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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '85 JUL 22 A11:32

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket Nos. 50-456 OC
50-457 OC

COMMONWEALTH EDISON COMPANY'S
MOTION TO AMEND HEARING SCHEDULE

Commonwealth Edison Company ("Applicant") moves the Atomic Safety & Licensing Board ("Licensing Board") to enter an order approving the hearing schedule attached to this Motion as an amendment of the schedule established by the Licensing Board's Special Prehearing Conference Order of April 17, 1985. The attached schedule incorporates without change the schedule milestones established by the Licensing Board for the litigation of the non-quality assurance contentions. In support of the Motion, Applicant states:

1. It is not feasible to complete the litigation of Intervenor Rorem, et al. ("Intervenors") quality assurance contention within the timeframe of the schedule established for the litigation of the other contentions. This statement is best exemplified by the fact that as set forth in the attached

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schedule, the report on the corrective action plan concerning the installation of safety-related equipment will now be delivered to the NRC Staff and Intervenor on October 15, 1985, 15 days after hearings are to start under the existing schedule. Moreover, the NRC Staff's review of the program's results and discovery by the parties thereon must be accomplished before hearings commence. Other steps in the hearing process, such as the completion of discovery also cannot be accomplished within the present schedule.

2. Counsel for the Applicant has assessed the time needed to litigate the quality assurance contention and after a number of discussions with counsel for the NRC Staff and counsel for the Intervenor, Applicant has developed the schedule attached to this Motion. Counsel is authorized to state that the NRC Staff concurs in the Motion and that Intervenor, in light of the understandings stated in Paragraph 3. below, have no objection to the Motion.

3. The attached schedule is premised on the following understandings among counsel:

- a. Applicant will use its best efforts to respond to as many of Intervenor's interrogatories and document requests as practicable in advance of August 9.

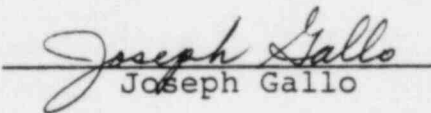
Applicant expects to answer 12 interrogatories with attendant documents in whole or in part by July 30, including among others, Intervenor's request Nos. 12, 13, 18, 25, 26, 28, 29 and 30.

- b. It is assumed that all corrective action programs that are relevant to the quality assurance contention will be completed by the Applicant and a final written position developed by the NRC Staff in sufficient time to permit the conduct of discovery within the established deadlines. Should this assumption prove incorrect in the future, counsel for the respective parties are prepared on an informal basis to adjust the discovery deadlines to provide for such discovery.
- c. Although the schedule establishes deadlines for the identification of witnesses, counsel have agreed that witnesses will be identified earlier

than those deadlines to the extent
practicable.

For good cause shown, Applicant's Motion should be
granted.

Respectfully submitted,


Joseph Gallo

One of the Attorneys For
COMMONWEALTH EDISON COMPANY

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DATED: July 19, 1985

SCHEDULE

July 30, 1985

Applicant and NRC Staff file objections to selected Intervenor's interrogatories and document requests.

August 9,

Applicant and NRC Staff (to the extent not previously furnished) complete answers to Intervenor's interrogatories and related document requests.

September 13,

Testimony filed on non-quality assurance contentions.

September 20,

File motions to strike on September 13 prefiled testimony.

September 27,

Deadline for identifying witnesses, except for the safety-related equipment issue (hereinafter "82-05 issue"), on all other issues including, if admitted, the QC inspector harassment issue; Discovery ends except for deposition of witnesses and discovery generally on 82-05 issue; and file answers to motions to strike and cross-examination plans on September 13 prefiled testimony.

October 1,

Hearings on non-quality assurance contentions commence except for emergency planning (evacuation of special facilities) issue; and results of 82-05 Corrective Action Program assembled by site project management and Region III and Intervenor's briefed on results of 82-05 issue.

October 4,

Estimated conclusion date of hearings on non-quality assurance contentions.

October 11,

Deadline for filing motions for summary disposition on QA contention.

SCHEDULE

October 15,	Depositions of all witnesses completed except for 82-05 issue; Report on 82-05 Corrective Action Program sent to parties.
November 8,	Deadline for filing responses to motions for summary disposition.
November 19,	Written Staff Position on 82-05 issue sent to parties, and witnesses on said program identified.
December 2,	Target date for Board ruling on motions for summary disposition (no summary disposition on 82-05 issue).
December 3,	Discovery ends on 82-05 issue.
December 23,	File testimony on issues remaining after summary disposition.
January 6, 1986	File Motions to Strike written testimony.
January 13,	File Responses to Motion to Strike and file Cross-Examination Plans.
January 20,	Hearing commences on QA and Emergency Planning (evacuation of special facilities) issues.