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intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" with respect to any document shall mean to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

1. With respect to NECNP Contentions 1, 2, 3, 4, 5, 7, 9, 10, 12, and 13 on the New Hampshire RERP, please provide the following information:

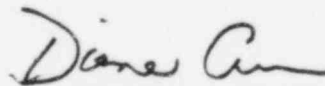
a. What is Applicant's position with respect to this contention? Describe in detail the reasons for your position.

b. Identify and provide access to all documents on which you rely during this proceeding to support your position on this contention. This includes all documents used in answers to these interrogatories, summary disposition motions, testimony, and cross-examination of witnesses during hearings.

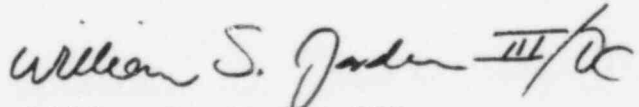
c. Identify all persons you may call as witnesses on these contentions during these proceedings, and describe any documents and the portions thereof that they may rely on for their testimony.

2. Identify and provide access to all documents in your possession relating to or mentioning in any way the New Hampshire Radiological Emergency Response Plan.

Respectfully submitted,



Diane Curran



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