UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF ROBERT QUERIO

The attached questions and answers constitute my testimony in the above-captioned proceeding. The testimony is true and accurate to the best of my knowledge, information and belief.

R. E. Querio
Robert Querio

Subscribed and sworn to
before me this 3rd day
of June, 1982.

Notary Public

AFFIDAVIT OF ROBERT E. QUERIO

ON CONTENTION 1

Q.1. State your name and present occupation.

A.1. My name is Robert E. Querio. I am presently employed by Commonwealth Edison Company as Station Superintendent for the Byron Nuclear Station.

Q.2. Briefly state your educational background and professional qualifications.

A.2. I graduated from the Illinois Institute of Technology in January, 1965. My background includes three years of fossil station experience prior to being assigned to the Commonwealth Edison Quad Cities Nuclear Station. I have since accumulated 14 years of nuclear experience including positions as: Technical Staff Engineer, Senior Reactor Operator (SRO), licensed Operating Shift Foreman and Technical Staff Supervising Engineer, all at Quad Cities Nuclear Station. I then served as the Byron Station Operating Assistant Superintendent for 3-1/2 years and have been the Station Superintendent for the past two years.

Q.3. Describe your responsibilities as Station Superintendent for the Byron Nuclear Station.

A.3. As Station Superintendent, I fulfill the position of Plant Manager as described in American National

Standard ANSI N18.1-1971. I am responsible for the direct management of the station including the planning, coordination and direction of the operation, maintenance, refueling, and technical activities. I am responsible for the final approval of all Station procedures and reports. When I prepared this testimony, 396 individuals were subject to my supervision and control.

Q.4. What is the purpose of your testimony?

A.4. In their Contention No. 1 DAARE and SAFE have stated that, by virtue of the Company's "record of non-compliance with Nuclear Regulatory Commission regulations," the Company has demonstrated its inability, unwillingness or lack of technical qualifications to operate the Byron Station within NRC regulations and so as to protect the public health and safety. DAARE/SAFE also contend that unless Edison demonstrates improvement in management operations and procedures and demonstrates that these improvements will be enforced, it should not be granted a license to operate the Byron Station. My testimony addresses the qualifications of the Station personnel, the commitment of the Station personnel, including myself, to safe operation of the Station, and the Station's plans for the packaging and transport of waste materials. By this testimony I show that the Station will be staffed by able and experienced personnel with the necessary technical qualifications

to safely operate the Byron Station within NRC regulations and that the Station management has the same strong commitment to safe operations as does Edison's corporate management.

Q.5. Could you explain what you mean when you say that the Station's management has the same strong commitment to safe operations as has the corporate management.

A.5. Yes. Commonwealth Edison Company's commitment to safe operations of its nuclear power plants begins with the highest level of corporate management. This commitment is reflected in Vice-President's Instruction No. 1-0-17 signed by the Vice-President of Nuclear Operations, Cordell Reed, which states in part:

> "This Instruction reaffirms Company policy regarding adherence to nuclear procedures and technical specifications. The primary concern of the company with respect to the operation of its nuclear generating plants is to ensure the health and safety of the public as well as station personnel. All personnel within the Company share this responsibility."

As Station Superintendent, it is my responsibility to carry out this instruction and to ensure long-term safe operation of Byron Station.

Q.6. How do you, as Station Superintendent, carry out that responsibility?

A.6. Basically by assuring that there exist appropriate procedures for the safe operation and maintenance of the Station, and that the procedures and other necessary steps are performed in a satisfactory manner. I have a large and qualified staff assigned to the Byron Station to assist me in maintaining and operating the plant safely.

Q.7. Please describe the staff which will be assigned to the Byron Station.

A.7. When fully operational, and after completion of all start-up tests, there will be approximately 450 persons assigned to the Byron Station to operate and maintain the plant on a day-to-day basis. During initial start-up there will be additional personnel. Of these, approximately 396 are currently assigned to the Station and are currently involved in preparation of the plant for operation and the performance of various pre-operational testing and checks that are required.

The current organizational structure for the Byron Station was developed as a result of a study performed in late 1978 on behalf of the Company by Booze, Allen & Hamilton Company. This study was designed to develop

a management organization and administrative controls at our nuclear stations and corporate offices to enhance both operational safety and overall reliability of our nuclear generating units. As a result of this study additional personnel were assigned to our operating stations to strengthen management controls and various operating systems and procedures have been improved. The management structure at the Byron Station incorporates a number of these improvements.

Q.8. Would you please describe the operational structure to be employed at the Byron Station when it becomes operational.

A.8. The Byron staff will be organized into four main functional groups consisting of the Operating Group, the Maintenance Group, the Administrative and Support Services Group, and the Personnel Administration Group. There are three Assistant Superintendents and a Personnel Administrator in charge of the four functional areas.

The Assistant Superintendents and the Personnel Administrator report directly to me as Station Superintendent. Exhibit A to this affidavit shows the organizational chart for the Station's main functional groups.

Q.9. What are the responsibilities of the four main functional groups?

A.9. Day-to-day operations of the Station is the responsibility of the Operating Group under the general supervision of the Assistant Superintendent-Operating and the specific supervision of the Station Shift Engineer. The Station Shift Engineer is the equivalent of the Shift Supervisor and is responsible for operating the plant in compliance with the NRC Operating License and Station Procedures on a day-to-day basis. Each Shift Engineer must have an NRC Senior Reactor Operator (SRO) License, and one Shift Engineer will be present at all times. The Shift Engineers supervise the shift personnel and are responsible for the plant being operated in a safe and reliable manner during their shift. They have the authority to order the shutdown of either or both units at any time. The Shift Engineers report directly to the Operating Assistant Superintendent.

Assisting each Shift Engineer with day-to-day operating activities are the SRO-Licensed Station Control Room Engineers (SCRE). Each SCRE has a four-year college degree in a technical area such as science or engineering and meets the NRC requirements for shift technical advisor. The RO-Licensed Nuclear Station Operators are responsible for all Control Room operations. The Equipment Operators and Equipment Attendants observe, inspect and operate plant equipment

which is outside of the Control Room. These Operators and Attendants receive direction from the Shift Engineer or from the Shift Foreman. Special Foremen such as the Stationman Foreman, Auxiliary Services Foreman and Fuel Handling Foreman and their respective crews report to the Shift Engineer.

In addition, four Operating Engineers with SRO-Licenses report directly to the Operating Assistant Superintendent. The Operating Engineers, who are among the most experienced people in the Department, assist the Operating Assistant Superintendent in directing the activities of the Operating Department.

Two SRO-Licensed operators are required to be at the Station at all times. The Byron Station will have sufficient SRO-Licensed personnel so that under normal circumstances at least three SRO-Licensed Operators will be at the Station. One of the more senior SRO people on the Station staff will be assigned on-call duty so that administrative level support is available for the Shift Engineer on a twenty-four-hour-a-day basis.

This operating organization provides for the presence at the Station of highly qualified licensed senior Reactor Operators to supervise operations at all times and, in addition, provides for high level administrative support on an on-call basis.

Q.10. What is the function of the Maintenance Department?

A.10. The Maintenance Department is organized to provide for normal repairs of equipment in the event of equipment failure and additionally to provide for surveillance, preventive maintenance, testing and other checks to verify that the plant equipment is maintained at its designed condition to ensure the safe operation of the equipment. The Maintenance Department procedures establish administrative controls to assure that maintenance work is performed in accordance with the regulatory requirements and design specifications.

Q.11. Describe the organization of the Maintenance Group.

A.11. The Maintenance Group is organized into four departments. Each of the four Department Supervisors, the Master Instrument Mechanic, the Master Electrician, the Master Mechanic, and the Storeroom Supervisor report directly to the Maintenance Assistant Superintendent.

The Master Instrument Mechanic is responsible for calibrating, maintaining and repairing plant instrumentation. He is supported by Instrument Work Analysts, Instrument Foremen, Control System Technicians, Instrument "A" Grade Mechanics and Instrument "B" Grade Mechanics.

The Master Electrician is responsible for maintaining and repairing all plant electrical equipment. He is supported by Electrical Work Analysts, Electrical Foremen, Senior Nuclear Electricians, Electrician "A" Grade Mechanics, Electrician "B" Grade Mechanics and Electrical Helpers.

The Master Mechanic is responsible for maintaining and repairing all plant mechanical equipment. He is supported by Mechanical Work Analysts, Mechanical Foremen, Senior Nuclear Mechanics, "A" Grade Mechanics, "B" Grade Mechanics and Mechanic Helpers.

The Storeroom Supervisor orders and stores parts and other supportive materials. He is supported by an Assistant Storeroom Supervisor and Stockmen.

Q.12. What are the responsibilities of the Administrative and Support Services Group?

A.12. This Group, consisting of five departments, has broad responsibilities for most aspects of plant operation not directly within the areas of Operations and Maintenance. Five Department Supervisors, namely: The Technical Staff Supervisor, the Radiation Chemistry Supervisor, the Office Supervisor, the Quality Control Supervisor and the Security Administrator report directly to the Assistant Superintendent for administrative and support services.

The Technical Staff Supervisor (TSS) provides technical support for plant operations, refueling, maintenance and plant modifications. He is responsible for monitoring equipment performance and implementing the Station onsite review and investigative function as described in the technical specifications. This function includes review of all safety-related activities at the plant to ensure that they are carried out in compliance with all applicable regulations. The TSS is supported by the Assistant Tech Staff Supervisor of Licensing and his staff; the Assistant Tech Staff Supervisor of Startup and his staff; and various Group Leaders and their respective system test engineers.

The Radiation Chemistry Supervisor, who is also the Radiation Protection Manager, is responsible for the Chemistry and Health Physics Programs. The Station Chemist, Station Health Physicist and Radiation Chemistry Foremen report to this supervisor.

The Station Quality Control Supervisor reports to the Administrative and Support Services Assistant Superintendent and is responsible for the Quality Control activities at the station such as: Reviewing drawings, specifications, maintenance/modification procedures and requests for purchase for inclusion of applicable quality requirements; performing receiving inspection for ASME and safety-related incoming materials

and items; inspecting of fabrication and installation activities; and having non-destructive examination and other testing performed as required.

The Security Administrator is responsible for administering the Station's Security Plan and interfacing with the Contractor Security Guard Force.

The Office Supervisor is responsible for directing the activities of the Clerical Staff in the Central File and Word Processing areas through his staff as-assistants. The Central File provides for document control to ensure that all safety-related activities in the plant are conducted according to the latest quality assurance requirements.

Q.13. What is the function of the Personnel Administration Group as it relates to the safe operation of the plant?

A.13. The Training Supervisor, Professionalism-Safety Coordinator, and a Staff Assistant report directly to the Personnel Administrator.

The Training Supervisor is responsible for all personnel training and re-training activities. This training responsibility includes planning, scheduling, preparing, presenting and documenting the completion of all training courses. The supportive training staff, which reports to the Training Supervisor, is organized into the following training areas: Operating Training,

Maintenance Training, Administrative Training and Support Services Training. The Support Services Training includes concerns such as radiation protection training and plant security training.

Q.14. Does Edison have people with the appropriate level of skills and training to carry out their responsibilities at the Byron Station?

A.14. Yes. Commonwealth Edison's long-term experience in nuclear power provides a pool of qualified individuals to staff Byron Station. The Byron Station will be staffed in accordance with the requirements of Revision 1 of NRC Regulatory Guide 1.8. Exhibit B illustrates present experience levels attained by the people currently assigned to the various job positions on the Byron Station staff. I believe this table gives a reasonably accurate picture of the experience levels we have at the station now.

Q.15. Could you summarize your testimony up to this point?

A.15. DAARE/SAFE Contention 1 makes a broad assertion that Commonwealth Edison Company will be unable, unwilling or will lack the technical qualifications to operate the Byron Station safely and within NRC regu-

latory requirements. I believe the station organizational arrangement I have described, in combination with the technical competence and nuclear experience levels of the Byron Station personnel, will provide for safe and reliable operation. We will also have the technical support of our corporate nuclear division, and will subject our operation to multiple layers of quality control and quality assurance inspections and audits. We will, of course, make every effort to avoid the types of incidents briefly alluded to in the DAARE/SAFE Contention, but in my opinion those incidents, which occurred over the five-year period 1974 through 1979, do not support to conclusion that Edison cannot or will not operate the Byron Station safely.

Q.16. DAARE and SAFE have claimed in Contention 1(g) that "applicant's record of packaging and hauling of low level wastes caused it to be banned from South Carolina's low level waste disposal site, and in Washington, all importation of low level waste was banned after an incident of waste leakage in transport by Applicant." Will the Byron Station have the procedures in place and the necessary equipment to assure the proper packaging and shipment of low level waste to licensed waste disposal facilities?

A.16. This part of the Contention is a perfect example of why I feel the specifics to which DAARE/SAFE refer in their Contention do not support their conclusion. Commonwealth Edison Company currently institutes considerably more control over the processing of radioactive wastes than had been the case at the time of the incidents mentioned by DAARE and SAFE. Due to improved radwaste processing technology and increased administrative controls, the Company is reducing the amount of solid waste actually produced at the Station; it is upgrading the waste handling systems to further improve volume reduction; it is implementing methods to eliminate free-standing liquids within packaged wastes; it has improved control of the design of packages used in shipment of radioactive materials; and it has increased quality inspections of prepared shipments of radioactive waste materials. The equipment and administrative controls at the Byron Station will incorporate improvements suggested by prior operating experience.

Q.17. How will low level solid radioactive waste be processed for shipment to burial sites?

A.17. The solid radioactive waste system at Byron Station is designed to process two general types of solid wastes: "wet" solid wastes and "dry" solid wastes.

Wet solid wastes consist mainly of spent filter cartridges, demineralizer resins and evaporator bottoms.

Dry solid wastes consist mainly of ventilation air filtering medium, contaminated clothing, paper, rags laboratory glassware and tools. Spent filter cartridges will be placed directly in drums for disposal. For those filters which contain large amounts of radioactive materials, the drum will be lined with precast concrete.

Two methods of treatment will be available for evaporator bottoms and dry compactible trash. Evaporator bottoms can be solidified in 55 gallon drums using portland cement. Dry compactible trash can be compacted into 55 gallon drums. Alternatively, either type of wastes may be treated in the volume reduction system. Using this system, evaporator bottoms can be reduced to a powder form in a fluidized bed dryer where they will be decreased in volume and increased in activity per unit volume. The dry salts are collected and solidified using a polymer binder. The volume of compactible trash can be reduced in the dry waste processor. The ash from the dry waste processor will be combined with the salts from the fluidized bed dryer and solidified using a polymer binder. The Station will have a capacity to store 1210 drums of packaged radioactive waste in designated storage areas.

Q.18. What administrative controls will be implemented to assure that the solid wastes have in fact been properly packaged for shipment to appropriate sites?

A.18. The Station is in the process of preparing a Process Control Program (PCP) for the solid radwaste system. This PCP is scheduled to be filed with the Commission six months prior to receipt of an Operating License. The purpose of the PCP is to describe the methods to be used to assure that the solid waste system will perform its intended function. It will be a manual detailing the program of sampling, analysis and formulation determination by which solidification of radioactive wastes from liquid systems is assured. The PCP will provide a means for assurance that the solid waste system is operated as designed and produces a final product that contains no free water and has completely solidifed all waste. Detailed implementing procedures to carry out the guidelines of the PCP will also be developed before Station operation.

The Quality Assurance Program provides a final check to ensure proper preparation of radioactive materials for shipment. The Quality Assurance procedures require that all areas of potential concern are checked prior to shipment of the materials. The condition of tie downs, supports, truck tires, shipping casks, radioactive contamination levels and shipping

papers are among the items checked. If problems are encountered with a shipment, they are corrected prior to shipment and further actions are taken to prevent recurrence. Follow-up action usually involves the revision of waste preparation or survey procedures. I believe that Byron Station will have adequate equipment and administrative controls to ensure that radioactive waste will be packaged and transported within applicable regulatory standards.

EXHIBIT A

BYRON STATION ORGANIZATION

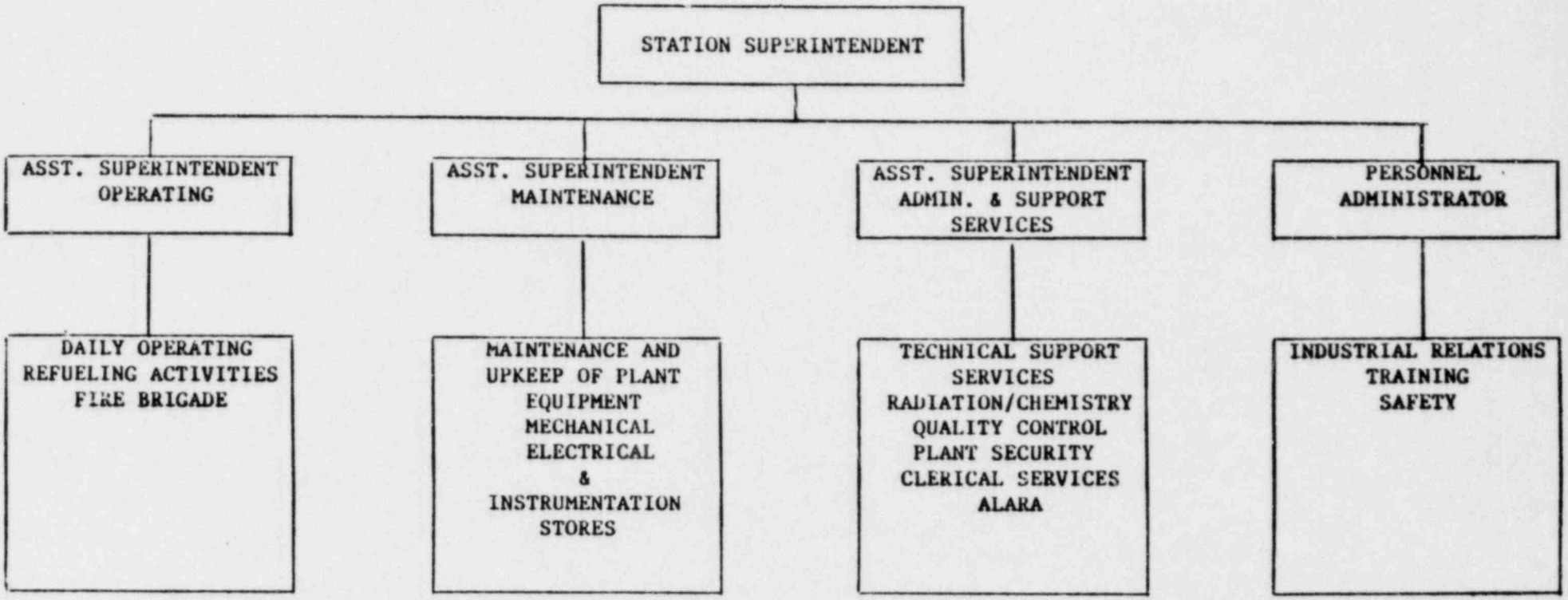

EXHIBIT B
AVERAGE EXPERIENCE LEVELS IN YEARS

Job Title		Ave. Commercial Nuc.	Ave. Military Nuc.	Total Other*	Total Experience	Total Exp. Per Job Title
Station Supt.	(1)	14	--	3	17	17
Op. Ass't. Supt.	(1)	9	6	--	15	15
Maint. Ass't. Supt.	(1)	12	--	1	13	13
Admin. Ass't. Supt.	(1)	9	6	--	15	15
Operating Eng.	(4)	9.8	--	20	59	14.8
Shift. Eng.	(6)	8.2	4.8	--	78	13
Shift Foreman	(6)	6.8	4.2	--	66	11
SCRE	(6)	5.0	1.3	3	41	6.8
NSO	(18)	4.8	--	13	100	5.6
EA	(59)	0.8	0.3	4.5	70	1.2
Op. Staff	(5)	6.6	--	83	116	23.2
Lead Mech.	(3)	6.3	--	20	39	13
Rad/Chem Supv.	(1)	6	--	2	8	8
Rad/Chem Mgmt.	(9)	4.2	--	4	42	4.7
Rad/Chem Tech.	(6)	4	--	8	32	6.4
Q.C. Supv.	(1)	11	--	1	12	12
Q.C. Staff	(5)	3.6	--	13	31	6.2
Security Admin.	(1)	6	--	3	9	9
Tech. Staff Supv.	(1)	7	--	6	13	13
Tech. Staff	(63)	2.3	0.4	36	208	3.3
Training Supv.	(1)	13	8	--	21	21
Nuclear Training Staff	(15)	3.6	2.8	60	157	10.5
Others**	(128)	3.8	--	563	1006	7.8
Totals	(342)	--	--	--	2262	--

* Indicates Power Plant Related Experience Areas
**Indicates Remainder of Plant Staff other than Clerical Staff.

The average experience level of the technical personnel in this figure is approximately 6.3 years.

DAARE/SAFE CONTENTION 2

CONTENTION 2

Intervenors contend that since residents of the DeKalb-Sycamore and Rockford areas, the zones of interest of DAARE and SAFE, are surrounded by 11 other nuclear generating units in operation of under construction (at Dresden, Quad-Cities, LaSalle, Zion and Braidwood) in addition to the two units at Byron, that the Applicant should re-evaluate the dose impacts of projected routine releases of radioactive materials (Chapter 11, FSAR) to determine the cumulative effects to residents from the addition of Byron releases to releases from the other 11 units. This re-evaluation is especially critical in light of Applicant's record of incidents at its other plants, since the granting of the Byron Construction License. This re-evaluation should be performed to ensure that applicable NRC (10 C.F.R. Part 20 and 10 C.F.R. Part 50, Appendix 1) and EPA (40 C.F.R. 190) limits for radionuclide releases and exposures are not exceeded in practice for DeKalb-Sycamore and Rockford area residents due to the addition of the Bryon units to other units in operation or under construction, and should focus upon both the projected and potential aggregate dose levels to these residents, and upon the known and potential effects of such projected and potential cumulative dose levels.

MATERIAL FACTS AS TO WHICH THERE IS NO GENUINE ISSUE TO BE HEARD

1. There is no effect on the populations in De Kalb-Sycamore and Rockford areas from routine releases of radioactivity in liquid effluents from the Byron Station. (Lahti Affidavit, p. 6)

2. Airborne radioactive emissions from routine operations of the Byron Station will meet the regulatory requirements of 10 CFR Part 50, Appendix I and 40 CFR Part 190. (Lahti, Affidavit, pp. 6-7; Byron FES, Appendix C)

3. Estimated airborne radioactive emissions from routine operations of the Byron Station will result in .01 millirem average annual dose to populations in the DeKalb-Sycamore and Rockford areas. (Lahti, Affidavit, p. 9)

4. Commonwealth Edison has the following operating nuclear power plants: Zion Station, Dresden Station and Quad-Cities Station. In addition, the Company has two nuclear power plants under construction: the La Salle County Station and the Braidwood Station. Each of these stations is more than 45 miles from the DeKalb-Sycamore and Rockford areas. (Lahti Affidavit, p. 9.)

5. Releases of airborne radioactivity from routine operations of each of the nuclear power plants operated or to be operated by Commonwealth Edison Company is or is expected to be in accordance with 10 CFR Part 50, Appendix I. (Lahti Affidavit, pp. 10-11)

6. Assuming that all of Commonwealth Edison Company's nuclear power plants were as close to the De Kalb-Sycamore and Rockford areas as the Byron Station, 30 miles, the cumulative dose from the airborne radioactive emissions from routine operation of those power plants is .08 millirem per year to the exposed populations in these areas. (Lahti Affidavit, pp. 11-12)

7. At dose levels of .08 millirem per year, there will be no detectable excess cases of cancer, no developmental abnormality in the newborn nor any genetically related ill health from the airborne radioactive emissions from the Byron Station and the other nuclear power plants operating or to be operated by Commonwealth Edison Company in Northern Illinois. (Fabrikant Affidavit, p. 30; See also Morgan dep. pp. 82-84)

DISCUSSION

Contention 2 asserts that Commonwealth Edison Company ("Edison") should perform a re-evaluation of the health effects of radioactive emissions from the Byron Station and the other nuclear power plants operating or to be operated by Edison. Edison's motion for summary disposition on this contention is based on the affidavits of Mr. Gerald P. Lahti and Dr. Jacob I. Fabrikant, extracts from the deposition of Dr. Karl Z. Morgan and conclusions of the NRC Staff set forth in the Safety Evaluation Report and Final Environmental Statement for the Byron Station. Mr. Lahti is an employee of Sargent and Lundy, Edison's architect-engineer for the Byron Station and is responsible for calculation of the radiological dose assessments for the Byron Station; Dr. Fabrikant is a physician and radiologist, a research biophysics scientist and a university professor in radiology and in biophysics at the University of California School of Medicine in Berkeley and at the Berkeley Laboratory, University of California, Berkeley. Dr. Fabrikant serves on national and international committees which are expert bodies on radiation and health effects of radiation. These committees include the BEIR I, II and III committees, the NCRP and the ICRP. Dr. Morgan is a retired professor of health physics with a distinguished background in the study of radiation and the health effects of radiation. He has been identified as a witness by DAARE and SAFE with respect to Contention 2.

Initially, the affidavit of Mr. Lahti establishes that liquid radioactive effluents from Byron Station are of no concern to the populations identified in the contention. Both De Kalb-Sycamore and Rockord are upstream of the point at which the Byron Station discharges liquid radioactive effluents into the Rock River. With respect to airborne radioactive emissions, Mr. Lahti's affidavit and the FES establish that such emissions will meet the regulatory standards of 10 CFR Part 50, Appendix I. Mr. Lahti calculates that such emissions will result in an average annual does of .01 millirem per year to the populations in the De Kalb- Sycamore and Rockford areas. Mr. Lahti has made comparable calculations for the Edison plants at Zion, Dresden, Quad Cities, LaSalle and Braidwood, assuming that each is located the same distance from the De Kalb- Sycamore and Rockford areas as the Byron Station. Using recent release data for the Zion, Dresden and Quad-Cities Station and projected release data for LaSalle and Braidwood, Mr. Lahti concludes that the total dose to the populations of interest is an annual average of .08 millirem per year.

Dr. Fabrikant's affidavit identifies three major health concerns from exposure to radiation. These are carcinogenesis, teratogenesis and genetic effects. At an annual average does rate of .08 millirem, Dr. Fabrikant concludes that there will be no detectable cases of excess cancer in the De Kalb- Sycamore and Rockord areas, no injury to fetuses and no genetic effect. This conclusion

was reached using the most conservative dose-response curve accepted by experts in radiation and the health effects of radiation.

Intervenors have not developed any evidence to the contrary. They do not dispute the calculations by which the Byron Station's conformity with Appendix I is demonstrated. Indeed, DAARE/SARE's responses to discovery indicates that they have merely surveyed the literature on radiation and health effects of radiation. Some of that literature raises questions about the details of such matters as the correctness of the dosimetry used in the Japenese atomic bomb survivor epidemological data and the inclusion of certain radioisotopes in calculating the amounts of radioactivity released in liquid effluents from the Byron Station. These matters are discussed in the affidavits of Dr. Fabrikant and Mr. Lahti and do not detract from their conclusions regarding the substance of Contention 2. Perhaps the most telling evidence in favor of the grant of summary disposition on this issue is the deposition testimony of intervenors' witness, Dr. Morgan. While Dr. Morgan has no familiarity with the level of projected radioactive releases from the Byron Station, he stated that he would not expect any adverse health effects at average annual releases of 5 millirem. Such a level is 500 times the expected releases from the Byron Station alone and about 60 times the calculated releases from all the nuclear

plants operating in northern Illinois.

Accordingly, there is no material fact in dispute and summary disposition in favor of Edison should be granted with respect to Contention 2.