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June 5, 1989

'89 JUN 12 P3:42

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
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

**APPLICANTS' OBJECTION IN THE NATURE OF A  
MOTION IN LIMINE TO PORTIONS OF THE  
PREFILED TESTIMONY OF CAROL SNEIDER**

Applicants object to and move in the nature of a Motion in Limine to exclude as evidence in this proceeding two portions of the "Testimony of Carol Sneider on Behalf of James M. Shannon, Attorney General for the Commonwealth of Massachusetts, Regarding JI-56 (Monitoring Rate)." In support of their motion, Applicants say that the sections of testimony in question are not material or relevant to any issue presently before this Board.

At two places in the testimony, the witness alleges that radiological monitoring will be delayed because the evacuees will, contrary to instructions, attempt to carry suitcases into the monitoring trailer:

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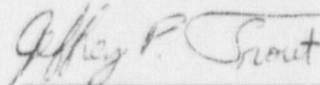
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- a) page 7, first full paragraph on the page; and
- b) page 13, last sentence of first paragraph on page,  
plus entry in the following table for "ave. time to  
frisk personal items".

Nowhere in JI Contention 56 is there any allegation that evacuees will lengthen the monitoring process by carrying suitcases into the monitoring trailers. Nor is this allegation contained in any of the answers provided by the Mass AG or SAPL to Applicants' interrogatories going to that contention.

Since this allegation made at pages 7 and 13 was neither contained in the contentions nor disclosed in discovery, that allegation is beyond the scope of the admitted contentions. Accordingly, the two passages noted above should be excluded as irrelevant.

Respectfully submitted,



---

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Docket Nos. 50-443-OL  
50-444-OL

(Off-site Emergency  
Planning Issues)

CERTIFICATE OF SERVICE

I, Geoffrey C. Cook, one of the attorneys for the Applicants herein, hereby certify that on June 5, 1989, I made service of the following documents:

1. Applicants' Objection in the Nature of a Motion In Limine to a Portion of the Prefiled Testimony of T. Michael Carter;
2. Applicants' Objection in the Nature of a Motion In Limine to the Admission in Evidence of the Prefiled Testimony of Dr. Howard Harris;
3. Applicants' Objection in the Nature of a Motion In Limine to Portions of the Prefiled Testimony of Thomas J. Adler on Traffic Guide Training;
4. Applicants' Objection in the Nature of a Motion In Limine to the Admission in Evidence of the Prefiled Testimony of Dr. Albert E. Luloff; and
5. Applicants' Objection in the Nature of a Motion In Limine to Portions of the Prefiled Testimony of Carol Sneider

by mailing copies thereof, postage prepaid, to:

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Adjudicatory File  
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U.S. Nuclear Regulatory  
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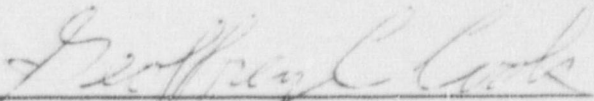
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