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



In the Matter of )

BOSTON EDISON COMPANY, et al., )

(Pilgrim Nuclear Generating )  
Station, Unit 2)

Docket No.  
50-471

MOTION OF INTERVENOR  
CLEETONS  
FOR CONSIDERATION OF  
THE ISSUE OF EMERGENCY PLANNING

The Commonwealth of Massachusetts has moved that the Board admit two new contentions which relate to the issue of emergency planning. NRC Staff has responded by document dated May 17, 1979, in support of the Commonwealth's Motion, although the Staff would prefer the admission of a single contention on the feasibility of emergency planning, with the parties "to negotiate the formulation of an acceptably worded contention."

As the Commonwealth's Motion recapitulates, the intervenor Cleetons had originally requested the admission of a contention raising the very same issue of emergency planning, which was supported by the NRC staff, but rejected

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by the Licensing Board on February 18, 1975. The Cleeton's appeal of this rejection to the Atomic Safety and Licensing Appeals Board was dismissed by the Appeals Board as interlocutory on April 28, 1975. The Appeals Board in its decision, however, made the observation:

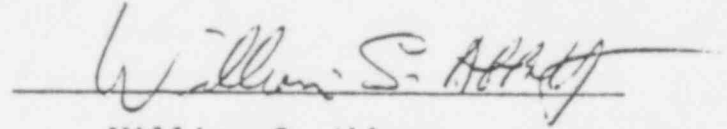
"Our dismissal of this appeal on procedural grounds of course connotes no agreement with the ruling below, viz., that the feasibility of developing a suitable evacuation plan need not be explored in a construction permit proceeding where such a plan exists for another reactor existing at the same site. Similarly, our action here also does not reach the question, urged on us by the applicants but not decided by the Board below, whether there is any need to plan for emergency evacuation of people from areas beyond the outer boundary of the plant's low population zone. Those issues may be lurking in the proceeding, but they are not appropriate for our consideration at this time."

The Intervenor Cleetons hereby move for the admission of a contention regarding the feasibility of developing an emergency plan for Pilgrim 2. The reasoning and arguments in support of such Motion are adequately and fully set forth by the Commonwealth in the Commonwealth's Motion For Consideration of the Issue of Emergency Planning. Further, inasmuch as the Cleetons had originally proposed the admission of such contention, the Cleetons request that such contention, if now admitted, be considered the joint contention of the Commonwealth and the Cleetons, and that the Cleetons, through their attorney, be permitted to participate in the wording of the contention and the introduction of evidence on same.

Respectfully submitted,

Mr. and Mrs. Alan R. Cleeton

By their Attorney:

A handwritten signature in cursive script, reading "William S. Abbott", written over a horizontal line.

William S. Abbott  
50 Congress St.  
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(617)-523-5520

Boston, Massachusetts

May 21, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the matter of  
BOSTON EDISON COMPANY, et al.  
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CERTIFICATE OF SERVICE

I hereby certify that the within "MOTION OF INTERVENOR CLEETONS FOR CONSIDERATION OF THE ISSUE OF EMERGENCY PLANNING" has been served on the following by deposit of copies thereof in the United States Mail, first class or air mail, postage prepaid this 21st day of May, 1979:

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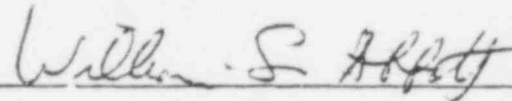
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A handwritten signature in cursive script, reading "William S. Abbott", is written over a horizontal line.

William S. Abbott