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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '84

JUL 23 11:16

In the Matter of: )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-454 OL  
(Byron Nuclear Station, ) 50-455 OL  
Units 1 and 2) )

COMMONWEALTH EDISON COMPANY'S ANSWERS TO  
INTERVENORS' THIRD SET OF INTERROGATORIES

Interrogatory No. 1: Were documents prepared or reviewed by or for Commonwealth Edison, or its agents, contractors or consultants, relating to the methodology and/or validity of the methodology, used to select inspectors and inspections included in the Byron reinspection program? If so, please provide such documents. This request includes any review of methodology used in the Byron reinspection.

Answer: The documents responsive to this interrogatory encompass those in which the chronological listing of inspectors for selection for the Reinspection Program and the determination of those inspections within the Program was described and/or implemented. These materials include Edison's February 22, 1983, letter to the NRC Staff in which the Program was delineated, various internal memoranda generated at Byron pursuant to implementation of the Program, and the Reinspection Program itself. In addition, some of Edison's consultants have commented upon the methodology utilized in the Reinspection Program as part of their overall comments. Except for those consultants' comments which have been withheld from production pursuant to Edison's work

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product privilege, all other materials responsive to this interrogatory have already been produced to Intervenor. Edison is not in possession of any non-privileged documents which analyze or evaluate the methodology utilized to select inspectors and inspections included in the Reinspection Program which have not previously been produced to Intervenor.

Interrogatory No. 2: Please state whether applicants possess recordings, including worksheets, which document or analyze the type, date, and findings of inspections performed by inspectors whose work was subject to 100 percent inspection in the Byron reinspection program. If so, please provide such records. Included in this request are records of both original inspectors and reinspectors.

Answer: All records of both inspectors and reinspectors responsive to this interrogatory have already been made available to Intervenor. Specifically, the materials produced in response to Intervenor's Interrogatories 11 and 12 and Request to Produce 37 (Intervenor's first sets of interrogatories and request to produce), plus the comparable materials produced for Pittsburgh Testing Laboratory, encompass the documents requested in the interrogatory.

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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:

*July 19, 1984*

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