

January 21, 1983

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the matter of

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

(Seabrook Station, Units 1 and 2)

DOCKET NUMBER  
PROD. & UTIL. FAC.

50-443  
50-444

NECNP RESPONSE TO APPLICANTS' INTERROGATORIES  
AND REQUEST FOR THE PRODUCTION OF DOCUMENTS

This document constitutes NECNP's response to the interrogatories submitted by Applicants on December 8, 1982. NECNP is still in the course of evaluating many of the contentions and the materials submitted to us by Applicants and Staff, and where appropriate, answers will be supplemented when our evaluation is completed. We note that in many cases, we remain unable to fully develop our position on contentions until the Applicants complete and make available certain required documents.

Applicants have prefaced their specific interrogatories with three general interrogatories, G-1, G-2, and G-3. With respect to G-1, NECNP identifies the documents relied upon at the end of each set of interrogatories on a particular contention.

NECNP objects, however, to interrogatories G-2 and G-3.

Interrogatory G-2 is so broad as to encompass the identification of particular mental and analytical processes. Where mathematical calculations have been performed by NECNP, we will include these in our responses to the interrogatories. NECNP will not, however, attempt to describe the mental processes of its members or experts, or include any material which constitutes attorney work product.

NECNP further objects to the request of Interrogatory G-3 that we identify any persons with whom we have communicated regarding the answers to these interrogatories. The Federal Rules of Civil Procedure, which generally govern NRC proceedings, do not permit discovery of the facts or opinions held by an expert who is not expected to be called at trial. See Fed. R. Civ. Pro. 26(b)(4)(B). There is therefore no purpose to be served in identifying all NECNP's sources of technical assistance. In the event that NECNP decides to present the testimony of any of our consultants, we will promptly supplement our answers to these interrogatories to identify those individuals. I-1-V-4. NECNP has no present intention of litigating the contentions of any other intervenors. We will supplement our answers to these interrogatories if this position should change.

VI-1. Yes.

VI-2-4. Because the Applicants' environmental qualification report is not yet available, NECNP is currently

unable to evaluate the status of this qualification of the electric valve operators. We will supplement our response when the environmental report is submitted.

In general, the basis for NECNP's contention that electric valve operators have not been qualified to NRC standards is that Applicants' FSAR indicates compliance with IEEE-382-1977 and IEEE 323-1974, but does not state that Applicants comply with NUREG-0588, as required by the Commission in CLI-80-21.

VI-5. Since Applicants have not submitted their environmental qualification report, NECNP does not have sufficient information with which to answer this question.

VI-6. NECNP has not examined any of the documents containing measurements or estimates of the harshness of the accident environment at Three Mile Island. We will supplement our answer when we have completed our evaluation.

VI-7. As far as NECNP knows, the accident at Three Mile Island still continues, as the core remains inaccessible and the plant continues to rely on instruments exposed to high radiation levels.

VI-8. NECNP has not yet obtained any expert evaluation of this issue. We will supplement our answer when the information becomes available.

VI-9. NECNP has not yet arranged for the testimony by any expert witnesses on NECNP Contention 4.B.2.

G-1. The answers to Applicants' interrogatories on

Contention I.A.2. are based on the following documents:

NUREG-0588

CLI-80-21

VII-1. Yes.

VII-2. NECNP has not yet obtained an expert evaluation of this issue. We will supplement our answer when the information becomes available.

VII-3. Those components which NECNP now contends must be environmentally qualified are the steam dump valves, turbine valves, and the steam dump control system. NECNP will identify other equipment that must be qualified when we have completed our evaluation of the residual heat removal system.

VII-4. See response to VII-2.

VII-5. See response to VII-2.

VII-6. NECNP has not yet arranged for testimony by any expert witnesses on this contention.

G-1. The documents relied on in answering this contention are:

NUREG - 0510, page A-15

NUREG - 0578, page 18

NUREG - 0705, Task A-45

GDC 4

GDC 34

VIII-1. Yes.

VIII-2. At this time, NECNP contends that duration of qualification has not been established for equipment listed in

FSAR Table 3.11(B)-1 and Appendix 3H. However, NECNP cannot complete its evaluation of the duration of environmental qualification for specific pieces of equipment until Applicants submit thier report on environmental qualification.

VIII-3. Each piece of equipment should be able to survive the conditions to which it would be exposed during an accident, for the period in which it would be required to perform its safety function.

VIII-4. NECNP is unable at this time to describe an exact accident scenario for each and every piece of equipment listed in response to Interrogatory VIII-3.

VIII-5. As far as we know, the accident at Three Mile Island still continues, since the core remains inaccessible and the plant continues to rely on instruments exposed to high radiation levels.

VIII-6. NECNP has not yet arranged for any expert witnesses to testify with respect to Contention I.B.2.

G-1. The answers to these interrogatories are based on the following documents:

NUREG-0588

Memorandum from S.H. Hanauer, Assistant Director for Plant Syustems, DSS, re: Environmental Qualification and Instrumentation (April 6, 1979) IX-1. Yes.

IX-2. All systems and components in the Emergency Feedwater Pumphouse HVAC which are required to monitor

pumphouse conditions and maintain the temperature range at which the emergency feedwater system can operate must be considered safety grade. This includes heating and cooling components in the pumphouse HVAC system.

IX-3. The basis for NECNP's answer to IX-2 is that since the emergency feedwater pumphouse and its equipment are capable of functioning and can be relied upon to function only within a particular temperature range, the HVAC system is required to maintain conditions within that range. Accordingly, it must be environmentally qualified to assure that it will not fail during an accident and thereby allow conditions to occur which would cause the failure of the emergency feedwater system.

IX-4. NECNP contends that, at a minimum, all components identified by Applicants in FSAR §9.4.11 and in answer to NECNP interrogatory 35 ("Applicants' Answers to NECNP Interrogatories, etc.", dated November 1, 1982 at 42-44) must be environmentally qualified. If necessary, we will supplement this answer after we have obtained expert evaluation of the FSAR and Applicants' interrogatory responses.

IX-5. The HVAC systems must be able to survive the harshness and duration of conditions to which they would be subjected in an accident.

IX-6. At a minimum, the HVAC system should be qualified to the parameters of NUREG-0538. NECNP will supply further accident parameters when we have obtained them from our experts.



IX-7. NECNP has not yet arranged for the testimony of any expert witnesses on Contention I.C.

G-1. NECNP relied on the following documents in answering Applicants' interrogatories with respect to Contention I.C.:

FSAR §9.4.11

FSAR Table 1.3-2, Sheet 14

FSAR Table 3.11 (B)-1, Sheet 4

X-I. Yes

X-2 - X-5. NECNP is unable to answer these questions since Applicants' "Reactor vessel Examination Plan" has not yet been made available. Moreover, Applicants' FSAR does not provide any specific description of Applicants' preservice or inservice testing program for reactor vessel welds beyond indicating that Reg Guide 1.150 is not fully complied with. NECNP will supplement its answer when the Reactor Vessel Examination is submitted.

X-6. Compliance with Regulatory Guide 1.150 is required unless Applicants can show some equivalent means of assuring the integrity of reactor vessel welds.

X-7. The basis for this contention lies in the Applicants' FSAR, which states that Applicants comply with Reg Guide 1.150 only to the extent to which "current technology allows." The FSAR does not indicate a) what that level of technology is, b) what degree of assurance it provides, or c) what alternative means Applicants will employ to achieve the same level of

safety as provided by compliance with the Regulatory Guide.

X-8. NECNP is not aware of other programs for preservice and inservice inspection of reactor vessel welds.

X-9. NECNP has not yet arranged to have any expert witnesses testify on Contention I.D.1

G-1. The documents relied on for NECNP's answers to interrogatories concerning contention I.D.1 are

FSAR at 1.8-57

Reg Guide 1.150

XI-1. Yes.

XI-2. NECNP notes that amendment 45 to the FSAR reduced the number of protection system actuation functions not tested at full power from twelve to eleven. For each of these functions, NECNP believes that no justification for not testing each at full power is acceptable.

XI-3. At this time, NECNP does not find any of the justifications for failure to test the twelve functions at full power to be acceptable.

XI-4. No.

XI-5. Acceptable means of testing actuating devices other than at full power are described in Reg Guide 1.22.

XI-6. The term "reliable" as used in NECNP Contention I.D.2 means providing all reasonable of assurance that the equipment will function normally whenever its use is necessary and desirable. NECNP contends that such assurance can be provided



only by testing at full power.

XI-7. NECNP has not yet arranged for the testimony of any expert witnesses on Contention I.D.2.

G-1. Documents relied on in answering interrogatories related to Contention I.D.2. are:

FSAR at 1.8-8,

FSAR §7.1-2.5

XII-1. Yes

XII-2. At this time, the airborne radioactivity detector appears to us to comply with GDC 21.

XII-3. NECNP is unable at this time to provide a complete list of leakage detection instruments which fail to comply with GDC 21. They include, however, detection instruments for temperature, flow and humidity as described at FSAR page 1.8-17.

XII-4. GDC 20 includes, in its definition of protection systems, those which "sense accident conditions." GDC 21 in turn requires that a protection system "shall be designed to permit periodic testing of its functioning when the reactor is in operation, including a capability to test channels independently to determine failure and losses of redundancy that may have occurred". Moreover, the leakage detection system is considered a protection system under IEEE-279-1971, which states that

the nuclear power generating station protection system encompasses all electric and mechanical devices and circuitry (from sensors to actuation device input

terminals) involved in generating those signals associated with the protective function. IEEE 279-1971 at 7.

Since the leakage detection system is one which senses accident conditions, NECNP contends that it should be testable at power as required by GDC 21 and IEEE 279-1971.

XII-5. See answer to XII-4

XII-6. NECNP has not studied the question of whether the NRC Staff has required compliance of the leakage detection system with GDC 21 for other plants.

XII-7. NECNP contends that Seabrook does not comply with positions C.5 and C.8 of Reg. Guide 1.45

XII-8. See FSAR at 1.8-17 for a description of Applicants' non-compliance with Reg. Guide 1.45. Applicants fail to comply with the requirement of position C.8 that "the leakage detection system should be equipped with provision to readily permit testing for operability and calibration during plant operation" Reg. Guide 1.45 at 1.45-4

XII-9. See response to XII-3

XII-10. See response to XII-3

XII-11. See response to XII-4

XII-12. See response to XII-4

XII-13. No.

XII-14. N/A

XII-15. NECNP has not yet arranged to have any expert witnesses testify on Contention I.D.3.

G-1. The documents relied on by NECNP in answering

Applicants' interrogatories on Contention I.D.3 are listed in our response to question XII-4.

XIII-1. In its answers to our interrogatories, the Staff has stated that "the Applicant has stated that the Seabrook design meets the requirement of IEEE Standard 338-1977." The Staff has also indicated its commitment to enforcing the requirements of IEEE-338-1977 "unless the Applicants can show an alternative means of achieving the same level of safety." See "Responses of the NRC Staff to NECNP's First Set of Interrogatories and Requests for Documents, etc." (December 28, 1982) at 39-40. Unless the Applicants should alter their apparent commitment to meet IEEE-338-1977 or the Staff should make a determination of noncompliance with that standard, NECNP does not intend to pursue this contention. If NECNP's position should thereby change, we will supplement our answers to Applicants' Interrogatories .

XIV-1. NECNP does not intend to pursue this contention because Applicants have stated that they comply with IEEE-323-1974. If NECNP should determine that Applicants do not in fact comply with IEEE 323-1974, we will renew this contention and answer Applicants' interrogatories relating to it.

XV-1. Yes.

XV-2. As far as NECNP knows, the wide range pressure instruments which are the subject of contention I.G. are

RC-PT-403 and 405, described in "Applicants' Answers to NECNP First Set of Interrogatories and Requests for Documents on Contentions I.D, etc." (November 22, 1982) at page 48.

XV-3. NECNP has not obtained expert evaluation of the location of the wide range pressure instruments. We will supplement our answer when this information is available from our consultants.

XV-4. See response to Interrogatory XV-3.

XV-5. NECNP relies, for its assertion that Seabrook wide range pressure instruments cannot be relied on to provide accurate information, on the information contained in IE Information Notice No. 82-11 (April 9, 1982).

XV-6. Yes. NECNP relies in addition on GDC 4, which requires that systems and components important to safety must be designed to accomodate and to be compatible with normal operating and accident conditions.

XV-7. Yes.

XV-8, XV-9. NECNP objects to these interrogatories in that they call for identification of persons informally consulted by NECNP or discussion of attorney work product, in violation to the Federal Rules of Civil Procedure.

XV-10. NECNP has not yet arranged for testimony by any expert witnesses on Contention I.G.

G-1. NECNP relied on the following documents in answering the interrogatories relating to Contention I.G.

IE Notice 82-11

GDC 4

XVI-1. Yes

XVI-2. NECNP has not identified a path to cold shutdown for Seabrook. That is the responsibility of Applicants.

XVI-3. See response to XVI-2.

XVI-6 - XVI-7. NECNP has not obtained an expert evaluation of these questions. We will supplement our answers as information becomes available.

XVI-8. NECNP has not yet arranged to have any expert witnesses testify on Contention I.I.

G-1. NECNP relied on the following documents in answering interrogatories with respect to Contention II:

GDC4

IE Bulletin 79-01B, Rev. 3 (October 24, 1980)

XVII-1. Applicants' and Staffs' answers to NECNP's interrogatories indicate to us that Applicants have now abandoned the use of acoustic accelerometers. NECNP has asked Applicants to document that change and identify the exact means of determining PORV position which will be used. NECNP is prepared to drop this contention upon assurance from Applicants that direct PORV position indicators are in use at Seabrook.

XXX-2 NECNP is unable to answer this interrogatory at this time, since we have not had any experts evaluate this contention. We will supplement our responses to Applicants'

interrogatories on Contention III.2 when we obtain the necessary expertise.

XXX-3 NECNP considers a "failure of both units" to be any series of events in which, after an accident has triggered emergency response procedures in one plant, the other plant either a) experiences an accident in which emergency response procedures are also triggered or b) experiences any failure calling for the application of resources or personnel which have already been committed to the accident at the first plant.

XXX-4,5 See response to XXX-2.

XXX-6 See response to XXX-3.

XXX-7,8 See response to XXX-2.

XXX-9 See response to XXX-3

XXX-10,11 See response to XXX-2.

XXX-12 See response to XXX-3.

XXX-13-25 See NECNP Supplemental filing on Emergency Planning Contentions (July 23, 1982) at 5-10.

XXX-26 NECNP has not yet arranged to have any expert witnesses testify in this proceeding.

XVII-2. Applicants' FSAR at Table 1.3-2, Sheet 4 and §5.2.2.8 states that acoustic accelerometers are used to indicate PORV flow. This constitutes an indirect means of indicating PORV position, in violation of NUREG 0737, Clarification Item II.D.1

XVII-3. NECNP relies for its position on NUREG 0737,



Clarification Item II.D.1.

XVII-4. See response to XVII-2.

XVII-5. NECNP has not yet arranged to have any expert witnesses testify on Contention 1.L.

G-1. See response to XVII-2.

XVIII-1. Yes.

XVIII-2. Applicants are required to comply with Appendix A to Branch Technical Position 9.5-1 of the Standard Review Plan and the requirements set forth in the Commission's final rule on fire protection, 10 CFR 50.48, plus Appendix R to 10 CFR Part 50.

XVIII-3. NECNP Contention I.M. is based on Applicants' 1977 fire protection plan in which Applicants admit various aspects of noncompliance with Branch Technical Position 9.5-1. The specific components are listed in NECNP's June 17 filing at pages 17-18, and in Table 3 of the Applicants' report. See letter from PSNH to NRC dated August 29, 1977. Table 3 contains references to Applicants' discussion of the nature of the non-compliance in each case.

In its answers to our interrogatories, the Staff states that Applicants have submitted an updated fire protection evaluation, dated April, 1982. We will update our response to this interrogatory after we have compared the new report with the 1977 report.

XVIII-4. NECNP has not yet arranged to have any expert

witnesses testify on Contention I.M.

G-1. NECNP relied on the following documents in responding to Applicants' interrogatories on Contention I.M.:

Standard Review Plan, BTP 9.5-1 App. A.

10 CFR 50.48

Letter from PSNH to NRC, dated August 29, 1977.

CLI-80-21.

FSAR at 1.8-43.

Response of NRC Staff to NECNP First Set of Interrogatories, etc. (Dec. 28, 1982), at 58.

XIX-1. No.

XX-1. Yes.

XX-2-4. NECNP has not yet obtained an expert evaluation of the materials in this proceeding relating to turbine missiles. We will supplement our answer when our consultants have review made their.

XX-5. NECNP has not yet arranged to have any expert witnesses testify on contention I.U.

XXII-2 - 4. NECNP has been concerned in this proceeding that the terms "safety related" and "important to safety"--previously used by the NRC to describe all equipment

which must be environmentally qualified--are thought of as distinct categories by Applicants and Staff, such that equipment defined as "important to safety" would be considered exempt from the NRC's environmental qualification requirements. The NRC has now promulgated a new rule on environmental qualification whose scope includes both equipment that is "safety related" and equipment "whose failure under postulated environmental conditions could prevent the satisfactory accomplishment of required safety functions by safety related equipment." 48 Fed. Reg. 2729 (January 21, 1982). NECNP adopts the definitions contained in the new rule for the purpose of determining the proper scope of Applicants' environmental qualification program.

XXI-5. Yes.

XXI-6. Applicants' updated version of Chapter 17 of the FSAR is still under review by our consultants. We will supplement our answer when the information becomes available.

XXI-7. NECNP has not yet arranged to have any expert witnesses testify on Contention II. B. 1.

G-1. See response to XXI-2-4.

XXII-1. Yes.

XXII-2. The basis for this contention is stated in our filings of April 26 and June 17. NECNP has reviewed

Applicants' August 1982 amendments to the FSAR, section 13.1, and concluded that the Quality Assurance program continues to be defective in that Applicants still have the Nuclear Quality Manager report to a supervisor who is responsible for production. NECNP contends that the Nuclear Quality Manager should instead report to the Vice President for Engineering.

XXII-3. NECNP has not yet arranged to have any expert witnesses testify on Contention II.B.3.

XXIII-1. Yes.

XXIII-2. NECNP is unable at this time to answer this interrogatory with any further specificity than that provided in our contention. See filings of April 26 and June 17, 1982. We will supplement our answer after our consultants have reviewed the FSAR.

XXIII-3. NECNP has not yet arranged to have any expert witnesses testify on Contention II.B.4.

XXIV-1. Yes.

XXIV-2. See answer to interrogatory XXIII-2.

XXIV-3. NECNP has not yet arranged to have any expert witnesses testify on Contention II.B.5.

XXV-1 - XXVIII-3. NECNP does not intend at this time to litigate the contentions of any other intervenors. If our position changes, we will supplement our answer.

XXIX-1. Yes.

XXIX-2. The emergency plan does not contain an adequate emergency classification and action level scheme, as required by 10 CFR 50.47(b) (4) and NUREG 0654, in that:

(a) No justification is given for the classification of various system failures as unusual events, alerts, site area emergencies, or general emergencies.

(b) The classification scheme minimizes the potential significance of transients.

(c) The Applicants' classification scheme fails to include consideration of specific plant circumstances, such as the anticipated time lag for evacuation due to local problems.

(d) The classification scheme fails to provide a reasonable assurance the Seabrook onsite and offsite emergency response apparatus and personnel can be brought to an adequate state of readiness quickly enough to respond to an accident.

(e) The emergency action level scheme fails to identify emergency action levels or classify them according to the required responses.

(f) The scheme is incapable of being implemented effectively to protect the public health and safety because it provides no systematic means of identifying, monitoring, analyzing, and responding to

the symptoms of transients and other indicators that transients may occur.

XXIX-3 -21. NECNP has provided examples of the deficiencies in Applicants' emergency classification scheme in the bases for its contentions on this issue. We have not had any experts review this issue, and therefore have nothing to add at this time. This answer will be updated as information becomes available.

XXIX-24, 25. See response to interrogatories XXIX-3 -21.

XXIX-26. No.

XXIX-27. N/A.

XXIX-28. At this time, NECNP has not identified any evacuation time estimates on which it will rely.

XXIX-29. NECNP has not yet arranged to have any expert witnesses testify on Contention III-1.

G-1. NECNP relied on the following documents in answering Applicants' interrogatories relating to Contention III.1:

10 CFR 50.47

NUREG 0654

Applicants' Radiological Emergency Plan

XXX-1. Yes.

XXXI-1 Yes

XXXI-2 In order to conform to Appendix E, §IV(F) of Part 50, Applicants must provide for the training of unit shift supervisors to deal with the special situations encountered in



emergencies. They include, but are not limited to, making choices among alternative responses under stress. NECNP will provide other specific requirements when this information becomes available from our experts.

XXXI-3 NECNP has not yet arranged to have any expert witnesses testify on Contention III.3.

G-1. See response to XXXI-2.

XXXII-1 Yes

XXXII-2 The deficiencies in Applicants' evacuation time estimates are listed in Contention III.12, NECNP Supplemental Filing on Emergency Planning Contentions (July 23, 1982) at 29-30.

XXXII-3-8 NECNP has not yet had any experts evaluate Contention III.12. We will supplement our answers to these interrogatories when the expertise becomes available to us.

XXXII-9 NECNP has not yet identified "each and every" difficulty associated with evacuation of the Seabrook area beaches. They include, however, the narrowness of the beach roads; congestion caused by roadside

parking; traffic buildup at intersections; the lack of stoplights at intersections; limited access roads to the beaches; and the existence in some areas of one-way streets where turning around is difficult.

XXXII-10 NECNP has obtained its knowledge of the difficulties of leaving the beach on a crowded weekend through conversations with numerous summer visitors to Seabrook. NECNP did not keep a record of these conversations.

XXXII-11 Counsel for NECNP interviewed Chief Robert Mark of the Hampton Police Department on July 16, 1982. Any notes of the meeting constitute undiscoverable attorney work product. The contents of this conversation are described in NECNP Contention III.12.

XXXII-12 NECNP has had no further conversation with Chief Mark about the evacuation, and cannot supply any additional information besides that contained in the basis of Contention III.12.

XXXII-13 NECNP has not arranged for the testimony of any expert witnesses regarding Contention III.12.

XXXIII-1 Yes

XXXIII-2-5 NECNP has not had Contention III.13 evaluated by experts. We will supplement our answers to interrogatories regarding Contention III.13 when the information becomes available.

XXXIII-6 Evacuee directional bias is the tendency of populations to move in a particular direction when evacuating in a crisis. One study of the accident at Three Mile Island, for example, showed a strong directional bias toward the northwest. The study attributed the bias to such factors as

preference for a site upwind from the plant; a psychological attraction to the mountains in times of danger; and a reluctance to move toward more densely populated areas. See Zeigler, et al., "Evacuation from a Nuclear Technological Disaster," Geographical Review, Vol. 71, No. 1, January 1981, at 8-9.

XXXIII-7 NECNP has not performed any evacuation time estimates for Seabrook.

XXXIII-8-9. See response to XXXIII-2-5.

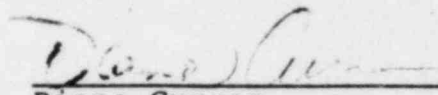
XXXIII-10 The term "evacuation shadow" refers to the tendency of an official evacuation advisory to cause departure from a much larger area than was originally intended. See Zeigler, supra at response to XXXIII-7, page 7.

XXXIII-11 NECNP has not performed any evacuation time estimates for Seabrook.

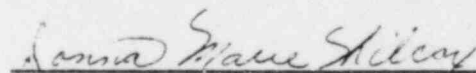
XXXIII-12 - 20. See response to XXXIII-2 - 5.

XXXIII-21. NECNP has not yet arranged to have any expert witnesses testify on this contention.

I hereby affirm that the facts alleged herein are true and correct to the best of my knowledge and belief.

  
Diane Curran

Subscribed and sworn to before me this 21st day of January, 1983.

  
Notary Public

My Commission Expires July 31, 1987

CERTIFICATE OF SERVICE

I certify that copies of NECNP's Response to Applicants' Interrogatories and Request for the Production of Documents was mailed January 21, 1983 by first-class mail to the following:

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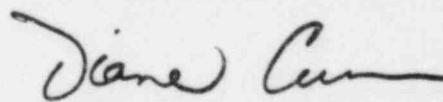
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