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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

'93 JUN 10 P 3:30

In the Matter of
Boston Edison Company
(Pilgrim Nuclear Power Station)

Docket No. 50-293 - OLA
(Spent Fuel Pool Expansion)

**RESPONSE OF BOSTON EDISON COMPANY
TO THE MASSACHUSETTS ATTORNEY GENERAL'S REQUEST
FOR A HEARING AND PETITION TO INTERVENE**

This is an operating license amendment proceeding concerning the addition of spent fuel storage racks to an existing spent fuel pool. It involves Pilgrim Nuclear Power Station ("PNPS"), which is owned and operated by Boston Edison Company ("Boston Edison") pursuant to an operating license issued by the Commission on June 1, 1972 and amended several times thereafter. A single petition has been filed requesting a hearing and seeking leave to intervene in the proceeding and leave to participate as an interested state. The petition is subject to the NRC's Rules of Practice, 10 C.F.R. § 2.714.

The proposed expansion of spent fuel pool storage capacity at PNPS involves no novel technical issues that have not been reviewed in the context of a number of other spent fuel pool storage expansion proceedings. It does not involve any consolidation or densification either of assemblies within the pool or pins within the assemblies. Rather, it simply involves the placement in presently unused space in the pool of additional racks of similar design to those presently resident in the pool. The proposal will have a slight impact on the heat load of the pool and does

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require the modification of several technical specifications; hence the requirement for the instant license amendment application.

Boston Edison accepts that the petitioner is the Attorney General of the Commonwealth, that his papers have been timely filed and that, *subject to* his tendering a supplement to his petition in which he identifies one or more admissible contentions, the petitioner has sufficient standing to intervene in this matter. It should be noted, however, that Boston Edison does not accept that the "concerns" asserted by petitioner in his hearing request constitute valid, litigable contentions in accordance with 10 C.F.R. § 2.714. Based upon the understanding that petitioner may at a later date file a supplement wherein specific contentions are asserted, Boston Edison will defer further response until that filing.

Respectfully submitted,
Boston Edison Company
By its attorneys



William S. Stowe
John M. Fulton
Boston Edison Company
800 Boylston Street
Boston, MA 02199
(617) 424-2544

Date: June 8, 1993

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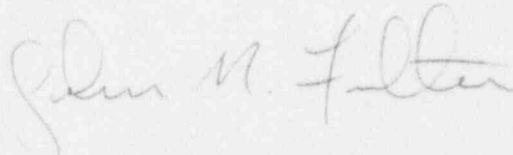
In the Matter of
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Docket No. 50-293
(Spent Fuel Pool Expansion)

NOTICE OF APPEARANCE

Notice is hereby given of the appearance of the undersigned for Boston Edison Company.

Respectfully submitted,



John M. Fulton
Senior Counsel
Boston Edison Company
800 Boylston Street
Boston, MA 02199
(617) 424-2553

Date: June 8, 1993

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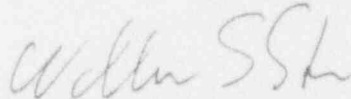
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Respectfully submitted,



William S. Stowe
Assistant General Counsel
Boston Edison Company
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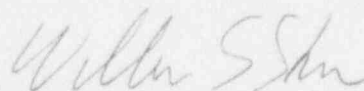
CERTIFICATE OF SERVICE

I hereby certify that copies of the Response of Boston Edison Company to the Massachusetts Attorney General's Request for a Hearing and Petition to Intervene along with the Notices of Appearance of John M. Fulton and William S. Stowe were served by first-class mail on the parties listed below on this date.

Office of the Secretary
Attn: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Date: June 8, 1993