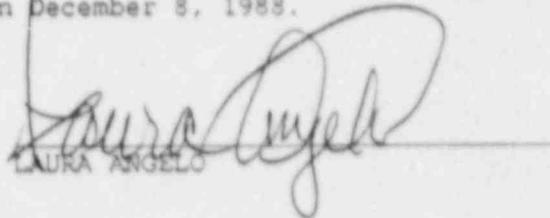


Laboratory, Argonne, Illinois, and Idaho National Engineering Laboratory, Idaho Falls, Idaho, begin to assemble, catalogue, and send copies to FEMA Headquarters to be examined.

3. At FEMA Headquarters, I have identified 6 files drawers which contain records identified by the Request for Production and I estimate that those 6 drawers contain thirty thousand (30,000) pages. The sorting, cataloguing and preliminary examination is proceeding at the pace of about four and one-half hours per drawer. When this stage of FEMA's search is completed, then the documents must be examined by Attorney Flynn. After duplications and nonresponsive documents are eliminated, assuming that none of the remaining documents will be withheld and taking into account the photocopying which will already have been done by other offices, I estimate that it will require 150 hours of staff time to make the necessary photocopies. Even though there is an office within FEMA which is equipped to handle large photocopying jobs (the print shop), nevertheless, there is no gain in efficiency in having them do this project because of the nonuniformity of the documents. Many of them are stapled or printed on both sides of the page or nonstandard sizes. All of them must be returned to their original files. The project amounts to many dozens of smaller tasks rather than one very large task. Simply as a measure of the magnitude of the undertaking, if these same documents were requested from FEMA Headquarters under the Freedom of Information Act, FEMA would expect advance payment of approximately \$4,500.00.

4. From my discussions with the other offices which are searching their records, I estimate that amount of time and effort which their searches will require is, in the aggregate, approximately equal to that of FEMA Headquarters.

5. I have extensive experience in responding to Freedom of Information Act Requests for the Office of Natural and Technological Hazards. It is my judgment that FEMA cannot comply with the the Massachusetts Attorney General's Request for Production much sooner than December 8, 1988.


LAURA ANGELO

Dated October 27, 1988
at Washington, D.C.

October 27, 1988
DOCKETED

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 NOV -1 A11:07

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE CLERK
DOCKETING & SERVICE
BRANCH

JUDGE IVAN W. SMITH, CHAIRMAN
JUDGE JERRY HARBOUR
JUDGE GUSTAVE A. LINENBERGER, JR.

_____)	
In the Matter of)	
Public Service Co. of New Hampshire,)	Docket No. 50-443-OL
et al.)	50-444-OL
(Seabrook Station, Units 1 & 2))	Offsite Emergency
_____)	Planning Issues

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion For Protective Order, Memorandum in Support of Motion for Protective Order, and Affidavit of Laura Angelo have been served on the following by Express Mail service on this 27th day of October, 1988.

Ivan W. Smith, Esq., Chairman
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
Bethesda, Maryland 20555

Dr. Jerry Harbour
Administrative Judge
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
Bethesda, Maryland 20555

Gustave A. Linenberger, Jr.
Administrative Judge
Atomic Safety and Licensing Board
Nuclear Regulatory Commission
Bethesda, Maryland 20555

Robert R. Pierce, Esq.
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
Nuclear Regulatory Commission
Bethesda, Maryland 20555

Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas G. Dignan, Jr., Esq.
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Carol S. Snieder
Assistant Attorney General
Office of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02103

Ellyn R. Weiss, Esq.
Harmon & Weiss
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009

Robert A. Backus, Esq.
Backus, Meyer & Solomon
116 Lowell Street
Manchester, NH 03106

Matthew T. Brock, Esq.
Shaines & McEachern
Post Office Box 360
Portsmouth, NH 03801

Barbara St. Andre, Esq.
Kopelman & Paige
77 Franklin Street
Boston, MA 02110

R. Scott Hill-Whilton, Esq.
Lagoulis, Clark, Hill-Whilton
& McGuire
79 State Street
Newburyport, MA 01950

Ashod N. Amirian, Esq.
Town Counsel for Merrimac
376 Main Street
Haverhil, MA 08130

Gary W. Holmes, Esq.
Holmes & Ellis
47 Winnacunnet Road
Hampton, NH 03842

J.P. Nadeau, Esq.
Selectmen's Representative
Board of Selectmen
10 Central Road
Rye, NH03870

Charles P. Graham, Esq.
Murphy and Graham
33 Low Street
Newburyport, MA 01950

Richard A. Hampe, Esq.
Hampe and McNichols
35 Pleasant Street
Concord, NH 03301

Philip Ahrens
Assistant Attorney General
Office of the Attorney General
State House Station, #6
Augusta, ME 04333

Geoffrey Huntington
Assistant Attorney General
25 Capitol Street
Concord NH 03301-6397

Sherwin E. Turk, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washing* n, D.C. 20555

Jane Doughty
Seacoast Anti-Pollution League
5 Market Street
Portsmouth, NH 03801

William S. Lord
Board of Selectmen
Town Hall - Friend Street
Amesbury, MA 01913

Sandra Gavutis, Chairman
Board of Selectmen
RFD 1, Box 1154
Route 107
Kensington, NH 03827

Allen Lampert
Civil Defense Director
Town of Brentwood
20 Franklin Street
Exeter, NH 03833

Angie Machiros, Chairman
Board of Selectmen
25 High Road
Newbury, MA 01950

Jerard A. Croteau, Constable
82 Beach Road
P.O. Box 5501
Salisbury, MA 01950

Michael Santosuosso, Chairman
Board of Selectmen
South Hampton, NH 01913

Calvin A. Canney, City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

Mr. Robert Carrigg, Chairman
Board of Selectmen
Town Office
Atlantic Avenue
North Hampton, NH 03862

William Armstrong
Civil Defense Director
Town of Exeter
10 Front Street
Exeter, NH 03833

Mrs. Anne E. Goodman, Chairman
Board of Selectmen
13-15 Newmarket Road
Durham, NH 03824

Brentwood Board of Selectmen
RFD Dalton Road
Brentwood, NH 03833

Peter S. Matthews
Mayor
City Hall
Newburyport, MA 01950

Richard R. Donovan
Federal Emergency Management Agency
Federal Regional Center
130 228th Street, S.W.
Bothell, Washington 98021-9796

Senator Gordon J. Humphrey
U.S. Senate
531 Hart Senate Office Building
Washington, D.C. 20510

Dated: October 27, 1988


H. JOSEPH FLYNN
Assistant General Counsel
Federal Emergency Management Agency