

April 1, 1991 DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'91 APR -4 P4:53

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Ivan Smith, Chairman  
Kenneth A. McCollum  
Richard F. Cole

In the Matter of )

PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, et al. )  
(Seabrook Station, Unit 1) )

Docket No. 50-443-OL  
(Offsite Emergency  
Planning Issues)

PETITION FOR LEAVE TO INTERVENE IN THE TRANSFER  
OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S OWNERSHIP  
INTEREST IN SEABROOK STATION TO NORTHEAST UTILITIES

NOW COMES the Seabrook Anti-Pollution League and petitions to  
intervene pursuant to 10 C.F.R. 2.714 upon the following bases:

1. The petitioner is a citizens' organization with a  
principal place of business at 5 Market Street, Portsmouth, New  
Hampshire, and representing the interests of citizens of the  
seacoast area of New Hampshire, and northeastern Massachusetts,  
most of whom are within the ten-mile emergency planning zone for  
the Seabrook Nuclear Power Plant, and who stand to be affected by  
any increase in risk caused by the proposed license amendment.  
The Seacoast Anti-Pollution League has been an intervenor before  
the NRC in regard to the licensing of Seabrook, both as to the  
construction permit, and as to the operating license.

2. As described in the application, Northeast Utilities  
(NU) desires to acquire Public Service Company of New Hampshire

(PSNH) and therefore, PSNH's rights and ownership interests in the Seabrook Nuclear Station, located in New Hampshire. It proposes to acquire this interest through a newly-created and wholly-owned subsidiary, North Atlantic Energy Corporation (NAEC).

3. NU is the principal owner and operator of the Millstone Nuclear Power Plant in Connecticut. As such, NU is currently under investigation by the NRC concerning the grossly unfair treatment of several Millstone employees who are nuclear whistleblowers. The NRC investigation was triggered by a Department of Labor complaint. Supporting sources concerning the NRC investigation are newspaper and magazine articles.

4. Specifically, the NRC is investigating a possibly pervasive pattern of intimidation and harassment of Millstone employees by NU management. The employees were intimidated and harassed for reporting to the NRC possible violations of nuclear regulations.

5. Such a practice on the part of NU management violates 10 C.F.R. 50.7 which protects employees from discrimination for reporting safety violations occurring at Millstone. On information and belief, the NRC Office of Investigations now has four investigators looking into the allegation by the Millstone whistleblowers.

6. Additionally, the NRC's Systematic Assessment of Licensee Performance (SALP) Report Nos. 50-245/89-99; 50-336/89-99; 50-423/89-99, III. G. Safety Assessment/Quality Verification