



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of	:
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PUBLIC SERVICE COMPANY OF	:
NEW HAMPSHIRE, et al	:
(Seabrook Station, Units 1 & 2)	:
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Docket Nos. 50-433-0L	:
50-444-0L	:
(Offsite Emergency Planning)	:
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TOWN OF KENSINGTON'S ANSWER OPPOSING THE STATE OF  
NEW HAMPSHIRE'S MOTION FOR SUMMARY DISPOSITION OF  
KENSINGTON CONTENTION #4

Pursuant to 10 CFR 2.749, on the basis of the Affidavit of Benjamin C. Lovell and the statement of undisputed facts attached hereto, the Town of Kensington moves the Board to enter an order dismissing the motion for summary disposition by the The State of New Hampshire for Kensington Contention #4.

STATEMENT OF FACTS NOT IN DISPUTE

1. The Town of Kensington has not been provided with any specific facts, nor has the State of New Hampshire made any showing, supporting the assertion that the Kensington Elementary School has a Dose Reduction Factor (DRF) of .9.
2. The Town of Kensington has not been provided with any information, nor has the State of New Hampshire made any showing, to indicate that Mr. Richard Strome, Director of the New Hampshire Civil Defense Agency (NHODA), is an expert on the sheltering capability of structures.