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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

81 NOV 30 P2:24

before the OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PUBLIC SERVICE COMPANY OF NEW)
HAMPSHIRE, et al.)

(Seabrook Station, Units 1 & 2))

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

APPLICANTS' ANSWER TO THE
PETITION TO INTERVENE OF
SUN VALLEY ASSOCIATION

On November 18, 1981, the Sun Valley Association (SVA) served by mail a petition to intervene in the above-captioned matter. This petition recites, inter alia, that SVA is "an association comprising of fifty (50) homeowners at Seabrook Beach in Hampton, N.H." and recites certain general reasons for wanting to intervene.

Pursuant to 10 CFR § 2.714(c), the applicants answer this petition and say that for the reasons set forth below, the petition at least in its present form should be denied.

SVA's petition fails to identify any members by name and address who wish to be represented by SVA and who have the necessary interest to maintain standing to intervene. In the

absence of such information, the petition must be denied.

Virginia Electric & Power Co. (North Anna Nuclear Power Station, Units 1 & 2), ALAB-536, 9 NRC 402, 404 (1979); Detroit Edison Co. (Enrico Fermi Atomic Power Plant, Unit 2), LBP-79-1, 9 NRC 73, 77 (1979).

At present, the petition does not appear to set out any specific contentions as such and clearly gives no bases for any contentions with "reasonable specificity" as is required before intervention can be granted. See 10 CFR § 2.714(b). Thus, even assuming that SVA amends to overcome the deficiency which now exists with respect to the failure to set out the names of individuals whom SVA is representing, intervention should still be withheld until SVA complies with the requirements of 10 CFR § 2.714(b).

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 November 25, 1981, I made service of the within document by mailing copies thereof, postage prepaid, to:

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