

LAW OFFICES OF  
LEBOEUF, LAMB, LEIBY & MACRAE  
1757 N STREET, N.W.  
WASHINGTON, D. C. 20036

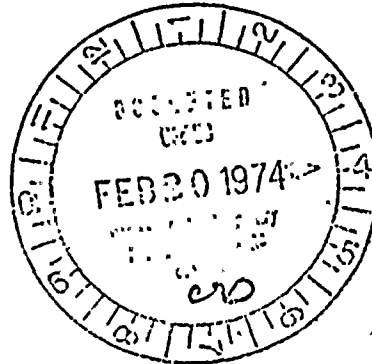
RECEIVED  
PROD. & UTIL. FILE 50-410

ONE CHASE MANHATTAN PLAZA  
NEW YORK, N. Y. 10005

WASHINGTON TELEPHONE  
202-672-6668

CABLE ADDRESS  
LALALU, WASHINGTON D. C.

February 14, 1974



Daniel M. Head, Esq.  
Atomic Safety and Licensing  
Board Panel  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Re: AEC Docket No. 50-410

Dear Mr. Chairman:

We have just received this morning a copy of a letter from Mr. Goldsmith to you dated February 12 requesting a two-week extension of time for filing his proposed findings and brief.

Applicant opposes this request. It is excessive, and is yet another example of Mr. Goldsmith's continually placing his other responsibilities ahead of the serious obligations which he undertook by appearing as counsel in this proceeding.

The proposed findings in question involve only two issues of the whole record. Since the hearings on need for power were concluded on December 4, 1973, Mr. Goldsmith has had well over two months to prepare his findings on that issue. The hearings concluded and the record was closed on January 23, 1974, thereby giving Mr. Goldsmith almost four weeks to prepare his findings on the energy conservation issue. Finally, the principal legal question to be briefed (concerning NEPA remedies) was identified as long ago as the fourth prehearing conference on December 19, 1973.

Furthermore, the granting of the requested extension would delay the date when the Board would have available the



11-11-68

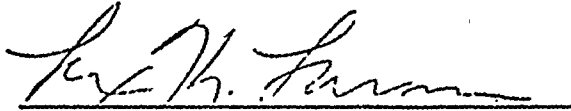
11

1

1

material it needs to render an initial decision. In turn, the prompt issuance of an initial decision (and of a construction permit should the decision be favorable to Applicant) would be jeopardized. I need not repeat the importance to Applicant, to its customers, and to the national interest, of the prompt issuance of a construction permit for Unit No. 2.

Very truly yours,



Lex K. Larson  
Lex K. Larson  
Attorney for Applicant

cc: Dr. William E. Martin  
Dr. Marvin M. Mann  
Richard I. Goldsmith, Esq.  
Carmine J. Clemente, Esq.  
Mrs. Suzanne Weber  
Anthony Z. Roisman, Esq.  
Bernard M. Bordenick, Esq.  
Secretary, U.S. Atomic Energy Commission  
Atomic Safety and Licensing Appeal Board

