

Attachment A

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),

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)
) Docket No. 50-471
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)

COMMONWEALTH OF MASSACHUSETTS'
APPLICATION FOR A SUBPOENA

Pursuant to 10 C.F.R. §2.720(a), and for the reasons outlined in its Answer in Opposition to Staff's Motions for a Protective Order, the Commonwealth hereby applies for the issuance of a subpoena directing the Argonne National Computer Center, 97005 Cass Avenue, Argonne, Illinois 60439, to produce at the offices of the Attorney General of Massachusetts, One Ashburton Place, 19th Floor, Boston, Massachusetts 02108, on or before August 10, 1981, at 10:00 a.m. any computer software or document containing or describing any modification or improvement made to the so-called "CRAC Code" since its original development.

The term "document" as used herein shall refer to the original and copy (but not both if identical in every respect) of any printed, written, recorded, transcribed, punched, taped, filmed, photographed or graphic matter in the possession,

custody, or control of the Argonne National Computer Center, whether sent or received or neither, whether a draft or otherwise, however produced or reproduced, and both sides thereof, including but not limited to, any memorandum, correspondence, letter, affidavit, court paper, transcript, diary, report, study, telegram, table, telex message, record, chart, paper, work paper, graph, index, book, notebook, pamphlet, periodical, tape, data sheet, data processing card, note, notation, sound recording, computer print-out or microfilm.

For the Commonwealth,

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Dated: *July 24, 1981*

Atomic Safety and Licensing
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U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
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U.S. Nuclear Regulatory
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Washington, D.C. 20555

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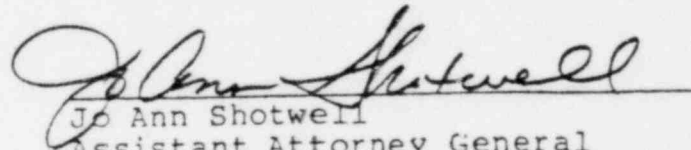
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