

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

COMMONWEALTH EDISON COMPANY

(Byron Station, Units 1 and 2)

)  
)  
)  
)

Docket Nos. 50-454  
50-455

NRC STAFF SECOND SET OF INTERROGATORIES TO  
INTERVENOR ROCKFORD LEAGUE OF WOMEN VOTERS

The NRC Staff, pursuant to 10 CFR § 2.740b, serves the following interrogatories to Intervenor Rockford League of Women Voters to be answered in writing under oath or affirmation within 30 days. See Memorandum and Order, dated August 30, 1982, at 3. As stated in the Licensing Board's Order of August 18, 1981 (at page 3), all parties have a continuing obligation to reply to interrogatories. Accordingly, if additional information comes to light after the Intervenor has answered these interrogatories, the responses should be supplemented or amended as necessary to keep them currently accurate.

Contention 1A

1A-1 Identify and list all the specific QA/QC deficiencies at Byron upon which Contention 1A is based and identify the Inspection Reports, if any, that note such specific QA/QC deficiencies.

1A-2 State in detail the basis for the assumption that deficiencies identified at plants other than Byron are relevant to the operational safety of the Byron plant.

DESIGNATED ORIGINAL

Certified By

DSO7 [Signature]

Contention 8

8 Is it the League's position that NRC regulations require the performance of a plant-specific PRA prior to issuance of an operating license? If the answer is yes, state in detail the basis for this position.

Contention 19

19 Is it the League's position that a site-specific accident consequence model is or should be required prior to issuance of an operating license? If the answer is yes, state in detail the basis for this position.

Contention 63

63 Is it the League's position that NRC regulations require the compilation of a list of important to safety structures, systems and components? If the answer is yes, state in detail the basis for this position.

Contention 106

106-1 What specific "Braidwood analysis" is referred to in the sixth sentence of Contention 106 and why is it "faulty" and "inapplicable" to the Byron review as claimed?

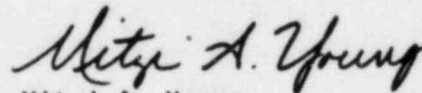
106-2 Identify the source document for quoted remarks attributed to a Dr. Henry Woodward in the League's October 4, 1982 response to Interrogatory 18(a) in the Applicant's second set of interrogatories to the League.

106-3 Identify by name each of the "witnesses" at the August 26, 1973 Byron construction permit hearing referred to in the League's October 4, 1982 response to Interrogatory 18(b) in the Applicant's second set of interrogatories and identify where in the transcript the pertinent testimony appears.

Contention 108

Specify those provisions of NUREG-0654 which the League alleges "are not and cannot be met" at Byron as stated in answer to Staff interrogatory 108-3.

Respectfully submitted,



Mitzi A. Young  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 15th day of November, 1982

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SECOND SET OF INTERROGATORIES TO INTERVENOR ROCKFORD LEAGUE OF WOMEN VOTERS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, this 12th day of November, 1982:

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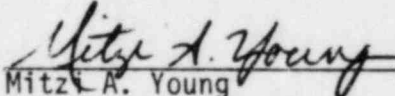
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