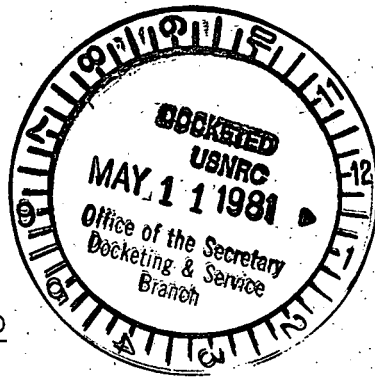


3/9/81

RELATED CORRESPONDENCE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of )  
COMMONWEALTH EDISON COMPANY )  
(Dresden Stations, Units 2 & 3) )

Docket Nos. 50-237-SP  
50-249-SP  
(Spent Fuel Pool  
Modification)

Dear Administrative Judges:

Enclosed is the affidavit of Richard B. Hubbard in response to Board Question 2 and the affidavit of Karl Kneil of the Nuclear Regulatory Commission.

Intervenor continues to believe that some of the ACRS, TMI and Category B items are unresolved safety issues which must be addressed in relation to this spent fuel pool modification. As stated in the River Bend decision:

"The Board should be able to look at [the SER] to ascertain the extent to which generic unresolved safety problems which have been previously identified in a TSAR item, a Task Action Plan, an ACRS report or elsewhere have been factored into the staff's analysis for the particular reactor - and with what result. To this end, in our view, each SER should contain [in this proceeding, the affidavit and record] a summary description of those generic problems under continuing study which have both relevance to facilitates of the type under review and potentially significant public safety implications." Gulf States Utilities Company (River Bend Station, Units 1 and 2) ALAB-444, 6 NRC 760, 775 (1977).

It is Intervenor's position that consideration by the Staff of unresolved generic safety issues should not be limited to the "Aqua Book" (NUREG -0606).

Finally, in reviewing Mr. Kniel's affidavit, Intervenor supports Mr. Kniel's statements that Tasks A-2, A-3, A-4, A-5 and A-8 do not apply to this proceeding.

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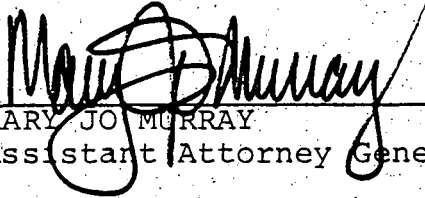
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Intervenor has not yet received the signature pages for the depositions of Applicant's witnesses O'Boyle, Mefford and Gilcrest, and will file those depositions with the Board as soon as those signatures are received.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS  
TYRONE C. FAHNER  
ATTORNEY GENERAL

BY:

  
\_\_\_\_\_  
MARY JO MURRAY  
Assistant Attorney General

Dated: May 7, 1981

cc: Service List w/enclosure