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July 2, 1985

Elaine I. Chan, Esq.
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: In the Matter of Commonwealth Edison Company
(Braidwood Nuclear Power Station, Units 1 and 2),
Docket Nos. 50-456/40-457

Dear Ms. Chan:

As we discussed recently, Intervenor's are preparing to meet the obligations imposed upon us by the Licensing Board in its June 21, 1985 Order (pp. 12-14) with respect to the claims of intimidation and harassment of L.K. Comstock Quality Control inspectors at the Braidwood site. In order to meet these obligations to provide additional specificity regarding instances of alleged harassment and to identify witnesses who can testify to such instances, we have asked the NRC Staff to provide us with the factual information known to it regarding these matters which, presumably, came to its attention in its investigation documented in Inspection Report 84-34 (p. 4).

We note that much of this information has already been communicated to Applicant, as noted in the Inspection Report and that, we understand, the QC inspectors involved did not seek confidentiality from the NRC. (Warnick deposition, Tr. 203.)

When we last spoke on this matter, you expressed the view that the Staff was precluded from providing this information to Intervenor's since it would represent unauthorized discovery on a claim that had not been admitted as a contention for litigation.

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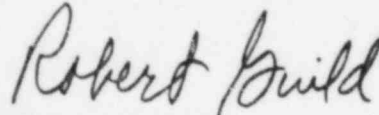
July 2, 1985

We believe that implicit in the Board's direction to us to supply it with the factual specifics regarding these matters was an authorization for us to obtain the needed facts from the Staff and Applicant.

Please consider this matter further and let us have your position on these questions in order that we may arrange for a conference call of the Board and parties to obtain a ruling, if necessary, in order for us to take this subject up with the appropriate NRC Staff witnesses in deposition next week.

With kind regards, I am

Very truly yours,

A handwritten signature in cursive script that reads "Robert Guild".

Robert Guild
One of the Attorneys for
Intervenors Rorem, et al.

RG:beg

cc: All Parties

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 JUL -5 A10:54

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

Docket No. 50-456
50-457

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CERTIFICATE OF SERVICE

I hereby certify that I have served copies of:

1. Rorem, Et Al., Quality Assurance Interrogatories and Requests to Produce, First Set;
2. Intervenors' Motion to Require NRC Staff Answers to Interrogatories;
3. Notice of Deposition; and
4. letter to Elaine I. Chan

on all parties to this proceeding as listed on the attached Service List, by having said copies placed in envelopes, properly addressed and postaged (first class), and deposited in the U.S. mail at 109 North Dearborn, Chicago, 60602, this 2nd day of July, 1985; except that the Licensing Board, Mr. Gallo and Ms. Chan were served via Federal Express and Mr. Miller was served by messenger. In addition, documents #1 and #2 listed above were served by first class mail on the Executive Director for Operations, U.S. Nuclear Regulatory Commission, Washington D.C. 20555.

Douglas W. Culp

BRAIDWOOD SERVICE LIST

50-456/50-457 OL

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