

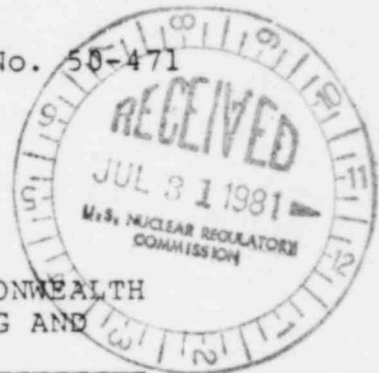
7/27/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of
BOSTON EDISON COMPANY, et al.
(Pilgrim Nuclear Generating
Station Unit 2)

Docket No. 50-471



APPLICANTS' INTERROGATORIES TO THE COMMONWEALTH
OF MASSACHUSETTS ON EMERGENCY PLANNING AND
TMI-2 RELATED ISSUES

Pursuant to 10 CFR §§2.740 and 2.740b, the following
interrogatories are propounded to the Commonwealth of Massa-
chusetts to be answered fully in writing and under oath.

1. Please state in detail each respect in which the
Commonwealth of Massachusetts contends that the Appli-
cants' preliminary plans for coping with emergencies
fails to comply with the requirement of 10 CFR 50,
Appendix E, Part II.
2. Please identify each fact upon which the Commonwealth
of Massachusetts relies in support of its answer to

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interrogatory number 1. Please identify each document, and the particular parts thereof, of which the Commonwealth is aware which supports each fact so identified in this interrogatory. Please further indicate each such document which the Commonwealth intends to offer in evidence in this proceeding. For the purpose of this interrogatory, please utilize the same definition of the word "document" as provided in the Commonwealth's interrogatories to Boston Edison Company.

3. Please state in detail each respect in which the Commonwealth of Massachusetts contends that the Applicants either fail to address or inadequately address the provisions of NUREG 0718, Revision 1, in their application for a construction permit, including the PSAR and amendments thereto.
4. Please identify each fact upon which the Commonwealth of Massachusetts relies in support of its answer to interrogatory number 3. Please identify each document, and the particular parts thereof, of which the Commonwealth is aware which supports each fact so identified in this interrogatory. Please further indicate each such document which the Commonwealth intends to offer in evidence in this proceeding. For the purpose of this interrogatory, please utilize the same definition

of the word "document" as provided in the Commonwealth's interrogatories to Boston Edison Company.

5. For each item contained under the heading "TMI-2 Related Requirements" in the Staff's Supplement No. 6 to the Safety Evaluation Report for Pilgrim Unit 2 (which items are located on pages 4-51 of that document) please state whether the Commonwealth agrees with the Staff's conclusion. If the Commonwealth disagrees with a particular item in any respect, please state, in detail, all reasons for such disagreement. If the Commonwealth takes no position or neither agrees nor disagrees with a particular item, please state what efforts the Commonwealth has undertaken or intends to undertake between now and the date of hearing to establish a position as to such item.
6. Please identify each fact upon which the Commonwealth of Massachusetts relies in support of its answer to interrogatory number 5. Please identify each document, and the particular parts thereof, of which the Commonwealth is aware which supports each fact so identified in this interrogatory. Please further indicate each such document which the Commonwealth intends to offer in evidence in this proceeding. For the purpose of

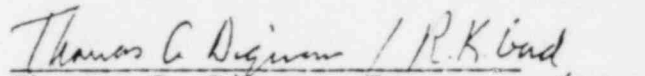
this interrogatory, please utilize the same definition of the word "document" as provided in the Commonwealth's interrogatories to Boston Edison.

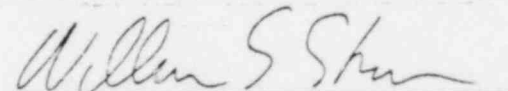
7. For each item labelled "Requirement" under the heading of "Emergency Planning" in the Staff's Supplement No. 5 to the Safety Evaluation Report for Pilgrim Unit 2 (which items are located on pages 13.3-1 through 13.3-10 of that document) please state whether the Commonwealth agrees with the Staff's conclusion. If the Commonwealth disagrees with a particular item in any respect please state, in detail, all reasons for such disagreement. If the Commonwealth takes no position or neither agrees nor disagrees with a particular item, please state what efforts the Commonwealth has undertaken or intends to undertake between now and the date of the of hearing to establish a position as to such item.
8. Please identify each fact upon which the Commonwealth of Massachusetts relies in support of its answer to interrogatory number 7. Please identify each document, and the particular parts thereof, of which the Commonwealth is aware which supports each fact so identified in this interrogatory. Please further indicate each

such document which the Commonwealth intends to offer in evidence in this proceeding. For the purpose of this interrogatory, please utilize the same definition of the word "document" as provided in the Commonwealth's interrogatories to Boston Edison.

9. Please identify each witness whom the Commonwealth of Massachusetts intends to have testify on its behalf on the subjects of emergency planning or TMI-2 related issues in this proceeding. Please state the relevant qualifications and background of such witness along with the subject matter upon which such witness is expected to testify and the substance of such witness's testimony.

Respectfully submitted,


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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
)

BOSTON EDISON COMPANY, et al.)
)

(Pilgrim Nuclear Generating)
Station, Unit 2))
)

Docket No. 50-471

CERTIFICATE OF SERVICE

I hereby certify that the Applicants' Interrogatories to the Commonwealth of Massachusetts on Emergency Planning and TMI-Related Issues filed in the above-captioned matter has been served on the following by deposit of a copy thereof in the United States mail, first class, postage prepaid:

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Dated: July 27, 1981