

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 APR 26 PM2:13

before the
ATOMIC SAFETY AND LICENSING BOARD

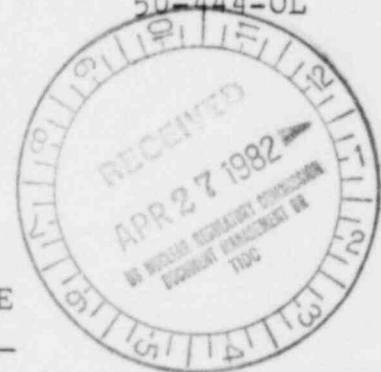
OFFICE OF SECRETARY
DOCKETING & RECORDS
BRANCH

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' MOTION FOR LEAVE TO
FILE RESPONSE TO SUPPLEMENT TO
THE PETITION TO INTERVENE OF THE
COMMONWEALTH OF MASSACHUSETTS

1. On March 12, 1982, this Board issued a Memorandum and Order (Order) which contemplated that amended petitions to intervene should be filed on or before April 6, 1982, and that responses thereto be filed on or before April 21, 1982.

2. On April 21, 1982, the Applicants' counsel received a "Supplement to the Petition to Intervene of the Commonwealth of Massachusetts. This pleading was served 15 days later than directed by the Order and too late for the Applicants to make the filing deadline of April 21, 1982.

WHEREFORE, the Applicants move that they be permitted to file late their response to the Commonwealth's supplement to

DS63
1/1

8204280280

its petition in the form separately submitted herewith.

By their attorneys,

Thomas G. Dignan, Jr.

R. K. Gad III

Ropes & Gray

Thomas G. Dignan, Jr.

R. K. Gad III

Ropes & Gray

225 Franklin Street

Boston, MA 02110

(617) 423-6100

April 22, 1982

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the applicants herein, hereby certify that on April 22, 1982, 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

Donald L. Herzberg, M.D.
George Margolis, M.D.
Hitchcock Hospital
Hanover, NH 03755

Ms. Patti Jacobson
3 Orange Street
Newburyport, MA 01950

Edward J. McDermott, Esquire
Sanders and McDermott
Professional Association
408 Lafayette Road
Hampton, NH 03842

Robert L. Chiesa, Esquire
Wadleigh, Starr, Peters, Dunn & Kohls
95 Market Street
Manchester, NH 03101

Rep. Nicholas J. Costello
Whitehall Road
Amesbury, MA 01913

Cooperative Members for Responsible
Investment
Box 65
Plymouth, NH 03264

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

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

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

Thomas G. Dignan, Jr.
Thomas G. Dignan, Jr.