

Attachment A

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  
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COMMONWEALTH OF MASSACHUSETTS'  
APPLICATION FOR A SUBPOENA

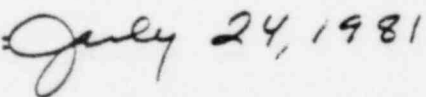
Pursuant to 10 C.F.R. §2.720(a), and for the reasons outlined in its Answer in Opposition to Staff's Motions for a Protective Order, the Commonwealth hereby applies for the issuance of a subpoena directing the Argonne National Computer Center, 97005 Cass Avenue, Argonne, Illinois 60439, to produce at the offices of the Attorney General of Massachusetts, One Ashburton Place, 19th Floor, Boston, Massachusetts 02108, on or before August 10, 1981, at 10:00 a.m. any computer software or document containing or describing any modification or improvement made to the so-called "CRAC Code" since its original development.

The term "document" as used herein shall refer 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,

custody, or control of the Argonne National Computer Center, 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, sound recording, computer print-out or microfilm.

For the Commonwealth,

By:   
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Dated: 

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
BOSTON EDISON COMPANY et al.	)	Docket No. 50-471
(Pilgrim Nuclear Generating	)	
Station, Unit 2)	)	
	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer in Opposition to Staff's Motions for a Protective Order, complete with Attachment A, has been served on the following by deposit of copies thereof in the United States Mail, first class mail, postage prepaid this 24th day of July, 1981:

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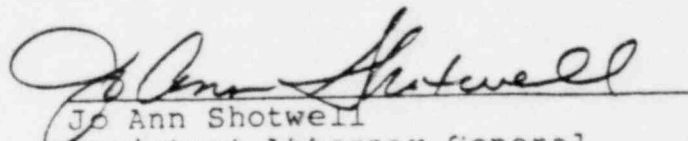
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