

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'83 OCT 13 A10:32

In the Matter of)

COMMONWEALTH EDISON COMPANY)

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

Docket Nos. 50-454 OF
50-455 ODOCKETING & SERVICE
BRANCH

INTERVENOR'S RESPONSE TO
MOTION TO STRIKE PROPOSED FINDINGS AND
CONCLUSIONS, AND TO WITHDRAW AS COUNSEL

Now comes Intervenor, ROCKFORD LEAGUE OF WOMEN

VOTERS, on its own behalf, in response to the motion of its counsel of record for the entry of an Order "striking all of the proposed Findings of Fact and Conclusions of Law previously filed by counsel on behalf of Intervenor and granting counsel leave to withdraw", responds as follows:

1. Intervenor does not object to the motion of its counsel for leave to withdraw as attorney of record; on the contrary, Intervenor prays that such leave be granted, not for the reasons stated in said counsel's motion, but for the reason that its counsel made false statements regarding the position of Intervenor in the Motion to Strike and filed said motion without his client's permission.

2. Intervenor objects to the motion of its counsel for an Order "striking all of the proposed Findings of Fact and Conclusions of Law" previously filed on its behalf, states that

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said motion was filed by counsel without its approval or permission, and further states that the "reasons" cited in support of said motion are false in the following respects:

(a) No representative of Intervenor has ever notified counsel "that it is dissatisfied with . . . proposed Findings and Conclusions previously filed on behalf of Intervenor", although Intervenor's representatives have complained to counsel that they understand and believe that he delegated the unsupervised preparation of certain proposed Findings and Conclusions to non-lawyers without their consent or prior knowledge.

(b) No representative of Intervenor has ever notified counsel "that it does not feel the proposed Findings and Conclusions are sufficient to entitle Intervenor to any relief on any issue" and such is not the position of Intervenor as to any issue.

Respectfully submitted,

Rockford League of Women Voters

By Elizanne Lewis
President