

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

COMMONWEALTH EDISON COMPANY'S
OBJECTION TO DAARE/SAFE'S INTERROGATORIES

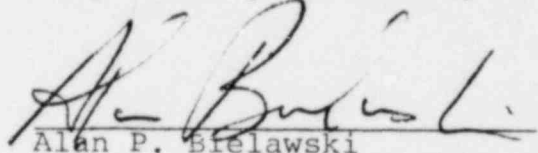
Commonwealth Edison Company ("Edison") objects to "DAARE/SAFE's Interrogatories on the SER & SSER To Be Answered By Commonwealth Edison & NRC Staff", served May 25, 1982 on the following grounds:

1. DAARE/SAFE's interrogatories were served on Edison three days prior to the date by which discovery was to be completed, thereby effectively precluding Edison from submitting responses prior to the discovery cut-off date established by the Licensing Board.

2. With the exception of the documents requested in Interrogatory 18(A), the interrogatories directed to Edison are unrelated to contested issues admitted in this proceeding. Although Edison's timeliness objection set forth above applies to Interrogatory 18(A), DAARE/SAFE will be provided with a substantial portion of the documents

requested therein pursuant to Edison's commitment to provide the Licensing Board with correspondence between the NRC Staff and Edison pertaining to the Byron Station.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Alan P. Bielawski", written over a horizontal line.

Alan P. Bielawski
One of the Attorneys for
Commonwealth Edison Company

Dated: June 14, 1982

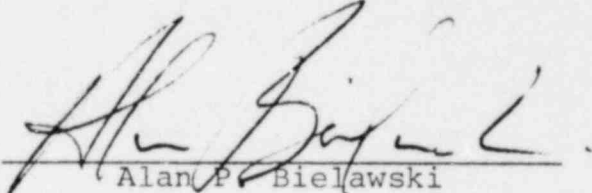
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CERTIFICATE OF SERVICE

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 the same on each of the persons at the addresses shown on the attached service list in the manner indicated.

Date:

6/14/82


Alan P. Bielawski

SERVICE LIST

COMMONWEALTH EDISON COMPANY -- Byron Station
Docket Nos. 50-454 and 50-455

BY EXPRESS OR FIRST CLASS MAIL

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