

7/2/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

85 JUL -5 10:54

BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
COMMONWEALTH EDISON COMPANY)	Docket No. 50-456
)	50-457
(Braidwood Nuclear Power)	
Station, Units 1 and 2))	

INTERVENORS' MOTION TO REQUIRE
NRC STAFF ANSWERS TO INTERROGATORIES

Pursuant to 10 CFR Section 2.720(h)(2)(ii), Intervenor
Bridget Rorem, et al., ("Intervenors"), by and through their
undersigned counsel, herewith file the attached Rorem, Et Al.,
Quality Assurance Interrogatories and Requests to Produce, First
Set, with the Licensing Board which are served on the Applicant
and NRC Staff, including the Executive Director for Operations.

Intervenors request that the NRC Staff voluntarily answer
the interrogatories and serve upon Intervenor copies of the
documents of which production is sought. Intervenor's counsel
understands that the NRC Staff is prepared to respond voluntarily
without compulsion by the Board.

If such voluntary responses by the NRC Staff are refused,
Intervenors move for an order directing the Staff to answer on
the grounds that answers to these interrogatories are necessary
to a proper decision in this proceeding and that, answers to
these interrogatories, in part, are not reasonably obtainable
from any other source.

WHEREFORE, Intervenors respectfully request that the NRC Staff voluntarily respond to this discovery or that the Board direct the NRC Staff to respond as herein sought, and that the Board grant such further relief as is just and reasonable.

July 2, 1985

Respectfully submitted,

Douglass W. Cassel, Jr.
Robert Guild
Timothy W. Wright, III

Attorneys for Intervenor Bridget
Rorem, et al.

By:

Robert Guild
Robert Guild

Douglass W. Cassel, Jr.
Robert Guild
Timothy W. Wright, III
109 North Dearborn
Suite 1300
Chicago, Illinois 60602
(312) 641-5570