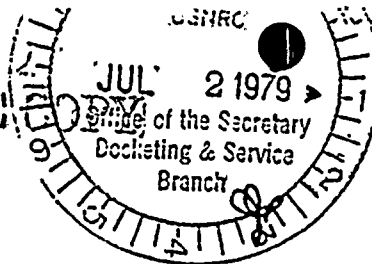


REGULATORY DOCKET FILE

NRC PUBLIC DOCUMENT ROOM

RELATED CORRESPONDENCE



In the Matter of : U.S. NUCLEAR REGULATORY  
 PENNSYLVANIA POWER AND LIGHT : COMMISSION  
 CO. ALLEGHENY ELECTRIC COOP. :  
 (Susquehanna Steam Electric Stat) : DOCKET NOS. 50-387  
 : 50-388

MOTION OF COLLEEN MARSH ET AL FOR  
 REVISION OF PRELIMINARY TIMETABLE AND  
 EXTENSION OF TIME WITHIN WHICH TO POSE  
 AND ANSWER FIRST ROUND DISCOVERY REQUESTS

NOW COME Colleen Marsh and Eleven Others, Intervenors herein, and hereby move and petition this Commission as follows:

1. The Board's Prehearing Conference Order, dated March 6, 1979 (pp. 79-82) established a "Preliminary Timetable...proposed by the Applicants..." without providing for, or obtaining input or advice from the within Intervenors.

2. The within Intervenors are individual citizens with limited financial resources, and such lack of funds has been a serious obstacle to Intervenors' securing professional and expert assistance in the preparation of first round discovery requests toward Applicants and NRC Staff, and has further hindered the within Intervenors' ability to timely respond to NRC Staff's and Applicant's first round discovery requests and document production of Colleen Marsh et al.

3. The Board's Order of March 6, 1979, at page 82 stated:  
 "The foregoing schedule is, of course, preliminary.  
 Future events may affect it substantially."

Obviously, the accident at Three Mile Island, just a few weeks after this Board's March Order has "substantially" changed the circumstances and has raised doubts about certain assumptions as to risks, design safety, and licensing procedures relative to nuclear power and the nuclear industry, thereby making it prudent to extend and broaden the discovery process in the within proceedings to take into account and benefit from the findings of various, pending, Congressional, Executive, legislative, and industry/consumer inquiries into the Three Mile Island accident.

4. In light of the Three Mile Island accident, many questions previously unconsidered or thought inappropriate must be asked of the Applicants and NRC Staff, but can not be included in the within licensing proceedings if the Board strictly adheres to the March 6, 1979 timetable.

WHEREFORE, Colleen Marsh and Eleven Others, Intervenors, hereby request that an Order be entered as follows:

1. Revising the Preliminary Timetable by postponing all dates therein at least 6 months to one year;

2. Provide the Intervenor an Extension of time of at least 6 months to one year within which to pose first rounds of discovery to Applicants and NRC Staff, and an Extension of like period within which to respond to first round discovery and document requests from NRC Staff and Applicants.

CERTIFICATE OF SERVICE

I hereby certify that copies of "Motion of Colleen Marsh et al for Revision of Preliminary Timetable and Extension of Time etc." in the foregoing proceeding have been served on the following by deposit in the United States mail, first class, this 28th day of June, 1979:

Charles Bechhoefer, Esc, Chairman  
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Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Glenn C. Bright  
A.S.L.B.F.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Docketing and Service Section  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

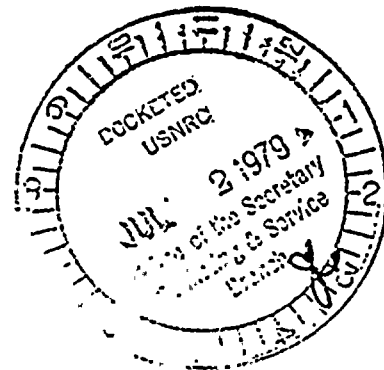
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*Colleen Marsh*

Colleen Marsh