

UNITED STATE OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AMENDMENT TO 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 by way of amendment to its Petition for Leave to Intervene, submits the attached affidavit of Dr. Mauray Tye, and, pursuant to 10 C.F.R. 2.714(b), raises the following contentions:

1. There has yet to be formulated an evacuation plan which would, with reasonable certainty, secure the safe removal of the local populace in the event of a nuclear accident.
2. Operation of the Seabrook Nuclear Power Plant in the absence of such an effective plan would constitute an unreasonable threat to the health and safety of the local populace.
3. The cornerstone of an adequate evacuation plan should be the construction by the Applicant, PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, of a new highway from the Interstate highway system to the Hampton Beach-Seabrook Beach Area.

Respectfully submitted:

SUN VALLEY ASSOCIATES
by its attorneys
SANDERS AND McDERMOTT
PROFESSIONAL ASSOCIATION

by:


Wilfred L. Sanders, Jr.

April 13, 1982

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PDR ADOCK 05000443
G PDR

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NUCLEAR REGULATORY COMMISSION

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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

State of New Hampshire
Rockingham, ss.

April 14, 1982

Then personally appeared Dr. Mauray Tye and acknowledged the foregoing to be his voluntary act and deed, before me,

Ed G. Dwyer
Justice of the Peace/Notary Public.

CERTIFICATE OF SERVICE

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

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