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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
RULES AND
ADJUDICATION STAFF

In the Matter of:)
ATLAS CORPORATION) Docket No. 40-3453
(source material license amendment)) March 22, 1999

GRAND CANYON TRUST'S MOTION FOR AN EXTENSION OF TIME

Grand Canyon Trust, et al, respectfully move for an extension of time until Friday, April 2, 1999 to file a reply to the Nuclear Regulatory Commission Staff's Response to the Grand Canyon Trust, et al., Request for Hearing and Petition for Leave to Intervene. According to the Presiding Officer's Order of February 17, 1999, such reply is due by Friday, March, 25, 1999.

Although the NRC's opposition brief was filed on Friday, March 19, the brief was not served on counsel for Grand Canyon Trust by email until Monday, March 22, 1999. Moreover, the exhibits to that brief – which apparently amount to more than 100 pages of materials – have still not been received. Given the delays in receiving the NRC's filings and the fact that counsel who is handling this issue is now ill, the Grand Canyon Trust will not be able to respond by Friday, March 25.

SECY-EHD-006

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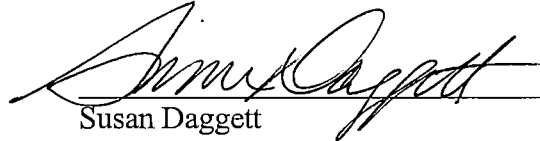
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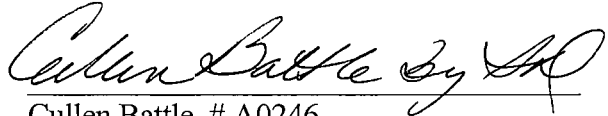
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Undersigned counsel has not been able to reach counsel for NRC staff to determine whether there is any objection to this extension. Counsel for the Atlas Corporation has indicated that he has no objection to this extension.

Dated this 22nd day of March, 1999.



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Attorneys for
Grand Canyon Trust, et al.

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CERTIFICATE OF SERVICE

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I hereby certify that copies of "Grand Canyon Trust's Motion for an Extension of Time" in the above-captioned proceeding have been served on the following by United States mail, and/or by facsimile (indicated by asterisk) on this 22nd day of March 1999.

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The Law Firm for the Environmental Movement

*(On August 1, 1997, we will officially
become Earthjustice Legal Defense Fund!)*

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March 12, 1999

Office of the Secretary
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Atlas Corporation
Docket No. 40-3453-MLA-3

To Whom It May Concern:

Enclosed please find an original and 3 copies of GRAND CANYON TRUST'S MOTION FOR AN EXTENSION OF TIME for filing in the above-referenced matter.

At your convenience, would you please return a file-stamped copy in the enclosed self-addressed stamped envelope.

Thank you in advance for your prompt attention.

Sincerely,

Lynda Lovett
Legal Secretary
to
Susan D. Daggett

LL/s

Enclosures

