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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the matter of:

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

Docket Nos.

50-443 OL  
50-444 OL

(Seabrook Station, Units 1 and 2)

SAPL'S ANSWER IN SUPPORT OF NECNP'S REPLY TO RESPONSES  
BY APPLICANTS AND STAFF TO NECNP CONTENTIONS ON THE NHRERP

SAPL answers in support of the position taken by NECNP with respect to litigation of implementation procedures.

For the reasons stated by NECNP in its Reply of September 23rd, SAPL urges the Board to allow litigation of the implementation procedures with respect to both the State and local RERP's. The bottom line "adequacy" of the plans as defined by 10 C.F.R. §50.47 can only be determined after a full hearing on the capability of sponsoring governments to carry them out.

Respectfully submitted,  
Seacoast Anti-Pollution League  
By its attorneys,  
BACKUS, SHEA & MEYER

By: \_\_\_\_\_

Robert A. Backus  
116 Lowell St., Box 516  
Manchester, N.H. 03105  
Tel: (603) 668-7272

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PDR ADOCK 05000443  
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