

ELGTU TTK

LAW OFFICES  
**TUTT AND KODNER**  
173 WEST MADISON STREET  
SUITE 1004  
CHICAGO, ILLINOIS 60602

RONALD TUTT  
JAN L. KODNER

312/263-1535

March 30, 1982

FREEDOM OF INFORMATION  
ACT REQUEST

**FOIA-82-168**  
**Rec'd 4-1-82**

U.S. Nuclear Regulatory Commission  
Director, Division of Rules and Records  
Office of Administration  
Washington, DE 20555

Gentlemen:

Pursuant to the Freedom of Information Act, as amended, 5 USC 552, and the Privacy Act of 1974, 5 USC 552A, I hereby request a copy of any and all documents relative to the Commonwealth Edison construction of two nuclear power plants in LaSalle, Illinois, Docket Nos. 50373 and 50374, as hereinafter specified.

Construction problems, defects, lack of adherence to government construction codes or standards, relating to, but not limited to, the following:

1. Concrete defects, including honeycombing, especially honeycombing of the Units 1 and 2 reactor pedestals and primary containment structures; improper pouring procedures; improper procedures for vibrating of concrete; improper procedures during concrete setting, especially concrete setting too fast; improper mixing of concrete.
2. Failure to remove debris from forms before pouring concrete, debris including wood, barrels, metal, plastic tarps, etc.
3. Improper assembly of steel rod reinforcing structures, especially indiscriminate or excessive cutting of assembled structures.
4. Poor quality welding of pipes and other structures, including failure to seat pipe ends prior to welding, visible pipe leaks, welds with open gaps containing only weld material, lack of adherence to pipefitting or welding codes, poor quality control, lack of inspection or radiography of welds.

5. Improper or incomplete mortaring of high-density concrete block structures, including use of poor quality mortar or mortar with improper proportions of ingredients.
6. Covering up with concrete of ends of pipe inserted into main reactor containment structures for strengthening cable to be passed through.
7. Cracks or other defects in the stack or the steel supports for the stack.
8. Any and all explosions, including, but not limited to, explosions in the area of the top of reactor 1; explosions which blew off either the reactor lid or the lid the reactor refueling pit; explosions which blew a hole in the reactor building roof; explosions resulting from purging, pressurization or depressurization tests of the containment structures.
9. Sabotage by construction workers.
10. Fraud by construction companies or Commonwealth Edison personnel.
11. Deaths or maiming injuries to construction workers.

If you determine that some portions of the requested information are exempt:

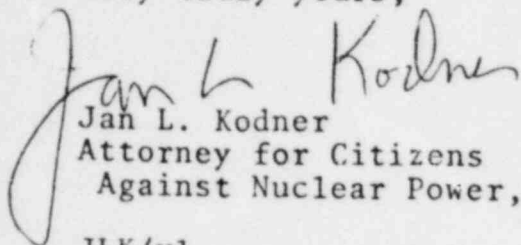
1. Please provide me with a copy of the remainder of the file;
2. Advise of the specific exemptions which you think justifies your refusal to release the information; and
3. Inform me of your agencies appeal procedures.

As you know, the amended act permits you to waive or reduce the fees if that "is in the public interest because furnishing the information can be considered as primarily benefitting the public". I believe that this request plainly fits this category; and, accordingly, request that you waive any fees. If your agency elects not to waive said fees, please advise of the costs involved.

U.S. Nuclear Regulatory Commission  
Director, Division of Rules and Records  
Page 3  
March 30, 1982

As provided for in the amended act, I shall expect to receive a reply within ten (10) working days. Thank you for your cooperation.

Very truly yours,

  
Jan L. Kodner  
Attorney for Citizens  
Against Nuclear Power, Inc.

JLK/v1