

*For
Per
George Dick*



June 19, 1998

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Response to Request for Information Related to Petition
Filed Pursuant to 10CFR2.206

Braidwood Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. 50-456 and 50-457

Byron Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. 50-454 and 50-455

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-40
NRC Docket Nos. 50-295 and 50-304

1/1

A001

References:

- (1) Mr. George F. Dick, Jr. (NRC) Letter to Mr. Oliver D. Kingsley, Jr. (ComEd), dated May 20, 1998
- (2) Mr. Samuel J. Collins (NRC) Letter to Mr. Michael D. Kohn (The National Whistleblower Legal Defense and Educational Fund), dated April 29, 1998

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This letter provides the Commonwealth Edison (ComEd) Company response to the request for information related to a petition dated March 25, 1998, filed by Michael D. and Steven M. Kohn, attorneys for The National Whistleblower Legal Defense Fund and Mr. Randy Robarge, requesting NRC action pursuant to 10 CFR 2.206. ComEd's response to the Petition was requested by the NRC in Reference (1). We received a copy of the NRC letter on May 20, 1998, and as requested, we are providing our response within 30 days of receipt of the May 20, 1998 NRC letter.

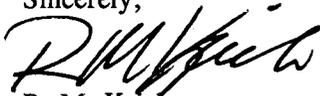
We consider that the Petition is wholly without merit and fails to meet the legal standard applicable to 10 CFR 2.206. Further, the Petition is a misrepresentation of facts pertaining to a proceeding pending before the U. S. Department of Labor, Case No. 98-ERA-2, concerning Section 211 of the Energy Reorganization Act. The Petition is based upon unfounded allegations that ComEd's actions pertaining to that proceeding constitute violations of 10 CFR 50.7(f). The facts do not support these allegations. No violations of NRC regulations occurred and, therefore, the relief requested by Petitioners should be denied entirely.

In Reference (2), the NRC informed Petitioners that the issues raised in the Petition did not warrant immediate action. The NRC determined that the issues raised in the Petition, based upon the information provided by the Petitioners, "...do not constitute an immediate safety concern..." at ComEd's nuclear facilities. The NRC further informed the Petitioners that it "...has not found that the licensee [ComEd] discourages employees at ComEd sites from utilizing the process of filing PIFs to identify safety concerns." ComEd concurs with the NRC's findings.

As requested in the second paragraph of Reference (1), the enclosed response includes a discussion of ComEd's position regarding the relationship between Problem Identification Forms (PIFs) and the concept of protected activity, ComEd's reasons for objecting to certain confidentiality agreement provisions suggested by the petitioning attorneys in the Section 211 proceeding mentioned in the Petition, and ComEd's position regarding the relationship between the confidentiality agreement and 10 CFR 50.7(f). In addition, as requested in the third paragraph of Reference (1), ComEd is enclosing a copy of the March 16, 1998 letter to Mr. Michael Kohn that is referenced at pp. 8-9 of the Petition.

If you have any questions with respect to this submittal, please call me at 630-663-7330 or Mr. Robert E. Helfrich at 312-394-4970.

Sincerely,



R. M. Krich

Vice President-Regulatory Services

Enclosure: Response of Commonwealth Edison Company (ComEd)
to the 10 CFR 2.206 Petition Dated March 25, 1998

cc: Regional Administrator – RIII
Braidwood – Senior Resident Inspector
Byron – Senior Resident Inspector
Dresden – Senior Resident Inspector
LaSalle – Senior Resident Inspector
Quad Cities – Senior Resident Inspector
Zion – Senior Resident Inspector
Illinois Department of Nuclear Safety

**RESPONSE TO NRC REQUEST FOR INFORMATION RELATED TO PETITION
FILED PURSUANT TO 10CFR 2.206 DATED MAY 20, 1998**

RESPONSE TO COMMONWEALTH EDISON COMPANY (COMED) TO THE 10CFR
2.206 PETITION DATED MARCH 25, 1998

On March 25, 1998, Michael D. and Steven M. Kohn, attorneys for The National Whistleblower Legal Defense Fund and Mr. Randy Robarge ("Petitioners"), filed a petition with the U. S. Nuclear Regulatory Commission (NRC) requesting enforcement and other actions pursuant to 10 CFR 2.206 ("Petition"). As grounds for the request, the Petitioners assert that NRC action should be taken because of: "(1) ComEd's interference with the willingness of employees to file "Problem Identification Forms" or "PIFs" for fear that the employees could be retaliated against by ComEd for doing such; and (2) the intentional prohibition of an employee from being able to directly communicate information to the U.S. Nuclear Regulatory Commission ("NRC")." The Petition also asserts that ComEd intentionally violated 10 CFR 50.7, "Employee protection".

By letter dated April 29, 1998, the NRC informed the Petitioners that the issues raised in the Petition did not warrant immediate action. The NRC determined that the issues raised in the Petition, based upon the information provided by the Petitioners, "...do not constitute an immediate safety concern..." at ComEd's nuclear facilities. The NRC further informed the Petitioners that it routinely assesses ComEd's actions to identify problems at its nuclear facilities, including the processes used by ComEd's employees to identify problems (e.g., the PIFs process). Based on these NRC assessments, as well as investigations of particular allegations, the NRC "has not found that the licensee [ComEd] discourages employees at ComEd sites from utilizing the process of filing PIFs to identify safety concerns." ComEd concurs with the NRC's findings.

Discussion

The Petition should be denied in its entirety because it fails to satisfy the legal standard for NRC action under 10 CFR 2.206. The institution of a proceeding or the initiation of an enforcement action in response to a request under 10 CFR 2.206 is appropriate only when substantial health and safety issues have been raised. Arizona Public Service Co. (Palo Verde Nuclear Generating Station, Units 1, 2 and 3), DD-92-1, 35 NRC 133, 143-144 (1992); Consolidated Edison Co. of New York (Indian Point, Units 1, 2 and 3), CLI-75-8, 2 NRC 173, 176 (1975); Washington Public Power Supply System (WPPSS Nuclear Project No. 2), DD-84-7, 19 NRC 899, 923 (1984).

The Petition fails to articulate substantial health and safety issues related to nuclear power safety at ComEd's plants (see NRC's April 29, 1998 letter, noted above). The Petition is simply a misrepresentation of facts pertaining to a proceeding pending before the U. S. Department of Labor, Case No. 98-ERA-2, concerning Section 211 of the Energy Reorganization Act. "A mere dispute over factual issues does not suffice." Northern Indiana Public Service Co. (Bailly Generating Station, Nuclear-1), CLI-78-7, 7 NRC 429, 433 (1978).

The use of 10 CFR 2.206 to raise disputes pertaining to the give-and-take of discovery in such a proceeding, is wholly inappropriate. Petitioners' two allegations, as set forth in the Petition, demonstrate that counsel for Petitioners were merely dissatisfied with ComEd's legitimate response to an inappropriate discovery request (Allegation I) and with the negotiated terms of a confidentiality agreement governing discovery that was signed and agreed to by both parties and then jointly presented to the Administrative Law Judge, who approved the agreement (Allegation II).

Because of the significant factual misrepresentations contained therein, ComEd chooses not to restate the allegations on pp. 2 and 6 of the Petition.

Allegation I.

Allegation I in the Petition (p. 2), concerning whether the filing of PIFs amounts to protected activity, should be dismissed. The allegation mischaracterizes ComEd's answer to an inappropriate discovery request lodged by the complainant in the above noted Section 211 proceeding. ComEd denied the complainant's request for admission of fact in that instance, on the basis that it called for a legal conclusion and was overly broad, vague and ambiguous. ComEd categorically rejects the ploy by Petitioners of suggesting, on page 4 of the Petition, that ComEd has denied that the filing of a PIF constitutes protected activity. If complainant was concerned about ComEd's objections, he could have brought his concern properly before the Administrative Law Judge handling the matter.

In short, the Allegation is simply incorrect as a matter of fact, and totally disregards the narrow perspective of ComEd's response. ComEd's denial in that particular context was merely an objection to an improperly worded litigation discovery request to admit. Nothing in ComEd's response suggests ComEd does not recognize the broader legal question that was buried within that request. ComEd recognizes that the preparation of internal nuclear safety related documents, such as a PIF, could give rise to protected activity.

In this regard, the anonymous affiant in the redacted affidavit set forth as Exhibit 5 of the Petition appears to suffer from the same misunderstanding of fact as Petitioners do regarding ComEd's response to the discovery request at issue. Most telling, is the reference in paragraph 4 of the affidavit to the "official legal position" of ComEd. This choice of words appears to indicate some coaching on the part of someone, perhaps counsel for Petitioners or Mr. Robarge himself, to assist the affiant in achieving that

misunderstanding. This is all the more likely since Petitioners' counsel is the likely source of the disclosure to the affiant of the "official legal position." It is simply an error to stretch ComEd's discovery response into an official legal position about PIFs.

Allegation II.

Allegation II in the Petition (p. 6), concerning whether the court-approved confidentiality Order entered by the Administrative Law Judge in the above mentioned Section 211 proceeding violates 10 CFR 50.7(f), also should be dismissed. Section 50.7(f) applies to agreements "affecting the compensation, terms, conditions, or privileges of employment [including settlement agreements]. . . ." See 55 Fed. Reg. 10,387, 10,399 (March 21, 1990) (Final Rule) ("The Commission is, therefore, maintaining in the final rule the application of its prohibitions to all agreements affecting the compensation, terms, conditions, and privileges of employment").

ComEd recognizes that the NRC construes that provision broadly, for example, in situations involving management "instructions" that might be interpreted as a condition of employment that could discourage employees from engaging in protected activity. The agreement contained in the confidentiality Order referred to in Allegation II, however, is clearly outside the ambit of 10 CFR 50.7(f). It is not an agreement affecting the compensation, terms, conditions, or privileges of employment. It is not a settlement agreement with an employee. It is not "instructions" to an employee that could impede any protected activity. Rather, it is merely a tool implemented by an Administrative Law Judge of the U. S. Department of Labor (which agency has complementary responsibilities with the NRC in this area) to facilitate the exchange of potentially confidential litigation documents as part of an ongoing Section 211 proceeding. The Section 211 complainant's disagreement with provisions of the Order governing

designation and exchange of confidential information between the parties does not establish a violation of Section 50.7(f).

The confidentiality Order, **Exhibit A**, embodies an agreement that was signed by counsel for ComEd and counsel for the Section 211 complainant in the above-mentioned case, and then jointly presented to the Administrative Law Judge for entry. The Order is styled a "Stipulation and Order Governing Confidentiality of Documents and Information." The sole purpose of this Order was to allow either party to designate something as "confidential," such as an employee's personnel file containing sensitive information, for example, to protect against the unfettered publication of that information to third parties without notice to the designating party. The Order contains a mechanism (Paragraphs 6-8) for either party to that case to challenge the other's designation of any material as confidential.

ComEd has a legitimate interest in protecting against the disclosure of confidential information, especially sensitive personnel related information, which is the type of information that ComEd sought to protect. ComEd sought to protect as confidential only a limited number of the vast array of documents requested by the complainant in the above-mentioned Section 211 proceeding. If either side wished to provide to the NRC a "confidential" document that an opponent produced, whether or not a subpoena is involved, the matter could easily be pursued consistent with the express terms of the Order.

The confidentiality provisions of the Order are not designed to impede any protected activities by employees, as the Petitioners suggest. Those provisions pertain only to the complainant in the Section 211 proceeding and no other employee. The Order does prevent not any person from bringing a safety concern to the attention of the NRC or citing evidence in support of that concern and, accordingly, does not impinge impermissibly on NRC regulatory responsibilities. In this instance, Petitioners have not alleged

that the complainant in the Section 211 proceeding sought unsuccessfully to disclose to the NRC any information whether designated confidential or not that was obtained during discovery. Also, Petitioners have not alleged that the Order has resulted in any instance of discrimination against an employee for engaging in protected activity (10 CFR 50.7).

The Petition notes (pp. 8-9) that ComEd did not agree to certain suggested language contained in the addendum to Mr. Michael Kohn's March 18, 1998 letter to ComEd's counsel (Exhibit 7 of the Petition). As ComEd's counsel explained in its March 19, 1998 reply to Mr. Kohn (Exhibit 8 to the Petition), the suggested language was contrary to the purpose of the confidentiality provisions contained in the Order.¹ Specifically, the suggested language would have permitted the disclosure of any confidential document to the NRC, without any prior notice to the other party and without any consideration given to whether or not the information pertains to a matter within NRC jurisdiction (i.e., whether related to nuclear safety or not). By its literal operation, the suggested language would give to either party total discretion to waive the confidential status of the opposing party's documents, simply by disclosing that information to the NRC. ComEd concluded that the suggested language was overly broad (similar to the complainant's inappropriate discovery request noted in ComEd's response to Allegation I above). Thus, ComEd determined not to agree to present the suggested language as part of the stipulation by the parties to the Administrative Law Judge.

Matters Addressed in the NRC Letter of May 20, 1998

¹ As indicated on p. 2 of its March 16, 1998 letter to Mr. Kohn, included as Exhibit B to this response, ComEd's counsel was surprised by Mr. Kohn's suggestion to add such a provision at that juncture. In fact, the week before, complainant's counsel had faxed on March 10, 1998 to ComEd's counsel a "final" proposed confidentiality agreement that it urged ComEd to immediately execute. Notably, the suggested language in Mr. Kohn's March 18, 1998 letter to ComEd's counsel was not in that "final" proposal.

ComEd has addressed above the items mentioned in the second paragraph of the NRC letter dated May 20, 1998 (Mr. George F. Dick, Jr. to Mr. Oliver D. Kingsley, Jr.), i.e., ComEd's position regarding the relationship between Problem Identification Forms (PIFs) and the concept of protected activity, ComEd's reasons for objecting to certain confidentiality agreement provisions suggested by opposing counsel in the Section 211 proceeding mentioned in the Petition, and ComEd's position regarding the relationship between the confidentiality agreement and 10 CFR 50.7(f).

In addition, as requested in the third paragraph of that letter, ComEd is enclosing herewith as **Exhibit B** a copy of the March 16, 1998 letter to Mr. Michael Kohn referenced at pp. 8-9 of the Petition.

Conclusion

The Petition is based only upon unfounded allegations that ComEd's actions pertaining to an ongoing Section 211 proceeding before the Department of Labor constitute violations of 10 CFR 50.7(f). The facts do not support these allegations. No violations of NRC regulations occurred and, therefore, the Petition should be denied.

Exhibits A and B, as noted

UNITED STATES OF AMERICA
DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES

_____)	
RANDY ROBARGE,)	
)	
Complainant,)	
)	
v.)	98-ERA-2
)	
COMMONWEALTH EDISON,)	
)	
Respondent.)	
_____)	

STIPULATION AND ORDER GOVERNING CONFIDENTIALITY OF
DOCUMENTS AND INFORMATION

It is hereby stipulated and agreed this 23rd day of March, 1998,
by and between the Complainant in this matter, Randy Robarge and
Respondent in this action, Commonwealth Edison, through their
undersigned counsel, as follows:

1. As used herein, the following words shall have the following meanings:
 - a. "Party or "parties" means one or more of the following: Randy Robarge and/or Commonwealth Edison;
 - b. "Court" or "this Court" means the U.S. Department of Labor and/or the Office of Administrative Law Judges;
 - c. "Disclosed," "furnished" or "submitted" means, without limitation, divulged, revealed, produced,

described, transmitted or otherwise communicated, in whole or in part; and

d. "This action" and "this litigation" shall mean the above captioned action, *Robarge v. Commonwealth Edison*, Case No. 98 ERA-2, pending before the Department of Labor.

2. Any party hereto may designate as confidential any information, including documents being produced, interrogatory answers, responses to requests for admissions and/or transcripts of testimony, disclosed, furnished or submitted, either voluntarily or pursuant to Court order, to any other party in this litigation. Such designation shall be made pursuant to the procedure set forth in paragraph 4 below after a good faith determination that the material contains a trade secret, proprietary information or other confidential research, development, technical, personnel, or commercial information.

3. All information designated as confidential shall not be disclosed to any person other than:

a. Counsel for the parties to this action including necessary secretarial, support and clerical personnel assisting such counsel;

b. The individual parties and their employee or former employee witnesses or witnesses employee or formerly employed by Commonwealth Edison or any subsidiary thereof;

c. Qualified persons transcribing or recording testimony involving such information or documents and necessary stenographic and clerical personnel thereof;

d. Technical experts and their staff who are employed for the purpose of this litigation;

e. The presiding Administrative Law Judge ("ALJ"), his assistants and such other personnel as may be authorized by him;

f. Other persons by written consent of the person or party which furnished the confidential information;

g. Governmental law enforcement agencies and other governmental bodies pursuant to valid subpoena, provided that:

(1) The subpoenaed party give counsel for the designating party written notice of such subpoena within five (5) days after service of the subpoena but not less than five (5) business days prior to the production of the documents in response thereto and shall, if so directed by the designating party,

object to such subpoena on a timely basis so as to preserve the designating party's rights; and
(ii) at or before the time of production the subpoenaed party shall proceed in good faith to seek to obtain confidential treatment of such "Confidential" subpoenaed documents from the relevant governmental law enforcement agency or body to the fullest extent available under law.

4. Any document (including transcripts of testimony) containing confidential information shall be stamped with the legend "Confidential," or otherwise identified by the party disclosing such information as confidential information, and the information contained therein shall not be disclosed except as provided in paragraph 3 above. The production by any of the undersigned parties of any "Confidential" documents during discovery in the Action without a "Confidential" designation shall not constitute a waiver of any rights. In the event that such production occurs, counsel for the producing party may redesignate as "confidential" and thereafter such documents shall be subject to terms of this Order. Confidential information not contained in a document shall be identified as such, orally or in writing, at the

- time it is furnished and such information shall not be disclosed except as provided above in paragraph 3.
5. Nothing in this Stipulation and Order Governing Confidentiality of Documents and Information ("Stipulation") shall preclude any party from asserting the attorney-client, or other privilege or the work product protection as to any information.
 6. If a party believes that any document designated as confidential does not contain confidential information as defined in paragraph 2, such party may contest the applicability of this Stipulation to such document by stating in writing the basis for challenging the designation of each such document as confidential.
 7. Upon receipt of such written notification, the parties shall make a good faith attempt to resolve the challenge. In the event the parties cannot resolve the disagreement, the party objecting to confidentiality shall have twenty days following termination of such negotiations in which to make a motion for an adjudication with respect to any such document.
 8. When the parties are unable to resolve any such dispute and the party objecting to the confidentiality files a motion pursuant to paragraph 7 above, any document that

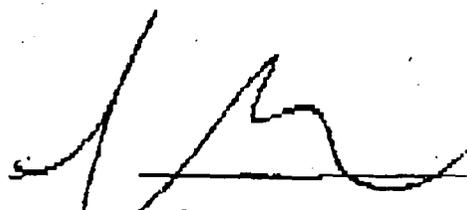
is made the subject of such a motion with respect to whether it in fact contains confidential information shall, until further order of the Court, be treated as confidential in accordance with the provisions of this Stipulation.

9. Notwithstanding the provisions hereof, each party is free to disclose information it has furnished, including confidential information to whomever it chooses, however such disclosure made to third parties outside the confines of this Stipulation, shall be deemed a waiver of the protections provided for in this Stipulation.
10. This Stipulation shall be without prejudice to the right of any party to bring before the ALJ the question of (a) whether any particular material is or is not confidential provided the party has complied with the procedures set forth herein; or (b) whether any particular material is or is not relevant to any issue in this case. No party, by entering into this Stipulation, concedes that any document, material or information classified by any other party as confidential or any documents, transcripts or other material reflecting claimed confidential information does in fact contain or reflect confidential information. However, no information designated as

confidential pursuant to this stipulation shall be disclosed except as provided herein unless and until the ALJ orders the release of such information from the confidentiality provisions of this stipulation.

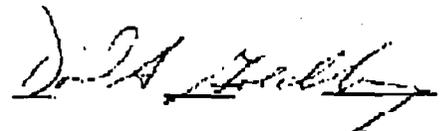
11. The parties' agreement to furnish confidential information is conditioned upon the treatment of such as provided herein. Nothing herein shall be construed to create rights in any person who is not a party.

By:



Attorney for Complainant.

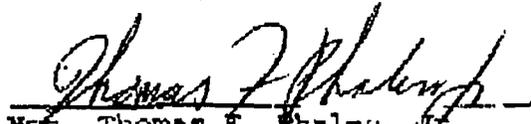
Stephen M. Kohn
Michael D. Kohn
KOHN, KOHN & COLAPINTO, P.C.
3200 F Street, N.W.
Washington, D.C. 20007-2756
(202) 242-6980



Attorney for Respondent

Richard F. O'Malley, Jr.
David A. Goldberg
SIDLEY & AUSTIN
One First National Plaza
Chicago, IL 60603
(312) 853-7000

Subject to the right of this Court and of each party to attach a copy of this signature page to a clean copy of the stipulation
SO ORDERED: and order for the official record of these proceedings.



Hon. Thomas F. Phelan, Jr.
Administrative Law Judge

3/24/98
Dated

SIDLEY & AUSTIN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

DALLAS
LOS ANGELES
NEW YORKONE FIRST NATIONAL PLAZA
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WASHINGTON, D.C.
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TOKYOWRITER'S DIRECT NUMBER
(312) 853-2216

March 16, 1998

Via FacsimileMichael D. Kohn
Kohn, Kohn & Colapinto.
3233 P Street, N.W.
Washington, D.C. 20007-2756Re: Robarge v. Commonwealth Edison Company (98 ERA 2)

Dear Michael:

We are in receipt of your fax of March 12, which I must say at the outset appears to add new layers of confusion in what should be a straightforward process of getting a protective order on file. In any event, especially in light of my recent letter to your partner which relates the history behind this aspect of the case, I would request you to refamiliarize yourself with the original ComEd proposed order. I think you will find that that proposal remains the most workable, and perfectly suitable, for our case. Moreover, your letter suggests that your biggest concerns with that original proposal -- regarding Section 5(g) and the requirement for the "challenging" party, rather than the "designating" party, to go to court to object to a confidential designation -- are no longer problematic. For your consideration, I set forth below some clarifying observations about your recent correspondence.

First, your letter is correct in that we discussed Section 5(g) of the ComEd order in our discussion on March 12. You were attempting to object to that section as some type of hindrance to your side's ability to, as you put it, "bring documents to the attention of the NRC." My only point to you was that Section 5(g) has nothing to do with what you were suggesting -- plus it is a mutually beneficial provision. Indeed, you seem to agree with my point now as you report that after further review, "the mere deletion of section (g) did not cure the problem [Complainant was raising.]" I trust you have recognized that the section merely provides a mechanism for either party to deal with governmental subpoenas that may be issued and that call for turnover of documents that were produced with a confidential designation in our litigation (i.e., it gives us a procedure to avoid having one's hands tied if a subpoena were ever issued that technically conflicted with the protective order).

Michael D. Kohn
March 16, 1998
Page 2

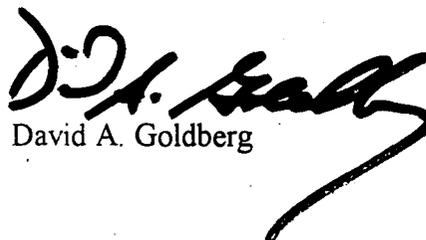
As for the next aspect of your letter, we frankly had never heard of your side's interest in potentially going to the NRC with any documents, and we will obviously have to address that, either amongst ourselves or with Judge Phalen, if that is a "right" you are now trying to preserve in this confidentiality order -- and it seems that you may be trying to do exactly that with your proposal for a new section that you include at the bottom of page one. Aside from the merits of that highly suspect provision, we see no basis for you to introduce it as a "bargain" for keeping Section 5(g) in the order. I state again, Section 5(g) has both parties' interests in mind. The same, obviously, cannot be said about your new paragraph which would not appear to be something ComEd could propose to Judge Phalen in an "agreed" stipulation.

Next, you indicate at the top of page two that you want a new paragraph that, in substance, preserves the ability for either party to go before the ALJ to obtain a "modification" of the protective order. This superfluous language does not strike us as something that Judge Phalen needs to affirmatively state in an order. I think we both agree that judges inherently have the authority to modify an order -- especially one of their own. Thus, I would ask you to rethink what this provision is intended to accomplish and let me know your thoughts.

Finally, the points you raise in your second-to-last paragraph are noted. I would only add that you did not need to send me another Exhibit A. The point I made in this regard in my last letter was that your latest version of the order did not cite to an Exhibit A, thus attaching an Exhibit A seemed confusing.

I am sure we will be in touch on these topics shortly, but in the meantime I seriously urge you to reconsider your position on the stipulation we first proposed in January.

Very truly yours,

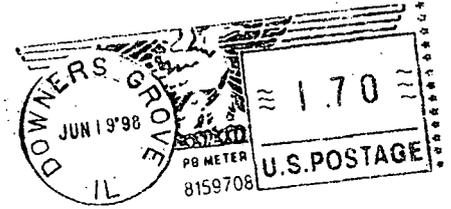


David A. Goldberg

cc: Richard F. O'Malley, Jr.

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

ComEd



"Addressee Only"
Jean Lee *DIAES*

OFC OF NUCLEAR REACTOR REGULATION
U.S. NUCLEAR REGULATORY COMMISSION
~~ATTN: DOCUMENT CONTROL DESK~~
WASHINGTON, D.C. 20555