

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

PUBLIC SERVICE ELECTRIC AND)
GAS COMPANY)

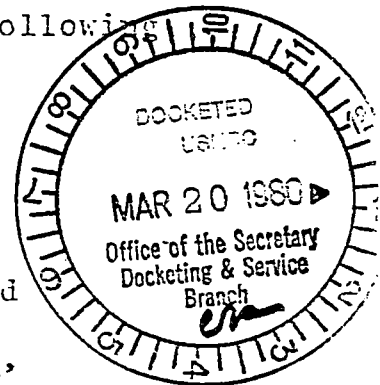
(SALEM NUCLEAR GENERATING)
STATION, UNIT NO. 1))

DOCKET NO. 50-272

INTERVENORS COLEMANS MOTION FOR EXTENSION
OF TIME TO FILE TESTIMONY AND POSTPONEMENT
OF HEARING THEREON

This proceeding is to consider the application of
Public Service Electric and Gas Company, et. al. (hereinafter
"Licensee") for an amended operating license to permit
increased storage of spent fuel in the Salem Generating Station
Unit 1. On February 22, 1980, the Atomic Safety and Licensing
Board (hereinafter "Board") issued a Memorandum and Order which,
among other things, required consideration of the following
question:

In the event of a gross loss of
water from the spent fuel storage
pool, what would be the difference
in consequences between those
occasioned by the pool with expanded
storage and those occasioned by the
present pool? (Memorandum and Order,
at 18).



The Board further directed evidentiary hearings on this question,
set for April 22, 1980. Testimony must be filed by March 24, 1980.

8004090008

This motion respectfully requests an extension of time to file testimony on the question cited above, for thirty (30) days, and postponement of the evidentiary hearing thereon, accordingly. The motion is made for several compelling reasons.

For one, the Memorandum and Order of the Board was not docketed until February 25, 1980, and was not received in this office until on or about February 28, 1980. Thus, little over three weeks were provided for response. Such a limited time is inadequate to properly address the important question raised by the Board. This is particularly so where intervenors' expert, who must be consulted on the question, is located in California.

Moreover, the attorney from this office, Keith Onsdorff, Esquire, who was representing the Colemans in these proceedings recently resigned, as indicated by his March 19, 1980 withdrawal of appearance. Thus, new counsel had to be appointed, and familiarized with the case and the issue at hand in order to prepare and file the testimony requested by the Board. In addition, the attorney now assigned to handle the hearings has other commitments at and around the April 22d date set for hearing.

For the reasons set forth above, intervenors urge that the Board grant this motion, In light of the Licensee's recent Motion for Directed Certification on the validity of the Board's question, and Stay of Board proceedings pending decision thereon, intervenors' request for additional time

would not appear to unduly prejudice the Licensee:

Respectfully submitted,

STANLEY C. VAN NESS
PUBLIC ADVOCATE

BY: Sandra T. Ayres
SANDRA T. AYRES
Assistant Deputy Public Advocate
Counsel for Intervenors Colemans

March 19, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

PUBLIC SERVICE ELECTRIC
AND GAS COMPANY
(SALEM NUCLEAR GENERATING
STATION, UNIT NO. 1)

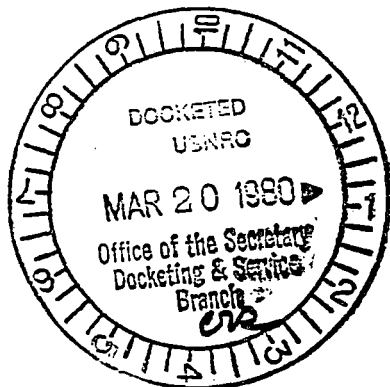
DOCKET NO. 50-272

NOTICE OF APPEARANCE

SANDRA T. AYRES, Assistant Deputy Public Advocate hereby notices the parties and licensing board in the above-captioned proceeding of her appearance as co-counsel, with Raymond E. Makul, Assistant Deputy Public Advocate, for the intervenors, Colemans, effective immediately.

Respectfully submitted,

STANLEY C. VAN NESS
PUBLIC ADVOCATE



BY: Sandra T. Ayres
SANDRA T. AYRES
Assistant Deputy Public
Advocate
Division of Public Interest
Advocacy
520 East State Street
Trenton, New Jersey 08625

DATED: March 19, 1980
cc: Service List

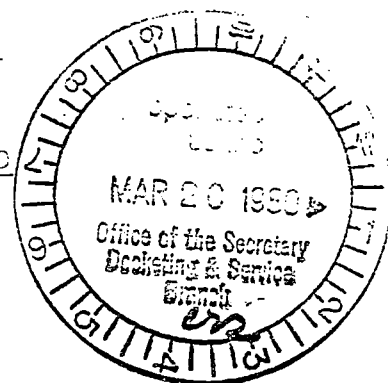
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

PUBLIC SERVICE ELECTRIC AND GAS)
(SALEM NUCLEAR GENERATING)
STATION, UNIT NO. 1)

DOCKET NO. 50-272



CERTIFICATE OF SERVICE

I hereby certify that copies of "Intervenors Colemans Motion for Extension of Time to File Testimony and Postponement of Hearing Thereon," and a Notice of Appearance by Sandra T. Ayres, Assistant Deputy Public Advocate, have been served upon the following by special delivery United States mail, this 19th day of March, 1980.

Gary L. Milhollin, Esq.
Chairman, Atomic Safety
and Licensing Board
1815 Jefferson Street
Madison, Wisconsin 53711

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

Mr. Frederick J. Shon
Member, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Washington, D.C. 20555

Janice Moore, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Washington, D.C. 20555

Dr. James C. Lamb, III
Member, Atomic Safety and
Licensing Board Panel
313 Woodhaven Road
Chapel Hill, N.C. 27514

Richard Hluchan, Esq.
Deputy Attorney General
Department of Law and Public
Safety
Environmental Protection
Section
36 West State Street
Trenton, N.J. 08625

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

Carl Valore, Jr., Esq.
Valore, McAllister, Aron
& Westmoreland
Mainland Professional Plaza
P.O. Box 175
Northfield, N.J. 08225

Richard Fryling, Jr., Esq.
Assistant General Solicitor
Public Service Electric
& Gas Company
80 Park Place
Newark, N.J. 07101

Office of the Secretary
Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Raymond E. Makul, Esq.
Assistant Deputy Public
Advocate
Division of Race Counsel
10 Commerce Court
Newark, N.J. 07102

Jane C. MacArthur, Esq.
Deputy Attorney General
Tatnell Building, P.O. Box 1-01

Mr. Alfred C. Coleman, Jr.
Mrs. Eleanor G. Coleman
35 "K" Drive
Pennsville, New Jersey 08070

Sandra T. Ayres
SANDRA T. AYRES