

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 and 2)

Docket Nos.: 50-443

and

50-444

April 14, 1983

MOTION OF THE STATE OF NEW HAMPSHIRE
TO AMEND CONTENTIONS NH-9 AND NH-13

Responding to the Board's request at the April 7-8, 1983
prehearing conference, New Hampshire proposes that the Board adopt the
following amended contentions:

NH-9 Radioactivity Monitoring

The Seabrook design does not provide an adequate program for
monitoring the release of radioactivity to the plant and its
environs under post-accident circumstances. Thus, the Applicant
has not complied with the requirements of NUREG-0737, Item
II.B.3.

NH-13 Operations Personnel Qualifications and Training

- (a) The Applicant has not complied with NUREG 0737, Item
I.A.1.1, in that it has not provided for a separate
position of shift technical advisor (STA) or an acceptable
equivalent to a separate STA position.
- (b) The Applicant has also not complied with NUREG-0737, Item
I.C.1 and §7.1 of Supplement 1 to NUREG 0737, in that its
training program does not include adequate upgraded
emergency operating procedures.

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Counsel for the NRC Staff and for the Applicant have reviewed these amendments, and neither objects to the re-phrasing of Contention NH-9.

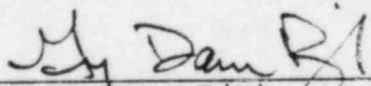
The Staff also has no objection to amended Contention NH-13(a); the Applicant, however, has not agreed to this proposed amendment. The Staff and the Applicant have also both indicated to New Hampshire that they cannot agree to the rewording of amended Contention NH-13 (b).

Although negotiations with the Staff and the Applicant did not result in agreement on the re-phrasing of each of these contentions, New Hampshire maintains that the amended contentions accurately narrow the focus of the issues originally raised by New Hampshire and admitted by the Board. Therefore, New Hampshire respectfully requests that the Board adopt amended Contentions NH-9 and NH-13 (a) and (b).

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

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Dated: April 14, 1983