

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: Jack R. Goldberg, Esq.  
Stephen H. Lewis, Esq.  
Michael Bloom, Esq.  
U.S. Nuclear Regulatory Commission  
Office of the Executive Legal Director  
Washington, D.C. 20555

Counsel for the NRC Staff

Notice is hereby given that the Commonwealth will take the deposition upon oral examination of a member or members of the NRC Staff designated by the Executive Director for Operations and having knowledge of the matters described below at the offices of the Attorney General, One Ashburton Place, 19th Floor, Boston, Massachusetts 02108, before a Notary Public or other officer authorized to administer oaths and to take testimony, on September 2, 1981, at 9:00 a.m., and thereafter until the deposition is completed.




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The matters as to which said individual(s) will be disposed are as follows:

- (1) The methodology and results of the analysis of accident consequences at Pilgrim and other sites recently performed by or for the NRC's Division of Probabilistic Risk Assessment, as those methods and results relate to whether the Applicants in this proceeding have adequately demonstrated the feasibility of protective action in the event of an accident at Pilgrim II and the adequacy of their preliminary emergency plans.
- (2) The feasibility of protective action in the event of an accident at Pilgrim II and the adequacy of the preliminary plans therefor.

The Commonwealth is informed that the Staff intends to provide supplemental answers to its First Set of Interrogatories Relative to Emergency Planning. The Commonwealth notes that said supplemental answers may obviate the need for this deposition.

  
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

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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.  
Chairman  
Atomic Safety and  
Licensing Board  
3320 Estelle Terrace  
Wheaton, Maryland 20906

Dr. A. Dixon Callihan  
Union Carbide Corporation  
P.O. Box Y  
Oak Ridge, Tennessee 37830

Dr. Richard F. Cole  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Patrick J. Kenny, Esq.  
Edward L. Selgrade, Esq.  
Deputy Director  
Mass. Office of Energy  
Resources  
73 Tremont Street  
Boston, Massachusetts 02108

Henry Herrman, Esq.  
Room 1045  
50 Congress Street  
Boston, Massachusetts 02109

Mr. & Mrs. Alan R. Cleeton  
22 Mackintosh Street  
Franklin, Massachusetts 02038

William S. Abbot, Esq.  
Suite 925  
50 Congress Street  
Boston, Massachusetts 02109

Thomas G. Dignan, Jr., Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, Massachusetts 02110

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

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

Jack R. Goldberg  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Thomas S. Moore, Chairman  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Christine N. Kohl, Esquire  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Stephen H. Lewis  
U.S. Nuclear Regulatory  
Commission  
Office of the Executive  
Legal Director  
Washington, D.C. 20555

Michael Bloom  
U.S. Nuclear Regulatory  
Commission  
Office of the Executive  
Legal Director  
Washington, D.C. 20555

Office of the Secretary  
Docketing and Service Section  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

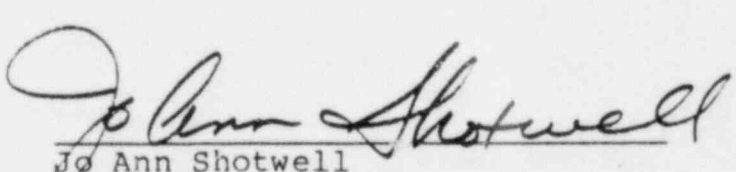
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Plymouth, Massachusetts 02360

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

Francis S. Wright, Esquire  
Berman & Lewenberg  
211 Congress St.  
Boston, Massachusetts 02110

Dr. John H. Buck  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

R. K. Gad III  
Ropes & Gray  
225 Franklin Street  
Boston, Massachusetts 02110

  
Jo Ann Shotwell  
Assistant Attorney General  
Environmental Protection Division  
Public Protection Bureau  
Department of the Attorney General  
One Ashburton Place, 19th Floor  
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