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March 22, 1988

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UNITED STATES NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'88 MAR 28 P4:26

In the Matter of )

Public Service Company of )  
New Hampshire, et al. )

(Seabrook Station, Units 1 & 2) )

OFFICE OF SECRETARY  
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BRANCH

Docket No. 50-443 OL-1/444-OL-1

ONSITE EMERGENCY  
PLANNING & TECHNICAL  
ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S MOTION  
TO COMPEL APPLICANTS TO RESPOND TO NECNP'S THIRD SET OF  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS ON NECNP CONTENTION IV

1. The New England Coalition on Nuclear Pollution ("NECNP") hereby requests that the Licensing Board order Applicants to provide answers to Interrogatories No. 4, 5, 6, 7, 14, requesting information regarding microbiologically induced corrosion.<sup>1</sup> Granting this motion would be appropriate should the Board decide that the issue of microbiologically induced corrosion is within the scope of NECNP Contention IV.

2. In support of this motion to compel, NECNP refers the Board to the arguments set out in "NECNP's Motion to Compel Applicants to Respond NECNP's Second Set of Interrogatories and

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1 NECNP's Third Set of Interrogatories and Request for Production of Documents to Applicants on NECNP Contention IV," filed February 19, 1988.

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Request for Production of Documents on NECNP Contention IV," dated January 25, 1988" and "NECNP's Motion or Reconsideration of the Board's Denial of NECNP's Motion to Compel, dated February 17, 1988," dated March 1, 1988.

3. In their response to NECNP's Third Set of Interrogatories to Applicants on NECNP Contention IV, Applicants again re-defined "biofouling" as follows:

extensive settlement of fouling organisms, resulting in significant percentages of the surfaces being covered and thus measurable affecting flow or heat exchanger efficiency. 'Settlement' means colonization on plant surfaces by fouling organisms, primarily mussels and barnacles.

"Applicant's [sic] Responses to NECNP's Third Set of Interrogatories and Request for Production of Documents to Applicants on NECNP Contention IV," filed March 7, 1988, at 3. To the extent that Applicants' responses to "NECNP's Third Set of Interrogatories and Request for Production of Documents on NECNP Contention IV" are based on an improperly narrow definition of "biofouling," their answers to these questions are partially unresponsive.<sup>2</sup> Accordingly, NECNP requests that the Board order Applicants to provide answers based on the general definition of

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2 See "NECNP's Motion to Compel Applicants to Respond to NECNP's Second Set of Interrogatories and Request for Production of Documents on NECNP Contention IV," dated January 25, 1988, at 13-15, and "NECNP's Motion for Reconsideration of the Board's Denial of NECNP's Motion to Compel, dated February 17, 1988," dated March 1, 1988, at 8-10, and Exhibit A (Affidavit of Dr. James Bryers, at Para. 6.)

"biofouling" contained in NECNP's Third Set of Interrogatories and Request for Production of Documents to Applicants on NECNP Contention IV.<sup>3</sup>

4. NECNP also requests that the Board order Applicants to provide information with respect to circulating water systems other than cooling systems in response to Interrogatories Nos. 4, 5, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, on the grounds that these interrogatories are clearly "relevant to the subject matter involved in the proceeding...[or which] appears reasonably calculated to lead to the discovery of admissible evidence." 10 C.F.R. § 2.740(b)(1).<sup>4</sup>

Respectfully submitted,

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3 NECNP defined "biofouling" as "any degree of micro- or macro-biologically cell deposition and subsequent biologically mediated corrosion of nuclear power plant cooling systems by aquatic debris, macro- or micro-biological organisms, silt, and mud, or by any other organic or inorganic material." NECNP's Third Set of Interrogatories and Request for Production of Documents to Applicants on NECNP Contention IV," filed February 19, 1988, at 3.

4 See "NECNP's Motion to Compel Applicants to Respond to NECNP's Second Set of Interrogatories and Request for Production of Documents on NECNP Contention IV," dated January 25, 1988, at 2-5.

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CERTIFICATE OF SERVICE

I certify that on March 22, 1988, copies of the foregoing pleading were served by first-class mail on all parties listed on the attached service list.

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