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April 13, 1989

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

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

APPLICANTS' CROSS-REFERENCE TO JOINT INTERVENOR
CONTENTIONS AND APPLICANTS' REBUTTAL TESTIMONY

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PDR ADOCK 05000443
G PDR

D503

TABLE 1
(by Testimony Section)

<u>Testimony Number</u>	<u>Testimony Section</u>	<u>Contentions/Bases</u>
16	III	1A, 1B, 22
16	IV	1A, 1B, 22
16	V	1A, 1B, 22
16	V.A.1	2B
16	V.A.2	2B
16	V.A.3	2B
16	V.A.4	2B
16	V.A.5	2D
16	V.A.6	2B
16	V.A.7	2F
16	V.B.1	2B, 2E, 21
16	V.B.2	2B, 2E, 22
16	V.B.3	2B, 2E
16	V.B.4	2B, 2E
16	V.B.5	2B, 2E
16	V.C	2B, 2E
16	V.D	2C, 2F, 2H
16	V.E.1	1B, 2G, 22
16	V.E.2	1B, 2A
16	V.E.3	1B, 22
16	V.E.4	1A, 1B, 2B, 2E, 22
16	V.E.5	1A, 1B, 2B, 2E, 22
16	VI.A	20
16	VI.B	3
16	VI.C	2I
16	VII	4
17	II.A.1	56A
17	II.A.2	56B
17	II.A.3.a	56A
17	II.A.3.b	56B
17	II.B.1	56A
17	II.B.2	56B
17	II.B.3	56A

18	II	45N
18	III	45I, MAG EX-10A, MAG EX-10B
18	IV	MAG EX-10C, MAG EX-11B(2), MAG EX-11B(4), MAG EX-11D
18	V	MAG EX-9B, MAG EX-10D, TOH/NECNP EX-2
18	VI	45O, MAG EX-10F
18	VII	MAG EX-10F
19	II	36A
19	III	35A, 35B, 35D, 35E
19	III	36A
19	III	38A, 38B, 38C, 38D
19	IV	35C
19	V	35A, 35B, 35C, 35D, 35E, 36A, 38A, 38B, 38C, 38D, MAG EX-9A, MAG EX-9B, MAG EX-9C, MAG EX- 9D, MAG EX-17C
20	I	13
20	II	13
20	III	13
20	IV.A	13C
20	IV.B	13C
20	IV.D.1	13C
20	IV.D.2	13C
20	IV.E	13C
20	IV.F	13C
20	IV.G	13B
20	IV.H	13A
20	IV.1	13D
21	I	27, 61, 62, 63
21	II.A	27C, 27G, 61, 63A, 63B
21	II.B	61, 63A

21	II.B.1	27B(2), 61, 62, 63D, 63E, 63F, 63G, 63H, 63I
21	II.B.2	27B(2), 61, 62, 63E, 63F, 63G, 63H, 63I
21	II.B.3	27B(2), 61, 63E, 63F, 63G, 63H, 63I
21	II.B.4	27C, 61, 63E, 63F, 63G, 63H, 63I
21	II.B.5	61
21	II.B.6	61, 63A
21	II.B.7	61
21	II.B.8	27E, 61
21	II.B.9	61
21	II.B.10	61
21	II.B.11	61
21	III.A	27F
21	III.B.1	27E, 27F, 61
21	III.B.2	27F
21	III.B.3	27A, 27B(2), 27C, 27F, 61, 63
21	III.B.4	27C, 27E, 27F, 62, 63E, 63F, 63G, 63H, 63I
21	III.C.1	27A
21	III.C.2	27A, 62
21	III.D.1	27A, 27B(2), 27C, 63B
21	III.D.2	27B(1)
21	III.D.3	63A, 63B, 63C, 63D, 63E, 63F, 63G, 63H, 63I
21	III.E	27C
21	III.F.1	27D
21	III.F.2	63D
21	III.F.3	27G
22		31, MAG EX-8B
23	III.A	MAG EX-2E
23	III.B	MAG EX-21B
23	III.C	SAPL EX-4

23	III.D	SAPL EX-6, TOH/NECNP EX-1d
23	III.E	SAPL EX-7
23	III.F	SAPL EX-8
23	III.G	TOH/NECNP EX-1a, TOH/NECNP EX-1b
23	III.H	SAPL EX-13, TOH/NECNP EX-1f, TOH/NECNP EX-1g
24		MAG EX-14C
25	II	MAG EX-19 (Basis B(1), B(2), D)
25	II.D	SAPL EX-14
25	II.F	TOH/NECNP EX-2
25	III	TOH/NECNP EX-2
25	IV	SAPL EX-2
25	V	SAPL EX-12
26	II.B	18A
26	II.C	17A
26	III.A.1.a	17B, 18F
26	III.A.1.b.1	18C, 18H
26	III.A.1.b.2	18B, 18D
26	III.A.2	17A
26	III.B	23
26	III.C	MAG EX-19A
26	III.C.1	MAG EX-11B(1)
26	III.C.3	MAG EX-11B(3), MAG EX-11B(5)
26	III.D	MAG EX-11A
26	III.E	MAG EX-11B(6)
26	III.F	MAG EX-11B(7)
26	III.G	MAG EX-19D
26	III.H	20

TABLE 2
(by JI Contention)

<u>Testimony Number</u>	<u>Testimony Section</u>	<u>Contention/Bases</u>
16	III	1A
16	IV	1A
16	V	1A
16	V.E.4	1A
16	V.E.5	1A
16	III	1B
16	IV	1B
16	V	1B
16	V.E.1	1B
16	V.E.2	1B
16	V.E.3	1B
16	V.E.4	1B
16	V.E.5	1B
16	V.E.2	2A
16	V.A.1	2B
16	V.A.2	2B
16	V.A.3	2B
16	V.A.4	2B
16	V.A.6	2B
16	V.B.1	2B
16	V.B.2	2B
16	V.B.3	2B
16	V.B.4	2B
16	V.B.5	2B
16	V.C	2B
16	V.E.4	2B
16	V.E.5	2B
16	V.D	2C
16	V.A.5	2D
16	V.B.1	2E
16	V.B.2	2E
16	V.B.3	2E
16	V.B.4	2E
16	V.B.5	2E
16	V.C	2E
16	V.E.4	2E
16	V.E.5	2E
16	V.A.7	2F
16	V.D	2F
16	V.E.1	2G
16	V.D	2H
16	VI.C	2I

16	VI.B	3
16	VII	4
20	I	13
20	II	13
20	III	13
20	IV.H	13A
20	IV.G	13B
20	IV.A	13C
20	IV.B	13C
20	IV.D.1	13C
20	IV.D.2	13C
20	IV.E	13C
20	IV.F	13C
20	IV.1	13D
26	II.C	17A
26	III.A.2	17A
26	III.A.1.a	17B
26	II.B	18A
26	III.A.1.b.2	18B
26	III.A.1.b.1	18C
26	III.A.1.b.2	18D
26	III.A.1.a	18F
26	III.A.1.b.1	18H
16	VI.A	20
16	V.B.1	21
16	III	22
16	IV	22
16	V	22
16	V.B.2	22
16	V.E.1	22
16	V.E.3	22
16	V.E.4	22
16	V.E.5	22
26	III.B	23
21	I	27
21	III.B.3	27A
21	III.C.1	27A
21	III.C.2	27A
21	III.D.1	27A
21	III.D.2	27B(1)
21	II.B.1	27B(2)
21	II.B.2	27B(2)
21	II.B.3	27B(2)
21	III.B.3	27B(2)
21	III.D.1	27B(2)
21	II.A	27C
21	II.B.4	27C
21	III.B.3	27C
21	III.B.4	27C

21	III.D.1	27C
21	III.E	27C
21	III.F.1	27D
21	II.B.8	27E
21	III.B.1	27E
21	III.B.4	27E
21	III.A	27F
21	III.B.1	27F
21	III.B.2	27F
21	III.B.3	27F
21	III.B.4	27F
21	II.A	27G
21	III.F.3	27G
22		31
19	III	35A
19	V	35A
19	III	35B
19	V	35B
19	IV	35C
19	V	35C
19	III	35D
19	V	35D
19	III	35E
19	V	35E
19	II	36A
19	III	36A
19	V	36A
19	III	38A
19	V	38A
19	III	38B
19	V	38B
19	III	38C
19	V	38C
19	III	38D
19	V	38D
18	III	45I
18	II	45N
18	VI	45O
17	II.A.1	56A
17	II.A.3.a	56A
17	II.B.1	56A
17	II.B.3	56A
17	II.A.2	56B
17	II.A.3.b	56B
17	II.B.2	56B
21	I	61
21	II.A	61
21	II.B	61
21	II.B.1	61

21	II.B.10	61
21	II.B.11	61
21	II.B.2	61
21	II.B.3	61
21	II.B.4	61
21	II.B.5	61
21	II.B.6	61
21	II.B.7	61
21	II.B.8	61
21	II.B.9	61
21	III.B.1	61
21	III.B.3	61
21	I	62
21	II.B.1	62
21	II.B.2	62
21	III.B.4	62
21	III.C.2	62
21	J	63
21	III.B.3	63
21	II.A	63A
21	II.B	63A
21	II.B.6	63A
21	III.D.3	63A
21	II.A	63B
21	III.D.1	63B
21	III.D.3	63B
21	III.D.3	63C
21	II.B.1	63D
21	III.D.3	63D
21	III.F.2	63D
21	II.B.1	63E
21	II.B.2	63E
21	II.B.3	63E
21	II.B.4	63E
21	III.B.4	63E
21	III.D.3	63E
21	II.B.1	63F
21	II.B.2	63F
21	II.B.3	63F
21	II.B.4	63F
21	III.3.4	63F
21	III.D.3	63F
21	II.B.1	63G
21	II.B.2	63G
21	II.B.3	63G
21	II.B.4	63G
21	III.B.4	63G
21	III.D.3	63G
21	II.B.1	63H

21	II.B.2	63H
21	II.B.3	63H
21	II.B.4	63H
21	III.B.4	63H
21	III.D.3	63H
21	II.B.1	63I
21	II.B.2	63I
21	II.B.3	63I
21	II.B.4	63I
21	III.B.4	63I
21	III.D.3	63I
23	III.A	MAG EX-2E
22		MAG EX-8B
19	V	MAG EX-9A
18	V	MAG EX-9B
19	V	MAG EX-9B
19	V	MAG EX-9C
19	V	MAG EX-9D
18	III	MAG EX-10A
18	III	MAG EX-10B
18	IV	MAG EX-10C
18	V	MAG EX-10D
18	VI	MAG EX-10F
18	VII	MAG EX-10F
26	III.D	MAG EX-11A
26	III.C.1	MAG EX-11B(1)
18	IV	MAG EX-11B(2)
26	III.C.3	MAG EX-11B(3)
18	IV	MAG EX-11B(4)
26	III.C.3	MAG EX-11B(5)
26	III.E	MAG EX-11B(6)
26	III.F	MAG EX-11B(7)
18	IV	MAG EX-11D
24		MAG EX-14C
19	V	MAG EX-17C
25	II	MAG EX-19 (Basis B(1), B(2), D)
26	III.C	MAG EX-19A
26	III.G	MAG EX-19D
23	III.B	MAG EX-21B
25	IV	SAPL EX-2
23	III.C	SAPL EX-4
23	III.D	SAPL EX-6
23	III.E	SAPL EX-7
23	III.F	SAPL EX-8
25	V	SAPL EX-12
23	III.H	SAPL EX-13
25	II.D	SAPL EX-14
23	III.G	TOH/NECNP EX-1a

23	III.G	TOH/NECNP EX-1b
23	III.D	TOH/NECNP EX-1d
23	III.H	TOH/NECNP EX-1f
23	III.H	TOH/NECNP EX-1g
18	V	TOH/NECNP EX-2
25	II.F	TOH/NECNP EX-2
25	III	TOH/NECNP EX-2

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'89 APR 20 P5:16

April 18, 1989

OFF
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

_____)
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)

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on April 18, 1989, I made service of the documents listed below:

1. Applicants' Final Trial Brief;
2. Applicants' Rebuttal Testimony No. 17 (Radiological Monitoring Process);
3. Applicants' Rebuttal Testimony No. 18 (School Protective Actions);
4. Applicants' Rebuttal Testimony No. 19 (Media Center/Rumor Control and Operation of EBS);
5. Applicants' Rebuttal Testimony No. 20 (ORO Prerequisites and Training);
6. Applicants' Rebuttal Testimony No. 21 (Coordination of Governmental Resources and Responses);
7. Applicants' Rebuttal Testimony No. 22 (Provisions for Prompt Communications Among ORO Field Personnel);

8. Applicants' Rebuttal Testimony No. 23 (Regarding Scope of Graded Exercise);
9. Applicants' Rebuttal Testimony No. 24 (Training of MS-1 Hospital Responders);
10. Applicants' Rebuttal Testimony No. 25 (New Hampshire Exercise Performance);
11. Applicants' Rebuttal Testimony No. 26 (Protective Action Recommendations Made by NHY ORO During the Exercise);
12. Applicants' Cross-Reference to Joint Intervenor Contentions and Applicants' Rebuttal Testimony
13. Applicants' Supplemental Answers to Intervenors' Expert Witness Interrogatories;
14. Professional Qualifications of John W. Baer;
15. Professional Qualifications of Robert Cotter;
16. Professional Qualifications of George R. Gram;
17. Professional Qualifications of John G. Robinson;
18. Professional Qualifications of Colby E. Wells;
19. Applicants' Exhibit No. 55;
20. Applicants' Exhibit No. 55A;
21. Applicants' Exhibit No. 56;
22. Applicants' Exhibit No. 57;
23. Applicants' Exhibit No. 58;
24. Applicants' Exhibit No. 59; and
25. Applicants' Exhibit No. 60.

by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

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Adjudicatory File
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(* = Ordinary U.S. First Class Mail)