

RELATED CORRESPONDENCE

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' RESPONSE TO  
COMMONWEALTH'S REQUEST FOR  
THE PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. § 2.741(d), the Applicants hereby respond to the Commonwealth's Request for the Production of Documents (First Set) as follows:

1. The Applicants have already produced the documents described in paragraph 1 of the request.

2-4. In response to paragraphs 2, 3 and 4, the Applicants will allow the Commonwealth to inspect the files of those employees of Boston Edison Company who are primarily responsible for so much of the pending construction permit application as relates to matters

concerning 10 C.F.R. App. E, exclusive of material (if any), that is privileged, confidential or classified or that constitutes work product within the meaning of 10 C.F.R. § 2.740 (b)(2), at the offices of Boston Edison Company, 800 Boylston Street, Boston, at a time convenient to the parties. Except as herein stated, the Applicants object to these requests on the ground that they are overly broad, unduly burdensome, and fail to describe the materials requested with requisite particularity. See Illinois Power Co. (Clinton Power Station, Units 1 & 2), ALAB-340, 4 N.R.C. 27, 34 (1976).

By its attorneys,

/s/ Thomas G. Dignan, Jr.  
/s/ R. K. Gad III

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Attorneys for the Applicants

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CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the applicants herein, hereby certify that on August 4, 1981, I made service of the within document by mailing copies thereof, postage prepaid, first class or airmail, to:

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