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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of Commonwealth) Docket Nos.
Edison Company (Zion Station,) 50-295
Units 1 and 2) 50-304

APPLICANT'S RESPONSE TO INTERVENOR'S
THIRD SET OF INTERROGATORIES AND
REQUEST FOR DOCUMENTS

A. INTERROGATORIES

Commonwealth Edison Company, ("Applicant") hereby responds to "Intervenor's Third Set of Interrogatories and Request For Documents" as follows:

Interrogatory 1: With respect to question 4(b) posed by the Licensing Board in its "Order following Prehearing Conference" of January 19, 1979, state the names and address of each person expected to be called as an expert witness at the evidentiary hearing on this matter.

- Answer: (a) Larry B. Bean
Commonwealth Edison Company
72 West Adams Street
Room 1230
Chicago, Illinois
- (b) Denton Louis Peoples
Commonwealth Edison Company
72 West Adams Street
Room 1230
Chicago, Illinois

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Interrogatory 2: State and describe the subject(s) to be addressed and the substance of each witness's testimony, on question 4(b).

Answer: (a) With respect to question 4(b), Mr. Bean's testimony will describe the following:

(i) his background and qualifications;

(ii) the Zion Station Security Program which includes a discussion of the security organization; physical barriers; access requirements; communications requirements; security control centers; and response requirements.

Mr. Bean's testimony will establish that since the spent fuel pool is considered a vital area and is protected accordingly, irrespective of the number of fuel assemblies which are stored therein, there will be no need to modify the Physical Security Plan or the Safeguards Contingency Plan for the Station.

(b) With respect to question 4(b), Mr. Peoples' testimony will describe the following:

(i) his background and qualifications;

(ii) the Commonwealth Edison Company Generating Stations Emergency Plan (GSEP) including a description of the corporate organizational structure.

Mr. Peoples' testimony will establish that since the GSEP is not predicated upon a particular amount of nuclear fuel in use or in storage at the facility, the modification of the storage will not require a change of the GSEP.

Interrogatory 3: Identify and particularize any documents to be relied upon by each witness in regard to question 4(b).

Answer:

- (1) Commonwealth Edison Company Generating Station Emergency Plan;
- (2) Emergency Evacuation Plan - Zion Nuclear Power Station For Zion Emergency Services and Disaster Agency and Supporting Agencies;
- (3) GSEP Drill Reports for Zion Station dated: March 27, 1979; April 1, 1978; May 30, 1978; September 25, 1978; January 2, 1979; March 28, 1977; June 22, 1977; September 2, 1977; and June 5, 1978;
- (4) GSEP Environmental Director Emergency Plan Implementing Procedures;
- (5) Zion Station Emergency Plan Implementing Procedures;
- (6) Zion Station Security Plan.

B. REQUEST FOR DOCUMENTS

Applicant hereby responds to Intervenor's "Request for Documents" as follows:

Request 1: Pursuant to 10 CFR §2.741, the State of Illinois (Intervenor) hereby requests that Commonwealth Edison (Applicant) make available to Intervenor the documents described in Applicant's answer to Interrogatory three (3) hereinabove on or before May 25, 1979.

Response: Applicant will produce the documents identified above in its Answer to Intervenor's Interrogatory 3, with the exception of the Zion Station Security Plan, subject to the agreed restrictions with respect to the use and dissemination of these documents discussed in Attachment A hereto.

Intervenor has previously requested the production by Applicant of the Zion Station Security Plan. Applicant

has refused to produce this document because of its proprietary nature but has agreed to supply the Attorney General with certain information contained in the Plan.

Request 2(a): Pursuant to 10 CFR §2.741, Intervenor requests Applicant to make available to Intervenor the following documents:

(a) The Generating Station Emergency Plan (GSEP) for Zion Nuclear Station, Units 1 and 2.

Response: See Applicant's response to Intervenor's Request 1 above.

Request 2(b): Any emergency or evacuation plans, implementation plans, procedures, monitoring plans, test or drill plans, coordination plans or any other documents relating to procedures for dealing with emergencies and/or evacuation involving the Zion Nuclear Plant.

Response: See Applicant's response to Intervenor's Request 1 above.

Request 2(c): Reports of any inspections, reviews, drills or practices of emergency and/or evacuation systems, plans and procedures made by Applicant, the Nuclear Regulatory Commission, the Illinois Emergency Services and Disaster Agency, The Illinois Department of Public Health or any other federal, state or local agency.

Response: As part of Applicant's response to Intervenor's Request 1, Applicant will furnish the GSEP Drill Reports for Zion Station dated: March 27, 1979; April 1, 1978; May 30, 1978; September 25, 1978; January 2, 1979; March 28, 1977; June 22, 1977; September 2, 1977; and January 5, 1978.

Applicant objects to Intervenor's request that Applicant furnish reports which are in the possession of the Nuclear Regulatory Commission on the ground that these documents are equally available to Intervenor pursuant to the provisions of 10 CFR §§2.744 and 2.790.

Applicant also objects to Intervenor's request that Applicant furnish reports made by various State of Illinois and local agencies on the ground that since Intervenor represents the State of Illinois in these proceedings, these documents should already be within Intervenor's control.

Request 2(d): Any documents, letters, memoranda or other communications regarding the interaction of Applicant with federal, state and local law enforcement, fire, medical, civil defense or emergency agencies.

Response: Applicant objects to this request for the following reasons:

(a) Intervenor's request is overbroad in failing to describe the documents with reasonable particularity as required by 10 CFR §2.741(2)(c).

(b) To the extent that this request entails documents which are in the possession of the Nuclear Regulatory Commission or the state or local agencies, Applicant objects to the request for the reasons stated in Applicant's response to Request 2(c) above.

Dated: May 23, 1979



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One Of the Attorneys for
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May 22, 1979

Ms. Susan Sekuler
Assistant Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Re: In the Matter of Commonwealth Edison Company
(Zion Station, Units 1 and 2) Proposed Amend-
ments to Increase Spent Fuel Storage Capacity,
Docket Nos. 50-295, 50-304

Dear Susan:

Pursuant to the State of Illinois' Request for Documents dated May 14, 1979, Commonwealth Edison Company agrees to produce the following documents subject the restrictions regarding their use and dissemination described below:

(1) Commonwealth Edison Company Generating Station Emergency Plan;

(2) Emergency Evacuation Plan - Zion Nuclear Power Station For Zion Emergency Services and Disaster Agency and Supporting Agencies;

(3) GSEP Drill Reports for Zion Station dated: March 27, 1979; April 1, 1978; May 30, 1978; September 25, 1978; January 2, 1979; March 28, 1977; June 22, 1977; September 2, 1977; and January 5, 1978;

(4) GSEP Environmental Director Emergency Plan Implementing Procedures;

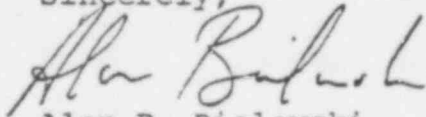
(5) Zion Station Emergency Plan Implementing Procedures.

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Ms. Susan Sekuler
5/22/79
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Because public disclosure of the names, addresses and telephone numbers of those persons and organizations listed in these documents could impair the effectiveness of the emergency response capability, the State of Illinois agrees that such information will not be disclosed to persons other than the attorneys who represent the State of Illinois in these proceedings and their consultants. If you are in accord with this agreement please sign this letter and return it to my office.

Sincerely,



Alan P. Bielawski



Susan Sekuler
Assistant Attorney General

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of Commonwealth) Docket Nos.
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Units 1 and 2) 50-304

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Response to Intervenor's Third Set of Interrogatories and Request For Documents" dated May 23, 1979, have been served upon Intervenor, the State of Illinois, by personal delivery upon their counsel of record, and have been served upon the following by deposit in the United States mail, first class, postage prepaid, this 23rd day of May, 1979:

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Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
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Washington, DC 20555

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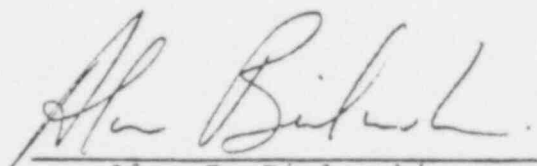
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