

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

COMMONWEALTH EDISON COMPANY )

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

Docket Nos. 50-454-OL  
50-455-OL

State of Illinois )  
County of Cook ) SS

AFFIDAVIT OF CHARLES L. MCDONOUGH

Charles L. McDonough, being first duly sworn on  
oath deposes and states as follows:

1) My name is Charles L. McDonough. I am employed  
by Commonwealth Edison Company as Director of Environmental  
Assessment. This position involves the overall supervision  
of the preparation of environmental reports submitted by  
Commonwealth Edison Company on proposed nuclear generating  
facilities.

2) In line with my responsibilities, I was asked  
by Paul Murphy, an attorney with Isham, Lincoln & Beale, the  
law firm representing Commonwealth Edison Company in the NRC  
operating license proceeding for Byron, to attend a meeting  
in the offices of Mr. Myron Cherry on the morning of

September 26, 1979 to discuss the contentions of the League of Women Voters of Rockford, Illinois, concerning the Byron Station operating license proceeding.

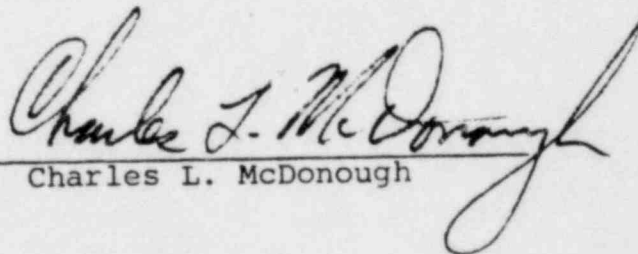
3) The meeting took place as scheduled, and was attended by Ms. Carol Wies and Ms. Betty Johnson, of the League of Women Voters of Rockford, Illinois, Mr. Dick Goddard and Mr. Calvin Moon, of the NRC, Mr. Paul Murphy and Mr. Alan Bielawski, of Isham, Lincoln & Beale, Ms. Leslie Bowen of Commonwealth Edison Company, Mr. Myron Cherry and myself. I was informed that Mr. Cherry had at that time been asked to represent the League of Women Voters of Rockford, Illinois for the purposes of negotiating contentions.

4) The meeting was opened by Mr. Cherry. He first made a statement to the effect that the meeting was useless in the sense that no matter what he or the League did, the Byron Station would be completed and placed into service. He then stated that his purpose in representing the Rockford League of Women Voters would be to delay the licensing of the Byron Station, in order to increase the cost of the Byron Station. He explained that if he and others were successful in achieving delays in the licensing of nuclear facilities, these actions would eventually deter utilities from proposing to construct new nuclear facilities because of cost considerations and uncertainties concerning projected service dates.

5) Throughout this discussion, the members of the League of Women Voters of Rockford, Illinois did not state that their motives were any different from those put forth by Mr. Cherry, but on the contrary seemed quite pleased with Mr. Cherry's performance. I do not recall that any substantive issues were resolved during the course of the meeting.

The foregoing affidavit is based on my own personal knowledge and is true in fact and in substance.

Dated: November 20, 1981

  
Charles L. McDonough

SIGNED and SWORN  
to before me this 20th  
day of November, 1981

  
Notary Public