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September 12, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

Pennsylvania Power and Light
Company,

and

Allegheny Electric Cooperative
(Susquehanna Steam Electric
Station Units 1 & 2)

DOCKET NOS.:

50-387-

50-388



MOTION FOR EXTENSION OF TIME TO ANSWER
OR OBJECT TO FIRST ROUND INTERROGATORIES
OF APPLICANT AND NRC BY INTERVENOR SEA

Intervenor SEA comes now and moves for an extension of time to answer or object to the first round interrogatories of the applicant and the NRC for the following reasons which constitute, equal and amount to good cause, pursuant to 10 CFR 2.711(a):

1) Fourteen (14) days is simply not enough time to prepare answers or objections to such lengthy, burdensome, oppressive interrogatories.

The applicant, staff, and the Board know full well that it would take a full time staff, including an attorney, radiation physicist and engineer, at least six (6) months to adequately answer or object to these quassonian interrogatories.

The applicant, staff and Board also know that SEA is a volunteer citizens organization without the necessary full time staff and resources. To allow SEA only 14 days to respond after denial of our motion for a protective order is punitive and offensive to any remnants of procedural due process and fairness that the Board might retain.

If the Board does not grant a reasonable extension of time, pursuant to 10 C.F.R. 2.711(a), for SEA to respond, it will only demonstrate that the BOARD, while giving lip service to effective citizen participation, merely desires to rush through the hearings and grant an operating license.

2) SEA, and, to its knowledge, the other intervenors, have not had access to a copy of the prehearing conference transcript outside the local public document room, in direct contravention of the Board's own Special Prehearing Conference Order (March 6, 1979). The Staff has not lent one of its copies to the intervenors. The Staff make no arrangements for the use of the transcript outside the LPDR as required on page 83 of the Order. Even these

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