

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Docket Nos. 50-237, 50-249, 50-254, 50-265]

9/26/78  
COMMONWEALTH EDISON COMPANY, and  
IOWA-ILLINOIS GAS & ELECTRIC COMPANY

ESTABLISHMENT OF ATOMIC SAFETY AND LICENSING BOARD  
TO RULE ON PETITIONS

Pursuant to delegation by the Commission dated December 29, 1972, published in the Federal Register (37 F.R. 28710) and Sections 2.105, 2.700, 2.702, 2.714, 2.714a, 2.717, and 2.721 of the Commission's Regulations, all as amended, an Atomic Safety and Licensing Board is being established to rule on petitions and/or requests for leave to intervene in the following proceeding:

COMMONWEALTH EDISON COMPANY, and  
IOWA-ILLINOIS GAS & ELECTRIC COMPANY

(Dresden Nuclear Power Station, Units 1 and 2)  
(Quad Cities Nuclear Power Station, Units 1 and 2)

This action is in reference to a notice published by the Commission on August 22, 1978, in the Federal Register (43 F.R. 37245) entitled "Proposed Issuance of Amendments to Facility Operating Licenses."

The Chairman of this Board and his address is as follows:

Gary L. Milhollin, Esq.  
1815 Jefferson Street  
Madison, Wisconsin 53711

- 2 -

The other members of the Board and their addresses  
are as follows:

Mrs. Elizabeth B. Johnson  
Union Carbide Corporation  
Nuclear Division  
P. O. Box X  
Oak Ridge, Tennessee 37830

Dr. Quentin J. Stober  
Fisheries Research Institute  
University of Washington  
Seattle, Washington 98195



James R. Yore, Chairman  
Atomic Safety and Licensing  
Board Panel

Dated at Bethesda, Maryland ,  
this 28th day of September 1978

Reg. Files



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

9/22/78

IN THE MATTER OF COMMONWEALTH  
EDISON CO. Dresden Station, Units  
2 and 3 )  
)  
)  
Amendments to Facility )  
Operating License Nos. DPR-19 )  
and DPR-25 )  
(Increase Spent Fuel Storage )  
Capacity) )

Docket Nos. 50-237  
50-249

NOTICE

TO: Richard J. Goddard, Esq.  
L. Dow Davis, IV, Esq.  
United States Nuclear  
Regulatory Commission  
Office of the Legal Director  
Washington, D.C. 2055

Mr. John W. Rowe, Esq.  
Isham, Lincoln and Beale  
One First National Plaza  
Chicago, Illinois 60690

PLEASE TAKE NOTICE that I have today filed with the  
NUCLEAR REGULATORY COMMISSION OF THE UNITED STATES a Petition to  
Intervene in this cause a copy of which is attached hereto and  
herewith served upon you.

PEOPLE OF THE STATE OF ILLINOIS  
WILLIAM J. SCOTT  
Attorney General  
State of Illinois

BY: Susan N. Sekuler  
SUSAN N. SEKULER

DATED: September 8, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF COMMONWEALTH )  
EDISON CO. Dresden Station, )  
Units 2 and 3 )  
 )  
Amendments to Facility )  
Operating License Nos. )  
DPR-19 and DPR-25 )  
(Increase Spent Fuel Storage )  
Capacity) )  
 )

Docket Nos. 50-237  
50-249

PETITION FOR LEAVE TO INTERVENE

The PEOPLE OF THE STATE OF ILLINOIS (hereinafter the "State of Illinois") by WILLIAM J. SCOTT, Attorney General of the State of Illinois, hereby moves the United States Nuclear Regulatory Commission (hereinafter the "Commission") for leave to intervene with respect to the Commission's consideration of the request of Commonwealth Edison Company (hereinafter "Licensee") for a modification to the spent fuel storage pool of the Dresden Nuclear Generating Station Units No. 2 and 3 and for concurrent issuances of amendments to Facility Operating License Nos. DPR-19 and DPR-25. This petition is filed pursuant to Sections 2.714 and 2.715(c) of Title 10 of the Code of Federal Regulations Part 2 and the "Notice of Proposed Issuance of Amendments to Facility Operating Licenses"; August 11, 1978 (43 F.R. 30938).

The State of Illinois requests that the Commission grant a hearing on this proposed amendment and that the State of Illinois and any other interested individuals and organizations be allowed to participate fully in such proceedings.

The State of Illinois further requests that the Commission prepare an Environmental Impact Statement as required by 10 C.F.R. Part 51 on the Licensee's proposed amendment to its license.

These requests are made pursuant to 42 U.S.C. §2239 and such other statutes and regulations as may be applicable. The facts that constitute the basis for this Petition are as follows:

I

INTEREST OF THE STATE OF ILLINOIS

The People of the State of Illinois are citizens of a state of the United States, and are represented in this action by William J. Scott, Attorney General of the State of Illinois, who represents the People of the State of Illinois in all cases in which they are interested. Illinois Constitution of 1970, Art. V, Sec. 15; Ill. Rev. Stat., ch. 14, par. 4.

The State of Illinois has a substantial interest in the Licensee's request in that:

A. The Dresden Nuclear Generating Station is located in the State of Illinois;

B. The State of Illinois has an interest in the storage of additional radioactive spent fuel at the Dresden site which may create a hazard to the citizens of the State. The Licensee's proposed license revision was not considered during the licensing proceedings for Dresden nor was it considered in the Final Safety Analysis Report (FSAR) for Dresden. The proposed modification in the operation of the spent fuel pool differs significantly from the method of operation treated in the FSAR

for Dresden. Thus the State of Illinois has an interest in a full examination of the proposed license revision to ensure that public health and safety will be protected.

C. The technical information submitted by the Licensee in support of its amendment request is presently inadequate to assess all the effects of proposed action on the citizens of Illinois, inasmuch as the Licensee's application and supporting documentation for modification to the spent fuel storage pools do not indicate the ultimate effects of storing large amounts of zircaloy clad spent fuel in Borafilled stainless steel racks for long, undetermined time periods.

D. Grant of the proposed amendment to expand spent fuel storage capacity would contradict existing NRC policy in that it would undermine the effect of the developing generic EIS regarding the permanent and preferred disposition of spent fuel. Additional storage at Dresden is not needed to prevent an imminent shut down of the facility. Indeed the Licensee has several more years before it will reach that critical point. It is probable that the generic EIS will be issued prior to December, 1979. If the generic EIS determines that long term on site, spent fuel storage is preferred the Licensee will have ample opportunity to reapply for an amendment to expand the spent fuel pools. However, at present such action would be inconsistent with national goals and should be denied.

E. The State of Illinois has a responsibility to protect the health, safety and environment of its citizens and to make every effort to ensure that the alternatives to Edison's requests and the long term consequences of those requests are fully considered. The State of Illinois has a further responsibility to its citizens to ensure that,

if it is determined that the proposed action is necessary, any modification of the spent fuel storage pool shall be designed, constructed, operated and maintained in such manner as to prevent adverse environmental and health effects within the State of Illinois and to prevent hazards to public health resulting from additional storage of spent fuel.

#### RESERVATIONS

As these contentions are in part based upon documents which may be superseded, modified, or supplemented before or during a hearing on this matter, the State of Illinois respectfully reserves the right to modify, amend, add or delete contentions.

#### CONTENTIONS

1-22. The State of Illinois incorporates by reference Contentions 1 and 3-23 of its Petition to Intervene In the Matter of Commonwealth Edison Co. Zion Station Units 1 and 2: Amendments to Facility License Nos. DPR-39 and DPR-48 (Increase Spent Fuel Storage Capacity) Docket Nos. 50-237 and 50-249, which was filed August 15, 1978. (See Appendix A), and states that these contentions are equally applicable to to the Dresden License Application.

23. Approval of the amendment request would be contrary to the NRC policy position on spent fuel storage which prohibits non-emergency licensing of any expanded storage facility prior to the adoption of an official long range policy regarding the permanent storage of spent fuel. See "Intent to Prepare Generic Environmental Impact Statement of Handling and Storage of Spent Light Water Power Reactor Fuel", 40 F.R. 42801, September 16, 1975.

There is no emergency need to rerack compactly as the existing storage pools, which are presently being reracked in conservative arrays will contain more space than is necessary to accommodate full core discharge; therefore failure to grant the application at this time poses no threat of imminent shut down of the facility.

24. The application and supporting documentation inadequately discuss the ramifications of changing the rack configurations in a pool wherein damaged fuel is stored.

A. There has been insufficient consideration of potential occupational hazards to workers installing racks.

B. There is no discussion of the need to package defective fuel prior to removing and replacing it in pool.

C. There is no discussion of the effects of damaged fuel on a pool containing additional fuel elements in compacted racks.

D. There is no discussion of possible hazards and credible accidents involving release of additional radiation, chemicals and/or solid objects such as sections of cladding and fuel rods from the defective fuel stored in the pool.

25. The application and supporting documentation inadequately discuss potential occupational hazard from exposure to increased radiation emanating from defective fuel stored in the spent fuel pool:

A. To workers performing routine maintenance.

B. To workers performing special functions necessary to contain excess radiation emanating from damaged spent fuel.

26. The application and supporting documentation inadequately discuss the Quality Assurance programs regarding the integrity of the compacted racks and fuel baskets prior to installation and use.

27. The application and supporting documentation inadequately discuss inspection procedures necessary to detect defects in the compacted racks and baskets:

- A) prior to installation.
- B) following installation but prior to use.

WHEREFORE, the People of the State of Illinois ask that the Commission:

A. Institute a formal proceeding to consider Commonwealth Edison's request for license amendments to allow notification to the spent fuel storage pool in order to increase its capacity.

B. Grant the State of Illinois leave to intervene and be admitted as a party in such hearing.

C. Issue no license amendment unless and until a final environmental impact statement has been published and considered by the Commission.

D. Issue no license amendment unless and until all of Petitioner's Contentions are satisfactorily answered and resolved.

Further, the State of Illinois asks that the Commission act upon its Petition in expedient manner and that the Commission decide whether to grant the relief requested in this Petition before any further consideration of or action on the Licensee's request for a license amendment concerning Dresden, either by the Staff or the Commission, prior

to the Commission's action on this Petition shall be considered a denial of this Petition and final agency action subject to judicial review. The State of Illinois further requests that it be given prompt notice of any action taken by the Commission or the Staff on the Licensee's request to amend its license concerning the expansion of spent fuel storage at Dresden by contacting Assistant Attorneys General Susan N. Sekuler or Russel R. Eggert, either by telephone or telegram, on the day such action is taken.

PEOPLE OF THE STATE OF ILLINOIS

WILLIAM J. SCOTT  
Attorney General  
State of Illinois

BY:

  
RUSSELL R. EGGERT  
Assistant Attorney General

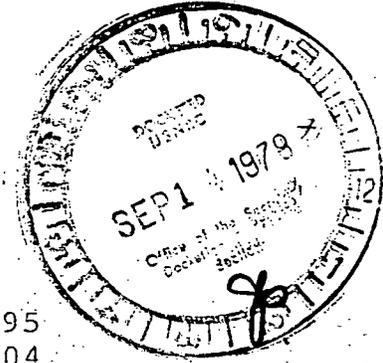
OF COUNSEL:

RUSSELL R. EGGERT  
Chief, Northern Region  
Environmental Control Division

SUSAN N. SEKULER  
Assistant Attorney General  
Environmental Control Division

188 West Randolph Street  
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Chicago, Illinois 60601  
(312) 793-2491

UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF COMMONWEALTH )  
 EDISON CO. Zion Station, Units )  
 1 and 2 )  
 )  
 Amendments to Facility )  
 Operating License Nos. )  
 DPR-39 and DPR-48 )  
 (Increase Spent Fuel Storage )  
 Capacity) )  
 )

Docket Nos. 50-295  
 50-304

PETITION FOR LEAVE TO INTERVENE

The PEOPLE OF THE STATE OF ILLINOIS (hereinafter the "State of Illinois") by WILLIAM J. SCOTT, Attorney General of the State of Illinois, hereby moves the United States Nuclear Regulatory Commission (hereinafter the "Commission") for leave to intervene with respect to the Commission's consideration of the request of Commonwealth Edison Company (hereinafter "Licensee") for a modification to the spent fuel storage pool of the Zion Nuclear Generating Station Unit Nos. 1 and 2 and for concurrent issuances of amendments to Facility Operating License Nos. DPR-39 and DPR-48. This petition is filed pursuant to Section 2.714 of Title 10 of the Code of Federal Regulations Part 2 and the "Notice of Proposed Issuance of Amendments to Facility Operating Licenses"; July 18, 1978 (43 F.R. 30938).

The State of Illinois requests that the Commission grant a hearing on this proposed amendment and that the State of Illinois and any other interested individuals and organizations be allowed to participate fully in such proceedings.

The State of Illinois further requests that the Commission prepare an Environmental Impact Statement as required by 10 C.F.R. Part 51 on the Licensee's proposed amendment to its license.

These requests are made pursuant to 42 U.S.C. §2239 and such other statutes and regulations as may be applicable. The facts that constitute the basis for this Petition are as follows:

I.

INTEREST OF THE STATE OF ILLINOIS

The People of the State of Illinois are citizens of a state of the United States, and are represented in this action by William J. Scott, Attorney General of the State of Illinois, who represents the People of the State of Illinois in all cases in which they are interested. Illinois Constitution of 1970, Art. V, Sec. 15; Ill. Rev. Stat., ch. 14, par. 4.

The State of Illinois has a substantial interest in the Licensee's request in that:

A. The Zion Nuclear Generating Station is located in the State of Illinois;

B. The State of Illinois has an interest in the storage of additional radioactive spent fuel at the Zion site which may create a hazard to the citizens of the State. The Licensee's proposed license revision was not considered during the licensing proceedings for Zion nor was it considered in the Final Safety Analysis Report (FSAR) for Zion. The proposed modification in the operation of the spent fuel pool differs significantly from the method of operation treated in the FSAR

for Zion. Thus the State of Illinois has an interest in a full examination of the proposed license revision to ensure that public health and safety will be protected.

C. The technical information submitted by the Licensee in support of its amendment request is presently inadequate to assess all the effects of proposed action on the citizens of Illinois, inasmuch as the Licensee's application and supporting documentation for modification to the spent fuel storage pool do not indicate the ultimate effects of storing large amounts of zircaloy clad spent fuel in Borafilled stainless steel racks for long, undetermined time periods.

D. Grant of the proposed amendment to expand spent fuel storage capacity would contradict existing NRC policy in that it would undermine the effect of the developing generic EIS regarding the permanent and preferred disposition of spent fuel. Additional storage at Zion is not needed to prevent an imminent shut down of the facility. Indeed the Licensee has four more years before it will reach that critical point. It is probable that the generic EIS will be issued prior to December, 1979, two years before the Zion pool will be filled. If the generic EIS determines that long term, on site, spent fuel storage is preferred the Licensee will have ample opportunity to reapply for an amendment to expand the spent fuel pool. However, at present such action would be inconsistent with national goals and should be denied.

E. The State of Illinois has a responsibility to protect the health, safety and environment of its citizens and to make every effort to ensure that the alternatives to Edison's requests and the

long term consequences of those requests are fully considered. The State of Illinois has a further responsibility to its citizens to ensure that, if it is determined that the proposed action is necessary, any modification of the spent fuel storage pool shall be designed, constructed, operated and maintained in such a manner as to prevent adverse environmental and health effects within the State of Illinois and to prevent hazards to public health resulting from additional storage of spent fuel.

#### RESERVATIONS

As these contentions are in part based upon documents which may be superseded, modified, or supplemented before or during a hearing on this matter, the State of Illinois respectfully reserves the right to modify, amend, add or delete contentions.

#### CONTENTIONS

1. Approval of the proposed license amendment would be a major action of the Commission significantly affecting the quality of the human environment in Illinois. The National Environmental Policy Act of 1969 as amended requires the Licensee to submit an environmental report and requires the Commission to prepare an environmental impact statement with respect to the proposed license amendment.

2. Approval of the amendment request would be contrary to the NRC policy position on spent fuel storage which prohibits non-emergency licensing of any expanded storage facility prior to the adoption of an official long range policy regarding the permanent

storage of spent fuel. See "Intent to Prepare Generic Environmental Impact Statement of Handling and Storage of Spent Light Water Power Reactor Fuel", 40 F.R. 42801, September 16, 1975.

A. There is no emergency need to rerack as the existing storage pool contains more space than is necessary to accommodate full core discharge.

B. The existing pool is able to accommodate normal refueling discharges until 1981, therefore failure to grant the application at this time poses no threat of imminent shut down of the facility.

3. Approval of the amendment request would be contrary to NRC policy as the Licensee has not shown that a shutdown caused by insufficient pool storage capability would adversely effect the community currently being served by the facility either economically or by substantially diminishing electricity available to those currently served by Zion. In fact, any diminution of power output from the Zion station could easily be supplemented by currently under-utilized fossil fuel plants serving the Chicago area.

4. The amendment request and supporting documentation do not address all alternatives for managing the spent fuel problem in the short term.

A. The licensee has not explored the alternative of expanding the physical area of the existing pool.

B. The licensee has not explored the alternative of curtailing

power output from Zion either in conjunction with energy conservation and pricing alternatives which would result in a reduction of demand or in conjunction with increasing the use of under-utilized fossil fuel plants to meet current demand.

5. The amendment request is premised on future activity by the Licensee which would violate the policy underlying proposed regulation 10 C.F.R. §20. 306, 39 F.R. 32921 (1974), which would require the shipment from the plant of all transuranic waste within five years after its generation. The policy of that proposed regulation is fully applicable to this case, and supports rejection of the amendment request.

6. The Licensee has made no showing that it will be financially capable of meeting the costs of eventual disposal of the spent fuel wastes which it intends to store in the expanded spent fuel pool.

A. The Licensee should be required to submit cost evaluations for handling, transportation, storage, disposal and permanent surveillance of excess spent fuel.

B. The Licensee should be required to provide a fund or security to cover costs of waste disposal.

7. The amendment request and supporting documentation do not adequately discuss monitoring procedures. In light of the proposed compaction and long term storage of nuclear spent fuel the Licensee should clarify the following:

A. The monitoring system that is used and its range of sensitivity;

- B. The frequency of released emissions;
- C. The amount of radioactive materials emitted including
  - 1. a definition of negligible, and
  - 2. the procedure by which negligible amounts of radioactivity are quantified;
- D. Methods of detecting a loss of neutron material and swelling of stainless steel rods in storage racks.
- E. procedures to monitor ground water movement in the vicinity of the plant for leakage from spent fuel pool.

8. The request and supporting documentation fail to establish that the plant will adequately and safely handle the incremental burden of radioactivity resulting from the proposed expansion of capacity. There has been insufficient development of all credible accident scenarios. For instance, the nuclear design criteria calculations for abnormal conditions are based solely on single operator error.

9. The radioactive waste treatment system for the spent fuel pool has not been shown to be adequate for the proposed expansion of capacity:

A. Whether or not damaged fuel has been stored in the expanded storage pool.

B. Where leakage exceeds 1%.

10. The Licensee has failed to discuss the possibility of encapsulating defective spent fuel elements upon discovering leakage or disintegration due to loss of cladding integrity.

11. The Licensee's discussion of spent fuel pool boiling is

inadequate in that there is no discussion of possible fuel cladding damage under such conditions.

12. The amendment request and supporting documentation discuss neither the continued integrity of the spent fuel rods during long-term storage in the pool nor possible increased radioactive releases from loss of rod integrity, which may create difficulties in moving and shipping the rods from the site after a prolonged storage period.

A. The amendment request and supporting documentation do not analyze the long-term electrolytic corrosion effects of using dissimilar alloys for the pools liners, pipes, storage racks, and storage rack bases.

B. The Licensee has not adequately examined the effects of accelerated corrosion, microstructural changes, alterations in mechanical properties, stress corrosion, cracking, intergranular corrosion, and hydrogen absorption and precipitation by the zirconium alloys due to the proposed compaction and long-term storage of spent fuel.

13. The amendment request and supporting documentation do not give sufficient data to fully assess the durability and performance of the Boral stainless steel rods which form the spent fuel storage racks in the following respects;

A. There is inadequate analysis of the corrosion rate of the rods.

B. There is no calculation of the effect of the water chemistry on the Boral within the stainless rods.

C. There is inadequate information as to the life expectancy of the Boral rods.

D. There is no mention of the possible swelling of Boral within the stainless steel rods, a condition which could affect, among other things, removal of fuel bundles from the baskets.

14. The amendment request and supporting documentation do not consider possible degeneration of the Boral density due either to generic defects or to mechanical failure which would diminish the effectiveness of the Boral as a neutron absorber, thus leading to criticality in the spent fuel pool.

15. The proposed expanded fuel storage pool configuration does not positively preclude the possibility of criticality in the spent fuel pool. All credible consequences associated with criticality excursions due to errors in spent fuel spacing or to accidents during fuel handling operations are not adequately discussed.

16. The Licensee's criticality consideration is based solely on the theoretical calculations using various systems such as CREETAN and CITATION to arrive at  $K_{eff}$  .95. The Licensee should be required to submit substantiated data using actual test results so that true  $K_{eff}$  .95 is arrived at.

17. The heat removal capacity of the Spent Fuel Cooling Systems has not been shown to be adequate, under all credible conditions or normal, abnormal, faulted, or accident operation to support the proposed expansion of the spent fuel storage pool capacity.

A. Increased thermal load on the Cooling System due to the proposed expansion of the spent fuel storage pool capacity could interfere with the ability of safety related systems that are dependent upon the Cooling System (such as the Residual Heat Removal System) to perform their functions; and

B. An increased thermal load on the Component Cooling System due to an accident triggering safety related systems (such as the Residual Heat Removal System) could impair the ability of the Component Cooling System to serve the expanded spent fuel storage pool.

18. The amendment request and supporting documentation do not establish the method by which the Licensee will positively preclude the movement of heavy objects, such as the shipping casks, over the pool at all times when that pool holds stored spent fuel, which could lead to possible damage to spent fuel from the accidental dropping of such objects.

19. The Licensee has failed to supply sufficient information with respect to the installation of the new spent fuel storage racks to evaluate the possibility of accidental damage to stored spent fuel assemblies during such activity.

20. The evaluation of additional radiological impacts offsite due to the proposed expansion of the spent fuel pool is inadequate.

A. There is no calculation of additional heat rejected to the environment from the proposed expansion of the spent fuel pool storage capacity.

B. There is no analysis of possible hazards to flora and fauna created by additional heat rejected to the environment.

21. The Licensee has failed to supply sufficient information to assess the occupational radiation dosage to workers who will be engaged in rearranging stored spent fuel and in installing new spent fuel storage racks.

22. The Licensee has not presented a revised and updated version of its medical and health care plan for those injured in evacuation or emergency situations due to more dense and increased storage of spent fuel to assure the public safety.

23. The amendment request and supporting documentation do not include anti-sabotage and security plans, so that there is no assurance that adequate protection has been developed.

WHEREFORE, the People of the State of Illinois ask that the Commission:

A. Institute a formal proceeding to consider Commonwealth Edison's request for license amendments to allow notification to the spent fuel storage pool in order to increase its capacity.

B. Grant the State of Illinois leave to intervene and be admitted as a party in such hearing.

C. Issue no license amendment unless and until a final environmental impact statement has been published and considered by the Commission.

D. Issue no license amendment unless and until all of Petitioner's Contentions are satisfactorily answered and resolved.

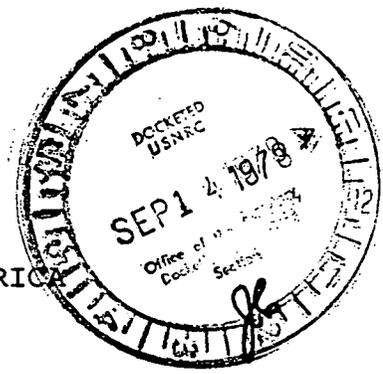
Further, the State of Illinois asks that the Commission act upon its Petition in expedient manner and that the Commission decide whether to grant the relief requested in this Petition before any further consideration of or action on the Licensee's request for a license amendment concerning Zion, either by the Staff or the Commission. Any action upon the Licensee's request, either by the Staff or the Commission, prior to the Commission's action on this Petition shall be considered a denial of this Petition and final agency action subject to judicial review. The State of Illinois further requests that it be given prompt notice of any action taken by the Commission or the Staff on the Licensee's request to amend its license concerning the expansion of spent fuel storage at Zion by contacting Assistant Attorneys General Susan N. Sekuler or Russell R. Eggert, either by telephone or telegram, on the day such action is taken.

PEOPLE OF THE STATE OF ILLINOIS

WILLIAM J. SCOTT  
Attorney General  
State of Illinois

BY: \_\_\_\_\_  
RUSSELL R. EGGERT  
Assistant Attorney General

BEFORE THE NUCLEAR REGULATORY  
COMMISSION OF THE UNITED STATES OF AMERICA



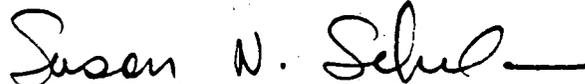
A F F I D A V I T

I, SUSAN N. SEKULER, an attorney, hereby certify the following in support of the foregoing Petition to Intervene:

1. That I am an Assistant Attorney General with the Environmental Control Division of the Office of the Attorney General of Illinois;

2. That I am of counsel for the State of Illinois in the matter of Commonwealth Edison Co., Dresden Station, Units 2 and 3; Docket Nos. 50-237 and 50-249;

3. That all facts alleged in the Petition to Intervene attached hereto are true to the best of my knowledge and belief.

  
SUSAN N. SEKULER

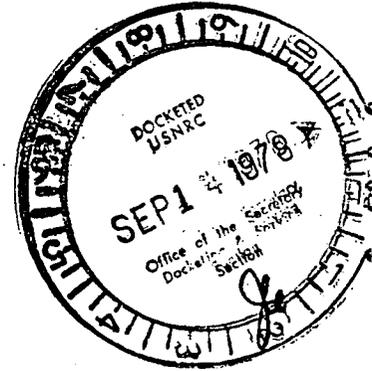
SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 8TH DAY  
OF SEPTEMBER, 1978.

  
Notary Public

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF COMMONWEALTH )  
EDISON CO. Dresden Station, )  
Units 2 and 3 )  
Amendments to Facility )  
Operating License Nos. )  
DPR-19 and DPR-25 )  
(Increase Spent Fuel Storage )  
Capacity) )

Docket Nos. 50-237  
50-249



CERTIFICATE OF SERVICE

I, SUSAN N. SEKULER, hereby certify that I have this 8th day of September, 1978 served copies of the foregoing Petition for Leave to Intervene on each of the following persons by depositing same in envelopes addressed to said persons, first class, postage prepaid, and depositing with the U.S. Postal Service at 160 North La Salle Street, Chicago, Illinois 60601.

Secretary of the Commission  
United States Nuclear Regulatory  
Commission  
Washington, D.C. 2055  
Attention: Chief, Docketing  
and Service Section

Executive Legal Director  
United States Nuclear Regulatory  
Commission  
Washington, D.C. 2055

Mr. John W. Rowe  
Isham, Lincoln & Beale  
One First National Plaza  
Chicago, Illinois 60690

*Susan N. Sekuler*

---

SUSAN N. SEKULER

Assistant Attorney General

ENVIRONMENTAL CONTROL DIVISION  
188 West Randolph Street  
Suite 2315  
Chicago, Illinois 60601  
(312) 793-2491

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF COMMONWEALTH )  
EDISON CO. Dresden Station, Units )  
2 and 3 )  
Amendments to Facility )  
Operating License Nos. )  
DPR-19 and DPR-25 )  
(Increase Spent Fuel Storage )  
Capacity) )

Docket Nos. 50-237  
50-249

A P P E A R A N C E

The PEOPLE OF THE STATE OF ILLINOIS hereby appear in  
the above-captioned matter by WILLIAM J. SCOTT, Attorney General  
of the State of Illinois.

WILLIAM J. SCOTT  
Attorney General  
State of Illinois

BY:

  
RUSSELL R. EGGERT

Assistant Attorney General

OF COUNSEL:

RUSSELL R. EGGERT  
Chief, Northern Region  
Environmental Control Division

SUSAN N. SEKULER  
Assistant Attorney General  
Environmental Control Division

188 West Randolph Street  
Suite 2315  
Chicago, Illinois 60601  
(312) 793-2491

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

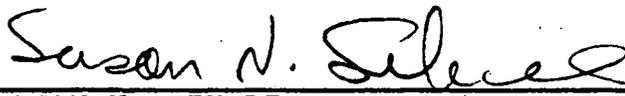
In the Matter of )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-237  
(Dresden Station, Units 2 and 3) ) 50-249



NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the captioned matter. In accordance with §2.713(a), 10 C.F.R. Part 2, the following information is provided:

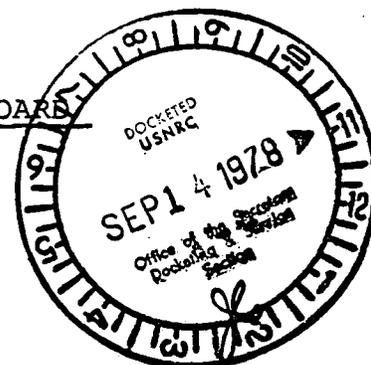
Name	Susan N. Sekuler
Address	Illinois Attorney General 188 West Randolph Street Suite 2315 Chicago, Illinois 60601
Telephone Number	Area Code-312 793-2491
Admissions	Supreme Court of Illinois. United States District Court, Northern District of Illinois. United States Court of Appeals for the Seventh Circuit. United States Court of Appeals for the D.C. Circuit.
Name of Party	People of the State of Illinois

  
\_\_\_\_\_  
SUSAN N. SEKULER  
Assistant Attorney General

Dated at Chicago, Illinois  
this 8th day of September, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

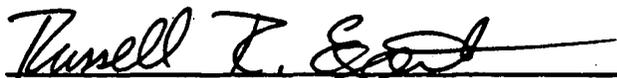


In the Matter of )  
 )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-237  
 ) 50-249  
(Dresden Station, Units 2 and 3) )

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the captioned matter. In accordance with §2.713(a), 10 C.F.R. Part 2, the following information is provided:

Name	Russell R. Eggert
Address	Illinois Attorney General 188 West Randolph Street Suite 2315 Chicago, Illinois 60601
Telephone Number	Area Code 312- 793-2491
Admissions	Supreme Court of Illinois United States District Court, Northern District of Illinois United States Court of Appeals for the Seventh Circuit United States Court of Appeals for the D.C. Circuit
Name of Party	People of the State of Illinois

  
RUSSELL R. EGGERT  
Assistant Attorney General

Dated at Chicago, Illinois  
this 8th day of September,  
1978.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

[Docket Nos. 50-237 and 50-249]

COMMONWEALTH EDISON COMPANY



ESTABLISHMENT OF ATOMIC SAFETY AND LICENSING  
BOARD TO RULE ON PETITIONS

Pursuant to delegation by the Commission dated December 29, 1972, published in the Federal Register (37 F.R. 28710) and Sections 2.105, 2.700, 2.702, 2.714, 2.714a, 2.717 and 2.721 of the Commission's Regulations, all as amended, an Atomic Safety and Licensing Board is being established to rule on petitions and/or requests for leave to intervene in the following proceeding:

COMMONWEALTH EDISON COMPANY

(Dresden Nuclear Power Station,  
Units 2 and 3)

This action is in reference to a notice published by the Commission on August 11, 1978, in the Federal Register (43 F.R. 35763) entitled "Proposed Issuance of Amendments to Operating Licenses."

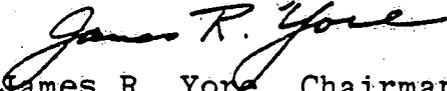
The Chairman of this Board and his address is as follows:

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

The other members of the Board and their addresses  
are as follows:

Dr. Linda W. Little  
Research Triangle Institute  
P. O. Box 12194  
Research Triangle Park, N.C. 27709

Dr. Forrest J. Remick  
305 E. Hamilton Avenue  
State College, Pa. 16801

  
James R. Yore, Chairman  
Atomic Safety and Licensing  
Board Panel

Dated at Bethesda, Maryland  
this 21st day of September 1978.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

COMMONWEALTH EDISON COMPANY )

(Dresden Nuclear Power Station, )  
Units 2 and 3) )  
)  
)  
)  
)  
)

Docket No.(s) 50-237  
50-249

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s)\* upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated at Washington, D.C. this

22<sup>nd</sup> day of Sept 1978.

Peggy T. Downing

Office of the Secretary of the Commission

- \* 1- Petition for leave to Intervene (State of Ill. dtd 9/8/78
- 2- Establishment of ASLB to Rule on Petitions dtd 9/21/78

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
COMMONWEALTH EDISON COMPANY ) Docket No.(s) 50-237  
 ) 50-249  
(Dresden Nuclear Power Station, )  
Units 2 and 3) )  
 )

SERVICE LIST

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