

8/14/81

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

Notice of Deposition

TO: Thomas G. Dignan, Jr., Esq.
R. K. Gad, III, Esq.
Ropes & Gray
225 Franklin Street
Boston, Massachusetts 02110

William S. Stowe, Esq.
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

Counsel for the Applicants

Notice is hereby given that the Commonwealth will take the deposition upon oral examination of the individuals named or described below on the subjects described at the Office of the Attorney General, One Ashburton Place, 19th Floor, Boston, Massachusetts before a Notary Public or other officer authorized to administer oaths and to take testimony on Friday, September 4, 1981, at 9:00 a.m., and thereafter until the deposition is completed.



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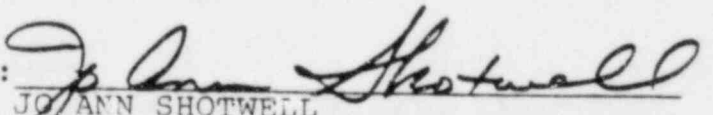
Persons to be Deposed

- (1) Robert H. Cunningham, Staff Assistant to the Vice President, Nuclear, Boston Edison Company
- (2) Robert J. Merlino
HMM Associates
- (3) An employee of Boston Edison Company having full and complete knowledge of the methodology and results of any accident consequences analyses performed by or for Boston Edison Company with respect to releases from Pilgrim II equivalent to the PWR-1 to PWR-7 releases defined in WASH-1400, releases from Pilgrim I equivalent to the BWR-1 to BWR-4 releases defined in WASH-1400, or accidents with containment failure modes such that the radioactive releases exceed those set forth in the design basis accident assessment described in Chapter 15 of the Pilgrim II PSAR.

Subjects of Deposition

Messrs. Cunningham and Merlino will be questioned as to the existence, methodology, and results of any studies performed by or for Boston Edison Company with respect to evacuation of persons within 10 and 30 miles of the Pilgrim site. They will also be questioned as to the existence, methodology, and results of any studies performed by or for Boston Edison Company relevant to the effect upon evacuation times for persons within 10 miles of the site of the bottlenecks at the Sagamaore and Bourne rotaries and spontaneous or ordered evacuation of the population on Cape Cod. The employee described in item (3) above will be questioned as to the matters described therein.

By:


JO ANN SHOTWELL
Assistant Attorney General
Environmental Protection Division
Public Protection Bureau
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, Massachusetts 02108
(617) 727-2265

Dated: August 14, 1981

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that the within Notice of Deposition has been served on the following by deposit of copies thereof in the United States Mail, first class mail, postage prepaid this 14 day of August, 1981:

Andrew C. Goodhope, Esq.
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Licensing Board
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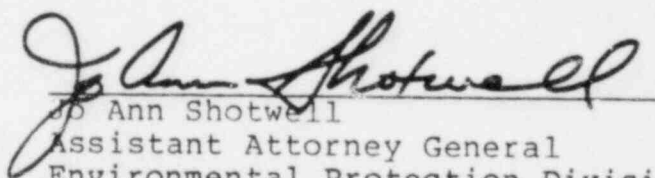
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