March 24 1986

UNITED STATES NUCLEAR REGULATORY COMMISSION *86 MAR 26 AND :34 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Public Service Company of New Hampshire, et al.

Docket Nos. 50-443 OL 50-444 OL

(Seabrook Station, Units 1 & 2)

Offsite Emergency Planning

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S MOTION FOR LEAVE TO FILE RESPONSE TO OBJECTIONS TO NECNP'S CONTENTIONS FILED BY APPLICANTS, NRC STAFF, AND STATE OF NEW HAMPSHIRE

On February 24, 1986, the New England Coalition on Nuclear Pollution ("NECNP") filed contentions on the Seabrook emergency response plans for the state of New Hampshire and local New Hampshire governments. Between March 6 and March 14, 1986, NECNP received responses to its contentions from Applicants, the state of New Hampshire, and the NRC staff. Those responses contained extensive objections to most of NECNP's contentions.

Although NRC rules of practice do not explicitly provide for responses to objections to contentions, the Appeal Board has ruled that contentions may not be dismissed before intervenors are given an opportunity to respond to objections. <u>Houston</u> <u>Lighting and Power Company</u> (Allens Creek Nuclear Generating Station, Unit 1), ALAB-565, 10 NRC 521 (1979). NECNP therefore requests leave to file the attached response to the parties' objections. We note that in addition to containing arguments in

8603270349 860324 PDR ADOCK 05000443 G PDR support of NECNP's contentions, this pleading also modifies some contentions in response to reasonable objections from Applicant, staff, or the state.

Respectfully submitted,

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