UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

DAARE/SAFE MOTION FOR LEAVE TO FILE ATTACHED REPLY

DAARE/SAFE, by its undersigned counsel, moves for leave to file the attached reply which addresses new matters raised for the first time by Commonwealth Edison and the NRC Staff in their responses to DAARE/SAFE's motion. Fairness suggests that DAARE/SAFE, too, be afforded an opportunity to address these new matters.

DATED: October 18, 1982

Respectfully submitted,

Douglass W. Cassel, Jr. Jane M. Whicher

by: Douglass W. Cassel, Jr.

Attorneys for DAARE/SAFE on matters relating to Quality Assurance/Quality Control USNRC

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