

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

COMMONWEALTH EDISON COMPANY

(Braidwood Nuclear Power
Station, Units 1 and 2)

DOCKETED
USNRC

'85 MAY 10 A10:28
Docket Nos. 50-456-2
50-457-0
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

INTERROGATORIES TO APPLICANT
COMMONWEALTH EDISON COMPANY

Intervenor, Bob Neiner Farms, Inc., et al., hereby serves upon Applicant, Commonwealth Edison Company, written interrogatories pursuant to 10 C.F.R. § 2.740b. Each interrogatory should be answered separately and fully in writing, under oath or affirmation, within 14 days after service.

1. Identify the document(s) which or the person(s) whose opinion(s) provides(s) Applicant's basis for the conclusion that 765 kV transmission lines will not create any of the following conditions for persons who are within 600 feet of the line for six or more hours per day:

- a. audible noise impairing hearing;
- b. increasing tension;
- c. sleep interference;
- d. interference with the operation of cardiac pacemakers;
- e. biological effects on humans because of exposure to electric fields excluding the use of nearby areas for working, living, or recreation; and
- f. danger of shock to persons and animals.

2. Identify by name, title or position, and address, all persons Applicant intends to present as witnesses to testify with regard to Contention #1 and 4.

3. What is the earliest projected date Applicant intends to begin construction of the 765 kV line that will be distribute power produced by the Braidwood Nuclear Power Station, Units 1 and 2.

8505140237 850510
PDR ADOCK 05000456
G PDR

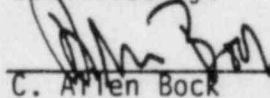
4. Has Applicant independently or by contract studied or investigated the possible harmful effects of 765 kV transmission lines. If yes, and the study or investigation was written, please supply Intervenor with a copy of that document or provide Intervenor with an address where it can obtain such a copy. What is the name, title and address of the persons who were principally responsible for the conduct of the study or investigation.

5. If Applicant has preliminary and/or final construction plans for the 765 kV line, provide Intervenor with specific detail as to the location, height of line, height of poles, type of construction, etc.

6. Has Applicant studied the possible dangers posed to the Braidwood Nuclear Power Station if production of RDX-HMX is begun at the Joliet Arsenal. If so, please provide Intervenor with a copy of that study.

7. What is the opinion of Applicant or persons with whom Applicant has consulted regarding the negative implication and possible dangers resulting from static electricity build-up around the 765 kV line and its effect in or around silos, farm buildings, fuel supply tanks and homes.

Submitted by:



C. Allen Bock
Attorney for Intervenor

C. Allen Bock
P.O. Box 342
Urbana, IL 61801
217/897-6208

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-456
50-457

I, C. Allen Bock, attorney for Intervenor, certify that copies of the Interrogatories have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 7th day of May, 1985.

C. Allen Bock

DATED: May 7, 1985

SERVICE LIST

Lawrence Brenner, Esq.
Chairman
Administrative Law Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

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

Myron Karman, Esq. (express mail)
Elaine I. Chan, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Joseph Gallo, Esq.
Victor G. Copeland, Esq.
Isham, Lincoln & Beale
Suite 840
1120 Connecticut Avenue, N.W.
Washington, DC 20036

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

Thomas J. Gordon, Esq.
206 N. Randolph
Champaign, IL 61820

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

Douglass W. Cassel, Jr.
Timothy W. Wright, III
BPI
109 N. Dearborn Street, Suite 1300
Chicago, IL 60602

Erie Jones, Director
Illinois Emergency Services and
Disaster Agency
110 E. Adams
Springfield, IL 62705

Rebecca J. Lauer (express mail)
Isham, Lincoln & Beale
Three First National Plaza
Suite 5200
Chicago, IL 60602