

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of
COMMONWEALTH EDISON COMPANY
(Byron Nuclear Power Station,
Units 1 and 2)

Docket Nos. 50-454 OL
50-455 OL

RESPONSE TO MOTION FOR PROTECTIVE ORDER FILED
BY COMMONWEALTH EDISON COMPANY
AND
REPLY TO NUCLEAR REGULATORY COMMISSION AND
COMMONWEALTH EDISON OBJECTION TO INTERROGATORIES
AND IN SUPPORT OF LEAGUE'S MOTION FOR SANCTIONS

The Rockford League of Women Voters ("League"), by their attorneys, duly filed Interrogatories in accordance with the Rules of Practice. The Appeal Board in ALAB-678 did not (and could not) restrict the League's right to discovery and other necessary preparation.

The position of the Staff and Commonwealth Edison are inappropriate and their objections should be overruled and the League's discovery enforced.

Respectfully submitted,

ROCKFORD LEAGUE OF WOMEN VOTERS

By:

One of Its Attorneys

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OFFICE OF THE
CLERK

I certify that the foregoing Motion was served upon the Secretary of the Atomic Safety and Licensing Board, counsel for the U. S. Nuclear Regulatory Commission Staff, counsel for Commonwealth Edison Co. and the Secretary-Docketing Section of the U. S. Nuclear Regulatory Commission by mail, postage prepaid and properly addressed, this 3rd day of July, 1982.


