

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-456
(Braidwood Nuclear Power) 50-457
Station, Units 1 and 2))

DOCKETED
USNRC

'84 AGO 13 A11:27

DEPT. OF SECRETARY
DOCKETING & SERVICE
BRANCH

AFFIDAVIT OF DANIEL DEMOS

I, Daniel Demos, being first duly sworn do depose
and state:

1. My name is Daniel Demos. I am employed by
Commonwealth Edison Company as the District Superintendent
for the Joliet Area. I have held that position for approximately
six years. I have been employed by Edison for twenty years.
My business address is 1910 South Briggs Street, Joliet,
Illinois, 60433.

2. I recently met with Jim Frakes and Ralph
Miller, who are respectively the plant managers for the
Honeywell and Uniroyal plants at the Joliet Army Ammunitions
Plant (JAAP). Honeywell and Uniroyal are the contractors
responsible for the operation of the JAAP. Uniroyal is the
prime operating contractor and maintains TNT production
lines which are currently inactive. Honeywell maintains and
currently operates a facility for loading, assembling and
packaging ammunition, primarily 25 and 30 millimeter
ammunition. I discussed with them the activities at the

JAAP in light of newspaper article that appeared in Karkakee Daily Journal on March 23, 1984. That article reported on a recent conference regarding possible future reactivation and expansion of the JAAP.

4. According to Mr. Frakes, Honeywell has no plans to increase production or expand into new areas of production. Honeywell does not ship any explosives either to or from the JAAP by means of the railroad line that runs near the Braidwood site. All of their shipments are by truck and involve primarily 25 and 30 millimeter ammunition.


5. According to Mr. Miller, Uniroyal has no plans to reactivate or expand its TNT production facility at the JAAP. Presently, Uniroyal does not ship any explosives over the railroad line that runs near Braidwood. Uniroyal ships about one truckload of flake TNT from its stock each week. Uniroyal makes no other explosives.

6. According to Mr. Miller, the \$300 million mentioned in the newspaper article would be applied toward proposed capital projects to upgrade Uniroyal's present TNT production capability. This upgrading would not expand their TNT production capability but would produce a higher level of readiness if reactivation should ever occur. The newspaper article was inaccurate in suggesting that the proposed capital projects for the upgrading of the TNT production facility have been approved. Further, the article is erroneous in suggesting that these projects show that the


Army plans to reactivate the TNT production facilities at the JAAP. As mentioned in the newspaper article, the estimated cost of reactivation of the TNT production facilities is \$420 million. This cost would be over and above the \$300 million upgrading.

7. According to Mr. Miller, the RDX and HMX explosives referenced in the newspaper article have been manufactured for several years at a plant in Tennessee, thus they are not "new" as suggested by the article. However, the Army will be developing a new production process for these explosives at another site. At some time in the future, if the new process is found feasible, the Army may decide to build other plants employing the new process. The JAAP could be one of several candidates for the location of such a plant.

To the best of my knowledge and belief, the statements made herein are true and correct.


Daniel Demos

SWORN AND SUBSCRIBED to
before me this Sunday of
August, 1984.


Notary Public
My Commission Expires July 6, 1987

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter Of:)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Power)
Station, Units 1 and 2))

Docket Nos. 50-456

50-457

'84 AUG 13 11:26

SECRETARY
DOCKETING & SERVICE
BRANCH

NOTICE OF APPEARANCE

Notice is given that the undersigned attorney enters his appearance on behalf of Applicant, Commonwealth Edison Company, P.O. Box 767, Chicago, Illinois, 60690, in the above-captioned proceeding. In accordance with 10 C.F.R. §2.713, the following information is provided:

Name: Victor G. Copeland
Address: Isham, Lincoln & Beale
1120 Connecticut Avenue, N.W.
Suite 840
Washington, D.C. 20036
Telephone Number: (202) 833-9730
Admissions: United States District Court
for the Northern District of
Illinois
Supreme Court of Illinois

Victor G. Copeland
Victor G. Copeland

ISHAM, LINCOLN & BEALE
1120 Connecticut Avenue, N.W.
Suite 840
Washington, D.C. 20036

DATED: August 8, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:)
)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-456 0L
)
(Braidwood Nuclear Power) 50-457 0L
Station, Units 1 and 2))
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of MOTION FOR LEAVE TO FILE RESPONSE, COMMONWEALTH EDISON COMPANY'S RESPONSE TO NEINER FARMS' STATUS REPORT REGARDING CONTENTION 4, and NOTICE OF APPEARANCE OF VICTOR G. COPELAND were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, this 9th day of August, 1984.

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

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

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

Mr. Scott W. Stucky
Chief, Docketing and Services
United States Nuclear Regulatory
Commission
Office of the Secretary
Washington, D.C. 20555

C. Allen Bock, Esq.
P.O. Box 342
Urbana, Illinois 61801

Thomas J. Gordon, Esq.
Waller, Evans & Gordon
2503 South Neil
Champaign, Illinois 61820

Ms. Bridget Little Rorem
117 North Linden Street
Essex, Illinois 60935

Myron Karman, Esq.
Office of the Executive Legal
Director
United States Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
United States Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
United States Nuclear Regulatory
Commission
Washington, D.C. 20555

Jane M. Whicher, Esq.
BPI
109 North Dearbon Street
Suite 1300
Chicago, Illinois 60602

Ms. Lorraine Creek
Route 1
Box 182
Manteno, Illinois 60950

Erie Jones, Director
Illinois Emergency Services
and Disaster Agency
110 East Adams
Springfield, Illinois 62705

Victor G. Copeland
One of the attorneys for
Commonwealth Edison Company