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

DOCKETED
USNRC

'84 JUL -9 P12:46

In The Matter of)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Power)
Station Units 1 and 2)

Docket Nos. 50-456
50-457

SEE
DOCK
BRAIN

STATUS OF CONTENTIONS - PROPOSED REVISIONS AND AMENDMENTS.

The Petitioners, Bob Neiner Farms, Inc., as authorized by its shareholders; and Bob E. Neiner, Eleanor M. Neiner, Pat Neiner, and Lorraine Creek individually, hereby respond to the Order of the Atomic Safety and Licensing Board of June 8, 1984 as follows:

A. The above Petitioners, through their attorneys, C. Allen Bock and Thomas J. Gordon, do wish to continue as intervenors.

B. Petitioners statement as to the present status of their contentions:

Contentions:

1. No amendments or revisions. The petitioners do desire to provide additional research data that has been developed since the original contentions were presented.
3. No amendments or revisions except that the 20 mile radius is expanded to 25 miles.
4. In the matter of contention four we would at this time ask that the Licensing Board be advised of new information about the expected use of the rail line that lies adjacent to the Braidwood facility. We would ask that the following be added to our existing Contention 4.

1) The Army is at this time planning to reactivate and enlarge the Joliet Arsenal facility. [Article in the Kankakee Daily Journal, March 23, 1984 attached as Exhibit A.]

2) The Army is presently budgeting between \$300,000,000 and \$420,000,000 to reactivate and enlarge the Joliet Arsenal.

3) The TNT production facilities are to be enlarged and modernized.

4) The facility is being considered for the production of a new chemical-based explosive.

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5) Due to the increased activity planned at the Arsenal and the change in product production possibilities, the matter of exposure of the Braidwood Plant to increased hazards in relation to the railroad that passes within 1500 feet of the Braidwood Plant, is at this time a germane issue to the proceedings.

6) We reassert at this time that the actual traffic flow of TNT and other hazardous materials from the Joliet Arsenal that was considered in the initial investigation is not representative of what the actual traffic flow is when the Arsenal is at full production.

7) While this country remains at peace the intent of increased use of the Joliet Arsenal for the production of TNT as well as new product production is very high. It would surely follow that given a war-time situation the facility would be even more valuable to the Army and the production of goods would be higher, causing increased hazardous rail traffic past Braidwood Plant.

Contentions 5, 6, 7, 8, 10, and 11; no revisions or amendments.

C. Petitioners ask leave to file a contention related to Quality Control considerations. Nearly five years have elapsed since the amended contentions of Petitioners were filed. Petitioners at this time believe that a Quality Control contention can be developed and filed within 90 days of the date of this answer based on developments during that five year period.

Dated July 5, 1984.

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Arsenal

Continued from page 1

near Colorado Springs, Colo., 137,211 acres; Fort Polk, near Leesville, La., 198,375 acres; and Fort Ord, in northern California, where operations could be combined with nearby Fort Hunter-Liggett, more than 70,000 acres.

Further Army objections to JAAP center on its lack of training area, availability of troop housing and absence of airfields for strategic deployment, sources said.

"They're not saying Joliet's off the wall," one official said. "They're saying basically it's not a viable alternative to put a light infantry division there."

Marsh said the Army Forces Command in Atlanta would "make the first cut" from 10 to 15 sites it has studied to "four to six" possibilities within the next two months.

He said survivors of the cut are likely to be installations that "have barracks and an existing base."

Congressional sources said Army officials were seriously studying a less ambitious mission for the mothballed plant that could involve storage for spare parts, beefing up ammunition manufacturing or maintaining or expanding manufacturing for National Guard Reserve and Army Reserve equipment.

"It's that type of use they're looking at," one official said.

Marsh said there were other options he would urge for consideration by area legislators and chamber of commerce officials from Kankakee, Will, Grundy and Kendall Counties.

Those options include "increasing oncoming contracts" for the plant and gearing it up for the manufacture of RDX-HMX — a new chemical-based explosive to replace TNT.

"I can tell you that the Undersecretary of the Army, Jim Ambrose, has tracked this very carefully. He feels that Joliet could be and should be an active competitor" for RDX-HMX production, Marsh said.

Marsh said the new explosive could be produced at several Army sites throughout the country within the next few years and JAAP's design would make it "a clear competitor in the selection process."

And a document from a closed session between Marsh and the congressmen showed the Army is already planning the Joliet plant's reactivation.

Listed under "current activities" was a budget of more than \$300 million the Army has planned for upgrading the installation.

The plans include \$3.63 million for a container distribution facility in fiscal 1989; \$6.28 million to upgrade TNT production in fiscal 1990 to meet worker safety standards; \$157.2 million for sulfuric acid regenerating plants in fiscal 1991; \$59.5 million for pollution abated strong nitric acid plants in fiscal 1991; and \$66.06 million for a coal-fired steam plant in fiscal 1991.

The figures apparently do not include labor costs.

Although there was no estimate on the cost of preparing the plant for RDX-HMX production, the same document revealed the estimated reactivation cost of the plant to be \$420.6 million.

Most of the money would go for new construction — much of it cited in the plans for the next seven years.

At full mobilization, the documents said, the plant would employ 7,444 people, almost all of them civilians.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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USNRC

In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Station)
Units 2 and 2)

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Docket Nos. 50-456
50-457 BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of Status of Contentions--Proposed Revisions and Amendments of Bob Neiner Farms, Inc., as authorized by its shareholders; and Bob E. Neiner, Eleanor M. Neiner, Pat Neiner, and Lorraine Creek individually, in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk, Federal Express, on this 5th day of July, 1984.

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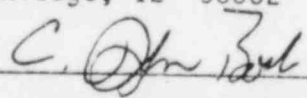
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