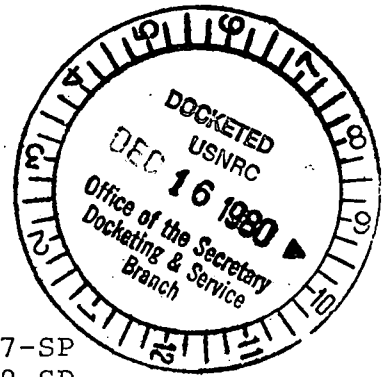


12/16/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



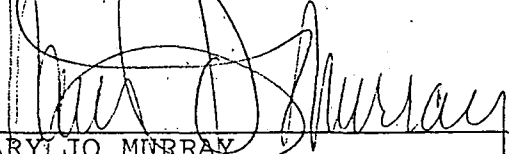
THE ATOMIC SAFETY AND LICENSING BOARD

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

TO THE MEMBERS OF THE BOARD

Enclosed you will find the cover page for Intervenor's Brief in Response to Applicant's Motion to Strike filed on December 10, 1980, which was erroneously omitted. We apologize for any inconvenience this error may have caused you.

Respectfully submitted,



MARY JO MURRAY
 Assistant Attorney General
 Environmental Control Division
 188 West Randolph Street
 Suite 2315
 Chicago, Illinois 60601
 312-793-2491

Dated: December 11, 1980

cc: Service List

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UNITED STATE OF AMERICA
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY,)
Dresden Station Units 2 and 3)
(Spent Fuel Pool Modification))

Docket Nos. 50-237-SP
50-249-SP

RESPONSE TO MOTION TO STRIKE

The State of Illinois ("Intervenor") hereby responds to the Motion to Strike the cross-examination by Intervenor of Millard L. Wohl (Tr. 674-684) submitted by Commonwealth Edison Company ("Applicant").

Respectfully submitted,

TYRONE C. FAHNER
Attorney General
State of Illinois

BY: 

MARY JO MURRAY
Assistant Attorney General

Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601
312-793-2491

8012800

084

RELATED CORRESPONDENCE

DOCKET NUMBER 50-237/249
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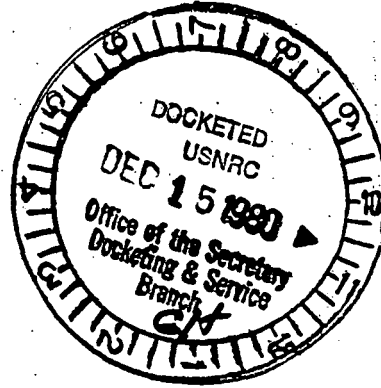
December 11, 1980

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US-NRC
DISTRIBUTION SERVICES
BRANCH

Ms. Mary Jo Murray
Assistant Attorney General
Environmental Control Division
Room 2315
188 West Randolph Street
Chicago, Illinois 60604



Re: Dresden Spent Fuel

Dear Mary Jo:

On December 3, 1980 you asked Commonwealth Edison to produce an internal Quadrex/NSC audit report written sometime in 1980 by a man named Henry Thailer. After talking with your expert, Mr. Hubbard, we were able to locate the document you were referring to. It is a 10-page report dated April 4, 1980 from J. Weber, Audit Team Leader, to J. Goldin (both of Quadrex/NSC) entitled: "Internal Audit of LaSalle Pipe Stress Analysis and Support Design (SAR-0303)--Internal Audit Report Number 80-3." Mr. Thailer was a member of the audit team. As the name implies, this internal audit relates to Commonwealth Edison's LaSalle County Nuclear Power Plant, presently under construction. It contains no reference to the Dresden spent fuel rack job. Further, I am informed by Jim Gilcrest and Walt Shewski that the Quadrex/NSC project group working on the LaSalle piping project is entirely separate from the group working on the Dresden racks.

After careful review and discussion with Mr. Gilcrest and Mr. Shewski, we have concluded that this document is not relevant to the Dresden spent fuel rack proceeding, nor is it reasonably calculated to lead to the discovery of relevant material. Accordingly, we will not provide this document to you pursuant to our agreement on informal discovery.

Sincerely,

Philip Steptoe

Philip Steptoe
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CC: Service List

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