

8/14/81

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



FIRST SET OF INTERROGATORIES TO THE  
COMMONWEALTH OF MASSACHUSETTS FROM THE NRC STAFF

The NRC Staff hereby propounds, pursuant to 10 C.F.R. § 2.740b,  
the following interrogatories.

1. Does the Commonwealth contend that NRC's regulations regarding emergency planning are inadequately specific to protect health and safety in relation to Pilgrim 2?
2. Please specify those parts of the Commission's regulations pertaining to emergency planning with which the Commonwealth contends BECO cannot, does not, or will not comply. Explain why BECO is or will be unable to comply with the Commission's emergency planning requirements, with specific reference to the characteristics of the area in and around the Pilgrim 2 site, including but not limited to population densities, transportation networks, land use, and distribution of food and water.

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3. Does the Commonwealth contend that the plume exposure EPZ for Pilgrim 2 ranging from 9.5 to 12 miles does not satisfy the requirements of the NRC's emergency planning regulations? Explain the basis for this answer.
4. Is it implicit in either of the Commonwealth's contentions (and if so which) that use of the criteria and conclusions of NUREG-0396 do not lead to establishment of a plume exposure EPZ for Pilgrim 2 adequate to protect health and safety in the event of an accident? Explain the basis for this answer and identify any supporting documents or studies.
5. Does the Commonwealth contend that the criteria of NUREG-0396 have been misapplied in establishing a plume exposure EPZ of 9.5 to 12 miles for Pilgrim 2? If the answer to this question is yes, then explain the basis for it and identify any supporting documents or studies.
6. Does the Commonwealth contend that the protective action strategies recommended in SAND-78-0454 are inadequate for Pilgrim 2? If so, how?
7. Does the Commonwealth contend that the evacuation studies regarding Pilgrim 2 performed by or for BECO and the NRC Staff are inadequate or erroneous in their assumptions, methodologies, or conclusions? If so, how?

Respectfully submitted,

*M Blume*

Michael B. Blume  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 14th day of August, 1981

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CERTIFICATE OF SERVICE

I hereby certify that copies of "FIRST SET OF INTERROGATORIES TO THE COMMONWEALTH OF MASSACHUSETTS FROM THE NRC STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 14th day of August, 1981:

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