

UNITED STATES
NUCLEAR REGULATORY COMMISSION
Washington D.C.



January 25, 1979

To: Edward Luton, Esq.
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Boston Edison Company, et al
(Pilgrim Nuclear Generating Sta-
tion, Unit 2; Docket No. 50-471)

Motion #3: That the Board Order that the Hearing
Record Be Re-Opened with Respect to the Issue of
Need for Power and that Updated Testimony Be
Filed Thereon

Alan and Marion Cleeton, by their counsel, hereby move that the Licensing Board order that the hearing record in the referenced proceeding be reopened with respect to the issue of need for power, and that the various parties to this proceeding be allowed and directed to file updated testimony with respect to such issue.

As grounds therefor, they state the following:

1. The record in the instant proceeding on the issue of need for power, which was one of the issues initially raised by the Cleetons, was closed on July 1, 1977.

2. Subsequent to the closing of the record on this issue, Boston Edison has in each successive power needs forecast, including its most recent long-range forecast dated December 31, 1977, revised its estimates downward from the projections which were the basis of the testimony earlier taken in this proceeding.

3. On October 24, 1978, the Massachusetts Energy Facilities Siting Council, which is the state agency responsible for approving or disapproving each annual utility power need forecast and confirming or denying the need for new generation facilities, issued its decision regarding the Boston Edison Company long-range forecast (1978-1987) of electric power needs and requirements dated December 31, 1977. Such decision (E.F.S.C. #78-12, a copy of which was furnished to the Board by the Commonwealth on December 5, 1978) declared that the Siting Council "[could] not accept the forecasted

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