

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

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ROBERT T. LINCOLN: 1872-1885
WILLIAM G. BEALE: 1885-1923

THREE FIRST NATIONAL PLAZA
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1120 CONNECTICUT AVENUE, N.W.
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WASHINGTON, D.C. 20036
202 833-9730

May 13, 1986



Robert Guild
BPI
109 N. Dearborn St.
Suite 1300
Chicago, IL 60602

PROD. & UTIL. FAC... 50-452/457 02

Dear Mr. Guild:

On March 28, 1986 in LBP-86-7, the Licensing Board granted in part your motion to compel production by Edison of certain documents which we claimed were privileged. On April 24, 1986 in CLI-86-08, the Commission dismissed Intervenor's amended quality assurance contention, except for the L.K. Comstock QC inspector harassment issues identified in contention item 2.C.

Edison has reviewed the documents subject to your motion to compel and is making available for your inspection today at Isham, Lincoln & Beale the documents with Bates stamp numbers listed in Attachment A, B and C. Since these documents have already been indexed in Edison's privilege log dated February 2, 1986, there is no need to index them again for purposes of this letter. The documents being produced are those which are within the scope of your motion to compel and the Licensing Board's March 28 Order, and which may potentially be relevant to the issues remaining in this case following the Commission's April 24 Order. In general, this means we are producing drafts of the BCAP report and the QCIRP report, but not drafts of other corrective action reports which have no possible relevance to L.K. Comstock QC inspector harassment issues.

Attachment A is a list of the pages of the documents being made available which have not been altered in any way. Attachment B lists those pages of the documents being made available which have had irrelevant material redacted

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Robert Guild
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(e.g. draft BCAP CSR results for structural, piping or HVAC construction categories). Attachment C lists the relevant pages of documents which originally had attorney comments on them. As authorized by the Board's Order these comments have been redacted as have irrelevant portions.

Attachment D is a list of documents which relate to the draft BCAP reports, but are not themselves drafts. These are not within the scope of your motion to compel or the Licensing Board's March 28 Order. Moreover, they are protected by the attorney-client and work product privileges.

Some time ago, you asked me to look for "backup" documents to certain INPO findings which I forwarded to you on April 15, 1986. In light of the Commission's decision, those findings are no longer relevant to this proceeding and therefore your request is not being pursued.

Truly yours,

A handwritten signature in cursive script, appearing to read "Philip P. Steptoe", with a stylized flourish at the end.

Philip P. Steptoe

PPS:skn

Enclosures

ATTACHMENT A

00823-00853	02386-02464	04435-04451
00882-00905	02490-02525	04464-04490
00908-00939	02536-02553	04625-04627
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ATTACHMENT C

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02966-02977	10339-10343	18093
02981-02982	16133-16181	18538
02989-02993	16183-16184	18582-18583
02995	16187-16191	18776-18790
03002-03007	16197	18794-18797
03166-03198	16199-16204	18802-18809
03201-03204	16207-16210	18850-18856
03214-03225	16220-16270	19340
03229-03230	16272-16273	21244a-21245
03237-03241	16275-16279	21525-21536
03243	16285	21539-21542
03250-03255	16287-16304	21551-21564
03257-03289	16307-16310	21568-21569
03292-03295	16321-16328	21575-21579
03305-03316	16396-16408	21581
03320-03321	16465-16477	21583
03328-03332	16631-16661	21588-21613
03334	16694-16742	22423-22472
03336-03337	16868-16871	22474
03341-03346	16877-16879	22478-22482
03397-03401	16891-16892	22488
05301-05314	16902-16905	22490-22495
05321-05324	16920-16924	22498-22501
05818-05825	16952-16955	22511-22517
05832-05838	16957	23660-23662
05851-05852	16961	23667-23670
05861-05864	17418-17431	25306-25354
05879-05883	17451	25360-25364
05910-05921	17621-17625	25370
07293	17629-17632	25372-25377
07931-07932	17642-17650	25380-25383
07934-07966	17654-17657	25393-25399
07969-07972	17662-17663	27743-27813
07982-07993	17665-17670	
07997-07998	17674-17684	

ATTACHMENT D

<u>Bates Number</u>	<u>Type of Document</u>	<u>Date</u>	<u>To</u>	<u>From</u>	<u>Description</u>
02917	Memo	10/4/85	Maiman DelGeorge Wallace Kaushal Smith Miller Gallo	Steptoe	Memo re: BCAP draft
03165	Copy of 02917				
03256	Copy of 02917				
04188-04192	Memo	9/9/85	Miller Gallo Lauer	Steptoe	Memo re: comments on BCAP draft
07933	Copy of 02917				
15541-15542	Memo	10/31/85	Maiman Wallace DelGeorge Kaushal Smith Miller Gallo Kostal	Steptoe	Memo re: BCAP draft
15827	Memo	10/18/85	Maiman Wallace DelGeorge Kaushal Smith Miller Gallo	Steptoe	Memo re: BCAP draft

<u>Bates Number</u>	<u>Type of Document</u>	<u>Date</u>	<u>To</u>	<u>From</u>	<u>Description</u>
15936-15937	Copy of 15541-15542				
16329	Memo	11/4/85	Wallace	Steptoe	Memo re: BCAP draft
17270	Copy of 15827				
17685-17686	Copy of 15541-15542 w/notes of P. Steptoe				
17741-17742	Copy of 15541-15542 w/notes of M. Miller				
17921	Memo	10/25/85	Maiman Wallace DelGeorge Kaushal Smith Miller Gallo	Steptoe	Memo: transmitting BCAP draft
18001	Copy of 17921				
18094	Copy of 18094				
18214	Copy of 15827				
23488	Copy of 17921				

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:	)	
	)	
COMMONWEALTH EDISON COMPANY	)	
	)	Docket Nos. 50-456
(Braidwood Station, Units 1	)	50-457
and 2)	)	

CERTIFICATE OF SERVICE

I, Gary A. Kruse, one of the attorneys for Commonwealth Edison Company, certify that copies of letter from Philip P. Steptoe to Robert Guild, dated May 13, 1986, have been served in the above-captioned matter on all persons listed on the attached Service List by United States mail, postage prepaid, this 13th day of May, 1986, except where service has been made as otherwise noted.



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Dated: May 13, 1986

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on May 13, 1986