

February 19, 1986

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

86 FEB 21 P4:43

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket Nos. 50-486 ANCH  
50-457 /OC

COMMONWEALTH EDISON COMPANY'S  
APPLICATION FOR DOCUMENT SUBPOENA

Pursuant to 10 C.F.R. §2.720, Commonwealth Edison Company ("Applicant") hereby applies to the Atomic Safety and Licensing Board for issuance of the attached document subpoena to the Custodian of Records for Raymond-Kaiser Engineers, Inc., commanding him or her to produce specified documents at the time and place indicated on the attached subpoena.

In support of this application, Applicant states as follows:

1. A quality control inspector harassment issue has been admitted as part of the quality assurance contention of Intervenor Bridget Little Rorem, et al. ("Intervenors") in the Braidwood proceeding. One of the alleged victims of the purported harassment was Mr. Worley Puckett, a former employee of Henry J. Kaiser Co. (now Raymond-Kaiser Engineers) at Cincinnati Gas & Electric's Zimmer Plant.

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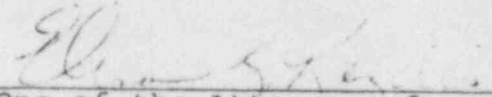
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2. Applicant will be unable to adequately prepare its case in the Braidwood proceeding unless it is permitted to gain access to documents in the possession of Raymond-Kaiser Engineers regarding Mr. Puckett.

3. Appropriate fees will be paid in accordance with 10 C.F.R. §2.720(d). Once the requested subpoena is issued, Isham, Lincoln & Beale will arrange to have the subpoena served by a non-party pursuant to 10 C.F.R. §2.720(c).

WHEREFORE, Applicant respectfully requests that the Licensing Board issue the attached subpoena to Raymond-Kaiser Engineers, Inc.

Respectfully submitted,

  
\_\_\_\_\_  
One of the Attorneys for  
Commonwealth Edison Company

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

# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

COMMONWEALTH EDISON COMPANY

(Braidwood Station, Units 1 and 2)

DOCKET NO. 50-456  
50-457

TO

Custodian of Records  
Raymond-Kaiser Engineers, Inc.  
CT Corporation  
208 South LaSalle Street  
Chicago, Illinois 60604

YOU ARE HEREBY COMMANDED to <sup>produce</sup> ~~appear~~ at Isham, Lincoln & Beale,  
Three First National Plaza, Suite 5200  
in the city of Chicago, Illinois  
on the 3rd day of March 19 86 at 10:00 o'clock A.M.  
to ~~testify on behalf of~~ XXXXXX

~~XXXXXX~~ the document(s) ~~XXXXXX~~ described  
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_  
\_\_\_\_\_

ATTORNEY FOR Commonwealth Edison Company  
Elena Z. Kezelis  
Isham, Lincoln & Beale  
Three First National Plaza  
Chicago, Illinois 60602  
TELEPHONE (312) 558-7500

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### 10 C.F.R. 2.720 (f)

On motion made promptly, and in any event  
at or before the time specified in the subpoena  
for compliance by the person to whom the sub-  
poena is directed, and on notice to the party at  
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the  
Commission may (1) quash or modify the sub-  
poena if it is unreasonable or requires evidence  
not relevant to any matter in issue, or (2) con-  
dition denial of the motion on just and reasonable

SCHEDULE OF DOCUMENTS  
TO BE PRODUCED

1. All documents relating to Mr. Worley O. Puckett, who was employed by Henry J. Kaiser Co. (now Raymond-Kaiser Engineers, Inc.) between 1975 and 1984 at the Wm. H. Zimmer Nuclear Power Plant in Ohio.

2. All documents reflecting or relating to any evaluations, reviews, promotions, disciplinary action, etc., or to the work performance of Mr. Puckett.

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

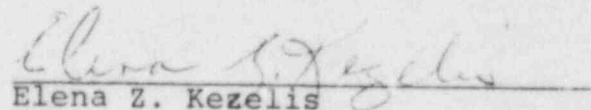
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In the Matter Of: )  
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COMMONWEALTH EDISON COMPANY )  
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(Braidwood Station, Units 1 )  
and 2) )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket Nos. 50-457  
50-457

CERTIFICATE OF SERVICE

I, Elena Z. Kezelis, one of the attorneys for  
Commonwealth Edison Company, certify that copies of Commonwealth  
Edison Company's Application For Document Subpoena has been  
served to all parties on the attached service list by  
deposit in first class mail, postage prepaid, this 19th day  
of February, 1986, except as otherwise noted.

  
Elena Z. Kezelis

ISHAM, LINCOLN & BEALE  
Three First National Plaza  
Suite 5200  
Chicago, Illinois 60602  
(312) 558-7500

DATED: February 19, 1986



\*\* Herbert Grossman, Esq.  
Chairman  
Administrative Law Judge  
Atomic Safety and Licensing Board  
United States Nuclear Regulatory  
Commission  
Washington, DC 20555

Atomic Safety and Licensing Appeal Panel  
United States Nuclear Regulatory  
Commission  
Washington, DC 20555

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

Mr. William L. Clements  
Chief, Docketing and Services  
United States Nuclear Regulatory  
Commission  
Office of the Secretary  
Washington, DC 20555

Dr. A. Dixon Callihan  
Administrative Law Judge  
102 Oak Lane  
Oak Ridge, TN 37830

Ms. Bridget Little Rorem  
117 North Linden Street  
P.O. Box 208  
Essex, IL 60935

\*\* Stuart Treby, Esq.  
Elaine I. Chan, Esq.  
Office of the Executive Legal Director  
United States Nuclear Regulatory  
Commission  
Washington, DC 20555

\* Robert Guild  
Douglass W. Cassel, Jr.  
Timothy W. Wright, III  
BPI  
109 North Dearborn Street  
Suite 1300  
Chicago, IL 60602

Atomic Safety and Licensing Board Panel  
United States Nuclear Regulatory  
Commission  
Washington, DC 20555

Charles Jones, Director  
Illinois Emergency Services and  
Disaster Agency  
110 East Adams  
Springfield, IL 62705

\* By Messenger

\*\* By Federal Express

William Little, Director  
Braidwood Project  
Region III  
United States Nuclear Regulatory  
Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Janice A. Stevens  
United States Nuclear Regulatory  
Commission  
7920 Norfolk Avenue  
Phillips Building  
Bethesda, MD 20014

FOR ADDRESSEE ONLY

George L. Edgar, Esq.  
Thomas A. Schmutz, Esq.  
Newman & Holtzinger, P.C.  
1615 L Street, N.W.  
Suite 1000  
Washington, D.C. 20036