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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket Nos. 50-454 OL
50-455 OL

OFFICE OF THE SECRETARY
DOCKETING & SERVICE

COMMONWEALTH EDISON COMPANY'S ANSWERS TO
INTERVENORS' THIRD SET OF INTERROGATORIES

Interrogatory No. 1: Were documents prepared or reviewed by or for Commonwealth Edison, or its agents, contractors or consultants, relating to the methodology and/or validity of the methodology, used to select inspectors and inspections included in the Byron reinspection program? If so, please provide such documents. This request includes any review of methodology used in the Byron reinspection.

Answer: The documents responsive to this interrogatory encompass those in which the chronological listing of inspectors for selection for the Reinspection Program and the determination of those inspections within the Program was described and/or implemented. These materials include Edison's February 22, 1983, letter to the NRC Staff in which the Program was delineated, various internal memoranda generated at Byron pursuant to implementation of the Program, and the Reinspection Program itself. In addition, some of Edison's consultants have commented upon the methodology utilized in the Reinspection Program as part of their overall comments. Except for those consultants' comments which have been withheld from production pursuant to Edison's work

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product privilege, all other materials responsive to this interrogatory have already been produced to Intervenors. Edison is not in possession of any non-privileged documents which analyze or evaluate the methodology utilized to select inspectors and inspections included in the Reinspection Program which have not previously been produced to Intervenors.

Interrogatory No. 2: Please state whether applicants possess recordings, including worksheets, which document or analyze the type, date, and findings of inspections performed by inspectors whose work was subject to 100 percent reinspection in the Byron reinspection program. If so, please provide such records. Included in this request are records of both original inspectors and reinspectors.

Answer: All records of both inspectors and reinspectors responsive to this interrogatory have already been made available to Intervenors. Specifically, the materials produced in response to Intervenors' Interrogatories 11 and 12 and Request to Produce 37 (Intervenors' first sets of interrogatories and request to produce), plus the comparable materials produced for Pittsburgh Testing Laboratory, encompass the documents requested in the interrogatory.

COMMONWEALTH EDISON COMPANY

By: Bruce D. Becker
Bruce D. Becker
One of Its Attorneys

Isham, Lincoln & Beale
Three First National Plaza
Suite 5200
Chicago, Illinois 60602
(312) 558-7500

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 the same on each of the persons at the addresses shown on the attached service list in the manner indicated.

Date: *July 19, 1984*

Bruce D. Becker

*Ivan W. Smith, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Room 428, East West/West Towers
4350 East West Highway
Bethesda, Maryland 20814

Ms. Diane Chavez
SAFE
528 Gregory Street
Rockford, Illinois 61108

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

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

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

**Mr. Doug Cassel
BPI
109 North Dearborn Street
Suite 1300
Chicago, Illinois 60602

**Region III
U.S. Nuclear Regulatory Commission
Office of Inspection of Enforcement
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Ms. Patricia Morrison
5568 Thunderidge Drive
Rockford, Illinois 61107

Ms. Betty Johnson
1907 Stratford Lane
Rockford, Illinois 61107

*Mr. Stephen Lewis
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
7735 Old Georgetown Road
Room 9604
Bethesda, Maryland 20814

Joseph Gallo, Esq.
Isham, Lincoln & Beale
Suite 840
1120 Connecticut Avenue, NW
Washington, D. C. 20036

Dr. Reginald L. Gotchy
Administrative Judge
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
4350 East West Highway
3rd Floor - call 492-7663
Bethesda, Maryland 20814

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

Alan S. Rosenthal, Chairman
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
4350 East West Highway
3rd Floor - call 492-7663
Bethesda, Maryland 20814

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

* service by Federal Express
** service by Messenger

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Howard A. Wilbur
Administrative Judge
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555