

RELATED CORRESPONDENCE

3/8/89  
DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'89 MAR 13 AIO:47

BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

NRC STAFF'S SUPPLEMENTAL RESPONSE TO  
TOWN OF AMESBURY'S FIRST SET OF INTERROGATORIES  
AND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO  
THE NUCLEAR REGULATORY COMMISSION ON THE  
SEABROOK PLAN FOR MASSACHUSETTS COMMUNITIES (SPMC)

The NRC Staff hereby supplements its October 26, 1988 response to the "Town of Amesbury's First Set of Interrogatories and Request for the Production of Documents to the Nuclear Regulatory Commission on the Seabrook Plan for Massachusetts Communities (SPMC), filed on October 6, 1988. As noted in the Staff's initial response to the Town of Amesbury's request, the Nuclear Regulatory Commission is not a party to this proceeding, and the responses herein are solely those of the NRC Staff. Further, in filing this supplemental response to the Town of Amesbury's request, the Staff does not waive any objection asserted in its initial response thereto, filed on October 26, 1988.

Interrogatory 1

In addition to the matters referred to in the Staff's initial response to this request, the Staff refers to the "Testimony of Thomas Urbanik II on Behalf of the NRC Staff on Joint Intervenor Contentions 4 and 7A (SPMC)", and the "NRC Staff's Pre-Trial Brief on Contentions

Concerning the Seabrook Plan for Massachusetts Communities (SPMC)", both of which were filed before the Licensing Board on March 7, 1989.

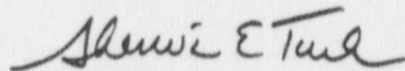
Interrogatory 2

See response to Interrogatory 1, supra.

Interrogatory 4

See response to Interrogatory 1, supra.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sherwin E. Turk".

Sherwin E. Turk  
Senior Supervisory  
Trial Attorney

Dated at Rockville, Maryland  
this 8th day of March, 1989

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

1

3

1

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
OL BRANCH

Robert A. Backus, Esq.  
Backus, Meyer & Solomon  
116 Lowell Street  
Manchester, NH 03106



H. J. Flynn, Esq.  
Assistant General Counsel  
Federal Emergency Management Agency  
500 C Street, S.W.  
Washington, DC 20472

Paul McEachern, Esq.  
Shaines & McEachern  
25 Maplewood Avenue  
P.O. Box 360  
Portsmouth, NH 03801

Charles P. Graham, Esq.  
McKay, Murphy & Graham  
100 Main Street  
Amesbury, MA 01913

Sandra Gavutis, Chairman  
Board of Selectmen  
RFD #1, Box 1154  
Kensington, NH 03827

Calvin A. Canney  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

R. Scott Hill-Whilton, Esq.  
Lagoulis, Clark, Hill-Whilton  
& McGuire  
79 State Street  
Newburyport, MA 01950

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

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

Gary W. Holmes, Esq.  
Holmes & Ellis  
47 Winnacunnet Road  
Hampton, NH 03842

Judith H. Mizner, Esq.  
79 State Street  
Newburyport, MA 01950

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

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

Mrs. Anne E. Goodman, Chairman  
Board of Selectmen  
13-15 Newmarket Road  
Durham, NH 03824  
Kensington, NH 03827

Hon. Gordon J. Humphrey  
United States Senate  
531 Hart Senate Office Building  
Washington, DC 20510

Richard R. Donovan  
Federal Emergency Management  
Agency  
Federal Regional Center  
130 228th Street, S.W.  
Bothell, Washington 98021-9796

Peter J. Matthews, Mayor  
City Hall  
Newburyport, MA 01950

Michael Santosuosso, Chairman  
Board of Selectmen  
South Hampton, NH 03827

Ashod N. Amirian, Esq.  
Town Counsel for Merrimac  
145 South Main Street  
P.O. Box 38  
Bradford, MA 01835

Barbara J. Saint Andre, Esq.  
Kopelman and Paige, P.C.  
77 Franklin Street  
Boston, MA 02110

Ms. Suzanne Breiseth  
Board of Selectmen  
Town of Hampton Falls  
Drinkwater Road  
Hampton Falls, NH 03844

Robert R. Pierce, Esq.\*  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

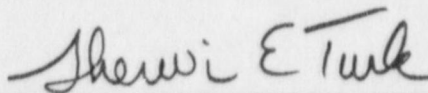
Atomic Safety and Licensing  
Appeal Panel (5)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docketing and Service Section\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

J. P. Nadeau  
Board of Selectmen  
10 Central Street  
Rye, NH 03870

Atomic Safety and Licensing  
Board Panel (1)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Ms. Elizabeth Weinhold  
3 Godfrey Avenue  
Hampton, NH 03842



---

Sherwin E. Turk  
Counsel for NRC Staff