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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of)

COMMONWEALTH EDISON COMPANY)

(Braidwood Station Units 1 and 2)

Docket Nos.

50-45

50-457

'86 FEB 18 AIO:26

OFFICE OF REGULATORY
DOCKETING & SERVICE
BRANCH

APPLICANT'S OBJECTIONS AND THIRD PARTIAL RESPONSE
TO INTERVENORS' THIRD SET OF QA INTERROGATORIES
AND REQUESTS TO PRODUCE

On January 24, 1986, Intervenor filed their Third Set of Quality Assurance Interrogatories and Requests to Produce. Applicant filed its First Partial Response on February 7, 1986 and its Second Partial Response on February 11, 1986. This submission is Applicant's Third Partial Response.

Applicant's Third Partial Response consists of Applicant's response and objections to Specific Interrogatory 10. For each document referenced or incorporated into Applicant's response a Bates number has been provided if that document was already made available. Additional documents and their respective numbers will be provided by February 24, 1986.

Documents for which Applicant is asserting a privilege will not be provided, and an index of privileged documents will indicate whether the attorney client ("AC") or attorney work product ("WP") privilege is being asserted.

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PDR ADOCK 05000456
G PDR

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SPECIFIC INTERROGATORY 10

10. Please identify and describe in detail any and all studies, inquiries, reviews or evaluations of the effectiveness of, results and conclusions of the Braidwood Construction Assessment Program (BCAP); the "top twenty" corrective action programs at Braidwood identified in the April 8, 1985, correspondence from David H. Smith to James G. Keppler; and the "Ongoing Corrective Action Program" identified in Appendix B to the BCAP June 1984 program description transmitted by James J. O'Connor to James G. Keppler by letter of June 22, 1984. As to each please detail the purpose and objectives, organization, methodology, procedures, staffing, implementation, results and conclusions of each. Please identify any documents which reflect these answers.

OBJECTION

Applicant objects to and declines to answer this interrogatory to the extent that it requests identification and description of any studies, inquiries, reviews or evaluations protected by the work product privilege. Applicant moves concurrently herewith for entry of a protective order pursuant to 10 C.F.R. 2.740(c)(1985).

This privileged information is not discoverable. 10 C.F.R. 2.740(b)(1)(1985). Work product information concerning an expert which has been retained in anticipation of litigation but is not expected to testify, cannot be discoverable unless a showing is made of exceptional circumstances under which it is impracticable for the party seeking discovery to obtain facts or opinions on the same subject by other means. Kerr-McGee Chemical Corp. (West Chicago Rare Earths Facility), LBP-85-38, 22 N.R.C. 604, 616-17; cf. Fed. R. Civ. P. 26(b)(4)(B). No attempt to make such a showing has been undertaken with respect to this interrogatory. Moreover, such a showing is unlikely. All material facts relevant to the Amended QA Contention have been or are being produced. Under NRC practice, Isham, Lincoln & Beale must disclose any newly-discovered material

SPECIFIC INTERROGATORY 10

facts found by experts providing consulting services in anticipation of litigation, even if otherwise privileged. Therefore, protection of the work product privilege in this case is not contravened by any "exceptional circumstances."

SPECIFIC INTERROGATORY 10

10. Please identify and describe in detail any and all studies, inquiries, reviews or evaluations of the effectiveness of, results and conclusions of the Braidwood Construction Assessment Program (BCAP); the "top twenty" corrective action programs at Braidwood identified in the April 8, 1985, correspondence from David H. Smith to James G. Keppler; and the "Ongoing Corrective Action Program" identified in Appendix B to the BCAP June 1984 program description transmitted by James J. O'Connor to James C. Keppler by letter of June 22, 1984. As to each please detail the purpose and objectives, organization, methodology, procedures, staffing, implementation, results and conclusions of each. Please identify any documents which reflect these answers.

RESPONSE

Applicant has interpreted this interrogatory as requesting information on overviews of the effectiveness, results and conclusions of the corrective action programs described in response to Specific Interrogatory 7 of Intervenor's Second Set of QA Interrogatories. To the extent that Applicant has objected to this Specific Interrogatory, Applicant has not responded.

The NRC has reviewed corrective action programs identified by this Interrogatory. Some NRC reviews are identified in the response to Specific Interrogatory 7 (Second Set). Intervenor has received all NRC inspection reports and should be able to identify any reviews not referenced in the response and update to Interrogatory 7. The NRC reports reflect or will reflect results, conclusions, purpose, methodology and implementation of the NRC's reviews.

Reviews of BCAP

BCAP Quality Assurance and the Independent Expert Overview Group (IEOG) conducted overviews of BCAP. The purpose and objectives, organization, methodology, procedures, staffing and implementation of BCAP Quality Assurance and the Independent Expert Overview Group are described in the BCAP Report (E0000731-E0000824). The BCAP Report summarizes the findings of the Quality Assurance Overview of BCAP in Appendix C. All BCAP QA records, including the Final Overview Report for BCAP QA (QC 71.5), have been made available for parties' review at the Braidwood site. The Final BCAP QA Overview Report is also available for inspection and copying as B0016297-370.

The IEOG issued its final report in December 1985 (E0005797-5839).

This report states the conclusions and results of the IEOG and describes the IEOG's staffing and methodology. All documents reflecting the IEOG's work which were in official BCAP files, BCAP QA files, or informal BCAP working files have been made available for parties' review at the location where they are stored. In addition, certain of these documents have been made available at the offices of Isham, Lincoln & Beale by agreement between Intervenor's and Applicant's counsel.

At the request of Mr. John Hansel of Evaluation Research Corporation, the General Office Quality Assurance Department conducted an evaluation of the RSCAP element of the Braidwood BCAP Program on September 10-14, 1984 and October 15-18, 1984. The report for this evaluation describes the purpose, methodology, and conclusions of the General Office Quality Assurance Review. This document has been made available for inspection and copying as B0016205-238. General

Office QA audit 20-85-A (B006029-6046) examined the Construction Sample Reinspection (CSR) portion of the BCAP Program to verify compliance to applicable procedures. A detailed description of the audit results is presented in the audit report under the paragraph titled "BCAP CSR Progress". (More information concerning General Office Audits is provided in the section of this response titled "Other Corrective Action Programs").

Review of Other Corrective Action Programs

The Special Project Group of Commonwealth Edison's Site Quality Assurance has conducted audits or surveillances of all the corrective action programs identified by this interrogatory except for BCAP. The introduction to the Response to Specific Interrogatory 4 (Second Partial Response to Second Set of QA Interrogatories) and the Introduction to the Response to Specific Interrogatories 58 and 59 (Sixth Partial Response of First Set of QA Interrogatories) describes the purpose and function of the Special Projects Group. The functional organization of this Group is depicted on the attached organization chart (Attachment 1). The surveillances and audits conducted by this Group are identified on the attached Quality Assurance Reference List by the Corrective Action Program to which they relate (Attachment 2). These documents describe the results and conclusions for each surveillance or audit. In general, QA monitoring found that the audited activities were performed in an acceptable manner.

Commonwealth Edison General Office Quality Assurance has also audited some of these Corrective Action Programs. These corporate audits have been performed at Braidwood on a four to six month cycle since the early stages of the project. The audits are performed under

the direction of the Director of Quality Assurance for Engineering and Construction. The Audit Team Leader and auditors are selected from members of the Quality Assurance Department who do not work at the Braidwood Site. These audits examined the activities of the site contractors and the site CECO Departments. The scope of these audits generally covers a broad range of site activities with emphasis on key work activities or concerns as deemed appropriate for the time period during which the audit is to be performed.

Two corporate audits were performed of the Braidwood Site Corrective Action Program activities. The Audits #20-85-A and #20-85-D were performed during the weeks of March 4, 1985 and May 13, 1985, respectively. A detailed discussion of the purpose, scope, references, staffing, results and assessment are included in each of the audit reports. General office audits are identified on the Quality Assurance Reference List (Attachment 2).

In addition, each of the contractors involved in these programs has a Quality Assurance Program which conducts audits of that Contractor's activities. Phillips, Getschow Internal Audit 84-BR16 (K0036803-36806) reviewed MTV packages to verify compliance to the requirements of Procedure QCP-B31 "Material Traceability Verification Program." Comstock Corporate Special Audit CQA-85-133 (00012075-178) reviewed the implementation of the following Corrective Action Programs: Electrical Conductor Extension Butt Splices, LKC Document Review, and QCIRP. These audit reports include the purpose, scope, references, staffing, results and conclusions of these reviews. In addition, site contractors perform regularly scheduled surveillances and audits of their procedures. While these reviews are not overviews, the audited procedures include

procedures which govern work performed for Corrective Action Programs. Audits and surveillances of this type have or will be made available for inspection and copying as part of the document production responding to Specific Interrogatory 7 of Rorem's Second Set of QA Interrogatories and Requests to Produce and its update. These documents will be listed on the index for appropriate Corrective Action Programs.

BCAP looked at some of these corrective action programs in its Review of Significant Corrective Action Programs (RSCAP). RSCAP reviewed MTV, NSSS Components Support Verification, Duct Fittings (as part of HVAC Retrofit Program review), LKC Document Review, Reinspection of Safety Related Equipment, Quality Control Inspector Reinspection Program (QCIRP), Quality Control Structural Steel Review (QCSSR), Safety Related Pipe Supports, and Instrument Retrofit Verification (IRV). In addition, although not an overview, the Construction Sample Reinspection (CSR) portion of BCAP inspected population items which overlapped partially with populations inspected as part of the following Corrective Action Programs: MTV, CEA Inspections, HVAC Installation Tolerances, NSSS Component Support Verification, NSSS Support and NSSS Support Steel, Structural Steel Installation Traveler (SSIT), Newberg Welding Program, HVAC Housing and Air Risers, HVAC Duct Fittings, LKC Document Review, Reinspection of Safety Related Mechanical Equipment, QCSSR, and Safety Related Pipe Supports. The purpose and objectives, organization, methodology, procedures, staffing, implementation, results, and conclusions of BCAP are detailed in the "Report on the Braidwood Construction Assessment Program (BCAP)" dated November 1985. The report summarizes the results of the CSR and RSCAP programs. All documents which reflect these findings have been made available for parties inspection and

copying. The RSCAP conclusions are discussed in more detail in the RSCAP Evaluation of Results (QG 69.50.2)(B0016239-296).

The National Board of Boiler and Pressure Vessel Inspectors (NBBPVI) conducted an independent audit of the Braidwood Station at the request of Commonwealth Edison Company to address specific NRC concerns about ASME work at the Braidwood Site. Appendix A of the Report on Material Traceability Verification Program is NBBPVI's "Supplementary Report on MTV Program." This appendix describes the purpose, methodology, results and conclusions of the NBBPVI audit with respect to MTV. A copy of the MTV Report has already been provided to Intervenors. Additional detail concerning the staffing, organization, scope and results of the NBBPVI review can be found in the NBBPVI's first interim report (L0000877-883) dated April 1, 1985 and second interim report (A0013536-13544) dated May 17, 1985.

ATTACHMENT 1 (Interrogatory 10)

SPECIAL PROJECTS & ACTIVITIES

S. C. (Steve) Hunsader
QA Supervisor

MECHANICAL

Material Traceability Verification
ASME Nameplate
ASME Section XI Program
N-5 Review

Instrument Retrofit
Corroded Pipe
Mandrell Extrusion

Flange Bolt-Up Program
ASME Material Procurement (DRSS)
CB&I Rework
 Recycle Hold-Up Tanks
 Field Erected Tank Repair
 Bio-Shield Repair

NSSS Support Steel
NISCo On-Going

Mechanical Surveillances

STRUCTURAL/EQUIPMENT

Mechanical Equipment Backfit
Pullman Rework:
 Duct Fitting Verification
 Missing Weld I.D. - HVAC Welds
 Linear Indications - Duct/Stiffener Welds
System Control
Hexcell

Block Wall Column Backfit
QCSSR
CEA Backfit
SSIT Doc. Review
GKNA Welding
GKNA On-Going
Midway
Krez-Duguid

Equipment Internal Cleanliness
Hanger Reinspection
Equipment Preventative Maintenance
FGCo MRR Requests

Structural Surveillances

*Staffing included eight QA Engineers and two PTL Inspectors

ATTACHMENT 2 (Interrogatory 10)
QUALITY ASSURANCE REFERENCE LIST

Corroded Pipe

1. CECQ QA Surveillance 4507 Rev. 1 (L0001070-1075)
2. CECQ QA Surveillance 4968 (B0014756-14758)
3. CECQ QA Audit 20-85-521 (B0014829-14838)
4. CECQ CO Audit 20-85-A (B0006029-6046)

MTV

1. CECQ QA Surveillance 3809 (B0016092-16095)
2. CECQ QA Surveillance 4181 (B0016097-16098a)
3. CECQ QA Surveillance 4250 (B0016099-16105)
4. CECQ QA Surveillance 4458 (L000400-402)
5. CECQ QA Audit 20-84-592 (B0007591-7600)
6. CECQ QA Audit 20-85-446 (B0016055-16068)
7. CECQ QA Audit 20-85-547 (B0008089-8095)
8. CECQ QA Audit 20-85-516 (B0015484-15498)
9. CECQ QA Audit 20-85-533 (B0002311-2321)

ASME Material Procurement

1. CECQ QA Surveillance 4699 (B0014804-14807)
2. CECQ QA Surveillance 4874 (B0014797-14798)
3. CECQ QA Surveillance 5069 (B0016174-16177)
4. CECQ QA Audit 20-85-553 (B0014808-14815)
5. CECQ QA Audit 20-85-523 (B0014816-14824)

Nameplate Documentation Retrieval Program (NDRP)

1. CECQ QA Surveillance 4476 Rev. 1 (B0014825-14828)
2. CECQ QA Audit 20-85-521 (B0014829-14838)

CEA Inspections

1. CECQ QA Surveillance 4566 (B0016131-16132)
2. CECQ QA Surveillance 4670 (B0016152-16153)

CEA's in Repaired Areas

1. CECQ QA Surveillance 4773 (B0014862-14869)
2. CECQ QA Surveillance 4715 (B0014905)
3. CECQ CO Audit 20-85-D (B0006797-6810)

CEA's Finished Slabs

1. CECQ QA Surveillance 4607 (B0014908)
2. CECQ QA Surveillance 4728 (B0014906-14907)
3. CECQ GO Audit 20-85-D (B0006797-6810)

Welded & Bolted Connections - Block Wall Columns

1. CECQ QA Surveillance 4351 (B0016106-16107)
2. CECQ QA Surveillance 4389 (B0014917-14919)
3. CECQ QA Surveillance 4431 (B0014920-14921)
4. CECQ QA Surveillance 4550 (B0014915-14916)
5. CECQ QA Surveillance 4882 (B0014913-14914)
6. CECQ QA Surveillance 4397 ()

HVAC Installation Tolerances

1. CECQ QA Audit 20-85-520 (B0008053-8064)

NSSS Component Support Verification (NSSS Supports and NSSS Support Steel)

1. CECQ QA Surveillance 5142 ()
2. CECQ QA Surveillance 5149 (B0016191-16192)
3. CECQ QA Surveillance 5248 (B0016193-16195)
4. CECQ QA Surveillance 4419 (B0016110-16124)
5. CECQ QA Surveillance 4650 (B0016136-16151)
6. CECQ QA Surveillance 4768 (B0014944-14945)
7. CECQ QA Surveillance 4830 (B0016158)
8. CECQ QA Surveillance 4885 (B0016159-16163)
9. CECQ QA Surveillance 5096 (B0016178-16180)
10. CECQ QA Surveillance 5097 (B0016181-16183)
11. CECQ QA Surveillance 5115 (B0016069-16071)
12. CECQ QA Surveillance 5368 (B0016196-16198)
13. CECQ QA Surveillance 5388 (B0016199-16200)
14. CECQ QA Surveillance 5389 (B0016201-16204)
15. CECQ QA Audit 20-85-510 (B0014970-14980)
16. CECQ QA Audit 20-85-530 (B0014959-14969)
17. CECQ QA Audit 20-85-551 (B0014946-14952)
18. CECQ QA Audit 20-85-523 (B0014816-14824)
19. CECQ QA Audit 20-85-557 (B0015823-15832)
20. CECQ QA Audit 20-85-550 (B0016043-16054)

Southwest Fab. Radiographs

1. CECQ QA Surveillance 4750 (B0015009)

PTL Radiographic Density

1. CECQ QA Surveillance 4749 (B0016154-16157)
2. CECQ GO Audit 20-85-D (B0006797-6810)

Electrical Conductor Extension Butt Splices

1. CEC Co QA Surveillance 4586 (B0016133-16135)
2. CEC Co QA Surveillance 4708 (B0015043-15044)
3. CEC Co QA Surveillance 4845 ()
4. CEC Co QA Audit 20-85-503 (B0016034-16042)
5. CEC Co QA Audit 20-85-557 (B0015823-32)
6. CEC Co GO Audit 20-85-D (B0006797-6810)

Structural Steel Installation Travellers (SSIT)

1. CEC Co QA Surveillance 3659 (B0016078-16091)
2. CEC Co QA audit 20-85-539 (B0006827-6851)
3. CEC Co QA Audit 20-85-564 (B0016028-16033)
4. CEC Co GO Audit 20-85-D (B0006797-6810)

Newberg Welding Program

1. CEC Co QA Surveillance 4804 (B0008078-8085)
2. CEC Co QA Surveillance 3866 (B0015122-15138)
3. CEC Co GO Audit 20-85-D (B0006797-6810)

HVAC Housing & Air Risers

1. CEC Co QA Audit 20-85-520 (B0008053-8064)
2. CEC Co GO Audit 20-85-D (B0006797-6810)

HVAC Duct Fittings

1. CEC Co QA Surveillance 4652 (B0015145-15152)
2. CEC Co QA Audit 20-85-520 (B0008053-8064)

LKC Document Review

1. CEC Co QA Surveillance 4688 (B0015153-15167)
2. CEC Co QA Surveillance 4410 (B0016108-16108a)
3. CEC Co QA Surveillance 4735 Rev. 1 (B0006984-7006)
4. CEC Co QA Audit 20-85-522 (B0006957-6968)

System Control - Control Board Welding

1. CEC Co QA Surveillance 4479 (B0016129-16130a)
2. CEC Co QA Surveillance 5266 (B0014765-14767)

Reinspection of Safety Related Mechanical Equipment

1. CECQ QA Surveillance 4671 (B0015219-15221)
2. CECQ QA Surveillance 4717 (B0015213-15214)
3. CECQ QA Surveillance 4958 (B0016166-16167)
4. CECQ QA Surveillance 5196 (B0015215-15218)
5. CECQ QA Surveillance 4988 (B0008049)
6. CECQ QA Audit 20-85-505 (B0015229-15246)
7. CECQ QA Audit 20-85-546 (K0036206-36208)

Quality Control Inspector Reinspection Program (QCIRP)

1. CECQ QA Surveillance 4730 (B0015285-15306)
2. CECQ QA Surveillance 4902 (B0015267-15284)
3. CECQ QA Surveillance 5046 (B0015247-15266)
4. CECQ QA Surveillance 5056 (B0015229-15246)
5. CECQ QA Audit 20-85-515 (B0015312-15323)
6. CECQ QA Audit 20-85-507 (B0015353-15360)

Quality Control Structural Steel Review (QCSSR)

1. CECQ QA Surveillance 2931 (B0016072)
2. CECQ QA Surveillance 3041 (B0001673)
3. CECQ QA Surveillance 3080 ()
4. CECQ QA Surveillance 3134 (B0016075)
5. CECQ QA Surveillance 3242 (B9916076)
6. CECQ QA Surveillance 3553 (B0016077)
7. CECQ QA Surveillance 3976 (B0016096)
8. CECQ QA Audit 20-85-501 (B0015328-15334)

Safety-Related Pipe Supports

1. CECQ QA Surveillance 4472 Rev. 1 (B0016125-16128)
2. CECQ QA Surveillance 4667 (B0015350-15352)
(B0015368-15370)
3. CECQ QA Surveillance 4997 (B0016170-16173)
4. CECQ QA Surveillance 5289 (B0015392-15453)
5. CECQ QA Surveillance 5181 (B0015324-15327)
6. CECQ QA Surveillance 4891 (B0016164-16165)
7. CECQ QA Surveillance 4992 (B0016168-16169)

Instrument Retrofit Verification (IRV)

1. CECQ QA Surveillance 4568 Rev. 2 (K0020921-20930)
2. CECQ QA Surveillance 4740 (B0015454-15455)
3. CECQ QA Surveillance 5373 (B0015388-15391)
4. CECQ QA Surveillance 5062 (B0015499-15504)
5. CECQ QA Surveillance 4074 (L0001087-1128)
6. CECQ QA Audit 20-84-592 (B0007591-7600)
7. CECQ QA Audit 20-85-516 (B0015484-15498)
8. CECQ QA Audit 20-85-545 (B0015461-15467)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

'86 FEB 18 A10:26
Docket Nos. 50-456 OFFICE OF PUBLIC AFFAIRS
50-457 DOCKETING & SERVICE
BRANCH

AFFIDAVIT OF ROBERT L. BYERS

I, Robert L. Byers, being first duly sworn, depose and state as follows:

1. I am employed by Commonwealth Edison Company as Assistant Superintendent for Unit 2 Construction, Project Construction Department at Braidwood Station.

2. My business address is Braidwood Nuclear Power Station, Braceville, Illinois 60407.

3. I have participated in the preparation of the response to Specific Interrogatory Number 10 filed by Intervenor Rorem et. al. in their Third Set of Quality Assurance Interrogatories and Request to Produce. In particular, I have responsibility for the portion of the response which concerns reviews by and of the RSCAP element of the BCAP Program.

4. To the best of my knowledge and belief, the portion of the response to Specific Interrogatory Number 10 identified above is true and correct.

Further affiant sayeth not.

Robert L. Byers
Robert L. Byers

Subscribed to and Sworn before me
this 13th day of February 1986

Carol J. McCoy

My Commission expires on

10/30/89

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
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COMMONWEALTH EDISON COMPANY)
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Docket Nos. 50-456
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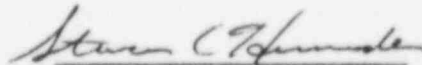
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

AFFIDAVIT OF STEVEN C. HUNSADER

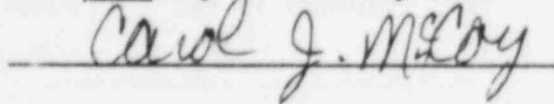
I, Steven C. Hunsader, being first duly sworn, depose and state as follows:

1. I am employed by Commonwealth Edison Company as Quality Assurance Supervisor at Braidwood Station.
2. My business address is Braidwood Nuclear Power Station, Braceville, Illinois 60407.
3. I have participated in the preparation of the response to Specific Interrogatory Number 10 filed by Intervenor Rorem et. al. in their Third Set of Quality Assurance Interrogatories and Request to Produce. In particular, I have responsibility for the portion of the response to Specific Interrogatory 10 which concerns overviews by Edison's General Office QA Department and the Special Projects Section of the Site QA Department as well as attachments 1 and 2 to the response.
4. To the best of my knowledge and belief, the portion of the response to Specific Interrogatory Number 10 identified above is true and correct.

Further affiant sayeth not.


Steven C. Hunsader

Subscribed to and Sworn before me
this 13th day of February 1986



My Commission expires on

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COMMONWEALTH EDISON COMPANY) Docket Nos. 50-456
) 50-457
(Braidwood Station Units 1 and 2)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

AFFIDAVIT OF GEORGE M. ORLOV

I, George M. Orlov, being first duly sworn, depose and state as follows:

1. I am a consultant to Commonwealth Edison Company as Staff Assistant to the Project Manager at Braidwood Station.
2. My business address is Braidwood Nuclear Power Station, Braceville, Illinois 60407.
3. I have participated in the preparation of the response to Specific Interrogatory Number 10 filed by Intervenors Rorem et. al. in their Third Set of Quality Assurance Interrogatories and Request to Produce. In particular, I have responsibility for the portion of the response to Specific Interrogatory 10 which concerns overviews of BCAP by the Independent Expert Overview Group and the scope of the CSR element of BCAP.
4. To the best of my knowledge and belief, the portion of the response to Specific Interrogatory Number 10 identified above is true and correct.

Further affiant sayeth not.

George M. Orlov
George M. Orlov

Subscribed to and Sworn before me
this 13th day of February 1986

Carol J. McCoy

My Commission expires on

10/30/89

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OFFICE OF THE CLERK
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I, Gary A. Kruse, one of the attorneys for Commonwealth Edison Company, certify that the following persons have been served in the above entitled matter with copies of Applicant's Third Partial Response to Intervenor's Third Set of Interrogatories and Request to Produce by deposit in the U.S. Mail on February 13, 1986 unless otherwise indicated.

SERVICE LIST

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Administrative Law Judge
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Chief, Docketing and Services
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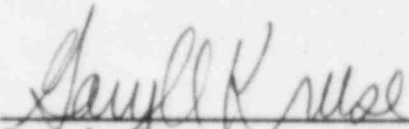
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William Little, Director
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Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

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