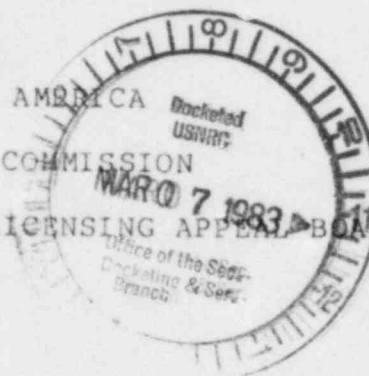


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



In the Matter of)
)
)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
)

(Seabrook Station, Units 1)
and 2))
)

Docket Nos. 50-443
50-444

NECNP MOTION FOR AN IMMEDIATE STAY OF OBLIGATION
TO ANSWER MOTIONS FOR SUMMARY JUDGMENT

NECNP has filed with the Board the attached "Motion for Deferral of Consideration of Motions for Summary Disposition or for Dismissal," which urges the Board to rule, inter alia, that summary judgment motions may not be considered until the Staff has filed its Safety Evaluation Report. The motion also requests the Board to hold in abeyance or to dismiss the pending motions for summary disposition which have been filed by the Applicants and Staff until a reasonable period after the SER has been filed. Because NECNP's answers to Applicants' summary judgment motions are due March 4, 7, 8, 9, and 11, NECNP requests the Board to take immediate action to suspend NECNP's obligation to answer these motions until the Board has made its decision on the attached Motion for Deferral of

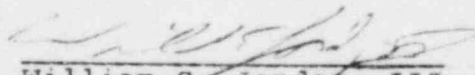
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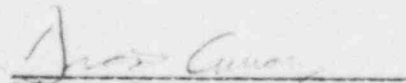
Consideration. If the Board should rule against NECNP, we request an additional ten days after the ruling to answer the motions for summary judgment.

This stay motion is necessary in order to relieve NECNP and other parties of the unnecessary burden of responding to summary disposition motions pending resolution of our Motion for Deferral. If that motion is granted, virtually all effort expended now in responding to summary disposition arguments will be wasted, and the Board will be burdened with an entire unnecessary set of filings. We emphasize as well that a decision to stay the deadline for summary disposition responses would not harm either the Applicants or the Staff in any way. Even if NECNP's Motion to Defer were denied, the result would be only a few weeks' delay in NECNP's responses to the summary disposition motions, and a similar brief delay in the Board's rulings. All other aspects of the proceeding would continue on schedule, and the summary disposition motions would still be resolved well in advance of the currently scheduled hearing date. Thus, equitable considerations favor granting this stay request pending resolution of the underlying motion.

Because of the time constraints involved, NECNP requests that the Board rule on this motion for an immediate stay by Monday, March 7, 1983. We request the Board to convey its ruling by telephone to all the parties who are obligated to answer summary judgment motions. This motion has been served today on the Applicants by Federal Express, and on the Staff by hand.

Respectfully submitted,


William S. Jordan, III


Diane Curran

Dated: March 3, 1983