

August 1, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'85 AUG -5 A11:38

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

Docket Nos. 50-4560L
50-457

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RESPONSE TO NRC STAFF INTERROGATORIES
TO INTERVENOR BRIDGET LITTLE ROREM, ET AL.
CONCERNING ITS QUALITY ASSURANCE CONTENTION
AND MOTION FOR PROTECTIVE ORDER

Intervenors Bridget Little Rorem, et al., by their under-
signed counsel, hereby respond to NRC Staff Interrogatories to
Intervenor Bridget Little Rorem, et al. concerning their
Quality Assurance Contention, which were served July 12, 1985.
Pursuant to 10 CFR Section 2.740(c), Intervenors move for the
entry of a protective order as to each interrogatory and
request for production of documents, or portion thereof, as to
which they herein object.

By way of introduction Intervenors note that their
discovery requests of Applicant and the NRC Staff, consisting
of interrogatories and requests to produce documents served
July 2, 1985, remain substantially unanswered. Objections by
the Applicant and the NRC Staff interposed against the majority
of our interrogatories were served July 29, and July 30, 1985,
respectively. As directed by the Board Intervenors intend to

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seek voluntary agreement by Applicant and the NRC Staff to supply further responses to interrogatories presently the subject of their objections and, as necessary, to seek an order pursuant to 10 CFR Section 2.740(f) compelling such discovery absent agreement.

Applicant has served partial answers to only nine (9) of Intervenors' sixty-two (62) interrogatories, together with related documents and listings of documents to be made available for inspection. This "first increment" response was delivered to Intervenors' counsel after close of business July 30, 1985. At this time Intervenors have not had sufficient opportunity to examine, inspect and evaluate the information in order to incorporate any such information in this response. Under the schedule approved by the Board at the July 23, 1985, Prehearing Conference complete answers to Intervenors' interrogatories and requests for production are to be served August 9, 1985. The NRC Staff's responses are expected shortly.

In submitting their proposed quality assurance contention Intervenors were required by the Licensing Board to provide "a precise specification of each occurrence of an alleged QA/QC deficiency," and "the data on which each alleged deficiency is premised (e.g., NRC inspection reports)," as the bases for our amended contention. Special Prehearing Conference Order, April 17, 1985, at p. 41.

That is what Intervenors have done. Thus, to the extent that the NRC Staff interrogatories seek identification of the