

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

APPLICANTS' ANSWERS TO "NECNP MOTION
TO COMPEL ANSWERS BY APPLICANTS TO
NECNP SECOND SET OF INTERROGATORIES ON
CONTENTIONS I.D.1, I.D.4, I.F, I.I., I.L, AND II.B"

Pursuant to 10 CFR §§ 2.730(c) and 2.740(f), the Applicants' hereby answer the "NECNP Motion to Compel Answers by Applicants to NECNP Second Set of Interrogatories on Contentions I.D.1, I.D.4, I.F, I.I., I.L, and II.B" served upon them by NECNP on February 16, 1983.

DSO 3

Interrogatory No. 3

There are two problems with this request, which is for a draft of an operational document prepared by someone else which the Applicants have not yet determined suffices as even a draft of the operational document to be used at Seabrook. The first is that, at least until the draft has been accepted by the Applicants, at least preliminarily, for use at Seabrook, it is not relevant to any issue in this case -- bearing in mind that the document in question is not evidentiary in the traditional testimonial sense, but rather constitutes (or, more precisely, will constitute when and if adopted by the Applicants) an operational document containing procedures the adequacy of which might be relevant. Prior to the time the document is so approved, its production is not only a waste of time, it presents the potential for confusion and distraction that would be counterproductive to the orderly conduct of this proceeding.

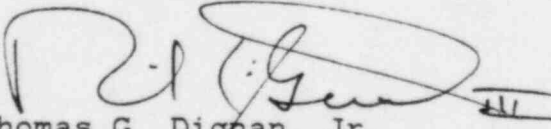
The second difficulty is that NECNP has indicated that it intends to withdraw the contention on which this question is based. If the contention is no longer

viable, the interrogatory is not relevant to any issue in the proceeding.

Interrogatory No. 7

This interrogatory, which is arguably an attempt to "back door" questions dealing with the rejected contentions on "systems interaction," was (consistent with this Board's ruling on documents relating to the PRA) answered insofar as the Applicants believe that they have any existing documents that are described in the question. The fact that NECNP believes that additional studies should have been made is immaterial; and the fact that NECNP believes that the studies to which the Applicants referred need not have been identified renders the answer simply an excess of caution. The Applicants have no additional studies to identify.

Respectfully submitted,


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Dated: February 28, 1983

CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on February 28, 1983, I made service of the within "Applicants' Answers to 'NECNF Motion to Compel Answers by Applicants to NECNF Second Set of Interrogatories on Contentions I.D.1, I.D.4, I.F, I.I., I.L, and II.B'" by mailing copies thereof, postage prepaid, to:

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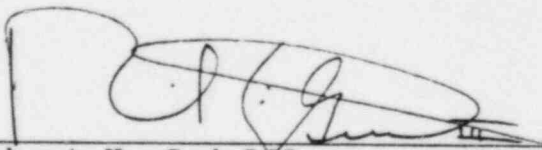
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