

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

81 NOV 30 P2:25

before the

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
MARKETING & SERVICE
BRANCH

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 THE
STATE OF NEW HAMPSHIRE AND
THE ATTORNEY GENERAL OF NEW HAMPSHIRE

On November 17, 1981, the State of New Hampshire (State) and the Attorney General of New Hampshire (AG) filed a joint petition to intervene under 10 CFR § 2.714. The applicants, pursuant to 10 CFR § 2.714(c) answer this petition as follows.

Both the State and the AG have the requisite interest to intervene.

The petition does not set forth any contentions with bases. Therefore, unless and until the State and AG comply with 10 CFR § 2.714(b), they should not be granted intervention status pursuant to 10 CFR § 2.714, but applicants have no objection

to their participation pursuant to 10 CFR § 2.715(c).

By their attorneys,

Thomas G. Dignan, Jr.

Thomas G. Dignan, Jr.

R. K. Gad III

Ropes & Gray

225 Franklin Street

Boston, MA 02110

(617) 423-6100

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:

Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Mr. Tomlin P. Kendrick
Executive Director
Coastal Chamber of Commerce
of New Hampshire
822 Lafayette Road
P.O. Box 596
Hampton, NH 03842

Paul A. Fritzsche, Esquire
General Counsel
Public Advocate
State House Station 112
Augusta, ME 04333

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney
General
Augusta, ME 04333

Jo Ann Shotwell, Esquire
Assistant Attorney General
Environmental Protection Division
Public Protection Bureau
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

William S. Jordan, III, Esquire
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Mr. Arnie Wight, Chairman
House Science and Technology
Committee
House of Representatives
Concord, NH 03301

E. Tupper Kinder, Esquire
Assistant Attorney General
Office of the Attorney General
208 State House Annex
Concord, NH 03301

Mr. Robert F. Preston
226 Winnacunnet Road
Hampton, NH 03842

Wilfred L. Sanders, Jr., Esquire
Sanders and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

Roy P. Lessy, Jr., Esquire
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas G. Dignan, Jr.

Thomas G. Dignan, Jr.