

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF GENERAL COUNSEL
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Before Administrative Judges:

Thomas S. Moore, Presiding Officer
Frederick J. Shon, Special Assistant

In the Matter of:)	Docket No. 40-3453-MLA-3
ATLAS CORPORATION)	
(Moab, Utah))	ASLBP No. 99-761-04-MLA
)	
)	May 21, 1999

UNOPPOSED MOTION FOR AN EXTENSION OF TIME FOR ALL PARTIES

Grand Canyon Trust, et al., respectfully move for an extension of time until Friday, June 11, 1999 to file responses to the Nuclear Regulatory Commission Staff's answers to questions presented by the Atomic Safety and Licensing Board in its Order of May 14, 1999. The Grand Canyon Trust also moves to extend the time for the NRC Staff to file responses to the Grand Canyon Trust's answers to questions presented in the Order of May 14, 1999. According to the Presiding Officer's Order, the Grand Canyon Trust's responses to the NRC Staff's answers and the NRC Staff's answers to the Grand Canyon Trust's responses are currently due by Friday, June 4, 1999.¹

¹ If the Atlas Corporation decides to file answers and responses, the Grand Canyon Trust proposes that Atlas follow the same briefing schedule requested for the NRC Staff.

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The NRC Staff's and the Grand Canyon Trust's answers are due on Friday, May 28, 1999. In the week following, which includes only four business days because of the Memorial Day holiday, and ends on June 4, 1999, primary counsel for the Grand Canyon Trust, Susan Daggett, is scheduled to be in the office only two days. In addition, Marie Kirk, also counsel for the Grand Canyon Trust, will be in the office only three business days during the week of June 4, 1999. Moreover, the Grand Canyon Trust anticipates that the length of the NRC staff's answers could be significant, because the Presiding Officer's Order of May 14, 1999 presents to the NRC Staff 11 questions with numerous subparts. Because of the length and complexity of the issues involved, the incidence of the holiday weekend, and counsels' prearranged travel plans, the Grand Canyon Trust requires more time in which to respond adequately to the NRC Staff's answers and believes that a one-week extension would be sufficient.

Undersigned counsel has contacted Lisa Clark, counsel for the NRC Staff, and the NRC Staff does not oppose this motion. Moreover, the NRC Staff believes it should be on the same briefing schedule as the Grand Canyon Trust and wishes to have the time to file responses extended to June 11, 1999 for both parties.

Dated this 21st day of May, 1999.



Susan Daggett
Robert B. Wiygul
Marie Kirk
Earthjustice Legal Defense Fund, Inc.
1631 Glenarm Place, Suite 300
Denver, CO 80202
Email: sdaggett@earthjustice.org,
rwiygul@earthjustice.org, mkirk@earthjustice.org
Telephone: (303) 623-9466
Fax: (303) 623-8083

Maui A Trust for Cullen Battle

Cullen Battle, # A0246
Fabian & Clendenin
215 S. State Street, Suite 1200
Salt Lake City, UT 84111
Email: cbattle@fabclen.com
Telephone: (801) 531-8900
Fax: (801) 596-2814

Maui A Trust for Gabrielle Sigel

Gabrielle Sigel
Jennifer A. Burke
Jenner & Block
One IBM Plaza
330 N. Wabash
Chicago, IL 60611
Email: gsigel@jenner.com, jburke@jenner.com
Telephone: (312) 222-9350
Fax: (312) 840-7758
Fax: (312) 840-7268

Attorneys for
Grand Canyon Trust, et al.

CERTIFICATE OF SERVICE

I hereby certify that copies of "Unopposed Motion for an Extension of Time for All Parties" in the above-captioned proceeding have been served on the following by United States mail, and by facsimile or email (indicated by asterisk) on this 21st day of May 1999:

*Administrative Judge
Thomas S. Moore
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001
Fax: 301-415-5599
E-mail: tsm@nrc.gov



*Anthony J. Thompson, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, D. C. 20037

* Administrative Judge
Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001
Fax: 301-415-5599
E-mail: tjs@nrc.gov

Office of the Secretary (2)
ATTN: Rulemaking and
Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Richard Blubaugh, Vice President
Atlas Corporation
Republic Plaza
370 Seventeenth Street,
Suite 3050
Denver, Colorado 80202

* Lisa Clark
Counsel for NRC Staff
U.S. Nuclear Regulatory Commission
Office of the General Counsel
Washington, D.C. 20555
Fax: 301-415-2036 Email: lbc@nrc.org

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GENERAL COUNSEL
ADJUDICATIONS STAFF

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