

18 June 1985

United States of America
Nuclear Regulatory Commission

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In the Matter of

Commonwealth Edison Company

(Braidwood Nuclear Station,
Units 1 and 2)OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHDocket Nos. 50-456 OL
50-457 OL

Intervenor's Response Concerning Documents and Names
of Potential Witnesses

This response is being filed as soon as was practicable, since I have been away and important family matters have been pressing since my return. The lateness of this filing certainly does not prejudice the applicant, since applicant stated in a June status report that it will not be possible to litigate the emergency planning contention at the October hearing. Additionally, I now understand that applicant has requested that the entire hearing be delayed until February of next year.

Books which I have read and which have influenced me concerning the emergency planning contention include The Counterfeit Ark (Crisis Relocation for Nuclear War), ed. Jennifer Leaning and Langley Keyes; Radiation and Human Health, by Dr. John Gofman; Tragic Choices, by Guido Calabresi and Phillip Ebbett; The Cost of Accidents, by Guido Calabresi; The Silent Intruder, by Charles Panati and Michael Hudson; Nuclear Madness,

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by Dr. Helen Caldicott; the Menace of Atomic Energy, by Ralph Nader and John Abbots.

I have also read articles by Steven Sholly of the Union of Concerned Scientists, and testimony prepared by him for another hearing. Additionally, I have read scores of articles in magazines and newspapers concerning emergency planning and evacuation.

I reiterate that I do not, at this time, have any expert witnesses lined up; no one has agreed to testify in my behalf. I have considered many people, but until the emergency plans and the standard operating procedures by which they will be implemented, have become available, it is not possible for me to determine the specific ways in which they do not meet the required criteria. Therefore, it is impossible for me to determine exactly which witnesses can best testify for me.

Furthermore, I believe there exists an expert witness privilege which protects my right to not disclose the names of potential witnesses at this time. I have a confidentiality agreement with several of them, and I have a duty to honor those agreements.

Respectfully submitted,
Bridget Little Rosem

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Certificate of Service

I hereby certify that copies of Intervenor's Response Concerning Documents and Names of Potential Witnesses are being mailed by first class mail from Chicago on July 18, 1985 to all on the service list except Ms Lauer and BPI, whose copies are being hand delivered.

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