OUNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION Before the Commissioners

'87 APR 30 P4:29

OFFICE OF SECRE ARY 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) April 29, 1987

ATTORNEY GENERAL JAMES M. SHANNON'S CORRECTION OF ERRATA AND SUBSTITUTION OF CORRECTED "BRIEF IN RESPONSE TO APPLICANTS' SUGGESTION OF MOOTNESS AND REQUEST FOR VACATION OF STAY"

The brief submitted by Attorney General James M. Shannon to the Commission and parties on April 28, 1987, pursuant to CLI-87-02, was inadvertently unsigned and contained several minor errata on pages 1-6. Attorney General Shannon hereby submits a corrected and signed copy of that brief.

Respectfully submitted,

JAMES M. SHANNON ATTORNEY GENERAL

By:

Carol S. Sneider
Donald S. Bronstein
Allan R. Fierce
Assistant Attorneys General
Environmental Protection Division
One Ashburton Place
Boston, MA 02108
(617) 727-2265

Dated: April 29, 1987

B705060071 870428 PDR ADOCK 05000443 C PDR

DOCKETED USNRC

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

'87 APR 30 P4:29

In the Matter of

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

OFFICE OF SECRETARY DOCKETING & SERVICE Docket No. (s) 50-443/444-0L

CERTIFICATE OF SERVICE

I, Carol S. Sneider, hereby certify that on April 29, 1987 I made service of the within document by mailing copies thereof, postage prepaid, by first class mail, or as indicated by an asterisk, by Federal Express mail, to:

*Lando W. Zech, Jr., Chairman *Thomas M. Roberts, Commissioner East West Towers Building 4350 East West Highway Bethesda, MD 20814

*James K. Asselstine, Commissioner East West Towers Building 4350 East West Highway Bethesda, MD 20814

*Kenneth M. Carr, Commissioner U.S. Nuclear Regulatory Commission East West Towers Building 4350 East West Highway Bethesda, MD 20814

U.S. Nuclear Regulatory Commission U.S. Nuclear Regulatory Commission East West Towers Building 4350 East West Highway Bethesda, MD 20814

...

*Frederick M. Bernthal, Commissioner U.S. Nuclear Regulatory Commission U.S. Nucler Regulatory Commission East West Towers Building 4350 East West Highway Bethesda, MD 20814

> Alan S. Rosenthal, Chairman Atomic Safety & Licensing Appeal Board U.S. Nuclear Regulatory Commission East West Towers Building Third Floor Mailroom 4350 East West Highway Bethesda, MD 20814

Gary J. Edles Howard A. Wilber
Atomic Safety & Licensing Appeal Atomic Safety & Licensing Appeal U.S. Nuclear Regulatory Commmission U.S. Nuclear Regulatory Commission East West Towers Building
Third Floor Mailroom
4350 East West Highway
Bethesda, MD 20814

East West Towers Building
Third Floor Mailroom
4350 East West Highway
Bethesda, MD 20814

Sheldon J. Wolfe, Chairperson Helen F. Hoyt, Chairperson Atomic Safety & Licensing Board Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commmission U.S. Nuclear Regulatory Commission East West Towers Building
Third Floor Mailroom
Third Floor Mailroom
4350 East West Highway
Third Floor Mailroom
4350 East West Highway
Third Floor Mailroom
4350 East West Highway Bethesda, MD 20814

Dr. Emmeth A. Luebke Dr. Jerry Harbour - Atomic Safety & Licensing Board Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commmission U.S. Nuclear Regulatory Commission East West Towers Building
Third Floor Mailroom
4350 East West Highway
Bethesda, MD 20814

East West Towers Building
Third Floor Mailroom
4350 East West Highway
Bethesda, MD 20814

Washington, DC 20472

*Docketing and Service U.S. Nuclear Regulatory Commission Washington, DC. 20555

Roberta C. Pevear Diana P. Randall State Representative 70 Collins Street Town of Hampton Falls Seabrook, NH 03874 Drinkwater Road dampton Falls, NH 03844

Atomic Safety & Licensing Robert A. Backus, Esq.
Appeal Board Panel Backus, Meyer & Solomon
U.S. Nuclear Regulatory 116 Lowell Street
Commission P.O. Box 516 East West Towers Building Manchester, NH 03106 Third Floor Mailroom 4350 East West Highway Bethesda, MD 20814

Bethesda, MD 20814

H. Joseph Flynn, Esq.

Assistant General Counsel
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.

Stephen E. Merrill
Attorney General
George Dana Bisbee, Esq.
Assistant Attorney General
Office of the Attorney General Concord, NH 03301

> Paul A. Fritzsche, Esq. Office of the Public Advocate State House Station 112 Augusta, ME 04333

*Sherwin E. Turk, Esq. Judith H. Mizner, Esq. Office of the Executive Legal Silvergate, Gertner, Baker Director - Fine, Good & Mizner
U.S. Nuclear Regulatory Commission 88 Broad Street
Tenth Floor Boston, MA 02110 7735 Old Georgetown Road Bethesda, MD 20814

U.S. Nuclear Regulatory Commission Washington, DC 20555

Matthew T. Brock, Esq.

Shaines & McEachern

25 Maplewood Avenue

J. P. Nadeau

Board of Selectmen

10 Central Road 25 Maplewood Avenue P.O. Box 360 Portsmouth, NH 03801

Sandra Gavutis, Chairperson Calvin A. Canney Board of Selectmen City Manager RFD 1, Box 1154 Rte. 107

Senator Gordon J. Humphrey Wasnington, DC 20510 (Attn: Tom Burack)

Senator Gordon J. Humphrey One Eagle Square, Suite 507 Concord, NH 03301 (Attn: derb Boynton)

Donald E. Chick Town Manager Town of Exeter 10 Front Street Exeter, NH 03833

Brentwood Board of Selectmen Gary W. Holmes, Esq. RFD Dalton Road Holmes & Ellis Brentwood, NH 03833

Atomic Safety & Licensing Jane Doughty
Board Panel Seacoast Anti-Pollution League 5 Market Street Portsmouth, NH 03801

Rye, NH 03870

City Hall 126 Daniel Street E. Kingston, NH 03827 Portsmouth, NH 03801

> Angelo Machiros, Chairman Board of Selectmen 25 High Road Newbury, MA 10950

Peter J. Matthews Mayor City Hall Newburyport, MA 01950

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

47 Winnacunnet Road Hampton, NH 03841

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

Thomas G. Dignan, Esq. R. K. Gad III, Esq. Ropes & Gray 225 Franklin Street Boston, MA 02110

Beverly Hollingworth 209 Winnacunnet Road Hampton, NH 03842

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

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

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

Rep. Edward J. Markey Chairman U.S. House of Representatives Subcommittee on Energy Conservation and Power 300m H2-316 House Office Building Annex No. 2 Washington, DC 20515 Attn: Linda Correia

Diane Curran, Esq. Harmon & Weiss Suite 430 2001 S Street, N.W. Washington, DC 20009

Richard A. Hampe, Esq. Hampe & McNicholas 35 Pleasant Street Concord, NH 03301

Edward A. Thomas Federal Emergency Management Agency 442 J.W. McCormack (POCH) Boston, MA 02109

Michael Santosuosso, Chairman Board of Selectmen Jewell Street, RFD 2 South Hampton, NH 03827

Anne E. Goodman, Chairperson Board of Selectmen 13-15 Nawmarket Road Durham, NH 03824

Charles P. Graham, Esq. McKay, Murphy and Graham Old Post Office Square 100 Main Street Amesbury, MA 01913

Gustave A. Linenberger, Jr. Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission East West Towers Building 4350 East West Highway Third Floor Mailroom Bethesda, MD 20814

Carol S. Skeider

Carol S. Sneider

Assistant Attorney General Environmental Protection Division

DATED: April 29, 1987