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BRANCH

HARMON & WEISS
2001 S STREET, N.W.
SUITE 430
WASHINGTON, D.C. 20009-1125

TELEPHONE
(202) 328-3500

GAIL McGREEVY HARMON
ELLYN R. WEISS
DIANE CURRAN
DEAN R. TOUSLEY
ANDREA C. FERSTER

March 5, 1987

Helen F. Hoyt, Esq.
Dr. Jerry Harbour
Gustave Linenberger
Administrative Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Seabrook operating license case:
offsite emergency planning issues

Dear Administrative Judges:

I am enclosing copies of NECNP'S interrogatories and requests for the production of documents against Applicants, the State of New Hampshire, the Federal Emergency Management Agency, and the NRC Staff and Executive Director for Operations. Copies have been served on the parties to this proceeding.

Please note that we seek the production of documents earlier than the 30 days permitted by 10 C.F.R. § 2.741(d), because of the extremely short litigation schedule that has been imposed. The date requested for production of documents is also consistent with the Board's order of January 9, 1987, which establishes March 19 as the deadline for filing answers to interrogatories. Should the parties be unwilling or unable to comply with our request, we may seek an extension of the litigation schedule in order to have sufficient time to review the documents that are produced.

In addition, please note that NECNP'S interrogatories to the NRC Staff are being filed with the Licensing Board with a request that may be directed to the NRC Staff, as provided for in 10 C.F.R. § 2.70(h)(2)(ii).

Sincerely,

Diane Curran

8703160031 870312
PDR ADOCK 05000443
Q PDR

cc: service list

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