



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 & 2)

)
) Docket Nos. 50-443-OL

)
) 50-444 OL
)
)

REPLY OF SUN VALLEY ASSOCIATION
TO APPLICANTS' RESPONSE TO AMENDED
PETITION FOR LEAVE TO INTERVENE OF
SUN VALLEY ASSOCIATION

NOW COMES the Petitioner, SUN VALLEY ASSOCIATION, by and through its attorneys, SANDERS AND McDERMOTT PROFESSIONAL ASSOCIATION of Hampton, County of Rockingham and State of New Hampshire, and states as follows:

1. That the Applicants have objected to the form of the previously submitted Affidavit of Dr. Mauray Tye.

2. That the Affidavit of Dr. Mauray Tye was in fact signed by the said Dr. Mauray Tye.

3. That notwithstanding Petitioner's belief that Applicants' objections to the jurat manifest a certain belligerence as well as an undue sanctification of form over substance, Petitioner agrees to "cure" the alleged defect by submitting the attached revised Affidavit.

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4. That Petitioner respectfully requests that the attached revised Affidavit be incorporated in and made a part of the Amended Petition For Leave To Intervene of SUN VALLEY ASSOCIATION.

Respectfully submitted:

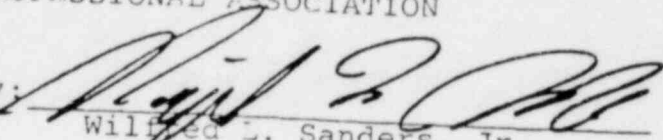
SUN VALLEY ASSOCIATION

by its attorneys

SANDERS AND McDERMOTT
PROFESSIONAL ASSOCIATION

Date: April 21, 1982

by:


Wilfred L. Sanders, Jr.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

APR 23 1982

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

AFFIDAVIT OF DR. MAURAY TYE

I, Dr. Mauray Tye, being duly sworn, depose and say as follows:

1. That I am a member of Sun Valley Association, an organization comprised of fifty (50) homeowners at Seabrook Beach, in the Town of Hampton, New Hampshire.

2. That my home is located within two miles of the Seabrook Nuclear Power Plant.

3. That there has yet to be formulated an evacuation plan which would, with reasonable certainty, secure my safe removal from the immediate area in the event of a nuclear accident.

4. That operation of the Seabrook Nuclear Power Plant in the absence of such an effective plan would necessarily constitute a grave threat to my health and safety.

5. That this threat is compounded during the summer months when countless numbers of seasonal residents, tourists and migrant workers populate the immediate area.

6. That I hereby authorize Sun Valley Association to represent my interests in the hearings before the Nuclear Regulatory Commission.

Dr. Mauray Tye
Dr. Mauray Tye

Commonwealth of Massachusetts
Essex, ss.

April 20, 1982

Personally appeared before me the above-stated Dr. Mauray Tye and made oath that the foregoing statements are true to the best of his knowledge and belief.

Dorothy L. Woodbury
Notary Public.

My Commission Expires

12/17/86

CERTIFICATE OF SERVICE

I, Wilfred L. Sanders, Jr., Esq., hereby certify that a copy of the foregoing Motion has been mailed this 21st day of April, 1982, by first class mail, postage prepaid, to:

Helen Hoyt, Chm.
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Atomic Safety and Licensing
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U.S. NRC
Washington, D.C. 20555

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Docketing and Service Sec.
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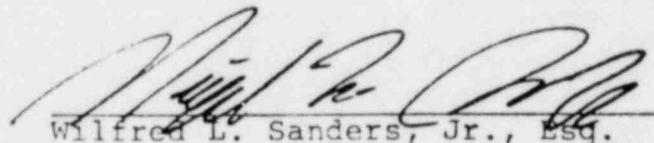
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