

INTERVENOR EXHIBIT

CHRONOLOGY OF EDISON'S RESPONSES TO INTERROGATORY 12

May 9, 1984 '85 JAN -8 Intervenor's First Set of Interrogatories served.

June 25, 1984 OFFICE OF SECUR
DOCKETING & SE
BRANCH Responses to First Set of Interrogatories (including Interrogatory 12) provided.

July 26, 1984 After cross-examination of Mr. Singh, Edison informed Intervenor's that Edison's response to Interrogatory 12 was incorrect.

July 31, 1984 Edison provided First Amended Response to Interrogatory 12.

August 3, 1984 Intervenor's informally requested breakdown of numbers contained in response to Interrogatory 12. (served August 6, 1984)

August 13, 1984 Dr. Ericksen's testimony was filed.

August 14, 1984 Edison provided unsigned answer to Intervenor's requested breakdown of Interrogatory 12.

August 15, 1984 Intervenor's sent letter (Attachment A) informing Edison's counsel that Edison's First Amended Response to Interrogatory 12 was inconsistent with the breakdown.

August 15, and 16, 1984 Counsel for Edison and Intervenor's discussed the inconsistencies. On the 16th, counsel for Edison orally provided new tallies of the breakdown and stated he could be contacted regarding the tallies on August 18, 1984.

August 18, 1984 Counsel for Intervenor's unsuccessfully attempted to reach counsel for Edison to resolve inconsistencies.

August 20, 1984 Edison provided a Second Amended Response to Interrogatory 12.

August 20, 1984 Counsel for Intervenor's informed counsel for Edison that this second amended response was still inconsistent with the breakdown and provided Intervenor's tallies.

August 20, 1984 (evening) Counsel for Edison informed Intervenor's that Intervenor's tally was correct and stated Edison would provide a corrected response to Interrogatory 12.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-45464-55506 Official Exh. No. B-11
 In the matter of Repton, 1 + 2
 Staff IDENTIFIED ✓
 Applicant RECEIVED
 Intervenor ✓ REJECTED ✓
 Cont'g Off'r _____
 Contractor _____ DATE 8/21/84
 Other _____ Witness _____
 Reporter dy

(Chronology cont.)

August 22, 1984
(afternoon)

Edison provided an (Untitled) Third Amended Response to Interrogatory 12.

August 22, 1984
(evening)

Counsel for Intervenors informed Edison that the (Untitled) Third Amended Response contained one error and received authorization to change the incorrect number.

**BPI****Business and Professional People for the Public Interest**

109 North Dearborn Street, Suite 1300 • Chicago, Illinois 60602 • Telephone: (312) 641-5570

August 15, 1984

BY MESSENGER

Mr. Michael I. Miller
 Isham, Lincoln & Beale
 Three First National Plaza
 52nd Floor
 Chicago, IL 60602

Re: NRC Docket Nos. 50-454
 50-455

Dear Mike:

Yesterday, we received Edison's response to Intervenor's First Set of Supplemental Interrogatories.

In checking the answers to Interrogatory 12 Supplement, we noted that many numbers are inconsistent with Commonwealth Edison Company's First Amended Response to Interrogatory 12 that we received on July 31, 1984.

For example, for "25 PIPING AND COMPONENT SUPPORTS TEMP. ATTACHMENT INSPECTION" Edison's most recent answer lists 373 original inspections made by 11 original inspectors and 0 reinspections of 0 inspectors. Edison's "corrected" response to Interrogatory 12 that we received on July 31, 1984 listed 27 original inspections made by 4 original inspectors and 13 reinspections of 2 inspectors. It appears that almost every other element listed in Edison's response to Interrogatory 12 Supplement also contains at least one inconsistency.

We would appreciate your checking with the Company immediately to determine the reason for the inconsistencies and to let us know whether Edison's First Amended Response to Interrogatory 12 is in error and/or the Response to Supplemental Interrogatory 12 is in error.

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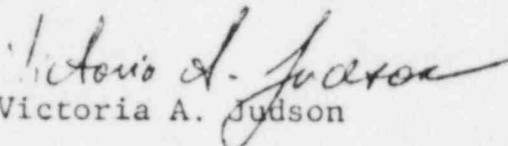
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Mr. Michael I. Miller
Isham, Lincoln & Beale
August 15, 1984
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Until we are provided with material that we know is correct, we cannot file supplemental testimony. I, therefore, would appreciate your contacting me about the inconsistencies as soon as possible.

Sincerely,


Victoria A. Judson

VAJ/ljs