

7/30/81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



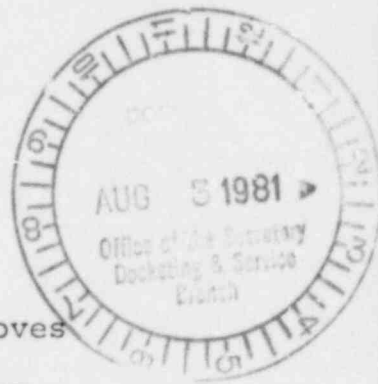
In the Matter of )

COMMONWEALTH EDISON COMPANY )

(Byron Nuclear Power Station, )  
Units 1 and 2) )

Docket Nos. 50-454  
50-455

MOTION OF COMMONWEALTH EDISON COMPANY  
TO COMPEL DISCOVERY BY  
THE ROCKFORD LEAGUE OF WOMEN VOTERS



Commonwealth Edison Company ("Applicant") moves the Board, pursuant to 10 CFR §2.740(f)(1), to issue an order directing the Rockford League of Women Voters (the "League") to answer forthwith Applicant's interrogatories directed to the League. In support of this Motion, Applicant states as follows:

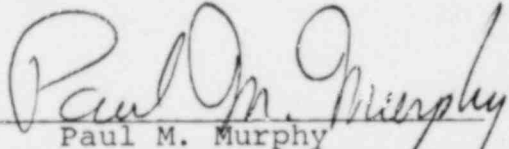
1. By Memorandum and Order, dated December 19, 1980, this Board opened discovery on all admitted contentions of the League.
2. On July 8, 1981, Applicant directed four interrogatories to the League (copies of which are attached hereto) which, pursuant to 10 CFR §2.740b(b), the League was required to answer not later than July 27, 1981, including five days for mailing.
3. As of this date, the League has neither answered nor objected to said interrogatories.

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WHEREFORE, Commonwealth Edison Company respectfully requests the Board to enter an order compelling the League to respond to Commonwealth Edison Company's First Round of Interrogatories in the manner required by the Commission's Rules of Practice.

DATED: July 30, 1981

Respectfully submitted,

  
\_\_\_\_\_  
Paul M. Murphy  
One of the Attorneys for Applicant  
Commonwealth Edison Company

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Dated: 7-8-81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. 50-454
	)	50-455
(Byron Nuclear Power Station,	)	
Units 1 and 2)	)	

COMMONWEALTH EDISON COMPANY'S FIRST ROUND  
OF INTERROGATORIES TO BE ANSWERED BY THE  
ROCKFORD LEAGUE OF WOMEN VOTERS

Pursuant to 10 CFR § 2.740b Commonwealth Edison Company (Edison) requests the Rockford League of Woman Voters (League) to answer separately and fully in writing, under oath or affirmation, each of the following Interrogatories within 14 days of service.

INSTRUCTIONS AND DEFINITIONS

1. As used in these Interrogatories, whenever appropriate, the singular form of a word shall be interpreted as plural and the masculine gender shall be deemed to include the feminine.
2. As used in these Interrogatories, the term "and," as well as "or," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might otherwise be construed to be outside their scope.
3. As used in these Interrogatories, the term "person" includes, without limiting the generality of its

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meaning, every natural person, corporate entity, partnership, association, governmental body or agency.

4. As used in these Interrogatories, the term "identification" of a person or entity includes stating his, her, or its full name, his or her most recent home address and telephone number, his, her, or its most recent known business address and telephone number, his or her present position, and his, her, or its connection or association with any party to this proceeding.

5. If any of the information contained in the answers to these Interrogatories is not within the personal knowledge of the person signing the Interrogatory, so state and identify each person, document and communication on which he relies for the information contained in answers not solely based on his personal knowledge.

6. If you cannot answer any portion of the following Interrogatories in full, after exercising diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

7. If you claim privilege with respect to any information which is requested by these Interrogatories, specify the privilege claimed, the communication and/or answer as to which that claim is made, the parties to the communication, the topic discussed in the communication and the basis for your claim.

## INTERROGATORIES

1. With respect to each Contention advanced by the League which has been admitted by the Atomic Safety and Licensing Board in the above-captioned proceeding, list the following:

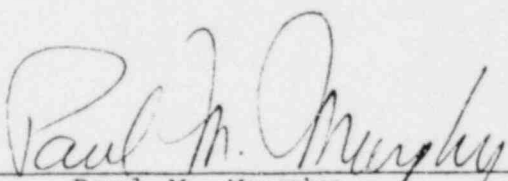
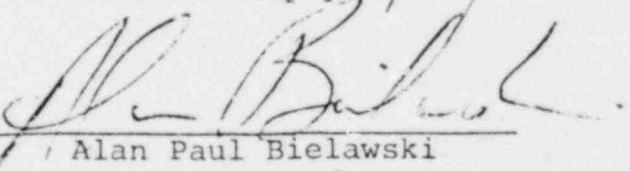
- a. A concise statement of the facts supporting each Contention together with references to the specific sources and documents and portions thereof which have been or will be relied upon to establish such facts;
- b. the identity of each person expected to be called as a witness at the hearing;
- c. the subject matter on which the witness is expected to testify;
- d. the substance of the witness's testimony.

2. With respect to each witness identified in the League's response to Interrogatory 1 above, identify each document which the witness will rely upon in whole or in part in the preparation of his testimony or in the development of his position.

3. With respect to each witness identified in the League's response to Interrogatory 1 above, identify the witness's qualifications to testify on the subject matter on which the witness will testify.

4. Identify all persons who participated in the preparation of the answers, or any portion thereof, to these Interrogatories.

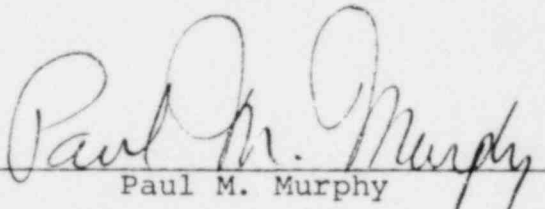
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Commonwealth Edison Company

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Commonwealth Edison Company, certifies that on this date he filed two copies (plus the original) of the attached pleading with the Secretary of the Nuclear Regulatory Commission and served a copy of same on each of the persons at the addresses shown on the attached service list by United States mail, postage prepaid.

DATE: July 30, 1981

  
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