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April 12, 1982

NUCLEAR REGULATORY COMMISSION

In the Matter of:

COMMONWEALTH EDISON COMPANY

LaSalle County Nuclear  
Generating Station, Unit 1  
and Unit 2

Docket Nos. 50-373  
50-374

Mr. Harold Denton  
Director of Nuclear Reactor  
Regulation  
9720 Norfolk Avenue  
Mail Stop P428  
Bethesda, Maryland 20814

Dear Mr. Denton:

On March 24, 1982, the Office of the Attorney General of the State of Illinois filed a "Request to Institute a Show Cause Proceeding and for Other Relief" in this docket alleging the existence of certain improper hole-drilling practices at LaSalle. This request was accompanied by affidavits of [REDACTED] a former construction worker at LaSalle, and Dale Bridenbaugh, an engineering consultant to the Attorney General's Office.

On April 8, 1982, Mr. Bridenbaugh, testifying before the Illinois Commerce Commission on behalf of the Attorney General's Office in opposition to Commonwealth Edison's pending request for rate relief, admitted that his affidavit did not justify deferring startup testing for LaSalle. Mr. Bridenbaugh said the purpose of his affidavit was to encourage the NRC to complete an investigation with respect to hole-drilling before the plant becomes radioactive. Mr. Bridenbaugh conceded that the plant will not become radioactive until after the fuel is loaded. A copy of the pertinent portions of the transcript is enclosed.

PRINCIPAL STAFF	
✓ 4-15-82	✓ 4-15-82
✓ 4-15-82	✓ 4-15-82
A/D	✓ 4-15-82
✓ 4-15-82	✓ 4-15-82
✓ 4-15-82	✓ 4-15-82
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received for the first time on 4-22-82

This letter has never been considered in any of my actions. To this point it is not relevant to any decisions I will make which will be based on whether safety or any other factor is involved.

APR 13 1982

Mr. Harold Denton  
April 12, 1982  
Page Two

In light of these admissions under oath, and the undisputed fact that it will take many weeks following issuance of a license authorizing fuel load and low power testing for fuel load to be accomplished, the Attorney General's show cause petition provides no possible justification for withholding issuance of the requested license.

Sincerely,

A handwritten signature in dark ink, appearing to read "Philip P. Steptoe". The signature is fluid and cursive, with the first name "Philip" being more prominent.

Philip P. Steptoe  
One of the Attorneys for  
Commonwealth Edison Company

PPS/kb  
Enc.

CC: Judith Goodie, Esq.  
James Keppler, Region II

IN 5

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

SEARCHED	INDEXED
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NOTICE OF FILING

Mr. Philip P. Steptoe  
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One First National Plaza  
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Chicago, Illinois 60603

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Mr. Harold Denton, Director of  
Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Md. 20814

Mr. Richard Hoefling  
Office of Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Maryland National Bank Bldg., Rm. 9605  
Washington, D.C. 20555

PLEASE TAKE NOTICE that on April 13, 1982 we filed by mailing to the Secretary, U.S. Nuclear Regulatory Commission, Washington, D.C., 20025 Comments of the People of Illinois on Commonwealth Edison Company's Presentation of March 31, 1982, a copy of which is attached.

TYRONE C. FAHNER  
Attorney General  
State of Illinois

BY: *[Handwritten signature: Judith S. Goodie]*  
Judith S. Goodie  
Assistant Attorney General

Environmental Control Division  
138 West Randolph Street  
Suite 2315  
Chicago, Illinois 60601  
(312) 793-2491

April 13, 1982

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