesbury", filed on October 11, 1988, which inadvertently was not photocopied as part of that document. We regret any inconvenience which this error may have occasioned.

We also wish to inform you that the Staff and Counsel for the Town of Amesbury have conferred in the interest of resolving this matter, and will advise the Board shortly whether and to what extent a ruling on this Motion is required.

Sincerely,

*Stephen A. Bergquist*

Stephen A. Bergquist  
Counsel for NRC Staff

Enclosure: As stated  
cc w/encl: Service list  
cc by telefax: Matthew Brock, Esq.

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k) Employees of all other State, local or municipal departments or agencies;

l) Individuals obligated to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements; and

m) Individuals available to provide assistance pursuant to agreements to aid between municipalities or other government units, or pursuant to other agreements.

ANSWER:

2. See Answer to Interrogatory 1. By way of further objection, the documents speak for themselves and the Staff has substantially greater resources to analyze these documents as it chooses.

TOA has not produced any documents in response to this request, and its assertion that "the documents speak for themselves" is of necessity incomprehensible. Further, TOA has objected to producing the requested documents, and Staff resources are irrelevant for reviewing documents which have not been produced. Absent a complete production of documents, TOA's other assertions cannot be evaluated. For the reasons discussed regarding Interrogatory 1, supra, TOA should be compelled to respond to Interrogatory 2, and to provide specific data requested by the Staff regarding personnel functions and availability in the event of an emergency.

c. Interrogatory 3

Interrogatory 3 and TOA's response read as follows:

3. Set out the training each of the category of personnel set out in Interrogatory 2 has to perform its function in an "emergency."

ANSWER:

3. See Answer to Interrogatory 2.