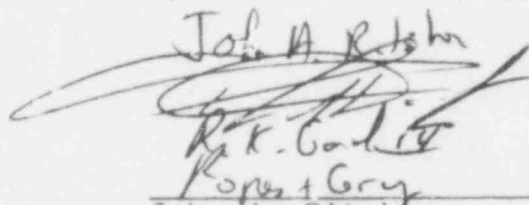


ANNEX

Pursuant to 10 CFR § 2.749(a) permittees herein set forth the material facts relevant to the foregoing motion as to which permittees contend there is no genuine issue to be heard.

1. If the sunk costs at Seabrook may properly be counted in the comparison of Seabrook, assuming cooling towers, with any other alternate site, then no alternate site is "obviously superior" to the Seabrook site even assuming use of cooling towers.

By their attorneys,



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CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the applicants herein, hereby certify that on June 6, 1979, I made service of the within document by mailing copies thereof, postage prepaid, first class or airmail, to:

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