

HARMON & WEISS

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USNRC

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50-443/444

September 16, 1982

Helen F. Hoyt, Chairperson  
Dr. Jerry Harbour, Administrative Judge  
Dr. Emmeth A. Luebke, Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Members of the Board:

On April 21, 1982, NECNP submitted a contention challenging the sufficiency of the Seabrook security plan. In a letter of July 9, 1982, NECNP then presented to the Board the qualifications of two of its security experts, Robert D. Pollard of the Union of Concerned Scientists and Paul C. Leavitt, former Chief of the Hampton, New Hampshire Police Department. That letter was withdrawn by NECNP during the second prehearing conference, at the request of counsel for the NRC staff.

After a considerable search, NECNP has now obtained the additional services of two highly qualified and experienced private experts on security systems, Patrick R. Lowrey and Herbert M. Dixon, of Draco Lion International, Inc., and of Robert Mark, current Chief of the Hampton, New Hampshire Police Department. NECNP intends to draft contentions on the adequacy of security provisions at Seabrook as soon as its experts have had an opportunity to examine it.

We are enclosing a copy of a letter from NECNP to the NRC Staff and the Applicants, presenting the qualifications of each of NECNP's security experts. Considering the extremely high caliber of our witnesses, we do not anticipate any objection to their qualifications to examine the plan.

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Members of the Board  
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Accordingly, we have proposed to the Staff and the Applicants that NECNP's experts examine the security plan and visit the Seabrook site sometime in mid-October, and prepare detailed contentions on the security plan shortly thereafter.

We will promptly inform the Board of whatever arrangements are made between the parties.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diane Curran".

Diane Curran

cc: Seabrook Service List

DC:law