

July 19, 1985

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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) )

Docket Nos. 50-456 *cl*  
50-457

COMMONWEALTH EDISON COMPANY'S  
MOTION TO COMPEL  
(INTERROGATORIES TO INTERVENOR BRIDGET LITTLE ROREM)

Pursuant to 20 C.F.R. § 2.740(f), Commonwealth Edison Company ("Applicant") hereby moves this Atomic Safety and Licensing Board to issue an order compelling the Intervenor Bridget Little Rorem to respond to Applicant's interrogatories. In support of this Motion, Applicant states as follows:

1. On April 25, 1985, Applicant served by mail "Interrogatories to Intervenor Bridget Little Rorem and Appleseed Alliance - Set II" upon Ms. Rorem and all parties (copy attached). These interrogatories were timely served well in advance of the discovery cut off date of May 20, 1985. At her deposition on May 21, 1985, Ms. Rorem denied that she ever received the mail service of the interrogatories. Applicant then served the interrogatories in hand upon Ms. Rorem at her deposition. Pursuant to an agreement among the

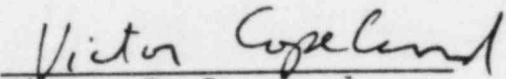
parties (see Commonwealth Edison Company's Status Report, March 1, 1985), answers to interrogatories are to be filed within the 14-day period prescribed by 10 C.F.R. § 2.740b(b). Thus, Ms. Rorem's answers to the interrogatories were due on June 4, 1985.

2. On June 18, 1985, counsel for Applicant telephoned Ms. Rorem to inquire about her answers to the interrogatories. At that time, Ms. Rorem indicated that she had not yet prepared any answers and that she would be travelling abroad until July 5, 1985. On June 20, 1985, counsel for Applicant sent a letter to Ms. Rorem again requesting that she respond to the interrogatories.

3. As of July 19, Applicant has yet to receive any answers to the interrogatories from Ms. Rorem. Counsel for Applicant has attempted to contact Ms. Rorem numerous times over the last week with no success. Further, Ms. Rorem has not returned calls left at her residence and at her husband's office. Based on Ms. Rorem's delay and the difficulty in reaching her, Applicant believes that an order of the Licensing Board is necessary to compel Ms. Rorem to respond to the interrogatories.

WHEREFORE, Commonwealth Edison Company respectfully requests that this Licensing Board issue an order compelling Bridge Little Rorem to respond without further delay to Applicant's "Interrogatories to Intervenor Bridget Little Rorem and Appleseed Alliance - Set II."

Respectfully submitted,

  
Victor G. Copeland  
One of the Attorneys for  
Commonwealth Edison Company

Dated July 19, 1985

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-456 <sup>OL</sup>  
50-457

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20. Your April 17 response (page 3) to Interrogatory 3 states:

Intervenor believes that emergency plans for other Commonwealth Edison nuclear plants have relied too heavily upon (a) the unlikelihood of any radiological emergency requiring a large-scale evacuation, (b) the availability of appropriate transportation vehicles, (c) optimum weather conditions during any emergency evacuation, and (d) that the public within 10 miles of these plants has more knowledge of proper response to emergency situations than has been provided by Commonwealth Edison's brochures.

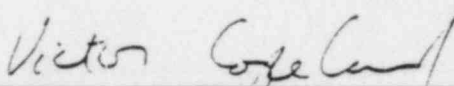
Please identify the Edison nuclear plant emergency plans referred to in the above response. Please identify by page references those passages of such plans that rely too heavily on the unlikelihood of any radiological emergency requiring a large scale evacuation, the availability of appropriate transportation vehicles, optimum weather conditions during any emergency evacuation, and that the public within 10 miles of these plants has more knowledge of proper response to emergency situations than has been provided by Commonwealth Edison's brochures.

21. Your response to Interrogatory 10 does not identify the specific hospitals referred to in your Contention 1. Please provide this information. If the answer is "none," so state.

22. Please identify the schools, kindergartens, nursery schools, licensed and unlicensed day care facilities referred to in your Response to Interrogatory 11.

23. Who sponsors the classes and field trips referred to in your  
Response to Interrogatory 11? Where are these sponsors located?

Submitted by:

  
\_\_\_\_\_  
Victor G. Copeland  
One of the Attorneys for  
Commonwealth Edison Company

Dated: April 25, 1985

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. 50-456
	)	50-457
(Braidwood Nuclear Power Station	)	
Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the INTERROGATORIES TO INTERVENOR BRIDGET LITTLE ROREM AND APPLESEED ALLIANCE - SET II were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, this 25<sup>th</sup> day of April, 1985.

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

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Dr. Richard F. Cole  
Administrative Law Judge  
Atomic Safety and Licensing Board  
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Atomic Safety and  
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Ms. Bridget Little Rorem  
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Essex, IL. 60935

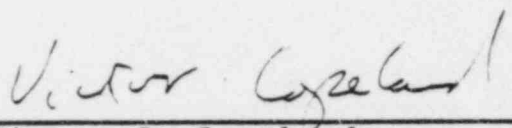
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	)	50-457
(Braidwood Nuclear Power Station	)	
Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of COMMONWEALTH EDISON COMPANY'S Motion To Amend Hearing Schedule and Motion to Compel (Interrogatories to Intervenor Bridget Little Rorem) were served (i) by messenger on the persons identified below by a single asterisk, (ii) by Federal Express on the persons identified below by two asterisks, and (iii) by deposit in the United States mail, first-class postage prepaid on the remaining persons, this 19th day of July, 1985, unless otherwise indicated.

Lawrence Brenner, Esq. Chairman\*  
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Washington, D.C. 20555

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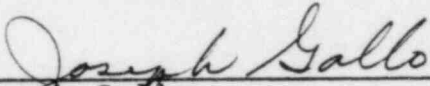
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