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VIA FEDERAL EXPRESS

October 17, 1984

'84 OCT 22 P12:43

Marshall E. Miller, Esq.
Chairman
Administrative Law Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Administrative Law Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. A. Dixon Callihan
Administrative Law Judge
Union Carbide Corporation
P.O. Box "Y"
Oak Ridge, TN 37830

Re: In the Matter of Commonwealth Edison Company
Braidwood Nuclear Power Station, Units 1 and 2
Docket Nos. 50-456 and 50-457 **OL**

Dear Administrative Judges:

Please enter my appearance, and that of Mr. Timothy Wright of our office, in lieu of Ms. Jane Whicher, on behalf of intervenors Bridget Rorem and Appleseed in the Braidwood operating license proceeding, effective today. I understand that Ms. Whicher has withdrawn as counsel by virtue of her recent change in employment.

I also wish to respond to Mr. Gallo's letter of October 9 to the Board, which urged you to issue your prehearing conference order and to establish a hearing schedule, based on papers previously filed by the parties. For the reasons stated below, I urge you to schedule a telephone conference with all parties prior to issuing your order and establishing a schedule.

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DS03

Marshall E. Miller, Esq.
Dr. Richard F. Cole
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October 17, 1984
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As you may recall, Ms. Whicher was not able to address Edison's proposed schedule, except to authorize her name to be signed to a brief letter to you dated August 6, 1984. No other attorneys in this office represented intervenors in this case at that time, nor could we, because of our intensive participation in the Byron hearings.

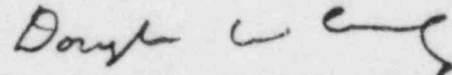
At this time we would request a reasonable opportunity to prepare contentions on both construction quality assurance and design quality assurance in this case, as well as to review any contentions previously filed.

We believe that allowing a reasonable time for this purpose will not prejudice Edison. As Edison's letter of October 4 to Mr. Denton indicates, the company expects that the in-service date for Braidwood 1, currently scheduled for April 1986, will be deferred by up to one year, upon conclusion of the company's review later this year.

Moreover, the company has known of this likely postponement for some time. In a prospectus dated September 4, a full month before its October 4 notice to Mr. Denton, and over a month before its October 9 notice to you, it advised shareholders of the same information contained in the October 4 letter to Mr. Denton.

In these circumstances, we do not believe the company can fairly claim prejudice by allowing intervenors a reasonable opportunity to formulate QA contentions. Accordingly, we propose that a telephone conference be arranged to address matters of scheduling in this case.

Respectfully submitted,



Douglass W. Cassel, Jr.
Attorney for intervenors
Bridget Rorem and Appleseed

DWC/ld
cc: Service list (by first class mail)

Encl: Notice of Appearance
Notice of Withdrawal of Counsel

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
COMMONWEALTH EDISON COMPANY
(Braidwood Station, Units 1 and 2)

DOCKETED
USNRC


Docket Nos. 50-456
50-457

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OFFICE OF SECRETARY
NUCLEAR REGULATORY COMMISSION
NOTICE OF APPEARANCE
BRANCH

Notice is hereby given that the undersigned attorney enters an appearance on behalf of the Intervenor Bridget Rorem, et al., (a/k/a Appleseed) with respect to all issues and matters relating to quality assurance of construction and design in the captioned matter. In accordance with 10 CFR §2.713 the following information is provided:

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District of Columbia Circuit
U.S. District Court for the
Northern District of Illinois
U.S. Court of Military Appeals
NAME OF PARTIES: Bridget Rorem, et al. (a/k/a Appleseed)


DOUGLASS W. CASSEL, JR.
Attorney for Appleseed on issues and
matters relating to quality assurance
of construction and design

Dated at Chicago, Illinois
this 17th day of October, 1984.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
COMMONWEALTH EDISON COMPANY
(Braidwood Station, Units 1 and 2)

DOCKETED
USNRC

Docket Nos. 50-456
50-457

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OFFICE OF SECRETARY
DOCKETING
BRANCH

NOTICE OF WITHDRAWAL OF COUNSEL

The undersigned, Jane M. Whicher, hereby withdraws her
Notice of Appearance on behalf of Intervenors Bridget Rorem, et al.,
filed May 9, 1983, on the grounds of a change of employment.

Respectfully submitted,


JANE M. WHICHER

JANE M. WHICHER
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of ACLU, Inc.
220 S. State, Rm. 816
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Dated: October 17, 1984

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