

RELATED CORRESPONDENCE

A circular postmark with a double-lined border. The outer ring contains numbers 1 through 12, representing the months of the year. The center of the circle contains the date "AUG 10 1981" followed by a right-pointing arrow. Below the date, the text "Office of the Secretary" and "Marketing & Service Branch" is printed in two lines.

In the Matter of:

BOSTON EDISON COMPANY, et al.
(Pilgrim Nuclear Generating
Station, Unit 2),

Docket No. 50-471

COMMONWEALTH OF MASSACHUSETTS
SECOND SET OF
INTERROGATORIES TO
BOSTON EDISON COMPANY
RELATIVE TO EMERGENCY PLANNING



Pursuant to 10 C.F.R. §§2.740b and 2.741, the Intervenor Commonwealth of Massachusetts requests that the following Interrogatories be answered fully, in writing, and under oath by an officer or agent of Boston Edison Company (hereinafter, "B.E. Co.")

Each question is to be answered in four parts as follows:

- A. Provide the direct answer to the question.
- B. Identify each document, and the particular parts thereof, which in any way serves as a basis for the answer.
- C. Identify all documents known to BE Co. which pertain to the subject matter questioned but which do not serve as bases for the Staff's

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answer, including documents which provide or support an answer different from that provided by BE Co.

- D. Identify the expert(s), if any, whom BE Co. intends to have testify on the subject matter questioned and state their qualifications.

For purposes of these instructions the term "document(s)" refers 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, 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, minute desk calendar, appointment book, sound recording, computer print-out or microfilm.

INTERROGATORIES

1. Please clarify the following aspects of BE Co's answer to Interrogatory No. 8 of the Commonwealth's First Set of Interrogatories to Boston Edison Company Relative to Emergency Planning:

- a. BE Co. states, in the third paragraph of its answer, that ". . . spaces are available in public buildings and offices which could accommodate peak

seasonal populations . . ." . Does this reference to "peak seasonal populations" include the peak transient populations?

b. BE Co. refers in the last sentence of the third paragraph, and again in the last paragraph, to "category 2" level of protection. Please explain these references, citing any NRC or other federal guidance from which this system of categorization is derived.

c. Please explain the meaning of the following phrase contained in the footnote on page 18 of BE Co.'s Answers to the Commonwealth's First Set of Interrogatories--"this figure . . . assumes a 100% existing ratio for the Plymouth total of both existing and upgradable spaces."

2. The Staff has indicated, in response to Interrogatory No. 34 of the Commonwealth's First Set of Interrogatories to the NRC Staff Relative to Emergency Planning, that it has asked BE Co. to provide evacuation time estimates assuming the weather condition of rain. Does BE Co. intend to comply with this request? If so, by what date? Describe the exact nature of the weather condition to be assumed. Specifically, will the assumption involve a rainfall

mid-day on a summer weekend after beaches are full? If BE Co. has already performed an analysis of evacuation times at Pilgrim assuming the condition of rain, explain in detail the results of that analysis.

3. BE Co. states, in its answer to Interrogatory No. 56 of the Commonwealth's First Set of Interrogatories to Boston Edison Company Relative to Emergency Planning, that "there are no 'ranges' as such associated with these types of devices." This answer seems inconsistent with the reference in SER Supplement No. 6, at p. 39, to a "high-range radiation monitor." Please explain this apparent inconsistency and describe in detail any ranges which you determine are in fact associated with these devices.

4. BE Co. refers, at p. 1C-8 of Amendment 43 to the Pilgrim PSAR, to "the current Emergency Preparedness evacuation model." Does this refer to the model used by HMM Associates, Inc. in its calculation of evacuation time estimates as described in Amendments 40 and 41 of the PSAR? If not, describe the referenced model in detail.

5. BE Co. states, in its answer to Interrogatory No. 31 of the Commonwealth's First Set of Interrogatories to Boston Edison Co. Relative to Emergency Planning, that "[t]he frequency of hurricanes, earthquakes and tornados put them beyond the bounds of any reasonable 'adverse case' definition." What, in the opinion of BE Co., is the frequency of each of these events at the Pilgrim site?

6. BE Co. explains, in its answer to Interrogatory No. 41 of the Commonwealth's First Set of Interrogatories to Boston Edison Co. Relative to Emergency Planning, that the projected doses and dose rates contained in Section 13.3.5.3 of the PSAR are to be used to classify an accident into the General Emergency, Site Emergency, or Alert categories. Are these projected doses and dose rates identical to those included in NUREG-0654 as Example Initiating Conditions for each emergency class? If not, explain in detail the nature of and reasons for any deviation. With respect to any projected dose or dose rate which is not identical to that included in the applicable list of Example Initiating Conditions in NUREG-0654, indicate whether that projected dose or dose rate is consistent in all respects with each of the conditions included in that list and explain the nature of and reasons for any inconsistency.

NOTE: Instructions B-D above do not apply to the following Interrogatories Nos. 7 and 8.

7. Please provide, for each individual whom BE Co. intends to call as a witness on emergency planning matters, a list of all proceedings of any kind before any tribunal in which said individual has testified and the subject matter of his testimony on each such occasion.

8. Please provide, for each individual whom BE Co. intends to call as a witness on emergency planning matters, a list of all reports, studies, papers, articles, and books,

whether published or not, and whether a draft or not, relating in any way to the subject of emergency planning and prepared, in part or in whole, by said individual or by a corporation, partnership, or other organization of which said individual is an employee, officer, director, partner, or agent.

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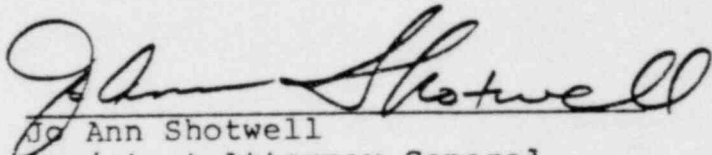
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