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CITY OF HAVERHILL
MASSACHUSETTS

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CITY SOLICITOR

April 4, 1988

In the matter of

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.

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

(Seabrook Station, Units 1 and 2)

CITY OF HAVERHILL, MASS. - CONTENTIONS

The City of Haverhill presents the following contentions:

CONTENTIONS BY THE CITY OF HAVERHILL
FOR THE MASSACHUSETTS EMERGENCY RESPONSE PLAN

The Emergency Response Plan does not consider Haverhill in its evacuation plan even though a portion of Haverhill is within the ten (10) mile limit. The City of Haverhill with a population of 50,000 demands to be included in the Emergency Response Plan. No provisions have been made for evacuation of schools, nursing homes, hospitals and day care centers or for any other related facility. Said facilities are located in close proximity to the (ten) 10 miles.

Also, note that Public Service of New Hampshire intends to use the Massachusetts Electric Facility on Water Street for a staging area. The City of Haverhill has obtained a temporary injunction in the Massachusetts Superior Court prohibiting said facility from being used as a staging area.



Ashod N. Amirian
Assistant City Solicitor

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'88 APR -6 P4:26

CITY OF HAVERHILL
MASSACHUSETTS

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CITY SOLICITOR

April 4, 1988

City of Haverhill, Mass.
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CONTENTIONS BY THE CITY OF HAVERHILL

In the matter of

PUBLIC SERVICE COMPANY
OF NEW HAMPSHIRE, et al

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

(Seabrook Station, Units 1 and 2)

CERTIFICATE OF SERVICE

I, Ashod N. Amirian, Esquire, Assistant City Solicitor for the City of Haverhill, hereby certify that on April 4, 1988, copies of the "City of Haverhill, Mass. - Contentions" in the above-captioned proceedings have been served on the following by deposit in the United States Mail, first class, this 4th day of April, 1988.

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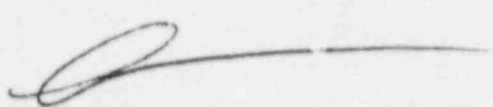
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