### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter Of:	)		84 AGO 13 A11:27
COMMONWEALTH EDISON COMPANY	) Docket Nos.	50-456	OUR OF SECRETARY
(Braidwood Nuclear Power Station, Units 1 and 2)	)	30 437	BRANCH

## AFFIDAVIT OF DANIEL DEMOS

- I, Daniel Demos, being first duly sworn do depose and state:
- 1. My name is Daniel Demos. I am employed by
  Commonwealth Edison Company as the District Superintendent
  for the Joliet Area. I have held that position for approximately
  six years. I have been employed by Edison for twenty years.
  My business address is 1910 South Briggs Street, Joliet,
  Illinois, 60433.
- 2. I recently met with Jim Frakes and Ralph Miller, who are respectively the plant managers for the Honeywell and Uniroyal plants at the Joliet Army Ammunitions Plant (JAAP). Honeywell and Uniroyal are the contractors responsible for the operation of the JAAP. Uniroyal is the prime operating contractor and maintains TNT production lines which are currently inactive. Honeywell maintains and currently operates a facility for loading, assembling and packaging ammunition, primarily 25 and 30 millimeter ammunition. I discussed with them the activities at the

JAAP in light of newspaper article that appeared in Karkakee Daily Journal on March 23, 1984. That article reported on a recent conference regarding possible future reactivation and expansion of the JAAP.

- 4. According to Mr. Frakes, Honeywell has no plans to increase production or expand into new areas of production. Honeywell does not ship any explosives either to or from the JAAP by means of the railroad line that runs near the Braidwood site. All of their shipments are by truck and involve primarily 25 and 30 millimeter ammunition.
- 5. According to Mr. Miller, Uniroyal has no plans to reactivate or expand its TNT production facility at the JAAP. Presently, Uniroyal does not ship any explosives over the railroad line that runs near Braidwood. Uniroyal ships about one truckload of flake TNT from its stock each week. Uniroyal makes no other explosives.
- 6. According to Mr. Miller, the \$300 million mentioned in the newspaper article would be applied toward proposed capital projects to upgrade Uniroyal's present TNT production capability. This upgrading would not expand their TNT production capability but would produce a higher level of readiness if reactivation should ever occur. The newspaper article was inaccurate in suggesting that the proposed capital projects for the upgrading of the TNT production facility have been approved. Further, the article is erroneous in suggesting that these projects show that the

Army plans to reactivate the TNT production facilities at the JAAP. As mentioned in the newspaper article, the estimated cost of reactivation of the TNT production facilities is \$420 million. This cost would be over and above the \$300 million upgrading.

7. According to Mr. Miller, the RDX and HMX explosives referenced in the newspaper article have been manufactured for several years at a plant in Tennessee, thus they are not "new" as suggested by the article. However, the Army will be developing a new production process for these explosives at another site. At some time in the future, if the new process is found feasible, the Army may decide to build other plants employing the new process. The JAAP could be one of several candidates for the location of such a plant.

To the best of my knowledge and belief, the statements made herein are true and correct.

Daniel Demos

SWORN AND SUBSCRIBED to before me this Aday of 1984.

My Commission Expres July 6, 1967

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD USARC

In the Matter Of:

\*84 AGO 13 ATT :26

COMMONWEALTH EDISON COMPANY

Docket Nos. 50-456 04

(Braidwood Nuclear Power Station, Units 1 and 2)

50-4570EON SECRETAR BRANCH

# NOTICE OF APPEARANCE

Notice is given that the undersigned attorney enters his appearance on behalf of Applicant, Commonwealth Edison Company, P.O. Box 767, Chicago, Illinois, 60690, in the above-captioned proceeding. In accordance with 10 C.F.R. §2.713, the following information is provided:

Name:

Victor G. Copeland

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Admissions:

United States District Court for the Northern District of

Victor G. Copeland

Illinois

Supreme Court of Illinois

ISHAM, LINCOLN & BEALE 1120 Connecticut Avenue, N.W. Suite 840 Washington, D.C. 20036

DATED: August 8, 1984

### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## DOCKETED BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:	}	'84 AGO 13 AII :26
COMMONWEALTH EDISON COMPANY	) Docket Nos.	50-456 0 L 50+457 0 L
(Braidwood Nuclear Power Station, Units 1 and 2)	;	DOCKETING & SERVICE BRANCH

### CERTIFICATE OF SERVICE

I hereby certify that copies of MOTION FOR LEAVE TO FILE RESPONSE, COMMONWEALTH EDISON COMPANY'S RESPONSE TO NEINER FARMS' STATUS REPORT REGARDING CONTENTION 4, and NOTICE OF APPEARANCE OF VICTOR G. COPELAND were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, this 9th day of August, 1984.

Marshall E. Miller, Esq. Chairman Administrative Law Judge Atomic Safety and Licensing Board United States Nuclear Regulatory Washington, D.C. 20555 Commission Washington, D.C. 20555

Dr. Richard F. Cole Administrative Law Judge Atomic Safety and Licensing United States Nuclear Regulatory Commission Washington, D.C. 20555

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

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One of the attorneys for Commonwealth Edison Company