

7/30/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
)
COMMONWEALTH EDISON COMPANY)
)
(Byron Nuclear Power Station,)
Units 1 and 2))

Docket Nos. 50-454
50-455

MOTION OF COMMONWEALTH EDISON COMPANY
TO COMPEL DISCOVERY BY
THE ROCKFORD LEAGUE OF WOMEN VOTERS



Commonwealth Edison Company ("Applicant") moves the Board, pursuant to 10 CFR §2.740(f)(1), to issue an order directing the Rockford League of Women Voters (the "League") to answer forthwith Applicant's interrogatories directed to the League. In support of this Motion, Applicant states as follows:

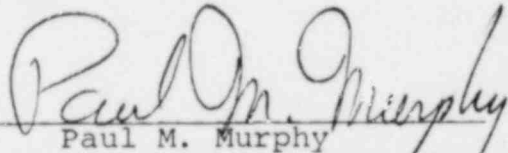
1. By Memorandum and Order, dated December 19, 1980, this Board opened discovery on all admitted contentions of the League.
2. On July 8, 1981, Applicant directed four interrogatories to the League (copies of which are attached hereto) which, pursuant to 10 CFR §2.740b(b), the League was required to answer not later than July 27, 1981, including five days for mailing.
3. As of this date, the League has neither answered nor objected to said interrogatories.

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WHEREFORE, Commonwealth Edison Company respectfully requests the Board to enter an order compelling the League to respond to Commonwealth Edison Company's First Round of Interrogatories in the manner required by the Commission's Rules of Practice.

DATED: July 30, 1981

Respectfully submitted,

A handwritten signature in cursive script that reads "Paul M. Murphy". The signature is written in dark ink and is positioned above a horizontal line.

Paul M. Murphy

One of the Attorneys for Applicant
Commonwealth Edison Company

Michael I. Miller, Esq.
Paul M. Murphy, Esq.
Alan P. Bielawski, Esq.
ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312) 558-7500

Dated: 7-8-81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
COMMONWEALTH EDISON COMPANY)	Docket Nos. 50-454
(Byron Nuclear Power Station,)	50-455
Units 1 and 2))	

COMMONWEALTH EDISON COMPANY'S FIRST ROUND
OF INTERROGATORIES TO BE ANSWERED BY THE
ROCKFORD LEAGUE OF WOMEN VOTERS

Pursuant to 10 CFR § 2.740b Commonwealth Edison Company (Edison) requests the Rockford League of Woman Voters (League) to answer separately and fully in writing, under oath or affirmation, each of the following Interrogatories within 14 days of service.

INSTRUCTIONS AND DEFINITIONS

1. As used in these Interrogatories, whenever appropriate, the singular form of a word shall be interpreted as plural and the masculine gender shall be deemed to include the feminine.
2. As used in these Interrogatories, the term "and," as well as "or," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might otherwise be construed to be outside their scope.
3. As used in these Interrogatories, the term "person" includes, without limiting the generality of its

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meaning, every natural person, corporate entity, partnership, association, governmental body or agency.

4. As used in these Interrogatories, the term "identification" of a person or entity includes stating his, her, or its full name, his or her most recent home address and telephone number, his, her, or its most recent known business address and telephone number, his or her present position, and his, her, or its connection or association with any party to this proceeding.

5. If any of the information contained in the answers to these Interrogatories is not within the personal knowledge of the person signing the Interrogatory, so state and identify each person, document and communication on which he relies for the information contained in answers not solely based on his personal knowledge.

6. If you cannot answer any portion of the following Interrogatories in full, after exercising diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

7. If you claim privilege with respect to any information which is requested by these Interrogatories, specify the privilege claimed, the communication and/or answer as to which that claim is made, the parties to the communication, the topic discussed in the communication and the basis for your claim.

INTERROGATORIES

1. With respect to each Contention advanced by the League which has been admitted by the Atomic Safety and Licensing Board in the above-captioned proceeding, list the following:

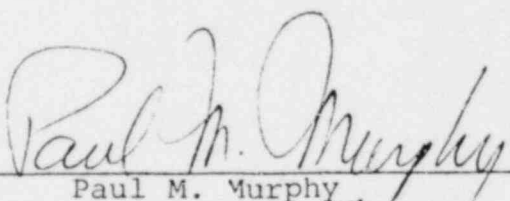
- a. A concise statement of the facts supporting each Contention together with references to the specific sources and documents and portions thereof which have been or will be relied upon to establish such facts;
- b. the identity of each person expected to be called as a witness at the hearing;
- c. the subject matter on which the witness is expected to testify;
- d. the substance of the witness's testimony.

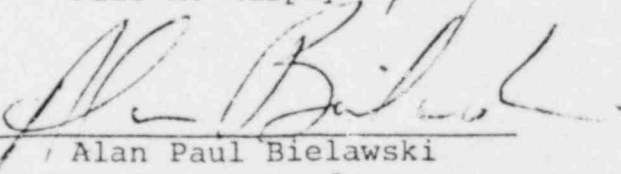
2. With respect to each witness identified in the League's response to Interrogatory 1 above, identify each document which the witness will rely upon in whole or in part in the preparation of his testimony or in the development of his position.

3. With respect to each witness identified in the League's response to Interrogatory 1 above, identify the witness's qualifications to testify on the subject matter on which the witness will testify.

4. Identify all persons who participated in the preparation of the answers, or any portion thereof, to these Interrogatories.

ISHAM, LINCOLN & BEALE
Paul M. Murphy
Alan Paul Bielawski
Suite 4200
One First National Plaza
Chicago, Illinois 60603
312/558-7500

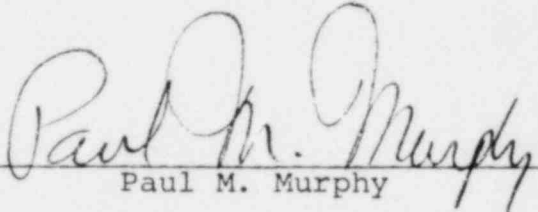

Paul M. Murphy


Alan Paul Bielawski
Attorneys for
Commonwealth Edison Company

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Commonwealth Edison Company, certifies that on this date he filed two copies (plus the original) of the attached pleading with the Secretary of the Nuclear Regulatory Commission and served a copy of same on each of the persons at the addresses shown on the attached service list by United States mail, postage prepaid.

DATE: July 30, 1981


Paul M. Murphy

Marshall E. Miller, Esq., Chairman
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. A. Dixon Callihan
Union Carbide Corporation
P.O. Box Y
Oak Ridge, Tennessee 37830

Dr. Richard F. Cole
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Myron Karman, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard J. Goddard, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Secretary
Attn: Chief, Docketing and
Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Chief Hearing Counsel
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ms. Betty Johnson
1907 Stratford Lane
Rockford, Illinois 61107

Dr. Bruce von Zellen
Department of Biological Sciences
Northern Illinois University
DeKalb, Illinois 60115

Ms. Beth L. Galbreath
734 Parkview
Rockford, Illinois 61107

Paul M. Murphy, Esq.
Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

Michael I. Miller, Esq.
Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

Mr. Cordell Reed
Commonwealth Edison Company
P.O. Box 767
Chicago, Illinois 60690

Myron M. Cherry, Esq.
Cherry, Flynn & Kanter
One IBM Plaza
Room 4501
Chicago, Illinois 60611

Dr. Axel Meyer
Department of Physics
Northern Illinois University
DeKalb, Illinois 60115

Kenneth F. Levin, Esq.
Beatty, Levin, Holland, Basofin
& Sarsany
11 South LaSalle Street
Suite 2200
Chicago, Illinois 60603

Mr. Charles E. Morris
Executive Director
Rockford Register Star
99 East State Street
Rockford, Illinois 61105