

1. The League of Women Voters is a national organization which is authorized by its Bylaws and Constitution to become involved with, and to participate in, the decision-making process involving issues which affect its members, including but not limited to energy and nuclear safety issues.

2. The League's Rockford, Illinois branch (composed of numerous persons living near the site of the Byron Station and within the service area of Commonwealth Edison, including but not limited to Mrs. Betty Johnson of Rockford, Illinois) has been specifically directed to take such steps as are necessary to challenge Commonwealth Edison's continued construction of the Byron Station on the ground that the Byron Station is presently being built under a design which does not resolve a myriad of serious outstanding safety problems. If these safety problems are not resolved, the League and its members, and the public, will be adversely affected both as regards their health and safety and as regards their cost of electric service.

3. Pursuant to its interest, the League has retained MHB Technical Associates of San Jose, California, to do a detailed study of the outstanding nuclear safety problems which adversely affect the Byron Station, in the specific context of the Byron Station. That MHB study, which is in the form of a sworn Affidavit verified under oath, is attached hereto and incorporated herein as Exhibit A.

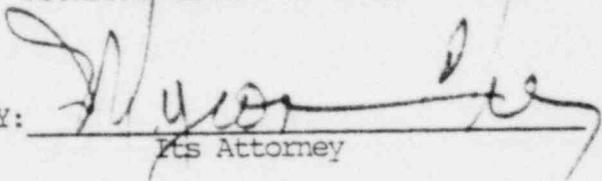
4. The MHB study demonstrates in detail that construction of the Byron Station is proceeding apace without factoring in problems identified and recognized, as to both their existence and their seriousness, by the Commission. The MHB study further demonstrates that continued construction of the Byron Station without resolution of these safety problems jeopardizes the public health and safety, in violation of the Rules and Regulations

of the Commission and specifically the authority vested in the Director of Nuclear Reactor Regulation to modify, suspend and revoke licenses (or take such other action as is appropriate) to protect the public health and safety.

WHEREFORE, on the basis of this request and the attached Affidavit containing the results of the MHB study above noted and incorporated herein by reference, the Rockford League of Women Voters requests that the Director of Nuclear Reactor Regulation initiate, pursuant to 10 C.F.R. §§ 2.206 and 2.202, the actions set forth above. Because construction of the Byron Station is now ongoing, and tends as it proceeds to prejudice the resolution of safety issues, the League requests that the Director initiate those actions as promptly as practicable.*

ROCKFORD LEAGUE OF WOMEN VOTERS

BY:

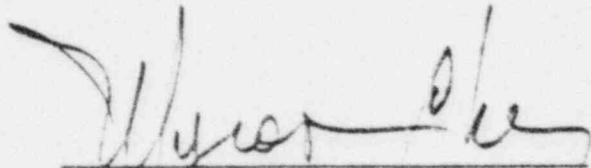

Its Attorney

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* As the League understands the Commission's Rules and Regulations, no response to this petition is permitted (and there is no appeal to the Commission from its grant or denial), so that its consideration should not be delayed for procedural reasons. While the MHB Affidavit incorporated herein is quite detailed, the League believes that the Director's expertise should enable him to reach a decision within 30 days on whether to initiate action as requested. The League urges a prompt decision so that the inquiry can be pursued expeditiously (or so that the League can pursue other remedies, should this request be denied), before the Byron Station becomes a potentially dangerous fait accompli. See paragraphs 1.2.3, 1.2.4, 2.3.5-2.3.8, 4.1-4.4 of the MHB Affidavit.

PROOF OF SERVICE

I certify that a copy of the foregoing Request and underlying Exhibit was served upon, by postage prepaid mail properly addressed, Harold R. Denton, Director of Nuclear Reactor Regulation, on November 21, 1980.


MYRON M. CHERRY