

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

COMMONWEALTH OF MASSACHUSETTS' SECOND SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS FROM THE NUCLEAR
REGULATORY COMMISSION STAFF
RELATIVE TO EMERGENCY PLANNING

Pursuant to 10 C.F.R. §2.744, the Intervenor Commonwealth of Massachusetts hereby requests the NRC Staff to produce and permit the Commonwealth to inspect and copy the documents designated below at the offices of the Attorney General, One Ashburton Place, 19th Floor, Boston, Massachusetts, 02108 on or before September 8, 1981, at 10:00 a.m.

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DEFINITIONS

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 in the possession or subject to the control of the NRC or any Commissioner, employee, agent or attorney thereof, 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.

DOCUMENTS REQUESTED

(1) All documents identified by the Staff in answer to the Commonwealth's Second Set of Interrogatories to the Nuclear Regulatory Commission Staff Relative to Emergency Planning, including any reports, studies, papers, articles, and books identified in response to Interrogatory No. 8. The Commonwealth states, as required by 10 C.F.R. §2.744(a), that these documents are clearly relevant to this proceeding as they have been identified by the Staff as pertaining to the subject matter of and/or forming bases for Staff answers to

interrogatories which relate specifically to the issues of the feasibility of emergency measures at Pilgrim and the adequacy of current plans therefor. Any documents identified in response to Interrogatory No. 8 are of particular relevance to this proceeding since they have been written, at least in part, by individuals who will offer testimony during the hearing or organizations with which they are affiliated.

(2) Transcripts (and copies in the case of written testimony) of all testimony listed in response to Interrogatory No. 7 of the Commonwealth's Second Set of Interrogatories to the Nuclear Regulatory Commission Staff Relative to Emergency Planning which relates in any way to the subject of emergency planning. Any documents responsive to this request are clearly relevant to this proceeding as they constitute prior pronouncements by individuals who will offer testimony during this hearing, or organizations with which they are affiliated, on the very subject which will be at issue.

(3) A copy of "The Consequences From Liquid Pathways After a Reactor Meltdown Accident" prepared for the NRC by S. J. Niemczyk of Sandia Laboratories and all documents relating thereto, including correspondence between the Staff and Sandia and internal Staff memoranda. These documents are relevant to the Commonwealth's contentions, since they relate to an entire class of accident consequences which must enter into any assessment of the feasibility of emergency measures and the adequacy of plans therefor.

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CERTIFICATE OF SERVICE

I hereby certify that the within Request been served on the following by deposit of copies thereof in the United States Mail, first class mail, postage prepaid this 5th day of August, 1981:

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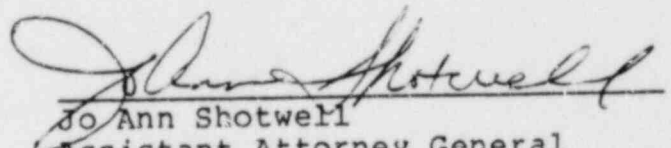
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