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June 20, 1984

Ms. Jane Whicher  
BPI  
109 N. Dearborn St.  
Room 1300  
Chicago, IL 60602

Re: In the Matter of Commonwealth Edison Company  
(Byron Nuclear Power Station, Units 1 and 2)  
Docket Nos. 50-454 and 455

Dear Jane:

This letter constitutes Edison's formal response to Intervenor's First Request to Edison for Production of Documents. We have already made available to you for inspection and copying a great quantity of documents. These documents were produced in response to categories 1 through 9 and 11 through 16 of your document request. Please be advised that in the event we discover any additional documents which are responsive to these categories we will immediately make them available to you.

As far as your other document request categories are concerned, Edison objects to them on the following grounds:

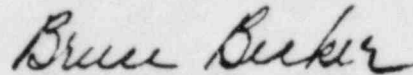
Category 10 - Edison objects to this request on the basis that the documents called for constitute work product and are excluded from discovery by Rule 26(b)(4) of the Federal Rules of Civil Procedure.

Categories 17-36 - Edison objects to each of these requests on the basis that the documents called for are irrelevant in that they are not within the scope of presently scheduled hearings on the Byron Station.

Categories  
37-38

- Edison has objected to Interrogatories 17, 18(g), 20-23 and 25, and therefore no documents were referenced regarding these interrogatories. All documents referenced in responding to Interrogatories 2, 8, and 9 have been made available to you. The documents which were referenced in responding to Interrogatories 11 and 12 are extremely voluminous. Should you desire to inspect them, please call me to discuss the mechanics of your inspection.

Very truly yours,



Bruce D. Becker

BDB:reg

cc: Service List