

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

11/18/82

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

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

'82 NOV 22 A10:51

Docket Nos. 50-454  
50-455 OF SECRETARY  
TRAINING & SERVICE  
BRANCH

MOTION TO DIRECT NRC STAFF  
TO COMMENCE SPECIAL INSPECTION

DAARE/SAFE, by its undersigned counsel, moves the Board to direct the NRC staff to commence its special inspection of DAARE/SAFE's allegations of unsafe QA/QC practices at Byron. In support of this motion, DAARE/SAFE states as follows:

1. On September 23, 1982, DAARE/SAFE moved the Board to reconsider its summary disposition of DAARE/SAFE's contention number one relating to QA/QC at Byron. DAARE/SAFE's motion was based in part on affidavits of three former employees of contractors at Byron, including a QA/QC Inspector and a QA auditor.

2. On October 12, 1982, in its response to DAARE/SAFE's motion, the NRC staff represented that it would commence "immediately" a special inspection of the allegations of DAARE/SAFE's affiants, which it expected to complete "by December 1, 1982." (Response at 7.)

3. As detailed in the attached letter of this date from the affiants' counsel to the NRC staff, the special inspection has yet to commence in earnest.

4. The staff's foot-dragging on this special inspection prejudices DAARE/SAFE's ability to prepare its case, especially since the Board has yet to rule on DAARE/SAFE's pending, fully briefed September 23, 1982 motion to reconsider.

WHEREFORE, DAARE/SAFE moves the Board to direct the NRC staff immediately to commence the special inspection and to complete it at the earliest reasonable date.

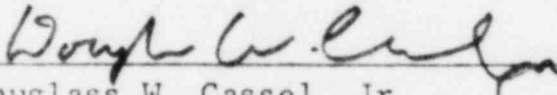
November 18, 1982

Respectfully submitted,

Douglass W. Cassel, Jr.  
Jane M. Whicher

Attorneys for DAARE/SAFE with  
respect to issues concerning  
quality assurance/quality control

by:

  
\_\_\_\_\_  
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