

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-454 OL  
50-455 OL

1. The Amendment and Consolidation of DAARE/SAFE Contention 3 and Rockford League of Women Voters Contentions 19 and 108 (Amendment) is stated in Exhibit A; which is attached to and made a part of this motion.
2. The purpose of the Amendment is to limit the statement of DAARE/SAFE Contention 3 (Contention 3) and Rockford League of Women Voters Contentions 19 and 108 (Contentions 19 and 108) to the issues which:

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- (a) are addressed in the Affidavits of David Turner, David Miller, J. Michael Maloney, Charles Lamb, Thomas Bowes, Gary Montel, Carl Swon, and Joel Cowen. Said Affidavits were filed with the Nuclear Regulatory Commission and served on all parties on Monday, February 21, 1983. Said Affidavits are incorporated herein by reference as Exhibits B, C, D, E, F, G, H, and I, respectively.
- (b) will be addressed by the witnesses which DAARE/SAFE intends to subpoena viz., Ruth Little, Director, Rockford Chapter, Girl Scouts of America (Camp McCormick); Robert Glazer, Director, Village of Progress, Oregon, Illinois; Steve Walters, Chief of the Byron Fire Department; William Dilts, Administrator in Charge of Emergency Services, Rockford Memorial Hospital; Jerry Brooks, Ogle County ESDA Coordinator; and, Paul Sereg, Region II, ESDA Coordinator, Dixon, Illinois.
- (c) will form the basis of DAARE/SAFE's and the Rockford League of Women Voter's cross-examination of witnesses called by other parties or by the Atomic Safety Licensing Board.

3. The testimonial evidence contained in Exhibits B through I, and the testimonial evidence which will be presented by Paul Holmbeck and that which will

be elicited from witnesses which DAARE/SAFE will subpoena concerns, in large part, certain inadequacies in the emergency plans stated in IPRA, VI, Revision 0, (Revision 0) and Evacuation Time Estimates Within the Plume Exposure Pathway Emergency Planning Zone for the Byron Nuclear Generating Station. (Evacuation Time Estimates)

4. The Amendment is timely filed. Both Revision 0 and the Evacuation Time Estimates were published in late December, 1982, and were produced by Commonwealth Edison for DAARE/SAFE in early January, 1983. These publication and production dates gave DAARE/SAFE approximately five to six weeks to review and analyze those documents; contact their witness about the plans; secure the agreement of their witnesses to testify; and prepare the testimony.
5. DAARE/SAFE's and the Rockford League of Women Voter's interest in adjudicating the adequacy emergency planning for the Byron Station will not be protected unless their motion is granted.
6. The Amendment will assist in the development of a sound record because it will eliminate those portions of Contentions 3, 19, and 108 which will not be addressed by DAARE/SAFE's witnesses; because it will state the issues about emergency preparedness with greater specificity; and because all of DAARE/SAFE's witnesses with respect to the Amendment have now been identified.
7. The Amendment will not broaden the issues or delay

the proceedings because all of the testimony which DAARE/SAFE intends to introduce is within the scope of Contentions 3, 19, and 108 as they are currently worded; and because DAARE/SAFE is willing to attempt a compromise of the issues raised in the Amendment and in Exhibits B through I. DAARE/SAFE will also promptly disclose any information about its case which is otherwise subject to discovery and will make its witnesses available for deposition.

Wherefore, DAARE/SAFE and the Rockford League of Women Voters respectfully ask the Nuclear Regulatory Commission to issue an order amending and consolidating DAARE/SAFE Contention 3 and Rockford League of Women Voter's Contentions 19 and 108 as stated in Exhibit A.

By Diane Chavez, DAARE/SAFE  
Representative

and

By Pat Morrison  
Pat Morrison, League of  
Women Voters of Rockford  
Representative

February 21, 1983