

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



COMMONWEALTH OF
MASSACHUSETTS' FIRST SET
OF DOCUMENT REQUESTS
TO THE APPLICANTS RELATIVE
TO TMI ISSUES

Pursuant to 10 C.F.R. §2.741, the Commonwealth of Massachusetts hereby requests the Applicants to produce and permit the Commonwealth to inspect and copy the documents designated below at the offices of the Attorney General, One Ashburton Place, 19th Floor, Boston, Massachusetts on or before September 17, 1981, at 10:00 a.m.

For purposes of the following requests, the term "document(s)" refers 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 or subject to the control of Boston Edison Company or any officer, director, employee, agent or attorney thereof, whether sent or received or neither, whether

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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, minute desk calendar, appointment book, sound recording, computer print-out or microfilm.

DOCUMENTS REQUESTED

(1) All documents identified by the Applicants in their answers to the Commonwealth's First Set of Interrogatories to the Applicants Relative to TMI Issues, including any contracts identified in response to interrogatory 9 and any reports, studies, papers, articles or books identified in response to interrogatory 13.

(2) Transcripts (or copies in the case of written testimony) of all testimony described in response to interrogatory 13 of the Commonwealth's First Set of Interrogatories to the Applicants Relative to TMI Issues which relates in any way to the TMI accident, the lessons learned therefrom, or any requirement contained in NUREG-0718 (Appendix B), NUREG-0718, Rev. 1 (Appendix B), NUREG-0578, or NUREG-0660.

(3) All documents, including contracts, prepared by or for the Applicants, Combustion Engineering, or Bechtel which

describe the plan, scope, or schedule for the Pilgrim II plant/site-specific probabilistic risk assessment study which the Applicants have committed to perform, including documents which describe the scope or timing of intermediate results.

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CERTIFICATE OF SERVICE

I hereby certify that the within Requests have been served on the following by deposit of copies thereof in the United States Mail, first class mail, postage prepaid this 19th day of August, 1981:

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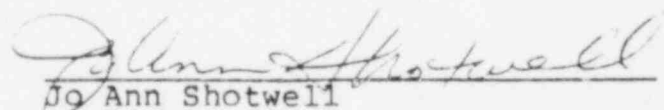
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