

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board Panel

December 31, 2007

DOCKETED
USNRC

December 31, 2007(11:42am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of)	
)	
Entergy Nuclear Generation Company and)	Docket No. 50-293-LR
Entergy Nuclear Operations, Inc.)	ASLBP No. 06-848-02-LR
)	
(Pilgrim Nuclear Power Station))	

**ENTERGY'S ANSWER OPPOSING
PILGRIM WATCH'S MOTION FOR CLARIFICATION**

I. INTRODUCTION

Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. ("Entergy") hereby answer and oppose Pilgrim Watch Motion for Clarification (December 21, 2007) ("Motion"). Pilgrim Watch's Motion should be denied because it does not seek any legitimate clarification of the Board's December 19, 2007 Order, but rather seeks to expand improperly the scope of Pilgrim Watch Contention 1 and require Entergy to respond to interrogatories and document requests prohibited by the NRC rules.

II. BURIED TANKS AND PIPING WITHIN THE SCOPE OF PW CONTENTION 1

Pilgrim Watch Contention 1 as admitted by the Licensing Board alleges that the aging management program in the Pilgrim Application is inadequate "with regard to aging management of buried pipes and tanks that contain radioactive water. . . ." Entergy Nuclear Generation Co. et al., (Pilgrim Nuclear Power Station), LBP-06-23, 64 N.R.C. 257, 315 (2006) (emphasis added). Indeed, Pilgrim Watch acknowledges that the admitted contention applies to buried pipes and tanks that contain radioactively contaminated water. Motion at 1.

Nothing in the Board's December 19, 2007 Order expanded the scope of Contention 1 beyond buried pipes and tanks that contain radioactive water. To the contrary, the Board's December 19, 2007 Order explicitly requires Entergy to identify "each buried pipe and tank which may potentially contain radioactive fluids." Order (Revising Schedule for Evidentiary Hearing and Responding to Pilgrim Watch's December 14 and 15 Motion) (Dec. 19, 2007) at 2 (emphasis added). Thus, there is no question that this Contention is still limited to those buried pipes and tanks within the scope of the license renewal rule containing radioactive water.

Pilgrim Watch's Motion quotes this portion of the December 19, 2007 Order (see Motion at 7), but conveniently omits the language limiting the buried pipes and tanks that Entergy must address in its testimony to those which may potentially contain radioactive fluids. It is unfortunate that Pilgrim Watch did not see fit to mention this language in its Motion.

There is likewise no merit to Pilgrim Watch's suggestion that the Board's October 17, 2007 Memorandum and Order¹ somehow expanded the scope of Contention 1. Nowhere in the October 17, 2007 Memorandum and Order does the Board purport to expand the scope of the admitted contention. Moreover, a ruling on a motion for summary disposition, which by definition seeks to dismiss or narrow a contention, cannot possibly expand the original contention. The only way a contention can be expanded under the NRC rules is by an amendment meeting the standards in 10 C.F.R. § 2.309(f)(2).

Further, it is clear that the October 17, 2007 Memorandum and Order did not expand the admitted contention. The portions of the Memorandum and Order to which Pilgrim Watch refers

¹ Memorandum and Order (Ruling on Entergy's Motion for Summary Disposition of Pilgrim Watch Contention 1, Regarding Adequacy of Aging Management Program for Buried Pipes and Tanks and Potential Need for Monitoring Wells to Supplement Program), LBO-07-12 (Oct. 17, 2007) ("LBP-07-12").

merely clarified that the issue is whether the buried pipes and tanks “at issue” will perform their intended safety function. LBP-07-12, slip op. at 18. Indeed, the Board noted,

Also in dispute is the ancillary matter of whether the SSW system and offgas system piping may contain radioactive liquid and should therefore be considered vis-à-vis proposed safety function leak detection.

Id. at 18. n.78. Obviously, such an issue would be entirely irrelevant if Contention 1 were no longer limited to those buried tanks and pipes within the scope of the license renewal rules that contain radioactive fluids.²

As a practical matter, it would be tremendously disruptive to this proceeding to expand the scope of the admitted contention a couple of weeks before Entergy’s testimony is due. Such an unwarranted action would require reexamination of more than a year of disclosures, would require development of substantial additional testimony, and could delay this proceeding by months. The Board should not brook Pilgrim Watch’s repeated attempts at delay.³

III. PILGRIM WATCH’S IMPROPER INTERROGATORIES

The second aspect of Pilgrim Watch’s Motion does not seek any legitimate clarification of the December 19, 2007 Order, but rather seeks to have Entergy respond in its testimony to what are essentially interrogatories and document requests. Pursuant to 10 C.F.R. §§ 2.336(f) and 2.1203(d), interrogatories and document requests are not permitted in a Subpart L proceeding.

² The Board’s discussion in footnote 79 of LBP-07-12 similarly demonstrates that the focus remains solely on components that could contain radioactive liquid.

³ Pilgrim Watch’s Motion for Clarification is the fourth of five motions that Pilgrim Watch has filed within a about a fortnight. Such repeated motions are unreasonable and oppressive conduct.

Further, Pilgrim Watch is once more overly selective in what it tells the Board. Pilgrim Watch states that it asked Entergy to provide the requested information and Entergy refused. Motion at 8. The full facts are as follows:

On December 10, 2007, after over a year of document disclosures and two-weeks before Entergy's testimony was then due, Pilgrim Watch sent by electronic mail a set of "disclosure requests" substantially the same as the requests on pages 9 through 11 of the Motion. As is evident on their face, these "disclosure requests" are predominantly interrogatories, asking questions that Pilgrim Watch wants answered. As is also evident, these requests go far beyond components that may contain radioactive water.

On the same day, Entergy responded to Pilgrim Watch's request. A copy of that response is attached. In its response, Entergy objected to Pilgrim Watch's request as impermissible interrogatories and document requests. Entergy also objected to such broad requests two weeks before testimony was due as unduly burdensome and unreasonable. Finally, Entergy objected to the requests for information on fuel oil tanks as beyond the scope of the proceeding.

Without waiving these objections, with respect to item A of Pilgrim Watch's requests asking for records of leaks (corresponding to item a on page 9 of the Motion), Entergy further stated:

[W]e have already informed you that the Control Room maintains a log of "steam leaks" which is not relevant to the admitted contention. Pilgrim is also required by 10 C.F.R. 50.75(g) to maintain records of spills or other occurrences involving the spread of contamination in and around the facilities, equipment or site. These occurrences were summarized in a July 31, 2006 letter to the NRC, which is already in your possession but is attached nevertheless. This information also appears irrelevant to Contention 1.

Similarly, with respect to items B and C of Pilgrim Watch's requests (corresponding to items b and c on page 9-11 of the Motion), Entergy stated:

Entergy has already produced Aging Management Reviews of the components within the scope of the buried tanks and piping program (which includes descriptions and operating experience), P&ID diagrams, and considerable additional materials on the components and aging management programs.

In sum, Entergy informed Pilgrim Watch that its prior disclosures contained information responsive to Pilgrim Watch's requests. Pilgrim Watch now simply repeats those requests without giving any indication whatsoever that it has even looked at the extensive material previously provide in Entergy's disclosures. Entergy has produced over 10,000 pages of documents relevant to Contention 1. With respect to those components within the scope of the contention, these prior disclosures include descriptions of the buried components and their materials (including certain specifications, P&ID and construction drawings), operating experience records (such as condition reports, audit reports and other documents relating to aging effects on in-scope systems, including documents pertaining to the inspection, excavation and prior repair of buried SSW piping⁴), and additional details on the Aging Management Programs and other inspections and surveillances.

In absence of any demonstrated deficiency in Entergy's prior disclosures, Pilgrim Watch's attempt to require Entergy to respond to questions should be denied. Pilgrim Watch should shoulder its own responsibility to review documents produced, and should not be permitted to dictate the content of Entergy's testimony.

⁴ Entergy has not identified any documents reflecting leakage from, inspections of, or need for repairs to any other buried components within the scope of license renewal that might contain radioactive fluids.

IV. CONCLUSION

For all of the foregoing reasons, Pilgrim Watch's motion should be denied

Respectfully Submitted,



David R. Lewis
Paul A. Gaukler
PILLSBURY WINTHROP SHAW PITTMAN LLP
2300 N Street, N.W.
Washington, DC 20037-1128
Tel. (202) 663-8000
Counsel for Entergy

Dated: December 31, 2007

Lewis, David R.

From: Lewis, David R.
Sent: Monday, December 10, 2007 1:30 PM
To: 'mary.lampert@comcast.net'
Cc: Gaukler, Paul A.
Subject: FW: Pilgrim- disclosure request
Attachments: DISCLOSURE REQUESTS specifics pipes and tanks 12.07.doc; PNPS 5 Questions.PDF

Dear Mary:

Pilgrim Watch's disclosure requests, attached, constitute interrogatories and requests for document production which are not permitted in a Subpart L proceeding. See 10 C.F.R. 2.1203(d). Moreover, making such broad requests two-weeks before testimony is due, after a year of disclosure, is unduly burdensome and unreasonable. In addition, your requests seek information on fuel oil tanks, which are beyond the scope of the admitted contention. Accordingly, we do not intend to respond to these requests.

Without waiving these objections, with respect to item A, we have already informed you that the Control Room maintains a log of "steam leaks" which is not relevant to the admitted contention. Pilgrim is also required by 10 C.F.R. 50.75(g) to maintain records of spills or other occurrences involving the spread of contamination in and around the facilities, equipment or site. These occurrences were summarized in a July 31, 2006 letter to the NRC, which is already in your possession but is attached nevertheless. This information also appears irrelevant to Contention 1.

In addition, with respect to items B and C, Entergy has already produced Aging Management Reviews of the components within the scope of the buried tanks and piping program (which includes descriptions and operating experience), P&ID diagrams, and considerable additional materials on the components and aging management programs.

Sincerely,

David Lewis
Counsel for Entergy

David R. Lewis | Partner
Pillsbury Winthrop Shaw Pittman LLP

Tel: 202.663.8474 | Fax: 202.663.8007 | Cell: 703 501 7708
2300 N Street, NW | Washington, DC 20037-1122

Email: david.lewis@pillsburylaw.com
www.pillsburylaw.com

From: Mary Lampert [<mailto:mary.lampert@comcast.net>]
Sent: Monday, December 10, 2007 8:46 AM
To: Gaukler, Paul A.
Cc: Lewis, David R.
Subject: Pilgrim- disclosure request

12/31/07

Paul and David:

Attached is a disclosure request; if you have trouble opening it, please call.

We appreciate and look forward to a timely and thorough response.

Thank you and enjoy the holiday season,

Mary
781-934-0389

B A N N E R
P A G E

User name lewisd

Host Name 172.16.13.34

File name Microsoft Word - DISCLOSURE REQUESTS

From 172.16.2.29:4250

Printer lp

DISCLOSURE REQUESTS -PILGRIM WATCH
December 10, 2007

A. RECORD LEAKS: It is my understanding that the company keeps a record of leaks. I believe that it is kept in, or by people working in, the control room. Whatever it is called at the site, we request that it be disclosed.

B. To comply with the requirement that, “Prior to entering the period of extended operation, the applicant is to verify that there is at least one opportunistic or focused inspection is performed during the past ten years.”

1. When were, or will, the inspections be performed;
2. Precisely, what component and precisely where on the component did, or will, the inspection(s) occur;
3. What percent of the total component was, will be, inspected; what method was, will be, and used to inspect – please provide documents of inspections?

C. COMPONENTS:

For each of the following buried pipes for the: standby gas treatment; salt service water; condensate storage; fuel oil¹; fire protection systems

¹ NOTE: There are 6 fuel oil tanks underground at Pilgrim - 2 for the heating boilers, 2 for the emergency diesel generators and 2 for the station blackout diesel. The fuel oil tanks at PNPS are buried completely and the pipes to and from the tanks are buried. The fill lines to the tanks are flush with the ground so the truck delivering fuel oil can have access to them; those lines then connect to the tank, usually to the top of the tank. The vent lines for all the buried tanks connect to the top of the tank and then surface and extend 10 feet or so in the air, they are capped with a rounded over device that lets air in or out and also keeps rain water from entering the tank. The oil tanks at PNPS supply fuel oil to the device in service that can be the emergency diesels, the black out diesel or the heating boilers. Those lines will run underground from the tank to the device in service and in the case of the heating boilers back to the tank because the heating boilers run a force feed loop. A force feed loop will send oil to the heating boilers, the boilers use the oil

1. Please provide a map indicating the location of the pipes/tanks under consideration
2. Volume – average daily flow rate (volume per day) material flows through piping system per day during normal plant operations and expected flow rate(s) during emergency response events, if different.
3. Material component is made of
4. Describe any “dead spots” in piping system under consideration
5. Distance from ground surface to piping system
6. Distance to shore line from the piping – provide range, not average
7. tests of soil around component – dates testing, results

For each section of each component, please number on a diagram the sections of each piping system so that it is clear what you are talking about in response to the questions below:

- 1) Length of section
- 2) Inside diameter of section
- 3) Wall thickness
- 4) Number fittings, flanges and elbows along length each pipe in system; material fitting/flanges and elbows are each made; and history installation/replacement/repair
- 5) Age of section – when was it installed
- 6) Description coatings/wraps – material made of; date applied; inspections (date and report); repair history to coating/wraps (date and report)
- 7) Inspection(s) of section – date(s) and report(s)
- 8) Repairs of section – date(s) and description(s)

they need to maintain the heat called for by the heating system thermostat and what oil is not used goes back to the tank underground.

9) Connections to tanks and systems – beginning and end points pipes

- a) Material connection/fitting made of
- b) When installed
- c) When inspected and provide report
- d) If repaired, when?

FUEL OIL TANKS – (6)

[There are 6 fuel oil tanks underground at Pilgrim - 2 for the heating boilers, 2 for the emergency diesel generators and 2 for the station blackout diesel.]

Please answer questions for each tank separately

- a. Location – distance to shoreline
- b. Distance from ground surface to top tank and to bottom tank
- c. Date tanks installed
- d. Volume material in tank under both normal and emergency situations, if differs
- e. Material made of
- f. Coatings/ and or wraps – description materials used; location of where it was applied to the tank; and date coating/wrap applied; date and description any repair to coating or wrap.
- g. Inspections - date of inspection(s); location of inspection(s); size of area inspected (percentage of whole); copy of report
- h. Repair history(s) - date of repair; location of repair within the specific component and copy of report describing repair



Entergy Nuclear Operations, Inc.
Pilgrim Station
600 Rocky Hill Road
Plymouth, MA 02360

Stephen J. Bethay
Director, Nuclear Assessment

July 31, 2006

Mr. Stuart A. Richards, Deputy Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No.: 50-293
License No.: DPR-35

Groundwater Protection – Data Collection Questionnaire

LETTER NUMBER: 2.06.070

Dear Mr. Richards:

The nuclear industry, in conjunction with the Nuclear Energy Institute (NEI), developed a questionnaire to facilitate compilation of baseline information regarding the current status of site programs for monitoring and protecting groundwater. All participating nuclear sites agreed to provide the requested information to both NEI and the Nuclear Regulatory Commission. The attachment to this letter contains the questionnaire response for Pilgrim Nuclear Power Station.

There are no commitments contained in this letter.

Please feel free to contact Mr. Bryan Ford, (508) 830-8403, if there are any questions regarding this subject.

Sincerely,

A handwritten signature in cursive script that reads "Stephen J. Bethay".

Stephen J. Bethay
Director, Nuclear Assessment

MJG/dm

206070

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station

Letter Number: 2.06.070
Page 2

cc: Mr. Samuel J. Collins
Region I Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. James Shea, Project Manager
Plant Licensing Branch I-1
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
One White Flint North O-8C2
11555 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Senior Resident Inspector
Pilgrim Nuclear Power Station

Mr. Ralph Anderson
Nuclear Energy Institute
1776 Eye Street, NW
Suite 400
Washington, DC 20006

Attachment to ENO letter 2.06.070

Pilgrim Nuclear Power Station
Groundwater Protection Questionnaire Response
(3 Pages)

206070

2025 RELEASE UNDER E.O. 14176

Question 1

Briefly describe the program and/or methods used for detection of leakage or spills from plant systems, structures, and components that have a potential for an inadvertent release of radioactivity from plant operations into groundwater.

Emergency Response

The plant is designed such that most pipe leaks are captured in the building sumps. Additionally, daily plant operator tours include inspections for leaks and spills and routine Radiation Protection surveys performed by the Radiation Protection Technicians include inspections for leaks and spills. Any leaks or spills found are documented in the site Corrective Action Program. This program is also utilized to trend the occurrences of leaks and spills at the station.

Sampling and radiological analyses of environmental samples are performed as part of the Radiological Effluent Monitoring Program (REMP) in order to detect any possible radiological impacts of normal operation. The REMP has been designed to monitor all significant pathways of radiation exposure to humans as well as certain media which serve as indicators of potential radionuclide accumulation in terrestrial or aquatic environments and verifies that off-site radionuclide concentrations conform to applicable federal regulations. PNPS also samples the site's four storm drain outfalls on a regular basis for radioactivity.

Question 2:

Briefly describe the program and/or methods for monitoring onsite groundwater for the presence of radioactivity released from plant operations.

Emergency Response

Pilgrim Station does not currently have a groundwater-monitoring program. The station lies immediately adjacent to Cape Cod Bay and the Atlantic Ocean. The groundwater flow gradient is from the higher terrain adjacent to the site, under the site property, and out to sea. There are no private or public land holdings or public drinking or irrigation water pathways existing between the site and the ocean.

Question 3:

If applicable, briefly summarize any occurrences of inadvertent releases of radioactive liquids that have been documented in accordance with 10 CFR 50.75(g).

Emergency Response

On September 30, 1975, there was a minor spill from a truck moving a metal cask filled with radioactive diatomaceous earth. The volume spill was estimated to be 1 – 2 gallons onto the pavement as the truck was moving the cask. The affected area was decontaminated.

On September 24, 1976, a barrel jack penetrated a 55-gallon drum containing spent resin. Approximately 10 to 20 gallons of liquid leaked from the drum. The affected area was decontaminated.

On August 2, 1977, while transferring Spent fuel Pool Resin to the Spent Resin Storage Tank, a vent valve was left open. This allowed water to spill on the pavement outside of the Radwaste Truck Lock Door. The water was mopped and absorbent material used and the impacted asphalt was paved over.

On September 22, 1980, a storage box containing wet masslin leaked less than a gallon of liquid onto the pavement in the yard. The area was subsequently surveyed and decontaminated.

On January 7, 1981, two one-inch valves were left open on the condensate resin fill hopper of the "B" Condensate Demineralizer. Resin leaked out of the valves towards a storm drain. The resin was cleaned up, the affected area was decontaminated, and the storm drains were surveyed for radioactivity. No detectable radioactivity was found.

On June 11, 1982, while backwashing condensate demineralizer resin, the configuration of the valves allowed approximately 1 cubic foot of resin to be exhausted to the vent duck work and consequently out the Reactor Building exhaust. The resin was removed and area was surveyed and decontaminated.

On July 13, 1984 during a routine radiological survey of the Protected Area (PA), a discrete radioactive particle was found on the ground in front of the Augmented Offgas Building. The area was surveyed and the particle removed. No other radioactivity was detected.

On September 25, 1986, a sludge spill occurred when a 55 gallon drum fell over during transport. The spill was cleaned up and the area was surveyed and decontaminated.

On November 16, 1988, during the dewatering of a liner filled with diatomaceous earth, a demineralized water valve was left open. Consequently, the liner overflowed 2600 gallons of water in the Radwaste Truck Lock of which 200 gallons spilled out onto the pavement in the yard. The affected areas were decontaminated and repaved.

On October 31, 1990 during a routine survey of the PA a discrete radioactive particle was found in front of the Administration Building. The area was surveyed and the particle removed. No other radioactivity was detected.

On December 3, 1990 a 55-gallon drum containing contaminated sand blast grit was knocked over by a forklift and some of the grit spilled onto the ground. The area was surveyed and decontaminated.

On June 3, 1992, there was an oil leak from a bag of rags. A small pool of oil was found on the ground. The oil was cleaned up and the surrounding area surveyed.

All of these events occurred within the radiological "Restricted Area" under Pilgrim Station control. None of the events occurred in any areas accessible to the public.

Question 4:

If applicable, briefly summarize the circumstances associated with any onsite or offsite groundwater monitoring result indicating a concentration in groundwater of radioactivity released from plant operations that exceeds the maximum contaminant level (MCL) established by the USEPA for drinking water.

Entergy Response

Pilgrim Station does not currently have a groundwater-monitoring program.

Question 5

Briefly describe any remediation efforts undertaken or planned to reduce or eliminate levels of radioactivity resulting from plant operations in soil or groundwater onsite or offsite.

Enterqy Response

There is currently no known contamination of soil or groundwater at the Pilgrim site. Therefore, there are no remediation efforts underway or planned.

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
Entergy Nuclear Generation Company and)	Docket No. 50-293-LR
Entergy Nuclear Operations, Inc.)	ASLBP No. 06-848-02-LR
)	
(Pilgrim Nuclear Power Station))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Entergy's Answer Opposing Pilgrim Watch's Motion For Clarification," dated December 31, 2007, were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid, and where indicated by an asterisk by electronic mail, this 31st day of December, 2007.

*Administrative Judge
Ann Marshall Young, Esq., Chair
Atomic Safety and Licensing Board
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
amy@nrc.gov

*Administrative Judge
Dr. Richard F. Cole
Atomic Safety and Licensing Board
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
rfl@nrc.gov

*Administrative Judge
Paul B. Abramson
Atomic Safety and Licensing Board
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
pba@nrc.gov

*Secretary
Att'n: Rulemakings and Adjudications Staff
Mail Stop O-16 C1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
secy@nrc.gov; hearingdocket@nrc.gov

Office of Commission Appellate
Adjudication
Mail Stop O-16 C1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Atomic Safety and Licensing Board
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

*Susan L. Uttal, Esq.
*David E. Roth, Esq
*Kimberly A. Sexton, Esq.
Office of the General Counsel
Mail Stop O-15 D21
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
slu@nrc.gov; der@nrc.gov; KAS2@nrc.gov

*Ms. Mary Lampert
148 Washington Street
Duxbury, MA 02332
mary.lampert@comcast.net

*Sheila Slocum Hollis, Esq.
Duane Morris LLP
1667 K Street, N.W.
Suite 700
Washington, D.C. 20006
sshollis@duanemorris.com

*Mr. Mark D. Sylvia
Town Manager
Town of Plymouth
11 Lincoln St.
Plymouth MA, 02360
msylvia@townhall.plymouth.ma.us

*Chief Kevin M. Nord
Fire Chief and Director, Duxbury Emergency
Management Agency
688 Tremont Street
P.O. Box 2824
Duxbury, MA 02331
nord@town.duxbury.ma.us

*Richard R. MacDonald
Town Manager
878 Tremont Street
Duxbury, MA 02332
macdonald@town.duxbury.ma.us



David R. Lewis