

RELATED CORRESPONDENCE

Dated: March 3, 1989

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'89 MAR -6 P1:51

before the  
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
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-OL  
50-444-OL  
Off-site Emergency  
Planning Issues

MASSACHUSETTS ATTORNEY GENERAL'S APPLICATION  
FOR DEPOSITION SUBPOENA DUCES TECUM

Pursuant to 10 CFR § 2.720, Mass AG James M. Shannon requests that this Board issue a deposition subpoena duces tecum for the appearance of Timothy Monahan, Superintendent of Schools for the City of Portsmouth, New Hampshire, Clough Drive, Portsmouth, New Hampshire 03801 on Monday, March 13, 1989, at 10:30 A.M. at the offices of Shaines & McEachern, P.A., 25 Maplewood Avenue, Portsmouth, New Hampshire. The Mass AG requests that the subpoena specify that the deponent bring with him the following documents:

(a) Any and all documents relating to the involvement of Mr. Monahan or the Portsmouth Schools in the June 28 and 29, 1988 emergency exercise for Seabrook Station.

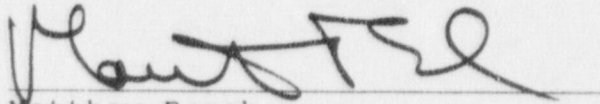
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As grounds therefore, the Mass AG states that the State of New Hampshire has advised that Mr. Monahan, as a school supervisory union superintendent identified in Attachment 1 of the DOE procedures in Volume 4B of the NHRERP, or his representative, was called, contacted or otherwise participated in the emergency exercise for Seabrook Station. The Mass AG wishes to examine the nature and extent of that participation and the exercise of emergency plans for New Hampshire EPZ schools.

Respectfully submitted,

JAMES M. SHANNON  
ATTORNEY GENERAL



By: Matthew Brock  
Assistant Attorney General  
Nuclear Safety Unit  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Dated:

# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al.

(Seabrook Station, Units 1 and 2)

TO Timothy Monahan  
Superintendent of Schools for the  
City of Portsmouth, New Hampshire  
Clough Drive  
Portsmouth, New Hampshire 03801

DOCKET NOS. 50-443-OL  
50-444-OL

Off-site Emergency  
Planning Issues

YOU ARE HEREBY COMMANDED to appear at the offices of Shaines &  
McEachern, P.A., 25 Maplewood Avenue,  
in the city of Portsmouth, New Hampshire  
on the 13th day of March 19 89 at 10:30 o'clock A.M.  
to testify on behalf of the Massachusetts Attorney General

in the above entitled action and bring with you the document(s) or object(s) described  
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_  
\_\_\_\_\_

ATTORNEY FOR Mass. A.G.  
Matthew Brock  
Asst. Attorney General  
Nuclear Safety Unit  
TELEPHONE (617) 727-2200

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### 10 C.F.R. 2.720 (f)

On motion made promptly, and in any event  
at or before the time specified in the subpoena  
for compliance by the person to whom the sub-  
poena is directed, and on notice to the party at  
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the  
Commission may (1) quash or modify the sub-  
poena if it is unreasonable or requires evidence  
not relevant to any matter in issue, or (2) con-  
dition denial of the motion on just and reasonable  
terms.



SCHEDULE OF DOCUMENTS

Any and all documents relating to the involvement of Mr. Monahan or the Portsmouth Schools in the June 28 and 29, 1988 emergency exercise for Seabrook Station.

~~RELATED CORRESPONDENCE~~

Dated: March 3, 1989

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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before the  
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
PUBLIC SERVICE COMPANY OF	)	Docket Nos. 50-443-OL
NEW HAMPSHIRE, et al.	)	50-444-OL
	)	Off-site Emergency
(Seabrook Station, Units 1 and 2)	)	Planning Issues
	)	

MASSACHUSETTS ATTORNEY GENERAL'S NOTICE  
OF DEPOSITION OF TIMOTHY MONAHAN

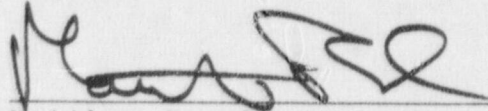
The Massachusetts Attorney General gives notice of the deposition of Timothy Monahan, Superintendent of Schools for the City of Portsmouth, New Hampshire, on Monday, March 13, 1989, at 10:30 A.M. at the offices of Shaines & McEachern, P.A., 25 Maplewood Avenue, Portsmouth, New Hampshire. The matter for examination is the involvement of Superintendent Monahan, and the Portsmouth Schools, in the June 28 and 29 emergency exercise for Seabrook Station. The deposition will be taken before an officer duly authorized to administer oaths.

The deponent is requested to bring with him the following documents:

(a) Any and all documents relating to the involvement of Mr. Monahan or the Portsmouth Schools in the June 28 and 29, 1988 emergency exercise for Seabrook Station.

Respectfully submitted,

JAMES M. SHANNON  
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read 'Matthew Brock', is written over a horizontal line.

By: Matthew Brock  
Assistant Attorney General  
Nuclear Safety Unit  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Dated: