

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING APPEAL BOARD

Before Administrative Judges:  
Alan S. Rosenthal, Chairman  
Gary J. Edles  
Howard A. Wilber

In the Matter of	)	February 25, 1988
	)	
PUBLIC SERVICE COMPANY OF	)	
NEW HAMPSHIRE, et al,	)	Docket Nos. 50-443-OL
	)	50-444-OL
(Seabrook Station, Units 1	)	
and 2)	)	Off-Site Emergency
	)	Planning
	)	

JOINT INTERVENOR APPEAL BY MOTION  
FOR DIRECTED CERTIFICATION

NOW COME the Town of Amesbury, Town of Hampton, Seacoast Anti-Pollution League and the New England Coalition on Nuclear Pollution (hereinafter "Intervenors") and jointly move for directed certification of the ASLB's MEMORANDUM AND ORDER dated February 17, 1988, and served upon Intervenors on February 18, 1988, which, inter alia, established the schedule for three discrete litigation "tracks" now pending before the off-site Licensing Board. As defined by the Board, the first, or "Main," track specifies time frames for filing proposed findings on all issues litigated concerning the New Hampshire Radiological Emergency Response Plan (NHRERP), excluding sheltering; the

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CONCLUSION

Under the present Licensing Board schedule, Intervenor will, at a minimum, be effectually precluded from a reasonable time to prepare proposed findings on the NHRERP. Alternatively, Intervenor will be denied a meaningful opportunity to develop critical safety issues through contentions on the SPMC. Intervenor are, therefore, saddled with a classic Hobson's choice from which this Appeal Board should provide appropriate and reasonable relief.

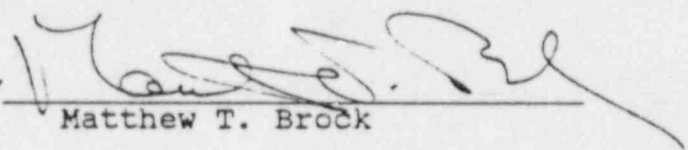
Given the limited time available, Intervenor respectfully request this Board to expedite consideration of this appeal.

Respectfully submitted,

TOWN OF AMESBURY  
TOWN OF HAMPTON  
By Their Attorneys  
SHAINES & McEACHERN  
Professional Association

Dated: February 25, 1988

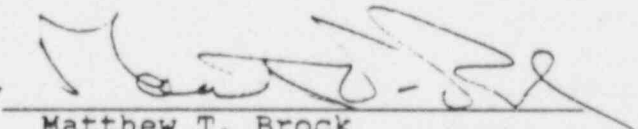
By

  
Matthew T. Brock

Intervenor  
SEACOAST ANTI-POLLUTION LEAGUE  
and NEW ENGLAND COALITION ON  
NUCLEAR POLLUTION

Dated: February 25, 1988

By

  
Matthew T. Brock  
Authorized Representative

CERTIFICATE OF SERVICE

I, Matthew T. Brock, one of the attorneys for the Town of Amesbury and Town of Hampton herein, hereby certify that on February 25, 1988, I made service of the foregoing document, INTERVENORS' NOTICE OF APPEAL and JOINT INTERVENOR APPEAL BY MOTION FOR DIRECTED CERTIFICATION, by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

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\*UPS Next Day Air



CERTIFICATE OF SERVICE

88 MAR -7 P4:41

I, Matthew T. Brock, one of the attorneys for the Town of Amesbury and Town of Hampton herein, hereby certify that on March 4, 1988 I made service of the foregoing document, CORRECTION OF ERRATA AND SUBSTITUTION OF PAGES TO "INTERVENORS' & SERVICE NOTICE OF APPEAL" AND "JOINT INTERVENOR APPEAL BY MOTION FOR DIRECTED CERTIFICATION", by depositing copies thereof in the United States Mail, first class postage prepaid for delivery (or, where indicated, by Express Mail, prepaid) addressed to:

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